



REDOVISNINGSRÅDET

31 October 2005

EFRAG
Avenue des Arts 13-14
1210 Brussels
Belgium

Your draft comment letter 5 August 2005 re EDs of Proposed Amendments to
IFRS 3 Business Combinations
IAS 27 Consolidated and Separate Financial Statements
IAS 37 Provisions, Contingent Liabilities and Contingent Assets
IAS 19 Employee Benefits

We refer to your draft comment letter and respond below to your specific questions.

Due to lack of time, as a consequence mainly of the big task of elaborating our response to the IASB on the extensive material presented, we have, unfortunately, not been able to comment more in detail on the viewpoints in your draft letter. However, we hope that our enclosed draft letter to the IASB will be of assistance to you when finalizing your comment letter to the IASB. We ask you kindly to observe that the enclosed letter is so far only preliminary and, therefore, may be subject to changes.

Our response to the IASB will be mailed in the middle of November and we will then send you a copy of it.

EFRAG Question 1

- (a) See our draft letter to the IASB, section 'Major Issues', paragraph 5.
- (b) Ditto.

EFRAG Question 2

No. See our draft letter to the IASB, section 'Major Issues'.

EFRAG Question 3

- (a) No. See our draft letter to the IASB, section 'Major Issues'.
- (b) No. We cannot see that such an analysis has been presented.

EFRAG Question 4

- (a) This is difficult to judge. See our response to IASB's Question 1 to IFRS 3.
- (b) See our response to IASB's Question 1 to IFRS 3.

EFRAG Question 5

See our response to IASB's Question 2 to IFRS 3.

EFRAG Question 6

Yes.

EFRAG Question 7

See our draft letter to the IASB, section 'Major Issues', paragraph 4.

EFRAG Question 8

- (a) Yes. See our draft letter to the IASB, section 'Major Issues', paragraph 9.5.
- (b) No. See our response to IASB's Question 2.
- (c) No. See our draft letter to the IASB, section "Major Issues", paragraph 9.3.

Yours faithfully,

The Swedish Financial Accounting Standards Council

Dennis Svensson

Managing Director