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Sir David Tweedie  
Chairman of the  
International Accounting Standards Board  
30 Cannon Street

Berlin, 31 May 2005

London EC4M 6XH  
United Kingdom

Dear Sir David,

### **ED Amendments to IFRS 6 and IFRS 1**

We appreciate the opportunity to comment on the Exposure Draft of *Proposed Amendments to IFRS 6 Exploration for and Evaluation of Mineral Resources and IFRS 1 First-time Adoption of IFRS*.

The proposed amendments refer to the exemption provided for an entity that both

- a) adopts IFRSs for the first time before the 1<sup>st</sup> January 2006 and
- b) applies IFRS 6 Exploration for and Evaluation of Mineral Resources before that date.

According to the Basis for Conclusion BC63-BC65 of IFRS 6, the Board's intention was to provide an exemption from the requirements of

- providing comparative disclosures as well as
- recognition and measurement of IFRS 6 for the comparative period.

This intention goes back to concerns of some constituents that entities would have difficulty in compiling the information necessary for 2004 comparative figures, given that the IFRS would be introduced close to 1 January 2005, and could result in substantial changes.



The proposed amendments to BC66 (g) of IFRS 6 and IFRS 1.36B just clarify that the exemption given is wider than comparative disclosures. It is in the interest of a number of first-time adopters to have the exemption clarified as soon as possible. Thus, the German Accounting Standards Board agrees to the proposed amendments.

If you would like any clarification of these comments, please contact me.

Yours sincerely,

*Prof. Dr. Klaus Pohle*  
President