

International Accounting Standards Board
30 Cannon Street
London EC4M 6 XH
United Kingdom

Dear sirs,

**Re: Exposure Draft ED/2013/1 – Recoverable Amount
Disclosures for Non-Financial Assets (Proposed amendments
to IAS 36)**

The Swedish Financial Reporting Board is responding to your invitation to comment on the Exposure Draft regarding Recoverable Amount Disclosures for Non-Financial Assets.

- We support the proposed changes as it removes a disclosure requirement that was inserted through a mistake in the drafting process.
- There was no due process involved when the amendments were presented in the exposure draft.

Below you find our detailed comments.

We support the proposed changes

We are pleased with the rapid response from the IASB regarding the inaccurate placement of the disclosure requirements. It is important that the drafting procedures regarding these kinds of changes are reviewed thoroughly as we can see that it has a significant impact if something is done wrong.

No due process when amending IAS 36

The consequential amendments to IAS 36 were not in line with due process as the proposed changes were significant. We believe that constituents should be made aware and able to comment on significant changes to the exposure drafts before the final standard is published. Either by having a reexposure or a review draft for comments. This would from our perspective support the fatal flaw review.



Rådet **för** **finansiell rapportering**

Other comments

We notice that the example given in the ED regarding the disclosure requirements is not comprehensive. We would urge the IASB to present an example with all the disclosure requirements.

If you have any questions concerning our comments please address our Executive member Claes Janzon by e-mail to: claes.janzon@radetforfinansiellrapportering.se.

Stockholm, 19 March 2013

Yours sincerely


Anders Ullberg
Chairman