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Mr. Steve Ong

Director, Standard Setting Hong Kong Institute of

Certified Public Accountants

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Dear Mr. Ong,

Re: Invitation to Comment on IASB Exposure Drafts

I refer to your letters dated 16 September 2010 and 3 November 2010. Please find below the comments to the exposure drafts.

(I) IASB Exposure Draft of Insurance Contracts (ED/2010/8)

The Exposure Draft aims to improve financial reporting of insurance contracts, to eliminate inconsistencies and weaknesses in existing practices and to enhance comparability across entities, jurisdictions and capital markets.

In so far as tax administration is concerned, I have no comment on the questions raised in the Exposure Draft. In general, the Department welcomes the proposed extensive disclosure of information, which enables users of financial statements to better understand the effects the insurance contracts have on the financial position and performance of the entities and their cash flow position.

(II) IASB Exposure Draft of Severe Hyperinflation (Proposed Amendments to IFRS 1) (ED/2010/12)

The Exposure Draft proposes an exemption to IFRS 1. The exemption would allow an entity that has been subject to severe hyperinflation to measure assets and liabilities at fair value and use that fair value as the deemed cost of those assets and liabilities in the opening IFRS statement of financial position.

The Exposure Draft provides guidance to entities which have been subject to severe hyperinflation on their resumption to presenting financial statements in accordance with IFRSs. As application of accounting standards for severe hyperinflation is rare in Hong Kong, I have no comment to make on the proposals of the Exposure Draft.

Yours sincerely,

San Crow in

(Mrs WU LAM Choi-wah) for Commissioner of Inland Revenue