

July 22, 2004

Annette Kimmitt
Senior Project Manager
International Accounting Standards Board
30 Cannon Street
LONDON
EC4M6 XH

United Kingdom

Dear Ms Kimmitt

**AMENDMENTS TO IFRS 3, COMBINATIONS BY CONTRACT ALONE OR INVOLVING
MUTUAL ENTITIES**

Industrie-Holding welcomes the opportunity to offer its comments on the above draft. They have been developed in collaboration with our member companies.

We understand that leaving these exceptional combinations in limbo, effectively covered by the present IAS 22, is not a very elegant solution from the Board's point of view. However, it could have been better to live with that inelegant solution until a more coherent approach has been developed in Phase II, rather than introduce this stop-gap, which potentially has many practical application problems. Among these we just mention the added difficulty of identifying an acquirer and the adoption of a relatively arbitrary valuation basis where no solid, cash-based cost-of-acquisition data are available.

On the transitional arrangements we believe that backdating the implementation of a new standard or amendment is unacceptable as a standard-setting practice. Implementation of a new standard or amendment should not be required at any date before the issue of the final standard. However, we understand that in this hopefully abnormal situation it may be the least bad approach.

Finally, we are of the opinion that, until another approach has been accepted after due process in Phase II, any amendment to the present IFRS 3 should retain internal consistency and treat costs directly related to the acquisition as part of its cost.

Yours sincerely

**Federation of Swiss Industrial
Holding Companies**



Dr. Arnold Knechtle
Director



Jan Atteslander

cc - IH Committee
 - IH Expert Group Accounting and Reporting