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**Comments to CESR's Concept Paper on equivalence of certain third country GAAP and on description of certain third countries' mechanisms of enforcement of financial information**

Dear Madam/Sir,

Swiss Re is one of the world's leading reinsurers and the world's largest life and health reinsurer. The company operates through more than 70 offices in over 30 countries. Swiss Re has been in the reinsurance business since its foundation in Zurich, Switzerland, in 1863. Through its three business groups Property & Casualty, Life & Health and Financial Services, Swiss Re offers a wide variety of products to manage capital and risk. Traditional reinsurance products, including a broad range of property and casualty as well as life and health covers and related services, are complemented by insurance-based corporate finance solutions and supplementary services for comprehensive risk management. Swiss Re's consolidated financial statements are currently published in accordance with Swiss GAAP FER (Swiss GAAP).

Paragraph 10 of the concept paper recognises that there are cases where a third country GAAP is applied by an issuer not regulated by that third country. Such cases raise broader enforcement issues that have not been covered by the mandate given to CESR. Therefore, the concept paper is limited to the assessment of GAAP equivalence in the most common situations (i.e., third country GAAP as applied and enforced in that third country). Our understanding of the scope limitation in paragraph 10 is that, assuming a third country GAAP is declared as equivalent to IAS/IFRS, an issuer would not be prevented from applying that third country GAAP if the issuer is not regulated by that third country.

We believe that if an issuer prepares financial statements under a non-equivalent third country GAAP, they should be able to apply appropriate remedies to the differences between the non-equivalent third country GAAP and a GAAP that is equivalent to IAS/IFRS. This approach would reduce the cost and effort of compliance for issuers whose existing accounting basis is not covered as part of CESR's current mandate but whose accounting policies follow the accounting guidance of third country GAAPs that are included in the scope of the mandate.

We thank you for the opportunity to express Swiss Re's comments on the concept paper. I would be pleased to discuss with you at your convenience any questions or issues that you may have concerning our letter.

Yours sincerely,

A handwritten signature in black ink that reads "Mark P. Swallow". The signature is written in a cursive, slightly slanted style.

Mark Swallow  
Chief Accounting Officer  
Swiss Reinsurance Company