



12 May 2019

EFRAG
35 Square de Meeûs
B-1000 Brussels
Belgium

Dear Sir/Madam

Discussion Paper: Non-exchange transfers

Norsk RegnskapsStiftelse (the Norwegian Accounting Standards Board – the NASB) is pleased to respond to your invitation to comment on the Discussion Paper *Non-exchange transfers: A role for societal benefit?*

The NASB finds the discussion in the Discussion Paper relevant and interesting. We appreciate the EFRAG's attempt to develop a framework that will improve the consistency in recognising non-exchange transfers. However, we do not fully agree with the scope. In our opinion, important topics such as income taxes should be included in the development of such a framework as we believe that the very different treatment of a tax imposed based on an expression of a net result compared to a tax imposed on any other basis is one of the most challenging elements in the area of non-exchange transfers. Further, we expect the treatment of levies as regulated in IFRIC 21 to be reassessed as part of the IASB project on provisions, which we expect to be a faster route to reconsidering the regulation. We assume that much work is still to be conducted to complete a framework, and, as we perceive the issues covered in this document less pressing than some other issues where work is planned or ongoing, we are not convinced that the EFRAG should prioritise further development of the framework.

You are welcome to contact us if you would like to discuss our response further.

Yours faithfully,

Karina Vasstveit Hestås
Chair of the Technical Committee on IFRS of Norsk RegnskapsStiftelse