

Antonio Vivaldistraat 2-8

Postbus 7984

1008 AD Amsterdam

T 020 301 03 42

F 020 301 03 09

E j.helderman@nivra.nl

I www.nivra.nl

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

Date	Re	Our ref	Attachment	Direct dial nr
September 25, 2008	Discussion Paper IAS 19	HV/IAS19		T +3120-3010365 F +3120-3010302

Dear IASB members,

The Royal Dutch Institute of Registered Accountants (NIVRA) appreciates the opportunity to respond to the Discussion Paper on Preliminary Views on Amendments to IAS 19 Employee Benefits.

We have submitted our comments on the IAS 19 Discussion Paper to the Dutch Accounting Standard Board (DASB) to be included in its comment letter. The Dutch Accounting Standards Board has submitted illustrative examples of pension plans in the Netherlands and NIVRA strongly supports the solutions and comments as provided by the DASB.

NIVRA appreciates IASB's initiative to reconsider IAS 19. Our main concern however is whether an interim project would be the best approach. The Discussion Paper addresses some fundamental issues, but not all. We strongly believe that the principal issues in post-employment benefit accounting are interrelated and that successful implementation is dependant on adequate consideration and acknowledgement of these interrelationships. We favour an approach that aligns with the "Financial Statement Presentation" project and where all major issues are dealt with simultaneously. We believe that short term amendments should not prevail over the quality aspects of international standards.

Furthermore the Discussion Paper does not provide sufficient clear and robust principles guidance for the accounting of post-employment benefit plans that are common in the Netherlands. We specifically point out the situation in the Netherlands for mandatory collective multi-employer schemes where pension funds are not controlled by the entity. In single employer plans, the risks regarding the defined benefit are shared between the entity, the employees and retirees.

In addition to these observations, we would like to bring the following specific issues to your attention:

#### 1. Defined-benefit promises and the corridor

NIVRA supports the discontinuance of the "corridor" including "option 1" where all changes are accounted for in the income statement, provided that this amendment aligns with the 'Financial Statement Presentation' project. We object to a direct recognition of actuarial gains

and losses as long as no fundamental review of the 'Financial Statement Presentation' and IAS 19 in total has taken place.

## 2. Contribution-based promises

NIVRA supports the introduction of the Contribution-based promises (CBP) as a revised definition of the formerly defined contribution plans, but also under the conditions of the fore mentioned integrated approach. We particularly demand for further clarification of the applicable technique for fair value measurement. In our view, a practical fair value method like "accumulated benefit obligation" should be considered. However the proposed changes are not clear.

## 3. Additions to scope

NIVRA supports to include mandatory collective multi-employer pension schemes and conditional indexation in the scope for the IAS 19 improvement.

If you have any questions about our comments or wish to discuss any of these matters further please contact Rob Bosman at +31 20 3010301.

Yours sincerely,

A handwritten signature in black ink, consisting of a stylized 'J' and 'G' followed by a long horizontal line.

J.G.P.M. Helderma RA

Chairman Royal NIVRA