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Berlin, 16 October 2008

Dear Stig,

EFRAG's Assessment of IFRIC 16 "Hedges of a net investment in a foreign operation"

On behalf of the German Accounting Standards Board (GASB) I am writing to comment on EFRAG's Assessment of IFRIC 16 "Hedges of a net investment in a foreign operation". We appreciate the opportunity to comment on EFRAG's assessment.

We agree with the views set out in the assessment. As a national standard-setter we are not in a position to answer the questions regarding the costs that will arise for preparers and for users to implement the amendment.

Please find attached our comments on the above mentioned EFRAG's assessments and the comments the Linde Group, Siemens AG, Volkswagen AG, Daimler AG and Bayer AG.

If you have any further questions, please do not hesitate to contact me.

Yours sincerely,

Liesel Knorr

President

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European Financial Reporting Advisory Group ■

INVITATION TO COMMENT ON EFRAG'S ASSESSMENTS OF IFRIC 16 'HEDGES OF A NET INVESTMENT IN A FOREIGN OPERATION'

Comments should be sent to commentletter@efrag.org or
uploaded via our website by 20 October 2008

EFRAG has been asked by the European Commission to provide it with advice and supporting material on IFRIC 16 *Hedges of a Net Investment in a Foreign Operation* (IFRIC 16). In order to do that, EFRAG has been carrying out a technical assessment of IFRIC 16 against the criteria for endorsement set out in Regulation (EC) No 1606/2002 and has also been assessing the costs and benefits that would arise from its implementation in the EU.

A summary of IFRIC 16 is set out in Appendix 1.

Before finalising its two assessments, 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 interest of transparency EFRAG will wish to discuss the responses it receives in a public meeting, so we would prefer to be able to publish all the responses received.

1 Please provide the following details about yourself:

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

German Accounting Standards Board (GASB)

- (b) Are you/Is your organisation or company a:

Preparer User X Other (please specify)

Standard-setter

- (c) Please provide a short description of your activity/ the general activity of your organisation or company:

- (d) Country where you/your organisation or company is located:

Germany

Invitation to Comment on EFRAG's Initial Assessments of IFRIC 16

(e) Contact details including e-mail address:

Liesel Knorr

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knorr@drsc.de

2 EFRAG's initial assessment of IFRIC 16 is that it meets the technical criteria for endorsement. In other words, it is not contrary to the true and fair principle and it meets the criteria of understandability, relevance, reliability and comparability. EFRAG's reasoning is set out in Appendix 2.

(a) Do you agree with this assessment?

X Yes

No

If you do not, please explain why you do not agree and what you believe the implications of this should be for EFRAG's endorsement advice.

(b) Are there any issues that are not mentioned in Appendix 2 that you believe EFRAG should take into account in its technical evaluation of IFRIC 16? If there are, what are those issues and why do you believe they are relevant to the evaluation?

There are no other issues.

3 EFRAG is also assessing the costs that will arise for preparers and for users from the implementation of IFRIC 16 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 are set out in Appendix 3. To summarise, EFRAG's initial assessment (see Appendix 3, paragraphs 2-4) is that IFRIC 16 is:

- (a) likely to involve some preparers in some incremental year one costs, but those costs are likely to be very insignificant;
- (b) likely to involve preparers in no incremental ongoing costs;
- (c) likely to involve users in no year one or ongoing incremental costs.

Invitation to Comment on EFRAG's Initial Assessments of IFRIC 16

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?

- 4 EFRAG's initial assessment is that IFRIC 16 is likely to result in improvements in the quality of the information provided and that the benefits to be derived from that will exceed the costs involved (Appendix 3, paragraphs 5 and 6).

Do you agree with this assessment?

Yes No

If you do not, please explain why you do not and what you think the implications should be for EFRAG's endorsement advice?

As a national standard-setter, we are not in a position to answer this question.

- 5 EFRAG is not aware of any other factors that should be taken into account in reaching a decision as to what endorsement advice it should give the European Commission on IFRIC 16.

Do you agree that there are no other factors?

Yes No

If you do not, please explain why you do not and what you think the implications should be for EFRAG's endorsement advice?

