

INVITATION TO COMMENT ON EFRAG'S ASSESSMENTS ON Prepayment Features with Negative Compensation (Amendments to IFRS 9)

Comments should be submitted by 2 November 2017 by using the '[Express your views](#)' page on EFRAG website or by clicking [here](#)

EFRAG has been asked by the European Commission to provide it with advice and supporting material on *Prepayment Features with Negative Compensation (Amendments to IFRS 9)* ('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.

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.

Your details

1 Please provide the following details:

- (a) Your name or, if you are responding on behalf of an organisation or company, its name:

BASF SE

- (b) Are you a:

Preparer User Other (please specify)

- (c) Please provide a short description of your activity:

Development of implementation concept for IFRS 9

- (d) Country where you are located:

Germany

- (e) Contact details, including e-mail address:

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

2 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 no issues have been identified that would affect 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.

(a) Do you agree with this assessment?

Yes No

If you do not agree, please provide your arguments and what you believe the implications of this could be for EFRAG's endorsement advice.

(b) 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? If there are, what are those issues and why do you believe they are relevant to the evaluation?

For the assessment of the amendments, EFRAG considered numerous criteria derived from the overall objectives of providing decision-useful information and assessing stewardship. In principle, we agree with this approach. However, we share the opinion that the definition of relevance should be altered: Currently, EFRAG considers information to be relevant when it influences the economic decisions of users or when it assists users in evaluating the stewardship of management (see Appendix 2, paragraph 6). From our viewpoint, relevance should focus on informational value which is in line with the current IASB Framework. In this context, we would like to point out that from a theoretical perspective, information not only has informational value when it actually influences economic decisions made by users of financial statements. Instead, information is also considered to have informational value when it is capable of influencing economic decisions made by the users of financial statements. Thus, information should be considered relevant when it is capable of influencing economic decisions. The current definition of relevance applied by EFRAG requires knowledge about the information available to users in each case. However, referring to the capability of influencing economic decisions when assessing relevance does not require this knowledge.

With regard to the amendments under consideration, we see a need to additionally consider the implications of differing effective dates for IFRS 9 and the amendments on comparability. Allowing for differentiated treatment of financial assets including prepayment features with negative compensation until January 1, 2019, clearly reduces comparability of financial statement information across different entities. As a result, this reduces decision usefulness and the ability to assess stewardship – but only for one year and will not have an effect in periods after January 1, 2019.

The European public good

- 3 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.

Improvement in financial reporting

- 4 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 an improvement over current requirements across the areas which have been subject to changes (see paragraphs 3 to 6 of Appendix 3 of the accompanying *Draft Letter to the European Commission*). To summarise, EFRAG's initial assessment is that the Amendments are likely to improve the quality of financial reporting.

Do you agree with the assessment?

Yes No

If you do not agree, please provide your arguments and indicate how this could affect EFRAG's endorsement advice.

Costs and benefits

- 5 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 8 to 17 of Appendix 3 of the accompanying *Draft Letter to the European Commission* regarding endorsement of the Amendments. To summarise, EFRAG's initial assessment is the one-off and ongoing costs for preparers are not expected to be significant. Also, EFRAG expects users to incur a one-off cost of understanding the change, but not to incur further ongoing costs.

Do you agree with this assessment?

Yes No

If you do not, please explain why you do not and (if possible) explain broadly what you believe the costs involved will be?

EFRAG currently expects that costs resulting from the application of the amendments will be insignificant for preparers that apply the amendments at the

*Prepayment Features with Negative Compensation (Amendments to IFRS 9)
Invitation to Comment on EFRAG's Initial Assessments*

same time as IFRS 9, because affected entities already have the necessary information for application (see paragraph 10 of Appendix 3). In addition to the arguments made by EFRAG, it should be considered that the effort of implementing IFRS 9 has already been exercised in many corporations, particularly larger corporations. Revising guidance on IFRS 9 requires those corporations to change accounting practices established for its implementation. Therefore, additional effort must be expected, which may in turn lead to not insignificant costs. However, we share EFRAG's viewpoint that preparers benefit from the amendments, as it simplifies the interpretation of IFRS 9.

- 6 In addition, EFRAG is assessing the benefits that are likely to be derived from the Amendments. The results of the initial assessment of benefits are set out in paragraph 18 to 20 of Appendix 3 of the accompanying *Draft Letter to the European Commission* regarding endorsement of the Amendments. To summarise, EFRAG's initial assessment is that the Amendments are designed to address the concerns of some interested parties on how IFRS 9 classifies financial instruments with negative prepayment features. Also, users are expected to benefit from the Amendments, as the resulting information will likely increase comparability between entities.

Do you agree with this assessment?

Yes No

If you do not agree with this assessment, please provide your arguments and indicate how this could affect EFRAG's endorsement advice.

- 7 EFRAG's initial assessment is that the benefits from improved financial information being available on a more relevant, understandable and comparable basis to be derived from implementing the Amendments in the EU, as described in paragraph 6 above, are likely to outweigh the costs involved which are considered as insignificant, as described in paragraph 5 above.

Do you agree with this assessment?

Yes No

If you do not agree with this assessment, please provide your arguments and indicate how this could affect EFRAG's endorsement advice.

Overall assessment with respect to the European public good

- 8 EFRAG has initially concluded that endorsement of the Amendments would be conducive to the European public good (see paragraphs 22 to 25 of Appendix 3 of the accompanying *Draft Letter to the European Commission*).

Do you agree with this conclusion?

Yes No

If you do not agree, please explain your reasons.

Prepayment Features with Negative Compensation (Amendments to IFRS 9)
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