



ZAMBIA INSTITUTE OF CHARTERED ACCOUNTANTS

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**International Accounting Standards Board
30 Cannon Street
London EC4M 6XH
United Kingdom**

E-mail: commentletters@iasb.org

Dear Sir,

Comments on ED/2011/3 Mandatory effective date of IFRS 9

The Zambia Institute of Chartered Accountants welcomes the opportunity to comment on the ED/2011/3 mandatory effective date of IFRS 9.

Question 1

The Board proposes to amend IFRS 9 (2009) and IFRS 9 (2010) so that entities would be required to apply them for annual periods beginning on or after 1 January 2015. Do you agree? Why or why not? If not, what alternative do you propose?

Comment

We do agree generally with the proposal to defer the mandatory effective date of IFRS 9 (2009) and IFRS 9 (2010) from annual periods beginning on or after 1st January 2013 to annual periods beginning on or after 1st January 2015. The proposal to defer the mandatory effective date will give the users of financial statements (e.g. preparers and investors) more time to implement the new requirements of IFRS 9 including the delayed impairment and hedge accounting phases at the same time.

Question 2

The Board proposes not to change the requirement in IFRS 9 for comparatives to be presented for entities that initially apply IFRS 9 for reporting periods beginning on or after 1 January 2012. Do you agree? Why or why not? If not, what alternative do you propose?

Comment

Yes, we do agree with the Board on its proposal to maintain the mandate to restate comparatives when an entity first applies the standard for reporting periods beginning on or after 1 January 2012. This requirement will enhance comparability and help the investor when analyzing and evaluating their investment decision-making. Though others are requesting for extension of the period waiving the restatements of comparatives, we believe that after 1st January 2012 would be ample time for implementation of IFR 9 from the time it was issued in 2009

The Institute will be ready to respond to any matters arising from the above comments.

Yours faithfully

Musonda Boniface
Technical Officer