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HQ 502/141 Pt.15

Mr. Steve Ong Director, Standard Setting Hong Kong Institute of Certified Public Accountants 37/F, Wu Chung House 213 Queen's Road East Wanchai, Hong Kong

INLAND REVENUE DEPARTMENT

REVENUE TOWER. 5 GLOUCESTER ROAD, WAN CHAI, HONG KONG.

網址 Web site: www.ird.gov.hk

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電 話:

Tel. No.:

2594 5037

傳 真: Fax No.:

2511 7414

電 郵: E-mail:

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31 March 2011

Dear Mr. Ong,

Re: Invitation to Comment on IASB Exposure Draft of Offsetting Financial Assets and Financial Liabilities

I refer to your letter dated 1 February 2011 inviting for comments.

The Exposure Draft aims at establishing a common approach for IFRS and US GAAP to offsetting financial assets and financial liabilities in the financial statements. It is proposed in the Exposure Draft that offsetting should apply only when the right of set-off is unconditional and legally enforceable, and the entity involved has intention to settle the amounts due on a net basis or simultaneously.

Whilst I have no specific comments to the questions posed in the Exposure Draft from the tax perspective, I support the proposed mandatory approach to eliminate the differences in offsetting requirements and improve comparability of financial statements. I also welcome the proposed extensive disclosure of useful and relevant information with clear presentation to users of financial statements.

Yours sincerely,

Lan Chi was

(Mrs WU LAM Choi-wah)

for Commissioner of Inland Revenue