

INVITATION TO COMMENT ON EFRAG'S INITIAL ASSESSMENTS ON DISCLOSURE INITIATIVE - AMENDMENTS TO IAS 7

Comments should be submitted by 13 May 2016 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 *Disclosure Initiative - Amendments to IAS 7* ('the Amendments'). In order to do so, EFRAG has been carrying out an assessment of the 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 amended to reflect EFRAG's decisions on Appendix 2 and 3 of the accompanying *Draft 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:

BASF SE

- (b) Are you a:

Preparer User Other (please specify)

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

Chemicals

- (d) Country where you are located:

Germany

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

Roland.brockmann@basf.com

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

2 EFRAG's initial assessment of the Amendments is that they meet the technical criteria for endorsement. In other words, the Amendments are not contrary to the principle of true and fair view; meet the criteria of understandability, relevance, reliability and comparability; and do not affect prudence. 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 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 Amendments 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 Appendix 3, paragraphs 3 to 5). To summarise, EFRAG's initial assessment is that the Amendments are likely to improve the quality of financial reporting.

Do you agree with this assessment?

Yes No

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

It is understood that the amendment aims at more transparency concerning financial items which by itself would increase the quality of financial reporting. We deem it more beneficial to find a commonly agreed definition of debt than to borrow the definition of financing activities from IAS 7 (also, see Basis for Conclusion Amendment IAS 7).

Also, we deem it more beneficial to have a more clear-cut definition of affected balance sheet items and categories of non-cash effect.

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 7 to 14 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 a significant increase in costs for preparers or users.

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?

In our view, this will highly depend on the existing technical architecture; the implementation may require more advanced systems especially to track/categorize non-cash effects, which would lead to additional cost.

- 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 paragraphs 15 to 20 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 both users and preparers are likely to benefit from the Amendments, as they will result in the provision of relevant and understandable information.

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?

Benefit for users: While we see that more transparency can lead to more benefits, we also believe that the amendment at hand asks for comparably specific information which are not relevant for every user of financial statements.

Benefit for preparer: We believe that any preparer who needs such a reconciliation probably has already implemented it for internal use. Also, the benefit of publishing such a reconciliation will be marginal for a preparer.

- 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?

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Other factors

- 8 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 Appendix 3, paragraph 25).

Do you agree with this conclusion?

Yes No

If you do not agree, please explain your reasons.