APPENDIX 1 A SUMMARY OF IFRIC 16

- 1 One way in which an entity may carry on foreign activities is to set up a foreign operation. That foreign operation might be a company or other legal entity (or a collection of legal entities) or it might be just a branch. (For simplicity, the language used in this Invitation to Comment assumes that a subsidiary company has been set up.) IAS 21 *The Effects of Changes in Foreign Exchange Rates* sets out how an entity should account for foreign currency transactions and for transactions by its foreign operations.
- 2 When an entity sets up a foreign operation, it usually makes some sort of investment in it. Some parent entities choose to hedge the foreign currency exposure arising on that net investment. IAS 39 *Financial Instruments: Recognition and Measurement* sets out how an entity should account for its hedges of net investments in foreign operations.
- 3 IAS 21 requires each entity (including each foreign operation) to determine its functional currency; in other words the currency of the primary economic environment in which the entity operates. IAS 21 then requires each entity to translate its foreign currency items into that functional currency and to account for the effects of such translation in accordance with the detailed requirements of the standard; that means some effects will be presented in the income statement ('profit or loss'), and some outside of the income statement ('other comprehensive income' or 'OCI') and subsequently recycled ('reclassified') to profit or loss.

Clarification 1—When an entity has a presentation currency that is different from its functional currency, do the foreign exchange differences that arise represent a hedgeable risk?

- 4 IAS 21 permits an entity to present its financial statements in a currency other than its functional currency. (This is known as the presentation currency.) When an entity has a presentation currency that is different from its functional currency, IAS 21 requires:
 - (a) the entity's assets and liabilities to be translated from the functional currency into the presentation currency at the balance sheet exchange rate;
 - (b) the entity's income and expenses to be translated from the functional currency into the presentation currency at the exchange rates prevailing at the dates of the transactions. For practical reasons, an average rate for the period is usually used; and
 - (c) all resulting exchange differences to be presented initially in OCI, and reclassified in profit or loss in a subsequent period in accordance with the detailed requirements of the standard.
- 5 As such, the choice of presentation currency will have an effect on return-on-capital ratios (because the same exchange rate is not used for the income statement as for the balance sheet) and on the net income reported (when the differences recognised in OCI are reclassified in profit or loss). Bearing that in mind, clarification has been sought from the IFRIC as to whether a hedge of the functional currency/presentation currency exchange rate would be eligible for hedge accounting.

- 6 IFRIC 16 makes it clear that such hedges would not be eligible for hedge accounting.

Clarification 2—When there are immediate, intermediate and ultimate parent entities, which exchange rates represent hedgeable risks?

- 7 In a very simple group there might be only one parent company and one subsidiary. In that structure it is easy to see that, if the parent wishes to hedge its net investment in the subsidiary, the hedgeable risk is the foreign currency exposure arising between the functional currency of the subsidiary and the functional currency of the parent. However, the IASB has been asked to clarify which exchange rates are hedgeable risks under IAS 39 when intermediate parent entities are involved. For example, assume that the ultimate parent in a group has a functional currency of Euros, its subsidiary has a functional currency of UK£, and that subsidiary (the foreign operation) has a functional currency of US\$. The IFRIC was asked to clarify whether, if the ultimate parent wished to hedge the net investment in the foreign operation and get hedge accounting treatment for that hedge in its consolidated financial statements, is the only hedgeable foreign currency risk the €/£ exchange rate or could, for example, the £/\$ rate risk also be hedged?
- 8 IFRIC 16 makes it clear that hedge accounting is available for any hedge of the foreign currency exposure arising between the functional currency of the foreign operation and the functional currency of any parent entity (the immediate, intermediate or ultimate parent), as long as in any set of financial statements, the net investment in the foreign operation is hedged only once. In other words, in our example the ultimate parent could hedge the €/£ exchange rate; but it could also hedge the £/\$ exchange rate, which is the exchange risk to which the intermediate parent entity is exposed.

Clarification 3—Does it matter, for hedge accounting purposes, which entity is holding the hedging instrument being used to hedge a net investment in a foreign operation?

