

Jean-Paul Gauzes  
President of the EFRAG Board  
European Financial Reporting Advisory Group  
Square de Meeûs 35/5th floor  
1000 Bruxelles  
Belgium

12 September 2020

Dear Mr Gauzes,

*Endorsement of the Interest Rate Benchmark Reform – Phase 2 (Amendments to IFRS 9, IAS 39, IFRS 7, IFRS 4 and IFRS 16)*

The Association for Financial Markets in Europe (AFME) welcomes and fully supports conclusions reached in EFRAG's Draft Letter to the European Commission Regarding Endorsement of the *Interest Rate Benchmark Reform – Phase 2 (Amendments to IFRS 9, IAS 39, IFRS 7, IFRS 4 and IFRS 16)*. In particular, we strongly agree that the ability to apply the Amendments already during 2020 is crucial for preparers of financial information to progress with their transition to the new benchmark interest for the reasons stated in the Draft Letter. Consequently, we strongly support the finalisation of the endorsement process as soon as possible to facilitate a timely publication of the Amendments in the Official Journal of the European Union.

We commend EFRAG for the work done to accelerate this process and stand ready to provide any additional comments if necessary.

Yours faithfully,

Tonia Plakhotniuk, Associate Director, Policy Division

[Tonia.Plakhotniuk@afme.eu](mailto:Tonia.Plakhotniuk@afme.eu)

+44 (0)20 3828 2717

Richard Middleton, Head of Policy Division

[Richard.Middleton@afme.eu](mailto:Richard.Middleton@afme.eu)

+44 (0)20 3828 2709

## **About AFME**

AFME (Association for Financial Markets in Europe) advocates for deep and integrated European capital markets which serve the needs of companies and investors, supporting economic growth and benefiting society. AFME is the voice of all Europe's wholesale financial

### **Association for Financial Markets in Europe**

**London Office:** 39<sup>th</sup> Floor, 25 Canada Square, London E14 5LQ, United Kingdom T: +44 (0)20 3828 2700

**Brussels Office:** Rue de la Loi 82, 1040 Brussels, Belgium T: +32 (0)2 788 3971

**Frankfurt Office:** Bürohaus an der Alten Oper, Neue Mainzer Straße 75, 60311 Frankfurt am Main, Germany

T: +49 (0)69 153 258 967

[www.afme.eu](http://www.afme.eu)

markets, providing expertise across a broad range of regulatory and capital markets issues. AFME aims to act as a bridge between market participants and policy makers across Europe, drawing on its strong and long-standing relationships, its technical knowledge and fact-based work. Its members comprise pan-EU and global banks as well as key regional banks, brokers, law firms, investors and other financial market participants. AFME participates in a global alliance with the Securities Industry and Financial Markets Association (SIFMA) in the US, and the Asia Securities Industry and Financial Markets Association (ASIFMA) through the GFMA (Global Financial Markets Association). For more information please visit the AFME website: [www.afme.eu](http://www.afme.eu). Follow us on Twitter @AFME\_EU