



13 March 2009

Mr. Stig Enevoldsen
Chairman
Technical Expert Group
EFRAG
Square de Meeûs 35
B-1000 BRUXELLES

E-mail: commentletter@efrag.org

Ref.: ACC/MB/SS/LF/SH

Dear Mr. Enevoldsen,

**Re.: FEE Comments on EFRAG's assessments of the revised version of IFRS 1
First-time Adoption of International Financial Reporting Standards
(Restructured IFRS 1)**

- (1) FEE (Fédération des Experts Comptables Européens – Federation of European Accountants) appreciates the request to comment on the assessments of the revised version of IFRS 1 *First-time Adoption of International Financial Reporting Standards* (the Restructured IFRS 1).
- (2) We support EFRAG providing a positive endorsement advice and we broadly agree with the assessments formulated by EFRAG, without detailed examinations by FEE of the proposals and underlying assumptions.

EFRAG's technical assessment of the Restructured IFRS 1 against the endorsement criteria

- (3) In our letter to the IASB dated 24 January 2008, we supported the proposed restructuring of IFRS 1 as part of the annual improvements project.
- (4) With the issue of the revised version of IFRS 1 with improved structure as published by the IASB on 27 November 2008, we support EFRAG's assessments against the endorsement criteria.

EFRAG's evaluation of the costs and benefits of the Restructured IFRS 1

- (5) We broadly agree with the evaluation of the costs and benefits of the Restructured IFRS 1 as provided by EFRAG but have not carried out a detailed examination.



Assessment Process

- (6) We believe that, in the current financial reporting environment, Europe needs to make every effort to prevent the creation of new deviations from IFRS. Furthermore, it needs to avoid to the extent possible any timing differences caused by delays in the endorsement mechanisms.
- (7) An enhanced due process for the IASB and IFRIC, improved governance of the IASB and timely and high quality European influence early in the standard setting process should result in international standards and interpretations that are acceptable for Europe. This European influence is expected to be exercised at, or before, exposure draft stage. EFRAG was created for that purpose and has the full support of FEE. As a due process is in place, at both IASB and EFRAG levels, these processes are expected to result in standards that are suitable for positive endorsement.

Endorsement

- (8) FEE supports the endorsement of the Restructured IFRS 1.

We would be pleased to discuss any aspect of this letter you may wish to raise with us.

For further information on this letter, please contact Ms Saskia Slomp from the FEE Secretariat.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Hans van Damme', is written over a horizontal line.

Hans van Damme
President