- 9 It is common for international groups to have a central treasury function that is responsible for managing the currency risks that arise throughout the group. Such functions are often placed within separate legal entities. Although such central treasury function companies typically do not have investments in foreign operations, they often hold the hedging instruments that are used to hedge the group's net investments in such operations. IFRIC has been asked whether such hedges are eligible for hedge accounting. Or, put more generally, whether it matters, for hedge accounting purposes, which entity is holding the hedging instrument being used to hedge a net investment in a foreign operation?
- 10 IFRIC 16 makes it clear that it does not matter which entity within the group holds the hedging instrument as long as the hedging instrument is effective in offsetting the risk arising from the exposure to the functional currency of the foreign operation and the functional currency of the specified parent entity, except that the hedging instrument cannot be held by the foreign operation that is being hedged.

Clarification 4—What amounts should be reclassified from OCI to profit or loss as reclassification adjustments on disposal of the foreign operation?

- 11 As already explained, IAS 21 requires certain exchange differences to be presented initially in OCI. Similarly, IAS 39 requires the exchange differences arising on the

hedging instrument used to hedge a net investment in a foreign operation and on the net investment itself to be presented initially in OCI (in the so-called 'foreign currency reserve'). IAS 21 requires that, on disposal of a foreign operation, the cumulative amount of the exchange differences presented in the foreign currency reserve for that foreign operation to be reclassified (ie recycled) to profit or loss.

- 12 There are broadly speaking two different ways of preparing the consolidated financial statements of a group that has intermediate parent entities and subgroups. One way is to prepare first the consolidated financial statements for the lowest level of sub-group, then consolidate those financial statements into the consolidated financial statements at the next level up until consolidated financial statements for the ultimate parent entity are prepared. This is known as the step-by-step method. Under the alternative method (the direct method), no sub-consolidations are prepared and instead all the assets and liabilities of the group are recognised directly in the ultimate parent's consolidated balance sheet. The aggregate net amount of the foreign currency reserve would be the same under either of the consolidation methods. However, the amount included in the foreign currency translation reserve in respect of an individual foreign operation may be affected by the method of consolidation.
- 13 IFRIC 16 clarifies that:
 - (a) under existing IFRS, both methods of consolidation are acceptable and that, on disposal of a foreign currency, the exchange differences taken to the foreign currency reserve for that particular foreign operation under the method adopted should be reclassified to profit or loss; and
 - (b) existing IFRS permits a parent that has used the step-by-step method to determine the amount of the foreign currency reserve in respect of a foreign operation it has disposed of as if the direct method of consolidation had been used in order to reclassify the appropriate amount to profit or loss. However, making such an adjustment to the amount that would otherwise be reclassified is not required. It is an accounting policy choice that should be followed consistently for disposal of all net investments.

APPENDIX 2

EFRAG'S TECHNICAL ASSESSMENT OF IFRIC 16

In its comment letters to the IASB, EFRAG points out that such letters are submitted in EFRAG's capacity as a contributor to the IASB's due process. They do not necessarily indicate the conclusions that would be reached by EFRAG in its capacity as adviser to the European Commission on endorsement of the final IFRS or Interpretation on the issue.

In the latter capacity, EFRAG's role is to make a recommendation about endorsement based on its assessment of the final IFRS or Interpretation against the European endorsement criteria, as currently defined. These are explicit criteria which have been designed specifically for application in the endorsement process, and therefore the conclusions reached on endorsement may be different from those arrived at by EFRAG in developing its comments on proposed IFRSs or Interpretations. Another reason for a difference is that EFRAG's thinking may evolve.

- 1 When evaluating IFRIC 16, EFRAG asked itself four questions:
 - (a) Is there an issue that needs to be addressed?
 - (b) If there is an issue that needs to be addressed, is an Interpretation an appropriate way of addressing it?
 - (c) Is IFRIC 16 a correct interpretation of existing IFRS?
 - (d) Does the accounting that results from the application of the IFRIC meet the criteria for EU endorsement?

IS THERE AN ISSUE THAT NEEDS TO BE ADDRESSED?

- 2 EFRAG understands from its discussions and consultations that there are some aspects of the existing hedge accounting requirements for hedges of net investments in foreign operations that are not clear and that there is consequently uncertainty as to the accounting required. Those areas include the issues addressed in IFRIC 16. As a result, EFRAG believes IFRIC 16 *is* addressing issues that need to be addressed.

