

International Accounting Standards Board
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19 August 2011

- **Your Ref: Comment letter on Exposure Draft ED/2011/3**
- **Mandatory Effective Date of IFRS 9**

Dear Sir.

Thank you for giving us the opportunity to comment on your exposure draft ED/2011/3: Mandatory Effective Date of IFRS 9.

The Board is proposing to move the mandatory effective date of IFRS 9 to reporting periods beginning on or after 1 January 2015. Early application would continue to be permitted. The Board has developed these proposals because of the extension of its timeline for completing the remaining phases of the project to replace IAS 39 Financial Instruments: Recognition and Measurement beyond June 2011.

I generally support these proposals. I agree that it is very important to allow entities to apply the requirements of all of the phases of the project to replace IAS 39 at the same time. This will reduce the burden on entities and allow a coherent and clear overall analysis of the impact of introducing the full IFRS 9. I also support the alignment of the effective date of IFRS 9 with the effective date of other major new standards, such as on Insurance Contracts, Leases and Revenue Recognition.

Although I generally support these proposals, I would like to stress the need for a red line here in terms of implementation timelines. There has been some slippage in the implementation timetable for international accounting standards. I would not support any further delays with respect to these.

Answers to specific questions raised by the IASB

Effective Date

Question 1

The Board proposes to amend IFRS 9 (2009) and IFRS 9 (2010) so that entities would be required to apply them for annual periods beginning on or after 1 January 2015. Do you agree? Why or why not? If not, what alternative do you propose?

Yes, I agree with this proposed requirement. This will allow entities to prepare adequately and give full and coherent consideration to the standard(s) replacing IAS 39.

Question 2

The Board proposes not to change the requirement in IFRS 9 for comparatives to be presented for entities that initially apply IFRS 9 for reporting periods beginning on or after 1 January 2012. Do you agree? Why or why not? If not, what alternative do you propose?

Yes, I agree with this approach. There would be sufficient timeframe for adoption and providing comparatives.

Yours faithfully

C.R. Barnard

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