

Ms Saskia SLOMP
EFRAG CEO

Ms Chiara DEL PRETE
EFRAG TEG Chairwoman

Brussels, 10 October 2019
EBF_038636

SUBJECT: EBF comments on the EFRAG's Assessments on Interest Rate Benchmark Reform (Amendments to IFRS 9, IAS 39 and IFRS 7)

Dear Ms Slomp, dear Ms Del Prete,

The European Banking Federation (EBF) welcomes the opportunity to comment on the EFRAG's initial assessments on the adoption of Interest Rate Benchmark Reform Amendments to IFRS 9, IAS 39 and IFRS 7. The EBF is very much involved in the Interest Rate Benchmark Reform given the broad range of changes the Inter-Bank Offered Rates (IBORs) Reform will require from banks, with particular attention to the potential consequences in financial reporting.

While you will find enclosed our response to the questionnaire, we would like to provide you with the following general comments:

- We welcome the proactive and timely approach taken by EFRAG towards ensuring the possibility of an expeditious EU endorsement process enabling the early application of the amendments already during 2019.
- We encourage EFRAG to expedite considerations around Phase II of the project by continuing its close cooperation with the industry to ensure timely consideration of the scope of IFRS issues arising from the IBOR reform in the context of the fast pace of the progress of the reform.

We appreciate your consideration of our comments and remain at your disposal if you have any questions or you would wish to discuss our views in more detail.

Yours sincerely,



Wim MIJS
Chief Executive Officer

European Banking Federation aisbl

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INVITATION TO COMMENT ON EFRAG'S ASSESSMENTS ON Interest Rate Benchmark Reform (Amendments to IFRS 9, IAS 39 and IFRS 7)

Comments should be submitted by 10 October 2019 by using the [express your views](#) page on EFRAG website or by clicking here.

EFRAG has been asked by the European Commission to provide it with advice and supporting material on Interest Rate Benchmark Reform (Amendments to IFRS 9, IAS 39 and IFRS 7). In order to do so, EFRAG has been carrying out an assessment of Amendments against the technical criteria for endorsement set out in Regulation (EC) No 1606/2002 and has also been assessing the costs and benefits that would arise from their implementation in the European Union (the EU) and European Economic Area.

A summary of the Amendments is set out in Appendix 1 of the accompanying *Draft Letter to the European Commission* regarding endorsement of the Amendments.

Before finalising its assessment, EFRAG would welcome your views on the issues set out below. Please note that all responses received will be placed on the public record, unless the respondent requests confidentiality. In the interests of transparency, EFRAG will wish to discuss the responses it receives in a public meeting, so it is preferable that all responses can be published.

EFRAG's initial assessments, summarised in this questionnaire, will be updated for comments received from constituents when EFRAG is in the process of finalising its *Letter to the European Commission* regarding endorsement of the Amendments.

Your details

1 Please provide the following details:

- (a) Your name or, if you are responding on behalf of an organisation or company, its name:

European Banking Federation

- (b) Are you a:

Preparer User Other (please specify)

Industry body, representing preparers

- (c) Please provide a short description of your activity:

The European Banking Federation is the voice of the European banking sector, uniting 32 national banking associations in Europe that together represent some 3,500 banks – large and small, wholesale and retail, local and international – employing about two million people

- (d) Country where you are located:

Belgium

- (e) Contact details, including e-mail address:

*Interest Rate Benchmark Reform (Amendments to IFRS 9, IAS 39 and IFRS 7)
Invitation to Comment on EFRAG's Initial Assessments*

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EFRAG's initial assessment with respect to the technical criteria for endorsement

2 EFRAG's initial assessment of the Amendments is that they the technical criteria for endorsement. In other words, the Amendments are not contrary to the principle of true and fair view and meet the criteria of understandability, relevance, reliability, comparability and lead to prudent accounting. EFRAG's reasoning is set out in Appendix 2 of the accompanying *Draft Letter to the European Commission* regarding endorsement of the Amendments.

(a) Do you agree with this assessment?

