

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

The Swedish Financial Reporting Board

RFR-rs 2014:17

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

Dear Sirs,

Re: ED/2014/4 Measuring Quoted Investments in Subsidiaries, Joint Ventures and Associates at Fair Value

The Swedish Financial Reporting Board is responding to your invitation to comment on the DP on measuring quoted investments in subsidiaries, joint ventures and associates at fair value.

We support the clarification that the unit of account for investments within the scope of IFRS 10 Consolidated Financial Statements, IAS 27 Separate Financial Statements and IAS 28 Investments in Associates and Joint Ventures is the investment as a whole rather than the individual financial instruments included within that investment.

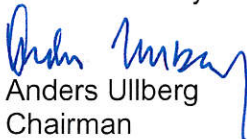
In this narrow amendment we question that the fair value measurement of the quoted investments, in all situations, should be calculated by multiplying the quoted price with the quantity of financial instruments held without any adjustments. We are concerned that this calculation could result in a fair value that is not relevant as it ignores market price adjustments such as control premiums or discounts. We think that this model may also lead to "day-one- losses" which would not give a fair view in certain situations.

We support the proposed amendments to the illustrative example in IFRS 13 p. 48 and also the proposed amendment to apply IFRS 10, IAS 27 and IAS 28 retrospectively and the proposed amendment to allow the amendments to IAS 36 prospectively.

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

Stockholm, 5 December 2014

Yours sincerely


Anders Ullberg
Chairman