

14 January 2009

Mr Bruce Porter  
Acting Chairman  
Australian Accounting Standards Board  
PO Box 204  
COLLINS STREET WEST VIC 8007

Via email: [standard@asb.gov.au](mailto:standard@asb.gov.au)

Dear Mr Porter

**Comments on ED 172 *Embedded Derivatives – proposed amendments to AASB Interpretation 9 and AASB 139***

Thank you for the opportunity to comment on the AASB Exposure Draft *Embedded Derivatives – proposed amendments to AASB Interpretation 9 and AASB 139*. CPA Australia, The Institute of Chartered Accountants and the National Institute of Accountants (the Joint Accounting Bodies) have considered the above exposure draft (ED) and our comments follow.

The Joint Accounting Bodies represent over 180,000 professional accountants in Australia. Our members work in diverse roles across public practice, commerce, industry, government, academia throughout Australia and internationally.

A copy of our letter submitted to the International Accounting Standards Board is attached which highlights our overall support of the proposals along with our concern about the effective date.

We support adoption of the proposals in Australia, as it will result in more useful information to stakeholders and do not see any issues in respect of the application to not-for-profits or the public sector.

If you have any questions regarding this submission, please do not hesitate to contact Mark Shying (CPA Australia) at [mark.shying@cpaaustralia.com.au](mailto:mark.shying@cpaaustralia.com.au), Kerry Hicks (the Institute) at [kerry.hicks@charteredaccountants.com.au](mailto:kerry.hicks@charteredaccountants.com.au) or Tom Ravlic (NIA) at [tom.ravlic@nia.org.au](mailto:tom.ravlic@nia.org.au).

Yours sincerely



Geoff Rankin  
Chief Executive Officer  
CPA Australia Ltd



Graham Meyer  
Chief Executive Officer  
Institute of Chartered  
Accountants



Roger Colton  
Chief Executive Officer  
National Institute of  
Accountants

**Representatives of the Australian Accounting Profession**



[cpaaustralia.com.au](http://cpaaustralia.com.au)



The Institute of  
Chartered Accountants  
in Australia

[charteredaccountants.com.au](http://charteredaccountants.com.au)



[nia.org.au](http://nia.org.au)

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

Via "Open to comment" page on [www.iasb.org](http://www.iasb.org)

Dear Sir David

**Comments on IASB Exposure Draft *Embedded Derivatives – proposed amendments to IFRIC 9 & IAS 39***

Thank you for the opportunity to comment on the IASB Exposure Draft *Embedded Derivatives – proposed amendments to IFRIC 9 and IAS 39*. CPA Australia, The Institute of Chartered Accountants and the National Institute of Accountants (the Joint Accounting Bodies) have considered the above exposure draft (ED) and our comments follow.

The Joint Accounting Bodies represent over 180,000 professional accountants in Australia. Our members work in diverse roles across public practice, commerce, industry, government, academia throughout Australia and internationally.

We agree with the content of the specific proposals, as they clarify the Reclassification of Financial Assets changes made in October 2008.

We encourage due process (even if a shortened version) to be undertaken in all circumstances in future to ensure that subsequent amendments or clarifications are not required.

While we do not support the 15 December 2008 effective date we understand the need for the IASB to introduce this immediately. Our general view is that the IASB, when setting effective dates and transition arrangements, should allow sufficient time for jurisdictions with legislative/endorsement processes to enact such changes to enable them to be fully compliant with IFRS.

If you have any questions regarding this submission, please do not hesitate to contact Mark Shying (CPA Australia) at [mark.shying@cpaustralia.com.au](mailto:mark.shying@cpaustralia.com.au), Kerry Hicks (the Institute) at [kerry.hicks@charteredaccountants.com.au](mailto:kerry.hicks@charteredaccountants.com.au) or Tom Ravlic (NIA) at [tom.ravlic@nia.org.au](mailto:tom.ravlic@nia.org.au)

Yours sincerely



Geoff Rankin  
Chief Executive Officer  
CPA Australia Ltd



Graham Meyer  
Chief Executive Officer  
Institute of Chartered  
Accountants



Roger Cotton  
Chief Executive Officer  
National Institute of  
Accountants

Cc: Bruce Porter, Acting AASB Chairman

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