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Dear Ms Kimmett,

**RESPONSE TO ED3 BUSINESS COMBINATIONS AND AMENDMENTS TO IAS 36 –
IMPAIRMENT OF ASSETS AND IAS 38 – INTANGIBLE ASSETS**

The Royal Dutch/Shell Group of Companies ("Shell") would like to take this opportunity to comment on the IAS exposure draft ED3 – Business Combinations and the associated Amendments to IAS 36 Impairment of Assets and IAS 38 Intangible Assets. We support the harmonisation between International and United States generally accepted accounting principles and we generally agree that the concepts and requirements contained in the subject exposure draft and associated IAS amendments lead to convergence with the requirements as set forth in US GAAP related to accounting for business combinations, goodwill and intangible assets. We do, however, note some striking differences between the proposed IAS requirements and the existing US requirements related to required disclosures of management's key assumptions related to cash flow projections and recommend that this area be revisited to ensure that a level playing field will exist for companies that adopt IAS as a basis for financial reporting.

If you have any questions concerning this comment letter, please contact Simon Ingall, the head of our accounting research and development team, at 020-7934-2304.

Yours sincerely
Shell International Limited

Tim Morrison
Group Controller