Yes No

If you do not agree, please provide your arguments and what you believe the implications of this could be for EFRAG's endorsement advice.

(b) Are there any issues that are not mentioned in Appendix 2 of the accompanying *Draft Letter to the European Commission* regarding endorsement of the Amendments that you believe EFRAG should take into account in its technical evaluation of the Amendments? If there are, what are those issues and why do you believe they are relevant to the evaluation?

The European public good

3 In its assessment of the impact of the Amendments on the European public good, EFRAG has considered a number of issues that are addressed in Appendix 3 of the accompanying *Draft Letter to the European Commission* regarding endorsement of the Amendments.

Improvement in financial reporting

4 EFRAG has identified that in assessing whether the endorsement of the Amendment is conducive to the European public good it should consider whether the Amendments are an improvement over current requirements across the areas which have been subject to changes (see paragraphs 3 to 5 of Appendix 3 of the accompanying *Draft Letter to the European Commission*). To summarise, EFRAG's initial assessment is that the Amendments are likely to improve the quality of financial reporting.

Do you agree with the assessment?

Yes No

If you do not agree, please provide your arguments and indicate how this could affect EFRAG's endorsement advice.

*Interest Rate Benchmark Reform (Amendments to IFRS 9, IAS 39 and IFRS 7)
Invitation to Comment on EFRAG's Initial Assessments*

Costs and benefits

- 5 EFRAG is also assessing the costs that are likely to arise for preparers and for users on implementation of the Amendments in the EU, both in year one and in subsequent years. Some initial work has been carried out, and the responses to this invitation to comment will be used to complete the assessment.

The results of the initial assessment of costs are set out in paragraphs 6 to 13 of Appendix 3 of the accompanying *Draft Letter to the European Commission* regarding endorsement of the Amendments. To summarise, EFRAG's initial assessment is that the Amendments will not result in significant undue costs for preparers and for users they will likely be cost neutral.

Do you agree with this assessment?

Yes No

If you do not, please explain why you do not and (if possible) explain broadly what you believe the costs involved will be?

- 6 In addition, EFRAG is assessing the benefits that are likely to be derived from the Amendments. The results of the initial assessment of benefits are set out in paragraph 14 to 17 of Appendix 3 of the accompanying *Draft Letter to the European Commission* regarding endorsement of the Amendments. To summarise, EFRAG's initial assessment is that the benefits resulting from the Amendments are likely to outweigh costs associated with their implementation.

Do you agree with this assessment?

Yes No

If you do not agree with this assessment, please provide your arguments and indicate how this could affect EFRAG's endorsement advice.

- 7 EFRAG's initial assessment is that the benefits to be derived from implementing the Amendments in the EU, as described in paragraph 6 above, are likely to outweigh the costs involved, as described in paragraph 5 above

Do you agree with this assessment?

Yes No

If you do not agree with this assessment, please provide your arguments and indicate how this could affect EFRAG's endorsement advice.

Other factors

- 8 EFRAG has identified a number of other factors that could be considered in assessing whether the endorsement of the Amendments are conducive to the European public good (see Appendix 3, paragraphs 18 to 20).

Do you agree with the assessment of these factors?

Yes No

*Interest Rate Benchmark Reform (Amendments to IFRS 9, IAS 39 and IFRS 7)
Invitation to Comment on EFRAG's Initial Assessments*

If you do not agree, please provide your arguments and indicate how this could affect EFRAG's endorsement advice.

Do you agree that there are no other factors to consider in assessing whether the endorsement of the Amendments is conducive to the European public good?

Yes No

If you do not agree, please identify the factors, provide your views on these factors and indicate how this could affect EFRAG's endorsement advice.

Overall assessment with respect to the European public good

- 9 EFRAG has initially concluded that endorsement of the Amendments would be conducive to the European public good (see paragraphs 21 to 24 of Appendix 3 of the accompanying *Draft Letter to the European Commission*).

Do you agree with this conclusion?

Yes No

If you do not agree, please explain your reasons.