



26 September 2008

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Sir David Tweedie
International Accounting Standards Board
30 Cannon Street
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Dear Sir David,

IASB Discussion Paper Preliminary Views on Amendments to IAS 19 Employee Benefits

We are pleased to respond to the IASB Discussion Paper on Preliminary views on Amendments to IAS 19 Employee Benefits.

We understand that by the issue of this discussion paper the IASB is trying to make amendments to IAS 19 in the short term rather than waiting for a comprehensive review of IAS 19 to be completed which may take some time.

We believe it is not appropriate for the IASB to consider amendments to IAS 19 which cause a change to measurement and presentation requirements until such time as the IASB Project on Financial Presentation is complete.

We also do not believe the IASB should change the current treatment for actuarial gains and losses (other than remove the corridor approach) to require them to go through the income statement. This will just create greater volatility in the earnings of companies that will further irritate investors and users of Financial Reports. Actuarial gains and losses should continue to be able to be taken to other comprehensive income.

We believe the concern expressed by the IASB on the setting of an expected long term return on defined benefit plan assets can be addressed by providing further guidance to preparers on how it should be set.

Please contact me on +613 9634 6470 if you need any further explanation of the letter.

Yours sincerely

David Anderson
Director Corporate Accounting