

Dear Françoise,

Referring to the draft endorsement advice on IFRS 9 “Financial Instruments” issued by EFRAG I would like to inform you that the Polish Accounting Standards Committee and the Ministry of Finance in general support the analysis conducted by EFRAG and its conclusions. We appreciate very much the high-quality work of EFRAG experts and the efforts made in the very difficult area of financial instruments.

As regards the main two problematic issues:

- 1) the proposed request from the EC to the IASB to defer the application of IFRS 9 for insurance sector – we are not able to support such request due to the fact that we have no feedback from the insurance sector in Poland that this solution would be needed. Moreover we have the opinion of the Polish Financial Supervision Authority (FSA) that such deferral in terms of valuation methods used for consolidated financial statements would not be possible in case of capital groups in which only some of the subsidiary undertakings are conducting insurance activities. According to the Polish FSA, EIOPA does not have appropriate data and analyses which could define the problems that would emerge from the time mismatch of the IFRS 9 and revised IFRS 4 application. Therefore FSA is of the opinion that there are no sufficient arguments for deferral of the IFRS 9 application for insurers.
- 2) whether the early application of IFRS 9 should be prohibited – we are of the opinion that on the one hand the early application might result in a temporal incomparability of financial statements of European companies, however on the other hand taking into account the significant implementation workload for companies – especially banks – the entities might not be ready for earlier application and this option might be used by a very limited number of companies. Concluding we are not against the early application.



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