

EFRAG
35 Square de Meeus
1000 Brussels
Belgium

18 November 2011

By e-mail: Commentletter@efrag.org

Dear Sir/Madam,

EFRAG Draft Comment Letter: IASB Agenda Consultation 2011

The Accounting Standards Committee set up by "FSR – danske revisorer" (The Institute of Danish Public Accountants) has discussed the IASB Agenda Consultation and the EFRAG Draft Comment Letter during several meetings this autumn.

In general, we fully support the EFRAG Draft Comment Letter.

We welcome very much the Agenda Consultation in which the IASB for the first time decided to collect views in a broad public consultation amongst constituents and other interested parties on the future agenda. We also very much welcome the outreach activities on this issue. We were co-organiser of the Outreach Event in Copenhagen which took place on 31 October 2011.

Not least in the aftermath of the financial crises, we find that more transparent and high quality financial reporting – and the setting of appropriate accounting standards – play a very important role in the efforts to restore and strengthen confidence in the financial markets.

We fully support the main messages in the EFRAG Draft Comment Letter, i.e.

- the need for a period of calm during which, however, the four major outstanding projects should be finalised (financial instruments, revenue recognition, leases and insurance contracts),
- the need for ensuring evidence based agenda priorities,
- that detailed project proposals should be subject to public consultation before a new project is started,
- that focus should be on adoption, implementation and post implementation reviews of existing IFRS standards and ensuring the consistency and quality of application of existing IFRS standards rather than pursuing the objective of convergence,

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- that the Conceptual Framework should be finalised as a priority probably through prioritising targeted improvements,
- that a comprehensive Disclosure Framework should be developed as a high priority in cooperation between IASB and EFRAG and national standard setters and bodies who have already worked on this topic – including criteria for inclusion and exclusion of information in the notes or elsewhere in the financial statements.

Side 2

We would further like to mention that the efforts to simplify existing standards should continue and that promoting research in fundamental as well as upcoming new accounting issues is very important. In respect of the latter, we find that the IASB should consider cooperating with the academic community given the scarce resources of the IASB.

On the topics of CSR reporting and Integrated Reporting we would prefer if the IASB undertook a more active role in future rather than merely monitoring the development. It is our impression that several stakeholders and companies have shown - and will show - interest in the developing of financial reporting to comprise also other aspects beyond those underlying financial items.

Regarding the question on which projects Danish constituents find the most important, we refer to the discussions which took place during the EFRAG/IASB Outreach Event in Copenhagen on 31 October 2011.

A quick survey among participants in the Outreach Event in Copenhagen indicated the following most important respectively least important issues from our point of view:

Most important	Least important
Financial statement presentation	Agriculture
Presentation and disclosure standard	Islamic transactions and instruments
Conceptual framework	Inflation
Liabilities	Rate-regulated activities
Business combinations under common control	Country-by-country reporting
Financial instruments with characteristics of equity	

On strategic priorities the survey indicated that resources in the next three years should be dedicated to Disclosure Framework and Conceptual Framework rather than developing new standards.

We would be happy to elaborate further on our comments should you wish so.

Kind regards

Jan Peter Larsen
chairman of the Danish
Accounting Standards Committee

Ole Steen Jørgensen
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