

**Draft Comment Letter**

Comments should be submitted by 9 March 2012 to [Commentletters@efrag.org](mailto:Commentletters@efrag.org)

[XX March 2012]

International Accounting Standards Board  
30 Cannon Street  
London EC4M 6XH  
United Kingdom

Dear Sir/Madam,

**Re: Exposure Draft Transition Guidance (Amendments to IFRS 10)**

On behalf of the European Reporting Advisory Group (EFRAG), I am writing to comment on the Exposure Draft *Transition Guidance (Amendment to IFRS 10)* (the ED) that was issued by the IASB on 20 December 2011. This letter is intended to contribute to the IASB's due process and does not necessarily indicate the conclusions that would be reached by EFRAG in its capacity as advisor to the European Commission on endorsement of definitive IFRS in the European Union and European Economic Area.

EFRAG welcomes the IASB's decision to clarify the transition guidance in IFRS 10. In addition, we also support the Board's decision to address this issue separately rather than through an annual improvement.

EFRAG supports the proposed amendments as they provide greater clarity and ensure consistent application of the transition requirements of IFRS 10. EFRAG agrees with the amendment as it provides an appropriate trade off between the costs to preparers and benefits to users.

Our detailed responses to the questions in the ED are set out in the Appendix to this letter.

If you wish to discuss our comments further, please do not hesitate to contact Panagiotis Papadopoulos or me.

Yours sincerely,

Françoise Flores  
**EFRAG Chairman**

## APPENDIX

### EFRAG's responses to the questions raised in the ED

#### Notes to EFRAG's constituents

- 1 *In May 2011, the IASB published IFRS 10 Consolidated Financial Statements, which included transitional provisions for its initial application. Soon after publication, constituents raised two concerns about these transitional provisions:*
  - (a) *IFRS 10 does not provide a definition of 'the date of initial application', which leaves it unclear whether the 'date of initial application' in IFRS 10 is the beginning of the first reporting period in which the entity adopts IFRS 10 (i.e. the current period) or the beginning of the earliest period presented in the first financial statements in which the entity adopts this standard.*
  - (b) *It was unclear whether relief from retrospective application of IFRS 10 would apply to an investor's interests in investees that were disposed of during a comparative period such that consolidation would not occur under either IAS 27/SIC-12 or IFRS 10 at the date of initial application.*
- 2 *The Exposure Draft Transition Guidance (Amendments to IFRS 10) (the 'ED') clarifies that the 'date of initial application means the beginning of the annual reporting period in which IFRS 10 is applied for the first time.' The ED also confirms the relief from retrospective application would apply to an investor's interest in investees that were disposed before the date of initial application of IFRS 10.*

#### Question 1

The Board proposes to clarify the 'date of initial application' in IFRS 10. The date of initial application for IFRS 10 would be 'the beginning of the annual reporting period in which IFRS 10 is applied for the first time'. The Board also proposes to make editorial amendments to paragraphs C4 and C5 of IFRS 10 to clarify how an investor shall adjust comparative period(s) retrospectively if the consolidation conclusion reached at the date of initial application is different under IAS 27/SIC-12 and IFRS 10.

Do you agree with the amendments proposed? Why or why not? If not, what alternative do you propose?

#### EFRAG's response

**EFRAG supports the proposed amendments as they provide greater clarity and ensure consistent application of the transition requirements of IFRS 10.**

- 3 EFRAG supports the proposed amendments as they provide greater clarity and ensures consistent accounting for transactions on the initial application of the standard.
- 4 EFRAG notes that the proposed definition of the 'date of initial application' is consistent with our understanding and the definition provided in other IFRSs. However, we agree with the suggestion of the IFRS Interpretations Committee that the IASB should consider adding a definition of the date of initial application to the Glossary of Terms.

**Question 2**

The Board proposes to amend paragraph C3 of IFRS 10 to clarify that an entity is not required to make adjustments to the previous accounting for its involvement with entities if the consolidation conclusion reached at the date of initial application is the same under IAS 27/SIC-12 and IFRS 10. As a result, the Board confirms that relief from retrospective application of IFRS 10 would apply to an investor's interests in investees that were disposed of during a comparative period such that consolidation would not occur under either IAS 27/SIC-12 or IFRS 10 at the date of initial application.

Do you agree with the amendments proposed? Why or why not? If not, what alternative do you propose?

***EFRAG's response***

**EFRAG agrees with the amendment as it provides an appropriate trade off between the costs to preparers and benefits to users.**

- 5 EFRAG believes that it is preferable to apply consistent criteria for the consolidation of the subsidiaries in the current period and comparative period, because it provides useful information about the development of the group and its history. However, we recognise that an entity may not be able to obtain information from an investee that it no longer controls and we believe that the costs of retrospective application of IFRS 10 would not outweigh the benefits to users. Therefore, we agree with the amendments to paragraph C3 of IFRS 10.