

16 October 2008

**Finance & Administration**

Corporate Accounting & Planning  
35/242 Exhibition Street  
Melbourne, Victoria, 3000

Tel: 03 9634 6470  
Fax: 03 9634 2359

Sir David Tweedie  
Chairman  
International Accounting Standards Board  
30 Cannon Street  
London EC4M 6XH  
UNITED KINGDOM

Dear Sir David

**Exposure Draft of Proposed Improvements to International Financial Reporting Standards**

**General Comments**

We are pleased to respond to your invitation to comment on the above exposure draft.

We support the International Accounting Standards Board's (IASB) annual improvements program to streamline non-urgent but necessary minor amendments to International Financial Reporting Standards (IFRS). Overall we agree with the proposed amendments and as such will only comment on those areas where we have specific issues to raise.

We would like to comment on the proposed amendments to the Basis for Conclusions on IFRS 8 *Operating Segments*.

**Request for comments**

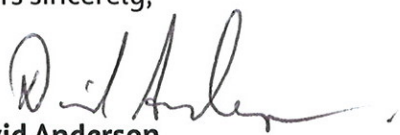
We agree with the amendment to paragraph BC35 in the Basis for Conclusions on IFRS 8 *Operating Segments*, which clarifies that the measure for segment assets be nil where such information is not provided to the chief operating decision maker. This point however is not clear within the standard and we believe it needs to be incorporated into paragraph 23 as follows:

23. An entity shall report a measure of profit or loss and total assets for each reportable segment. The measure for segment assets would be nil when such information is not provided to the chief operating decision maker.

This clear alignment of the standard with the Basis for Conclusions will alleviate any confusion regarding the disclosure requirements associated with this amendment.

Please contact me on +61(3) 9634 6470 if you need any further explanation on the comments made in this submission.

Yours sincerely,



**David Anderson**  
Director Corporate Accounting