IS AN INTERPRETATION AN APPROPRIATE WAY OF ADDRESSING IT?

- 3 EFRAG believes that an interpretation is an appropriate way of addressing issues that arise from a lack of clarity as long as that lack of clarity is not caused by inconsistencies between standards, in which case amendments to one or more standards are required.
- 4 In this case it has been suggested by some that one of the reasons for the existing lack of clarity is that there are inconsistencies between IAS 21 *Effects of Changes in Foreign Exchange Rates* and IAS 39 *Financial Instruments: Recognition and Measurement*. EFRAG does not believe that such inconsistencies exist; there are merely areas that lack clarity. It therefore believes that an interpretation is appropriate way of addressing the issues raised in IFRIC 16.

IS IFRIC 16 A CORRECT INTERPRETATION OF EXISTING IFRS?

5 As explained in Appendix 1, IFRIC 16 focuses broadly speaking on four issues.

Clarification 1—When an entity has a presentation currency that is different from its functional currency, do the foreign exchange differences that arise represent a hedgeable risk?

6 As explained in Appendix 1, under IAS 21 an entity has a free choice as to the currency in which it presents its financial statements (the presentation currency) even though the currency chosen will have an effect on return on capital ratios and on the actual result reported. However, there is some uncertainty as to whether, if an entity hedged the exchange rate 'risk' arising from having a presentation currency that is different from its functional currency, those hedges are eligible for hedge accounting.

7 IFRIC 16 states that such hedges are not eligible for hedge accounting. The IFRIC's reasoning is that hedge accounting is available only for hedges of risks that have a real economic effect on the reporting; presenting amounts in a presentation currency is merely a numerical convention necessary for the preparation of financial statements that include a foreign operation and will have no economic effect on the parent entity.

8 EFRAG believes this is a correct interpretation of existing IAS 39. That is because IAS 39 requires that, for a hedge to be eligible for hedge accounting, it must, inter alia, be a hedge of an exposure to changes in fair value or to variability in cash flows; and a hedge of the exchange rate 'risk' arising from having a presentation currency that is different from the functional currency is neither.

Clarification 2—When there are immediate, intermediate and ultimate parent entities, which exchange rates represent hedgeable risks?

9 In some groups a particular subsidiary might have an immediate parent, an intermediate parent and an ultimate parent. There is some uncertainty as to which exchange rate exposures are hedgeable risks in such circumstances. In particular, existing IFRS is not clear whether the only hedgeable risk from the ultimate parent's perspective is the foreign currency exposure arising between the functional currency of the foreign operation and the functional currency of the immediate parent, or whether exposures arising from the functional currencies of the other parents (including the ultimate parent) are relevant.

10 IFRIC 16 clarifies that the fact that the net investment is held through an intermediate parent does not affect the nature of the exchange rate risk arising for an intermediate or ultimate parent entity. Hedge accounting is available for any hedge of the foreign currency exposure arising between the functional currency of the foreign operation and the functional currency of any parent entity (the immediate, intermediate or ultimate parent), as long as in any set of financial statements, the net investment in the foreign operation is hedged only once.

11 The IFRIC's reasoning is that, when the foreign currency exposure of a net investment in a foreign operation is different from the functional currency of the holder of that net investment (whether it be an immediate parent, an intermediate parent or an ultimate parent), there is a hedgeable risk. The immediate parent entity is exposed to changes in the exchange rate of its directly held foreign operation's functional currency. However, indirectly every entity up the chain of

entities to the ultimate parent entity is also exposed to changes in the exchange rate of the foreign operation's functional currency.

- 12 EFRAG believes that this is a reasonable interpretation of existing IFRS. It also notes, as the Basis for Conclusions to IFRIC 16 itself explains, that, if existing IFRS permitted the ultimate parent entity to hedge only the exchange rate differences that arise between the ultimate parent's functional currency and the foreign operation's functional currency, it would mean that a hedge taken out by an intermediate parent entity to hedge its net investment in the foreign operation would have to be ignored in the ultimate parent entity's consolidated financial statements. Conversely, permitting only the immediate parent entity to undertake a net investment hedge would imply that an indirect investment does not create a foreign currency exposure for that indirect parent entity. Under IFRIC 16, hedging activity undertaken at the different parent levels is reflected in the ultimate parent entity's consolidated financial statements.

