20 January 2009

Sir David Tweedie
International Accounting Standards Board
30 Cannon Street
London EC 4M 6XH
UNITED KINGDOM

Dear Sir David

Re: Discontinued Operations. Proposed amendments to IFRS 5

The Polish Accounting Standard Committee presents its opinion on the exposure draft *Discontinued Operations. Proposed amendments to IFRS 5* published by the IASB.

Our opinion takes into consideration EFRAG's draft comment letter to the IASB concerning the proposed amendments to IFRS 5 (*Exposure Draft of proposed Amendments to IFRS 5*).

We agree with proposed amendments as they clarify that no additional disclosures are required for non-current assets (or disposal groups) classified as held for sale or discontinued operations after the date of such classification apart from those specifically required for such assets or disposal groups. We believe that these amendments only confirm the initial intention of the Board.

Question 1a)
Do you agree with the proposed definition?

We agree with the proposed definition.

Question 1b)
If an entity is not required to apply IFRS 8, is it feasible for the entity to determine whether the component of an entity meets the definition of an operating segment?

While it is unusual to import the requirements of another standard with different applicability, we are not unduly concerned about the references to IFRS 8. These references are only instructing the reader how to apply IFRS 5; they are not introducing IFRS 8 in its entirety. However, we note an underlying trend on the part of the standard setters to apply a "through the eyes of management" approach in standards other than IFRS 8, for example, these proposals and the recent amendments to IAS 36. In our view, this approach is sensible, but, because IFRS 8 only applies to listed entities, we suggest that the Board embark on an education process. Entities that are not listed may assume that they have no need to read IFRS 8, but IFRS 5 and IAS 36, which draw on the reasoning in IFRS 8, may apply to them.

Question 2)

Do you agree that the amounts presented for discontinued operations should be based on the amounts presented in the statement of comprehensive income?

We agree that the amounts presented for discontinued operations should be based on the amounts presented in the statement of comprehensive income, even if segment information disclosed to comply with IFRS 8 includes different amounts that are reported to the chief operating decision maker.

Question 3a)

Do you agree with the proposed disclosure requirements?

We agree with these proposals.

Question 3b)

Do you agree with the disclosure exemptions for *businesses* that meet the criteria to be classified as held for sale on acquisition?

We agree with these proposals.

Question 4)

Are the transitional provisions appropriate? Why or why not? If not, what would you propose, and why?

We support the proposal that entities should apply the proposed changes prospectively, from a date to be determined by the IASB after exposure, with one exception: the amounts in the statement of comprehensive income should be reclassified on the basis of the revised definition of discontinued operations for all periods presented.

Yours sincerely,

Joanna Dadacz Chairman of Polish Accounting Standards Committee

cc: Stig Enevoldsen, Chairman of EFRAG TEG