



International Accounting Standards  
Board (IASB)  
30 Columbus Building  
7 Westferry Circus  
Canary Wharf,  
London E14 4HD,  
United Kingdom

1 October 2019

Dear Board Member,

**Re: Exposure Draft: ED/2019/3 Reference to the Conceptual Framework – Proposed Amendments to IFRS 3**

BusinessEurope is pleased to respond to the invitation to comment upon the exposure draft *ED/2019/3 Reference to the Conceptual Framework – Proposed Amendments to IFRS 3* (the ED).

We agree with the amendments to IFRS 3 proposed in the ED. We think that these represent a pragmatic approach to the issue of the integration of references to the new Conceptual Framework and this should limit the potential for unintended consequences of the adoption of this new framework to affect IFRS 3.

We also agree with the proposed transitional provisions (that is, mandatory application to business combinations with an acquisition date after the amendments' application date, and the allowing of earlier application of the new provisions at the decision of the entity).

If you require any further information on this matter, please do not hesitate to contact us.

Yours sincerely,

Erik Berggren  
Senior Adviser  
Legal Affairs Department