Clarification 3—Does it matter, for hedge accounting purposes, which entity is holding the hedging instrument being used to hedge a net investment in a foreign operation?

- 13 In a number of international groups it is common for the hedging instruments used to hedge net investments in foreign operations to be held by an entity that does not itself have the net investment being hedged. There is a difference of view as to how existing IFRS are to be applied in such circumstances.
- 14 IFRIC 16 clarifies that it does not matter which entity within the group holds the hedging instrument as long as the hedging instrument is effective in offsetting the risk arising from the exposure to the functional currency of the foreign operation and the functional currency of the specified parent entity, except that the hedging instrument cannot be held by the foreign operation that is being hedged. For the purpose of assessing effectiveness, the change in value of the hedging instrument in respect of foreign exchange risk is computed by reference to the functional currency of the parent entity against whose functional currency the hedged risk is measured, in accordance with the hedge accounting documentation. Depending on where the hedging instrument is held, in the absence of hedge accounting the total change in value might be recognised in profit or loss, in other comprehensive income, or both. However, the assessment of effectiveness is not affected by whether the change in value of the hedging instrument is recognised in profit or loss or in other comprehensive income. As part of the application of hedge accounting, the total effective portion of the change is included in other comprehensive income. The assessment of effectiveness is not affected by whether the hedging instrument is a derivative or a non-derivative instrument or by the method of consolidation and the functional currency of the entity holding the instrument is irrelevant in determining effectiveness.
- 15 In summary, the IFRIC's reasoning is as follows:
- (a) The foreign operation being hedged could not hold the hedging instrument because that instrument would be part of, and denominated in the same currency as, the net investment it was intended to hedge.
 - (b) There is some existing implementation guidance (Question F.2.14 in the guidance on implementing IAS 39) that states that "IAS 39 does not require that the operating unit that is exposed to the risk being hedged be a party to the hedging instrument."

- (c) The IASB concluded, when revising IAS 21 in 2005, that the reporting entity in a set of consolidated financial statements is the group rather than the individual entity and that the net investment must be viewed from the perspective of the group. It follows, therefore, that the group's net investment in any foreign operation, and its foreign currency exposure, can be determined only at the relevant parent entity level. The IFRIC has similarly concluded that the fact that the net investment is held through an intermediate entity does not affect the economic risk. Consistent with this, monetary items (or derivatives) that are hedging instruments in a hedge of a net investment may be held by any entity within the group and the functional currency of the entity holding the monetary items can be different from those of either the parent or the foreign operation. A hedging item denominated in a currency that is not the functional currency of the entity holding it does not expose the group to a greater foreign currency exchange difference than arises when the instrument is denominated in that functional currency.
- (d) When determining the effectiveness of a hedging instrument in the hedge of a net investment, an entity computes the gain or loss on the hedging instrument by reference to the functional currency of the parent entity against whose functional currency the hedged risk is measured, in accordance with the hedge documentation. This ensures that the effectiveness of the instrument is determined on the basis of changes in fair value or cash flows of the hedging instrument, compared with the changes in the net investment as documented. Thus, any effectiveness test is not dependent on the functional currency of the entity holding the instrument. In other words, the fact that some of the change in the hedging instrument is recognised in profit or loss by one entity within the group and some is recognised in other comprehensive income by another does not affect the assessment of hedge effectiveness.
- 16 EFRAG believes this is a reasonable interpretation of existing IFRS. IFRIC 16's conclusions that the hedging instrument can be held by any entity in the group and that the foreign currency is determined at the relevant parent entity level have implications for the designation of hedged risks and make it possible for an entity to designate a hedged risk that is not apparent in the currencies of the hedged item or the foreign operation. In effect, IFRIC 16 allows currency exposures arising on a net investment in a foreign operation to be 'passed up' through the group, which enables entities to apply hedge accounting in those circumstances where the group has offsetting foreign currency exposures. EFRAG notes that this approach to designating risks is considered acceptable only for hedges of net investments, and IFRIC 16 states that it should not be applied by analogy to other types of hedge accounting.

