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Our ref : RJ-EFRAG 569
Direct dial : 0031-20-3010235
Date : February 13th 2014
Re : Comment letter on Proposed amendments to the IFRS for SME's

Dear members of the EFRAG Technical Expert Group,

The Dutch Accounting Standards Board (DASB) appreciates the opportunity to respond to your draft comment letter on the Exposure Draft Proposed amendments to the IFRS for SMEs.

Your draft comment letter is an excellent summary of the main changes proposed and includes comments with which we generally concur. We support most comments in your letter and therefore have decided to refer to your draft comment letter in our comment letter to the IASB.

In our response to the Request for Information Comprehensive Review of the IFRS for SMEs, we commented that in our opinion IFRS for SMEs should facilitate non-listed internationally operating companies or subsidiaries of listed companies that apply full IFRS in their consolidated accounts to apply IFRS for SMEs in practice. To achieve that, we believe IFRS for SMEs should be consistent with full IFRS regarding recognition and measurement requirements. We still believe the IASB should decide to align IFRS for SMEs with full IFRS regarding recognition and measurement. Otherwise, we believe the IASB would miss an opportunity to stimulate the use of IFRS for SMEs in Europe. We will include this remark in our comment letter to the IASB and ask you to consider to do the same.

We have the following more detailed remarks regarding the detailed comments and responses to the questions in the ED that are set out in the appendix of your comment letter:

- Q3: the IASB proposes an undue cost or effort exemption when recognizing intangible assets separately in a business combination. We would prefer that this exemption will also be allowed for recognition of contingent assets and liabilities;
- Q4: section 11 and 12 give an entity the option to apply either section 11 and 12 of the IFRS for SMEs, or the recognition and measurement provisions of IAS 39. Because the development and implementation of IFRS 9 we advise to directly refer to full IFRS in

general for this topic, so that IFRS for SMEs will not be outdated soon after its current revision;

- Q5: we think the IASB should also consider relief from full retrospective application of any change in the amortization period of goodwill due to the amendment of paragraph 19.23;
- Q7: we agree with the IASB that it would generally not be appropriate to wait until Post-implementation reviews to consider new and revised IFRS for incorporation into the IFRS for SMEs. We also do not support a five year cycle to consider amendments to IFRS for SMEs. In practice a three year cycle will lead to amendments once every five years, because of the due process for amendments, which, in our opinion, is long enough to ensure stability of IFRS for SMEs.

Yours sincerely,

A handwritten signature in black ink, consisting of a vertical line on the left, a loop at the bottom left, and a long horizontal stroke extending to the right.

Hans de Munnik
Chairman Dutch Accounting Standards Board