Norsk RegnskapsStiftelse

International Accounting Standards Board
30 Cannon Street
London EC4M 6XH
UK

Oslo, January 15 2009

Dear Sir/Madam

ED Investments in Debt Instruments proposed amendments to IFRS 7

Norsk RegnskapsStiftelse (the Norwegian Accounting Standards Board) appreciates the opportunity to comment on the ED Investments in Debt Instruments proposed amendments to IFRS 7.

We ask the Board to reconsider the wording and timing of the proposed amendments to IFRS 7. We do not see a clear rationale for why the proposed amendments, with its inherent costs from system adjustments, achieve the objectives set out for the proposed changes within an acceptable cost benefit ratio.

We do believe that this change in the requirements of IFRS 7 would benefit from a longer exposure period.

We recommend the board to clarify the term "investments in debt instruments" as this might not be intuitive to non English speaking readers.

Our replies to the questions in the Discussion Paper are in appendix A.

Yours faithfully
Norsk RegnskapsStiftelse

pp Siri C. Rosenblad

Erlend Kvaal
Chairman of the Technical Committee on IFRS

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Appendix A (Reply to questions provided by the IASB)

Question 1
The exposure draft proposes in paragraph 30A(a) to require entities to disclose the pre-tax profit or loss as though all investments in debt instruments (other than those classified as at fair value through profit or loss) had been (i) classified as at fair value through profit or loss and (ii) accounted for at amortised cost.

Do you agree with that proposal? If not, why? What would you propose instead, and why?

We ask for a more clear articulation of the objective / reason for this proposed disclosure requirement, including the considerations behind the proposed scope of the disclosure requirement. We are not convinced that the extra costs of this requirement of triple record keeping (full fair value, full amortised cost in addition to the current measurement used) justifies the benefit perceived by the Board.

We would like the Board to clarify that the amortised cost calculation proposed in paragraph 30A(a)(ii), in regard to investments in debt instruments classified as available for sale, is based upon impairments using the current market interest rate and not the interest rate required for financial instruments measured at amortised cost as described in IAS 39.63-66.

We would like the Board to clarify the definition of the term "all investments in debt instruments". Is a trade receivable an investment in a debt instrument?

We would like the Board to clarify whether the term "for all investments in debt instruments" requires disclosures only at a maximum aggregated level as shown in the proposed IG14A or that this requirement might require disclosure based on a level of classes of financial instruments.

Based on the current material provided, we do not agree with the current proposal.

Question 2
The exposure draft proposes to require disclosing the pre-tax profit or loss amount that would have resulted under two alternative classification assumptions.

Should reconciliations be required between profit or loss and the profit or loss that would have resulted under the two scenarios? If so, why and what level of detail should be required for such reconciliations?

As stated above we do not agree with the current proposal.

Question 3
The exposure draft proposes in paragraph 30A(b) to require entities to disclose for all investments in debt instruments (other than those classified as at fair value through profit or loss) a summary of the different measurement bases of these instruments that sets out (i) the measurement as in the statement of financial position, (ii) fair value and (iii) amortised cost.

Do you agree with that proposal? If not, why? What would you propose instead, and why?

We ask the board to consider if this requirement is not already sufficiently covered through the requirements in IFRS 7.25.

Question 4
The exposure draft proposes a scope that excludes investments in debt instruments classified as at fair value through profit or loss.

Do you agree with that proposal? If not, would you propose including investments in debt instruments designated as at fair value through profit or loss or those classified as held for trading or both, and if so, why?

We agree with this part of the proposal.

Question 5
Do you agree with the proposed effective date? If not, why? What would you propose instead, and why?

We disagree with the proposal to make this proposed amendment retrospective applicable. We are of the opinion that the benefits of the proposed change do not justify the extra cost of a forced on implementation of the change to the 2008 financial statement of calendar year end reporters.

Question 6
Are the transition requirements appropriate? If not, why? What would you propose instead, and why?

While we disagree with the proposed changes in general, we agree that it should not be required to provide comparative information relating to periods before the date of initial adoption.