Clarification 4—What amounts should be reclassified from OCI to profit or loss as reclassification adjustments on disposal of the foreign operation?

- 17 Existing IFRS requires certain exchange differences arising in respect of a net investment in a foreign operation to be presented initially in the OCI and, if and when that foreign operation is disposed of, the cumulative amount of those exchange differences should then be reclassified to profit or loss. However, the amount of exchange differences initially presented in OCI for a particular foreign operation (but not for the reporting entity's foreign operations in total) will differ depending on whether the step-by-step method of consolidation or the direct method of consolidation has been used. As a result, there is some uncertainty as to what amount should be reclassified when a foreign operation is disposed of.

- 18 IFRIC 16 acknowledges that the two methods of consolidation will have the effect described in the preceding paragraph, and it confirms that both methods are nevertheless acceptable under existing IFRS. That means that the amount reclassified from the OCI or foreign currency reserve to profit or loss on the disposal of a foreign operation could vary depending on the consolidation method used. However, IFRIC 16 also makes it clear that existing IFRS does not preclude a parent entity from determining the amount of the foreign currency reserve in respect of a foreign operation it has disposed of as if the direct method of consolidation had been used (even though the step-by-step method has been used until then) for the purpose of reclassifying amounts to profit or loss. Making such an adjustment to the amount that would otherwise be reclassified is not though required. Whether such an adjustment is made is an accounting policy choice that should be followed consistently for disposal of all net investments, irrespective of whether hedge accounting is applied or not.
- 19 EFRAG believes this clarification is a correct interpretation of existing IFRS.

Overall conclusion

- 20 Therefore, for the reasons set out above, EFRAG believes that IFRIC 16 is a reasonable interpretation of existing IFRS.

DOES THE ACCOUNTING THAT RESULTS FROM THE APPLICATION OF IFRIC 16 MEET THE CRITERIA FOR EU ENDORSEMENT?

- 21 Finally, EFRAG asked itself whether it believed that the information resulting from the application of IFRIC 16 would meet the criteria for EU endorsement; in other words, that:
- (a) it is not contrary to the 'true and fair principle' set out in Article 16(3) of Council Directive 83/349/EEC and Article 2(3) of Council Directive 78/660/EEC; and
 - (b) it meets the criteria of understandability, relevance, reliability and comparability required of the financial information needed for making economic decisions and assessing the stewardship of management.

EFRAG also considered whether it would be in the European interest to adopt the Interpretation.

- 22 A key issue for EFRAG in considering whether IFRIC 16 meets the above criteria was that it has previously concluded that IAS 21 and IAS 39 (as amended for adoption in the EU)¹ meet the criteria. As discussed in the previous section, EFRAG believes that IFRIC 16 is a reasonable interpretation of that existing IFRS.

Relevance

- 23 According to the IFRS Framework, information has the quality of relevance when it influences the economic decisions of users by helping them to evaluate past, present or future events or confirming, or correcting, their past evaluations. EFRAG has therefore considered whether IFRIC 16 would result in the provision of relevant

¹ The fact that material in IAS 39 was omitted from the text that was endorsed for use in the EU is of no relevance to our discussion of IFRIC 16.

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information; in other words, information that has predictive value, confirmatory value or both.

- 24 EFRAG is not aware of any reason to believe that some or all of the information that results from the application of IFRIC 16 is not relevant, or that IFRIC 16 results in relevant information being omitted. In EFRAG's view, IFRIC 16 merely seeks to clarify the application of existing requirements that have been judged to meet the relevance criteria.

Reliability

- 25 The Framework explains that information has the quality of reliability when it is free from material error and bias, can be depended upon by users to represent faithfully what it either purports to represent or could reasonably be expected to represent, and is complete within the bounds of materiality and cost. EFRAG has therefore considered whether information resulting from the application of IFRIC 16 exhibits those qualities.
- 26 EFRAG believes that it does, in that IFRIC 16 merely seeks to clarify the application of existing requirements that have been judged to meet the reliability criteria and, as far as EFRAG can judge, does not raise any additional reliability concerns of its own.

