

## **Stellungnahmen Stellungnahme BdB zum Konsultationspapier der SEC zur Anerkennung der IFRS in den Abschlüssen ausländischer Emittenten**

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18. September 2007

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We warmly welcome the proposal to allow foreign private issuers listed in the US to file financial statements prepared in accordance with International Financial Reporting Standards (IFRS) without reconciliation to US GAAP. The Association of German Banks has long argued in favour of mutual recognition of accounting standards in the US and Europe. The current plans to recognise IFRS accounts without the need for their reconciliation to US GAAP will bring the lengthy discussions of this issue to a positive conclusion. The decision to no longer require reconciliation will translate into considerable time and financial savings for foreign issuers listed in the US. This is likely to make the US capital markets significantly more attractive to foreign private issuers.

The proposal envisages accepting only financial statements prepared in accordance with the English version of IFRS in the form published by the IASB ("full IFRS").

To become legally effective in the countries of the European Union, however, all IFRS have to go through a special recognition procedure known as endorsement, which is laid out in Regulation (EC) No. 1606/2002 (IAS Regulation). This regulation requires IFRS approved by the IASB to be legitimised for use in the EU by being adopted into EU law. At the end of this process, the European Commission decides on the adoption of an IFRS or IFRICs as approved by the IASB. The Commission is not empowered to change the contents of the standard. In principle, therefore, IFRS endorsed for use in the EU should be "full IFRS". Nevertheless, certain temporal differences may arise. [...]