Association pour la participation des entreprises françaises à l'harmonisation comptable internationale

Mouvement des Entreprises de France
MEDEF

A F E P

Association Française des Entreprises Privées

IASB
30 Cannon Street
London EC4M 6XH
UK

Paris, November 24, 2009

Re: ED Improvements to IFRS - 2009

ACTEO & MEDEF welcome the opportunity to comment on the exposure draft "Improvements to International Financial Reporting Standards"-2009

Overall, except for issue 13 discussed below, we support EFRAG comment letter.

In particular, along with EFRAG and others, we voice strong concern against the proposed amendment to IAS 27 (issue 10). Significant changes to the measurement of assets and liabilities should not be dealt with as part of annual improvements. We disagree that the existing choice for the measurement of investments in subsidiaries, associates and joint ventures in the separate financial statements of the parent between cost, fair value through OCI or fair value through P/L be reduced. Indeed the proposed change would reduce measurement at cost in the circumstances where fair value would not be reliably measurable and eliminate fair value through OCI. That being said, we support that future requirements make abundantly clear that investments in subsidiaries, associates and joint ventures in the separate financial statements of the parent be assessed as stand-alone investments. Such a clarification would in our view lift any potential misapplication of IAS 36.4. Moreover, we believe that any amendment should expose and clearly take into account the newly published IFRS9. In the absence of the publication of consequential amendments to other standards, we are not in a position to assess how IAS 27, IFRS9 and IAS 36 would interact.

Re- issue 13 (amendment to IAS34), we differ from EFRAG's position. Indeed we believe that IAS 34-15 is currently providing clear principles to enable entities to decide whether fair value disclosures would be required in interim financial reports. Any amendment as proposed is in our view likely to weaken the standard as it would suggest - once more - that explicit requirements need to be part of the standard to trigger the necessary disclosures. IAS 34 should not be amended each time a new standard is published.

Such changes are at the risk of driving to a "check list attitude" which we know does not serve the relevance of financial reporting. Fair value disclosures in IFRS 7 clearly participate in an appropriate understanding of interim periods.

We remain at your disposal should you need further clarification or background information.

ACTEO	AFEP	MEDEF
Patrice MARTEAU	**Alexandre TESSIER**	**Agnès LEPINAY**
Chairman	Director General	Director of economic and financial affairs