	Appendix	Details
Part 1	A	Sime Darby Berhad Plantation Statistic as at 30 June 2010 (listed in Bursa Malaysia Securities Berhad)
	В	Extract of MASB letter to IASB dated 29 January 2010 on Fair Value Measurement Guidance
	С	Illustrative Examples
Part 2	D	Survey of IAS 41 Agriculture
	E	Analysis of fair value changes vis-a-vis profit before tax
	F	Extract of Audit Report
Part 3	G	Extract of Annual Reports
		- R.E.A Holdings
		g_
		- New Britain Palm Oil Limited
		- New Britain Palm Oil Limited
		 New Britain Palm Oil Limited MP Evans Group
		 New Britain Palm Oil Limited MP Evans Group SA SIPEF NV

Part 4

Н

Ι

of IAS 41

41(prepared by MASB)

AASB's recommendation to IASB to improve paragraph 51

Marked up version of proposed amendments to IAS

Introduction

- 1. Appendix D outlines the survey conducted and the results obtained. The survey was conducted to complement our request to the International Accounting Standards Board (IASB) to consider amending IAS 41 *Agriculture*.
- 2. In March and April 2010, we sent out questionnaires to plantation analysts. We also requested the assistance of IASB staff to circulate the questionnaire to its Analysts Representative Group. Each analyst was asked:
 - 1) whether they find the fair value information reported in the balance sheet and profit or loss useful or important in their analysis of financial statements of entities engaged in agricultural activities;
 - 2) whether their analysis of financial statements of entities engaged in agricultural activities would be affected if the fair value information of biological assets are disclosed in the notes to the financial statements rather than being reported in the balance sheet and profit or loss; and
 - 3) what other information would assist them in their analysis of financial statements of entities engaged in agricultural activities.

Survey Results

- 4. A total of 8 analysts responded to our survey.
- 5. Below is a summary of analysts' responses and comments with respect to Question 1.

		Highly useful	Useful	Indifferent	Not useful	Total
Is fair value information useful?		- 2		-	4	6
Analyst 1 (not useful)	It distorts the final of an agriculture of assumptions and 41 pointless.	company's ea	arnings. F	air value relie	es on	
Analyst 2 (not useful)	Fair valuation of b earnings. From re corporate have de basis. Fund mana fair valuation adju	porting fair v ecided to rep agers and and	alue on a ort fair va alysts are	quarterly bas lue adjustme ignoring the	sis, some nt on yea yearly / q	rly
Analyst 4 (not useful)					air value	

Analyst 5 (useful)	The requirement ensures greater availability of information on the company. The reporting of profits and losses in the P+L statement are unhelpful as they distort the underlying numbers.
Analyst 6 (not useful)	We find that the inclusion of fair value information on biological assets does not aid transparency and understanding, while the reporting of changes in fair value of biological assets in profit and loss (income statement) can have a significant distorting impact on the bottom line. As a result, we tend to strip out the changes in fair value when analyzing financial statements.
Analyst 7 (useful)	Chiefly use fair value on balance sheet to adjust our price/book metrics. Most valuation is based [on] cash flows.
Analyst 8 (not useful)	We are more cash flow focused. While the value of biological assets valuation does take into account the future cash flow generation ability of the underlying assets, our approach is to look at yearly cash flow generation from these assets. For example, when we analyse financial statements of Singapore listed palm oil plantation companies, we remove the changes to earnings arising as a result of changes in the value of bio-logical assets and focus on future yearly cash flow generation using detailed forecasts made based on the evolution of plantation maturity profile, production output, cost of production and our view on palm oil prices.
	Furthermore, one limitation of accounting for value of biological assets is the very limited information disclosed on the underlying assumptions driving this value. Without detailed information on these, the accounting entries relating to the value of biological assets, in itself, are of little (or no) use.

6. Below is a summary of analysts' responses and comments with respect to Question 2.

		Yes	No	Total	
Is your analysis affected if fair value is reported in the notes 1 3 4 rather than in the balance sheet and profit or loss?					
Analyst 1	No. For that to be useful, you must also disclose the age profile, area, specific production yield, discount rate used, selling price assumed. Still this is better than reporting it on the face of the P&L or BS.				
Analyst 2	nalyst 2 No. I think there is value for some disclosure.				
Analyst 4	Analyst 4 Yes. Would save us the time of stripping them out.				

Analyst 5	No. I think it would be a more appropriate place to put the information.
Analyst 7	We would need to restate shareholders' equity.

7. Below are other information that would assist analysts in their analysis of financial statements of entities engaged in agricultural activities.

Analyst 1	Forward sale % at a specific average price, deeper breakdown of age profile especially for perennial crops, breakdown of major cost items, average selling price for the fiscal quarter
Analyst 5	Common standards on reporting key information such as: precise definitions on land under production and yields.

8. Other comments from analysts:

-								
Analyst 1	Analysts always remove biological gains or losses when looking at earnings and end-users do not look at fair value as:							
	a) it is not a cash item.							
	 b) it makes earnings more volatile in both rising and falling price environment. 							
	 not knowing what goes into the fair value computation, hence is of no use when estimating true worth of an asset. 							
	 d) it can be used as an instrument for companies to raise or drop reported earnings. 							
Analyst 2	Assumptions used in arriving at the fair values are not clearly spelt out. Almost everyone has a different assumption in terms of CPO price assumption – for current year, medium term and long term assumption. This creates lots of subjectivity and "non-comparable" info among the plantation companies. Also, discount rates and cash flow assumptions should be clearly spelt out. CPO assumption used by independent valuers changes too drastically, in reaction to the CPO price changes like in 2008/09. To standardize CPO price assumption using guidelines on medium-and-long term price assumption which in theory should not change too much (and other assumptions).							
Analyst 3	As regards all palm oil stocks, both analysts and investors look at results excluding fair value adjustments. Fair values are very hard for analysts to compute, and are based on so many estimates/assumptions that they do not add value and are stripped out of calculations. Even for annual crops, where the concept is potentially more useful, IAS 41 is generally ignored.							

