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Dear Mr. Riley,

## Invitation to Comment on IASB Exposure Draft Recoverable Amount Disclosures for Non-Financial Assets: Proposed Amendments to IAS 36

I refer to your letter dated 4 February 2013 inviting for comments to the above IASB Exposure Draft.

The Exposure Draft proposes modification to the disclosure requirements in IAS 36 for the measurement of the recoverable amount of impaired assets. Specifically, in order to better represent the IASB's intention, disclosure of recoverable amount is narrowed to an asset or a cash generating unit ("CGU") for which the entity has recognised or reversed an impairment loss during the reporting period. Furthermore, when the recoverable amount of the impaired asset or CGU is measured on basis of fair value less cost of disposal, additional disclosure is required in respect of the valuation techniques, the level of the fair value hierarchy of the measurement, for Levels 2 and 3 fair value measurements, the key assumptions used including the discount rate used of the present value technique employed.

In general, I support the Exposure Draft which aims to clarify and better reflect the IASB's intention on the disclosure of recoverable amount for non-financial assets. I also welcome the proposed additional disclosure to provide useful information as well as converge with the disclosure requirements for impaired assets in US GAAP.

Yours sincerely,

Jan Croi was

(Mrs WU LAM Choi-wah)

for Commissioner of Inland Revenue