

October 18, 2011

Cliff: 251236

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

E-mail: www.ifrs.org

Dear Hans Hoogervost:

Exposure Draft "Mandatory Effective Date of IFRS 9"

Thank you for the opportunity to comment on the IASB exposure draft "Mandatory Effective Date of IFRS 9". The views expressed in this letter reflect the views of the Province of British Columbia Canada (the province).

The Summary (consolidated) Financial Statements of the province are prepared in accordance with Canadian Public Sector Accounting Standards which directs "government business enterprises" to International Financial Reporting Standards. Several of our organizations have adopted IFRS in 2011; one of these organizations will be impacted by any new insurance accounting requirements.

We support the board's view that entities should be able to apply the guidance from all phases of the IAS 39 project at the same time. Further, the mandatory application date of IFRS 9 should coincide with the application of the new standard on insurance contracts.

Responses to specific questions posed in the exposure drafts are attached. Should PSAB have any comments or questions, please contact me at 250-387-6692 or by e-mail: Stuart.Newton@gov.bc.ca, or Carl Fischer, Executive Director, Financial Reporting and Advisory Services Branch, at 250-356-9272 or by e-mail: Carl.Fischer@gov.bc.ca.

On behalf of the Government of British Columbia,

Sincerely,



Stuart Newton
Comptroller General
Province of British Columbia, Canada

encl.

.../2

pc: Peter Milburn
Deputy Minister
Ministry of Finance

Sabine Feulgen
Deputy Secretary to the Treasury Board
Ministry of Finance

Charles Coe
Special Advisor, Accounting Policy
Office of the Comptroller General

Carl Fischer
Executive Director
Financial Reporting and Advisory Services
Office of the Comptroller General

Peter Martin
Director
Accounting Standards Board, Canada
E-mail: ed.accounting@cica.ca

Question 1:

The Board proposes to amend IFRS 9 (2009) and IFRS 9 (2010) so that entities would be required to apply them for annual periods beginning on or after 1 January 2015. Do you agree? Why or why not? If not, what alternative do you propose?

We agree. Due to impairment and hedging forming an integral part of the comprehensive Financial Instruments standard, the mandatory effective date should be deferred until these phases are completed. We support the board's view that entities should be able to apply the guidance from all phases of the IAS 39 project at the same time.

Further, the mandatory application date of IFRS 9 should coincide with the application of the new standard on insurance contracts.

Question 2:

The Board proposes not to change the requirement in IFRS 9 for comparatives to be presented for entities that initially apply IFRS 9 for reporting periods beginning on or after 1 January 2012. Do you agree? Why or why not? If not, what alternative do you propose?

We agree. If entities are given an adequate transition period, relief from restating comparatives should be unnecessary.