

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

The Swedish Financial Reporting Board

RFR-rs 2013:07

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

Dear Sirs,

Re: IASB Exposure Draft ED/2012/6 Sale or Contribution of Assets between an Investor and its Associate or Joint Venture – Proposed amendments to IFRS 10 and IAS 28

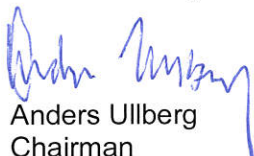
The Swedish Financial Reporting Board is responding to your invitation to comment on the Exposure Draft - Sale or Contribution of Assets between an Investor and its Associate or Joint Venture – Proposed amendments to IFRS 10 and IAS 28. We agree with IASB that there is inconsistency in the rules dealing with the accounting for loss of control of a subsidiary but we believe that this proposal fails to reach consistency for this kind of transactions.

In our view the proposed amendment is a short-term solution and too pragmatic. Our expectation of an amendment is that it should be robust in the long run. To use the difference between asset and business as a dividing line is not as robust as needed. Applying the amendment will give very disparate results for transactions that can be fundamentally similar. As there is very limited guidance in IFRS 3 regarding what constitutes a business there will continue to be diversity in practice how this kind of transactions is accounted for.

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 April 2013

Yours sincerely



Anders Ullberg
Chairman