Analyst 8	As mentioned above, more disclosure on underlying assumptions. For example, for a palm oil plantation company, evolution of the plantation maturity profile, expected/ assumed yields, assumed price of output, discount rate used on an yearly basis rather than one just block figure representing the discounted value of all future net cash flows.
	It is also useful, in my view, if a sensitivity analysis can also be provided accompanying the value of biological assets. eg What does a change of, say 10%, to the assumed selling price up or down would make to the value of underlying biological assets etc.

Appendix E Analysis of fair value changes vis-à-vis profit before tax

	Wilmar Intermatior (listed in Si Exchange Trading Lir	ingapore Securities	Golden Agr Resources (listed in Si Exchange S Trading Lin	ngapore Securities	New Britain F Limited (liste Port Moresby Exchange ar Stock Excha (Main Marke	d on the y Stock nd London nge	MP Evans ((listed on th Alternative Market of th Stock Exch	ne Investment ne London	SA SIPEF (listed on E Brussels)			dings plc he London nange (Main
Year end	31 Decemb 2008 US\$'000	per 2009 US\$'000	31 Decem 2008 US\$'000	ber 2009 US\$'000	31 Decembe 2008 USD'000	2009	31 Decemb 2008 US\$'000	per 2009 US\$'000	31 Decemi 2008 KUSD	ber 2009 KUSD	31 Decem 2008 US\$'000	ber 2009 US\$'000
Net gain / (loss) x from changes in fair value of biological assets	-	17,024	1,457,197	302,912	(77,476)	114,771	11,149	8,845	7,288	8,763	(2,660)	9,765
Profit before tax y (PBT)	1,789,325	2,294,387	1,947,060	593,146	28,805	200,069	23,447	15,338	82,559	82,562	36,309	41,717
% of <i>'changes in x l y fair value'</i> on PBT	-	0.7%	<u>75%</u>	<u>51%</u>	<u>(269%)</u>	<u>57%</u>	<u>48%</u>	<u>58%</u>	<u>9%</u>	<u>11%</u>	<u>(7%)</u>	<u>23%</u>
PBT before y–x = z 'changes in fair value'	1,789,325	2,277,363	489,863	290,234	106,281	85,298	12,298	6,493	75,271	73,799	38,969	31,952
Ratio of x / z <i>'changes in fair</i> <i>value'</i> on PBT before fair value changes	-	-	<u>3 times</u>	<u>1.0 times</u>	<u>-0.7 times</u>	<u>1.3 times</u>	<u>0.9 times</u>	<u>1.4 times</u>	<u>0.1 times</u>	<u>0.1 times</u>	<u>0.1 times</u>	<u>0.3 times</u>
	mature and palm plantat		mature plar immature p and nurseri	lantations	oil palm trees and growing	cane	oil palm, bee rubber and grain crops	ef-cattle,	oil palm, rub tea and trop and plants		oil palm pla and nurseri	

Appendix F Extract of audit report



Appendix F Extract of audit report

In accordance with these standards, we have performed procedures to obtain audit evidence about the amounts and disclosures in the consolidated financial statements. The procedures selected depend on our judgment, including the assessment of the risks of material misstatement of the consolidated financial statements, whether due to fraud or error. In making those risk assessments, we have considered internal control relevant to the group's preparation and fair presentation of the consolidated financial statements in order to design andit procedures that are appropriate in the circumstances but not for the purpose of expressing an opinion on the effectiveness of the group's internal control. We have assessed the basis of the accounting policies used, the reasonableness of accounting estimates made by the company and the presentation of the consolidated financial statements, taken as a whole. Finally, the board of directors and responsible officers of the company have replied to all our requests for explanations and information. We believe that the audit evidence we have obtained, provides a reasonable basis for our opinion.
In our opinion, the consolidated financial statements give a true and fair view of the group's financial position as of 31 December 2009, and of its results and its cash flows for the year then ended, in accordance with International Financial Reporting Standards as adopted by the EU and with the legal and regulatory requirements applicable in Belgium.
Without prejudice to the unqualified opinion issued above, we draw attention to the consolidated annual report, with regard to the valuation of the biological assets, referring to the fact that, because of the inherent uncertainty associated with the
valuation of the biological assets due to the volatility of the prices of the agricultural produce and the absence of a liquid market, their carrying value may differ from their realisable value.
Additional comment
The preparation and the assessment of the information that should be included in the directors' report on the consolidated financial statements are the responsibility of the board of directors.
Our responsibility is to include in our report the following additional comment which does not change the scope of our audit opinion on the consolidated financial statements:
 The directors' report on the consolidated financial statements includes the information required by law and is in agreement with the consolidated financial statements. However, we are unable to express an opinion on the description of the principal risks and uncertainties confronting the group, or on the status, future evolution, or significant influence of certain factors on its future development. We can, nevertheless, confirm that the information given is not in obvious contradiction with any information obtained in the context of our appointment.
Diegem, February 25, 2010
The statutory auditor
DELOITTE Bedrijfsrevisoren / Reviseurs d'Entreprises BV o.v.v.c. CVBA / SC s.f.d. SCRL Represented by Philip Macyaert