



Royal NIVRA

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International Accounting Standards Board  
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Date	Re	Our ref	Attachment	Direct dial nr
September 1, 2010	ED Amendments IAS 19	261-10HV/IAS19 -		T +3120-3010365 F +3120-3010302

Dear IASB members,

The Royal Dutch Institute of Registered Accountants (NIVRA) appreciates the opportunity to respond to the Exposure Draft Defined Benefit Plans Proposed Amendments to IAS 19 (ED).

We have submitted our comments on the ED to the Dutch Accounting Standard Board (DASB) to be included in its comment letter. NIVRA strongly supports the solutions and comments as included in the DASB comment letter to the IASB. We express our main concern in this comment letter.

**Todays pension plans ask for a fundamental review of IAS 19**

NIVRA appreciates IASB's initiative to reconsider IAS 19. Our main concern however is that only a limited number of changes are proposed without a fundamental and comprehensive review of IAS 19 as a whole.

Todays hybrid pension arrangements can be characterized as shared risk plans and therefore do not principally fit in the binary DB-DC classification of IAS 19. We believe that the proposed amendments in the ED in respect of shared funding (ED paragraph 64A) and shared risk (ED paragraph 85(c)) do not solve this problem and require further guidance and examples.

If you have any questions about our comments or wish to discuss any of these matters further please contact mr. Henk Verhoek at +31 20 3010365.

Yours sincerely,



Dr. R. Dekkers RA  
Chairman Royal NIVRA