

February 10, 2004

Jan Munro
IFAC Ethics Committee
545 Fifth Avenue, 14th Floor
New York, New York 10017
USA

By E-mail: EDComments@ifac.org

Dear Ms. Munro,

Re.: Proposed Revision to Code of Ethics for Professional Accountants – Section 8: Audit Partner Rotation

We would like to thank you for the opportunity to provide the International Federation of Accountants with our comments on the Proposed Revision to the Code of Ethics for Professional Accountants, paragraph 8.151.

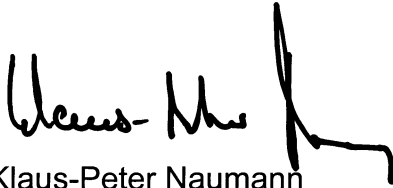
We do not support IFAC's intention to change Section 8 since it comes into force on December 31, 2004. We believe that opening Section 8 and addressing only one issue is not appropriate at present.

We are concerned that paragraph 8.151 of the Code of Ethics does not accurately reflect a principles-based approach. The addition of rules should be kept to a minimum in order to avoid such rules being circumvented.

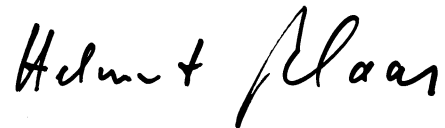
The revised text of paragraph 8.151 refers to "participate in the assurance engagement". In our view, the term used ought to be "audit" rather than "assurance" because the rotation of the lead engagement partner relates only to audit clients that are listed entities.

We would be pleased to discuss any aspect of this letter you may wish to raise with us.

Yours sincerely,



Klaus-Peter Naumann
Chief Executive Officer



Helmut Klaas
Head of Sections

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