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Sir David Tweedie  
International Accounting Standards Board  
30 Cannon Street  
LONDON EC4M 6XH

Dear Sir David,

**IASB Exposure Draft – Investments in Debt Instruments: Proposed Amendments to IFRS 7**

We are pleased to respond to the IASB Exposure Draft on Proposed Amendments to IFRS 7 *Financial Instruments: Disclosures*.

We understand that the IASB wants entities to provide more comprehensive disclosures on debt instruments especially in response to the global financial crisis however, we do not agree with the proposed disclosures that require an entity to maintain records on two different measurement bases.

We believe that when a standard such as IAS 39 *Financial Instruments: Recognition and Measurement* provides entities with a choice of measurement bases then an entity should not have to provide information on alternative basis. The methods outlined in IAS 39 provide acceptable measurement models and if the IASB is concerned about the disclosures or amounts being derived from the measurement models then it should address these concerns rather than requiring additional disclosures to be made. This could include a comprehensive review of how many categories of financial instruments exist within IAS 39 or reconsidering the impairment model in IAS 39 and the disclosures around impairment.

We believe that requiring such additional disclosures in IFRS 7 opens the door to question whether further disclosure requirements should be included in other standards such as IAS 2 *Inventories*, IAS 16 *Property, Plant and Equipment*, IAS 38 *Intangible Assets* and IAS 40 *Investment Property*, which all provide entities with a choice of measurement basis. We would not support this as we do not believe that this provides useful information to the end user of the financial statements, but could add to confusion.

Please contact me on +613 9634 6470 if you need any further explanation of the letter.

Yours sincerely

**David Anderson**  
Director Corporate Accounting