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**CL 45**

**Comments on Exposure Draft of Proposed Amendments to IAS 19  
“Employee Benefits  
Actuarial Gains and Losses, Group Plans and Disclosures”**

Dear Sirs:

We, the Japanese Institute of Certificate Public Accountants, are pleased to provide our comments on Exposure Draft of Proposed Amendment to IAS 19, “Employee Benefits Actuarial Gains and Losses, Group Plans and Disclosures” in International Financial Reporting Standards (the “Exposure Draft”). We generally support the Exposure Draft’s proposal and therefore agree with the proposed amendment. However, we have certain comments and recommendations as described below:

- (1) Paragraph 34 of the Exposure Draft proposes an extension of the provisions in IAS 19 relating to multi-employer plans for use in separate or individual financial statements of entities within a consolidated group that meet specified criteria. We do not agree with this proposal. For countries such as Japan which have a system for the disclosure of both consolidated financial statements of an entity and separate financial statements of consolidated subsidiaries which meet certain criteria, there is no distinction between the accounting standards to be adopted for separate financial statement purposes and those for consolidated financial statement purposes. Under these circumstances, we disagree with the proposal that the provision for exemption from defined benefit accounting be set forth for certain non-consolidated financial statements of an entity within a consolidated group.
- (2) Question 7 in the invitation to comment on the Exposure Draft asks whether any other disclosures are required in addition to the items stipulated in Paragraph 120 of

the Exposure Draft, for example, certain items required under SFAS 132. We believe that those items should not be required because the disclosure items proposed in Paragraph 120 are sufficiently extensive, particularly when compared with the disclosure items required under other IFRSs.

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We would be pleased to discuss any aspect of this letter with the IASB or its staff at your convenience.

Very truly yours,

Michiyoshi Sakamoto  
Chairman  
Technical Committee for IASB