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Our Ref: : RJ-EFRAG 555A
Date : Amsterdam, March 12th 2013
Re : Comment on draft comment letter Exposure Draft “Recoverable amount disclosures for non-financial assets (proposed amendments to IAS 36)”

Dear members of the EFRAG Technical Expert Group,

The Dutch Accounting Standards Board (DASB) appreciates the opportunity to respond on your draft comment letter Exposure Draft “Recoverable amount disclosures for non-financial assets (proposed amendments to IAS 36)”.

We also agree with the proposed amendments of the Exposure Draft and with your comment on the fatal flaw review process. We have decided to refer to your draft comment letter in our comment letter to the IASB, with an additional comment, which we also like to bring to your attention.

We ask the IASB to reconsider whether it is necessary at this time to increase the disclosure requirements under IAS 36 with the aim of consistency with IFRS 13 – Fair value measurement. We consider that, in principle, consistency within IAS 36 is more important. The proposals would greatly increase the required disclosures if an impairment loss were calculated by reference to fair value less costs of disposal rather than value-in-use. We also note that the proposed requirements exceed those in IFRS 13 for fair value measurements categorised within level 2 of the fair value hierarchy. Overall we suggest that the IASB first assesses the results from its Discussion Forum: Disclosures in Financial Reporting, before these type of amendments are made to existing standards.

Yours sincerely,



Hans de Munnik
Chairman Dutch Accounting Standards Board