

Rådet för finansiell rapportering

The Swedish Financial Reporting Board

RFR-rs 2009:02

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

Dear Sirs,

Re: Exposure Draft – Embedded Derivatives – Proposed Amendments to IFRIC 9 and IAS 39

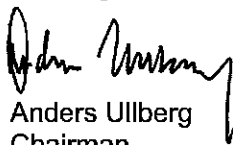
The Swedish Financial Reporting Board (Board) is responding to your invitation to comment on the above Exposure Draft (ED).

We agree with the proposed amendments including the proposed effective date. However, it should be noted that the proposed effective date means retroactive legislation for Sweden, and other countries, dependent upon official endorsement. Retroactive legislation, as well as retroactive effective dates, is something which is problematic and should only be used in very exceptional circumstances.

If you have any questions concerning our comments please address our Executive member Carl-Eric Bohlin by e-mail to: carl-eric.bohlin@radetforfinansiellrapportering.se

Stockholm, January 21, 2009

Kind regards,



Anders Ullberg
Chairman