



International Accounting Standards Board  
30 Cannon Street  
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United Kingdom

Cc  
Efrag

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Exposure Draft ED/2018/1  
**Accounting policy changes**

Representing preparers' point of view, the Swedish Enterprise Accounting Group (SEAG) welcomes the opportunity to comment on the Exposure Draft (ED).

In brief, we don't agree with the Boards' proposal to add the definition of an Agenda Decision in IAS 8 and to introduce a specific threshold for voluntary policy changes following such decisions. In our opinion, all material policy changes should be accounted for alike.

We believe it is contradictory to state that agenda decisions are non-authoritative and yet prescribe a specific accounting treatment for policy changes following such decisions. We are concerned that the proposed amendments may in practice be understood as agenda decisions are an integrated part of the IFRS, but without equivalent due process.

Yours sincerely,

CONFEDERATION OF SWEDISH ENTERPRISE

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*The Swedish Enterprise Accounting Group (SEAG) represents more than 40 international industrial and commercial groups, most of them listed. The largest SEAG companies are active through sales or production in more than 100 countries.*

## Appendix

Comments on the specific questions posed in the ED.

**1. Proposed introduction of a new threshold for voluntary changes in accounting policy that result from an agenda decision published by the IFRS IC.**

Although we appreciate the aim to make policy changes following agenda decisions easier to account for, we don't agree with introducing the proposed threshold. As stated above, this may be interpreted as agenda decisions are an integrated part of IFRS. We believe that all material policy changes should be accounted for alike.

**2. The Board's considerations in respect of not amending IAS 8 to address the timing of applying a change in accounting policy that results from an agenda decision published by the IFRS IC.**

We believe that the explanations are contradictory. It is stated that agenda decisions are non-authoritative – yet there seem to be a need for clarify the timing of an accounting change following such a decision. However, if the proposed amendments of IAS 8 are issued the considerations in BC 18-22 may be of some help for entities that are concerned about the timing of applying an accounting policy change following an agenda decision.