

INVITATION TO COMMENT ON EFRAG'S ASSESSMENTS ON ANNUAL IMPROVEMENTS TO IFRS STANDARDS CYCLE 2015-2017

1. Introduction

EFRAG has been asked by the European Commission to provide it with advice and supporting material on *Annual Improvements to IFRS Standards Cycle 2015-2017* ('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.

Comments should be submitted by 26 February 2018.

EFRAG's initial assessments, summarised in this questionnaire, will be updated for comments received from constituents when EFRAG is in the process of finalising its *Letter to the European Commission* regarding endorsement of the Amendments.

2. Your details

Name (if you are responding on behalf of an organisation or company, its name):	Please provide a short description of your activity:
Uniper SE	Uniper is a leading international energy company with operations in more than 40 countries and around 13,000 employees. Uniper's business is to provide a reliable supply of energy and related services. Its main operations include power generation in Europe and Russia and global energy trading. Its headquarters are in Düsseldorf, Germany.

Email

joerg.wallbaum@uniper.energy

You are a:

Preparer

Country:

Germany

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

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 and meet the criteria of understandability, relevance, reliability, comparability and lead to prudent accounting. EFRAG's reasoning is set out in Appendix 2 of the accompanying *Draft Letter to the European Commission* regarding endorsement of the Amendments.

Do you agree with this assessment?

Yes

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?

No

4. The European public good

In its assessment of the impact of the Amendments on the European public good, EFRAG has considered a number of issues that are addressed in Appendix 3 of the accompanying *Draft Letter to the European Commission* regarding endorsement of the Amendments.

4.1 Improvement in financial reporting

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 improvement over current requirements across the areas which have been subject to changes (see paragraphs 3 to 4 of Appendix 3 of the accompanying *Draft Letter to the European Commission*). To summarise, EFRAG's initial assessment is that the Amendments may provide some improvements to the quality of financial reporting, although, they may not eliminate all sources of diversity under certain conditions.

Do you agree with this assessment?

Yes

4.2 Cost and benefits

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 5 to 8 of Appendix 3 of the accompanying *Draft Letter to the European Commission* regarding endorsement of the Amendment. To summarise, EFRAG's initial assessment is that the benefits to be derived from implementing the Amendments in the EU are likely to outweigh any cost involved both for preparers and users.

Do you agree with this assessment?

Yes

4.3 Overall assessment with respect to the European public good

EFRAG has initially concluded that endorsement of the Amendments would be conducive to the European public good (see paragraphs 9 to 12 of Appendix 3 of the accompanying *Draft Letter to the European Commission*).

Do you agree with this conclusion?

Yes

5. Review your response

Do you want to review your response before submitting?

Yes

Thank you for your comments. Your response is very important to us.