Comparability

- 27 The notion of comparability requires that like items and events are accounted for in a consistent way through time and by different entities, and that unlike items and events should be accounted for differently.
- 28 In EFRAG's view, IFRIC 16 enhances the comparability of the information provided by eliminating some of the uncertainty that currently exists about the application of existing IFRS, which will result in a reduction in the diversity of current practice.
- 29 The one area where this is not the case is in the transitional provisions, which require the clarifications to be applied prospectively. (The effective date is annual periods beginning on or after 1 October 2008.) EFRAG believes that, as a matter of principle, it is invariably preferable to apply changes in standards and clarifications retrospectively—because retrospective application does not raise comparability issues. However, when changes or clarifications concern hedge accounting requirements, it could be very burdensome to apply the change or clarification retrospectively, and the fact that the hedge accounting requirements preclude entities from redesignating hedge relationships in the past periods can have other implications for the quality of the information provided. Therefore, EFRAG concluded that it is acceptable in this case for the changes and clarifications in IFRIC 16 to be applied prospectively.

Understandability

- 30 The notion of understandability requires that the financial information provided should be readily understandable by users with a reasonable knowledge of business and economic activity and accounting and the willingness to study the information with reasonable diligence.
- 31 Although there are a number of aspects to the notion of 'understandability', EFRAG believes that most aspects are covered by the discussion above about relevance,

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reliability and comparability because information that, for example, represents something as similar when it is in fact dissimilar is not understandable. The one aspect of understandability that EFRAG believes is not covered involves the complexity of the information provided and of the methodologies underlying the information. EFRAG's initial assessment is that the clarifications in IFRIC 16 do not add to the complexities that already exist.

True and Fair

- 32 Having concluded that the information that results from the application of IFRIC 16 will meet the criteria of relevance, reliability, comparability and understandability and being unaware of any other reason to be concerned about the accounting effect of the Interpretation, EFRAG sees no reason to believe that it is inconsistent with the true and fair view requirement.

European Interest

- 33 EFRAG has considered whether the benefits of implementing IFRIC 16 in the EU exceed the costs of doing so. Its initial assessment (as explained more fully in Appendix 3) is that, although implementation of IFRIC 16 would involve some costs, they are likely to be very insignificant and to be outweighed by the benefits.

Conclusion

- 34 EFRAG's overall conclusion is that IFRIC 16 satisfies the criteria for EU endorsement and EFRAG should therefore recommend its endorsement.

APPENDIX 3

EFRAG'S EVALUATION OF THE COSTS AND BENEFITS OF IFRIC 16

- 1 EFRAG has also considered whether, and if so to what extent, implementing IFRIC 16 in the EU might involve preparers and users incurring incremental costs, and whether those costs are likely to be exceeded by the benefits from its adoption.

Costs for preparers

- 2 EFRAG's initial assessment is that:
 - (a) clarification 1 will not involve preparers in any incremental year one or ongoing costs, except that those needing to change their existing practice will probably need to incur what EFRAG believes an insignificant amount of year one costs to amend their procedures;
 - (b) clarifications 2 and 3 will bring financial reporting closer to the hedging practices of a number of multinational groups, EFRAG anticipates that entities will already have systems in place—or those systems will require insignificant changes—to enable entities to apply the requirements of the Interpretation. It follows that it will involve preparers in insignificant incremental year one costs and no ongoing costs; and
 - (c) EFRAG's initial assessment is that clarification 4 will not involve preparers in any incremental year one or ongoing costs, except that—as with clarification 1—those needing to change their existing practice will probably need to incur what EFRAG believes an insignificant amount of year one costs to amend their procedures.
- 3 As IFRIC 16 is to be applied prospectively, there will be no year one transitioning costs.

Costs for users

- 4 EFRAG is not aware of any aspect of IFRIC 16 that will increase the costs users will incur in analysing the financial statements. Its initial assessment is therefore that it will not involve users in any incremental year one or ongoing costs.

Benefits for preparers and users

- 5 In EFRAG's view, IFRIC 16 will enhance the comparability of the information provided by eliminating some of the uncertainty that currently exists about the application of existing IFRS. This will result in a reduction in the diversity of current practice.

Overall assessment

- 6 EFRAG's assessment is that, although this will not result in major benefits, the benefits that will arise are likely to exceed the very insignificant costs that are likely to result from its implementation in the EU.