



COUNCIL ON CORPORATE
DISCLOSURE & GOVERNANCE

4 August 2005

D16 Comment Letters
International Accounting Standards Board
30 Cannon Street
London EC4M 6XH
United Kingdom

(By email: CommentLetters@iasb.org)

Dear Sirs,

IFRIC DRAFT INTERPRETATION D16 *SCOPE OF IFRS 2*

1. We are writing to provide our response to the IFRIC Draft Interpretation D16 *Scope of IFRS 2*.
2. The CCDG appreciates the efforts of the IFRIC in clarifying that transactions within the scope of IFRS 2 *Share-based Payment* include those in which the entity cannot specifically identify some or all of the goods or services received.
3. The CCDG is in overall agreement with the proposals in the draft interpretation.
4. Should you require any further clarification, please contact Mr Ramchand Jagtiani, Deputy Director, at the Institute of Certified Public Accountants of Singapore via email at jagtiani@icpas.org.sg. Thank you.

Yours sincerely,

Derek How
Secretary, CCDG