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Rob Goss
Head of Accounting Policy, Governance and Compliance

24 November 2009

Sir David Tweedie
Chairman
International Accounting Standards Board
30 Canon Street
London EC4M 6 XH

Dear David

Exposure Draft 2009/11: Improvements to IFRSs

Thank you for the opportunity to comment on this Exposure Draft. Australia and New Zealand Banking Group Limited (ANZ) is listed on the Australian Stock Exchange and remains one of a select group of banks who continue to be AA rated. Our operations are predominantly based in Australia, New Zealand and Asia and our most recent annual results reported profits of USD2.6 billion and total assets of USD419 billion.

In summary, we are generally supportive of the Board's proposed amendments to the 11 standards and interpretations however we believe that the wording of the amendments to IFRS 7 and IAS 1 could be amended slightly. The proposed changes and basis for the change are attached to this letter.

Should you have any queries on our comments, please feel free to contact me at Rob.Goss@anz.com.

Yours sincerely

Robert Goss

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Head of Accounting Policy, Governance and Compliance

cc: Mr Kevin Stevenson – Chairman, Australian Accounting Standards Board

Question 1
Do you agree with the Board's proposal to amend the IFRS as described in the exposure draft? If not, why and what alternative do you propose?

We are generally supportive of the Board's proposed amendments to the 11 standards and interpretations in the exposure draft with the exception of the items set out below:

IFRS 7
In our view the disclosures regarding exposure to credit risk required by IFRS 7 paragraph 36 (a) should be provided by 'class of instrument'. The proposed amendment may result in omission of instruments from within a class, which could be misleading. We propose the amendment to IFRS 7 paragraph 36 (a) is amended to include the underlined text as follows "this disclosure is not required for <u>classes of</u> financial instruments whose carrying amount best represents the maximum exposure to credit risk." This clarification would provide a clear link between the carrying amount of the financial asset per the balance sheet, and the maximum exposure to credit risk relating to that asset class.

IAS 1
We support the Boards intention to provide flexibility in the presentation of the statement of changes in equity either on the face of the statement of changes in equity or in the notes.

It is unclear to us whether the board's intention of the proposed amendment is to allow preparers to present the entire statement of changes in equity in the notes or only "to present the reconciliation requirements for classes of accumulated other comprehensive income either in the statement of changes in equity or in the notes to the financial statements" (BC1 to the proposed improvement).

If it is the board's intention to permit the presentation of the entire statement of changes in equity t in the notes we request that this fact be included in the basis for conclusion. If this is not the board's intention then the proposed amendment to paragraph 106 should be amended accordingly.