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Re: IASB ED/2019/6 *Disclosure of Accounting Policies*

Dear Jean-Paul,

We are pleased to have the opportunity to provide our comments on the EFRAG DCL on the Exposure Draft *Disclosure of Accounting Policies - Proposed amendments to IAS 1 and IFRS Practice Statement 2* (the 'ED').

We believe that providing guidance for identifying when an accounting policy is material and shall be disclosed could help entities in providing useful information to users.

We support the proposal included in the ED. In particular, we find useful the proposed list of examples, in which it is likely that information on accounting policies is material. However, we note that paragraph 117B(e) states that it is likely that an entity considers an accounting policy material if it applies the accounting policy in a manner that reflects the entity's specific circumstances. We think that this item is not useful, because entities always apply IFRS requirements in a way that reflects their specific circumstances.

Finally, regarding the proposed amendments to the Materiality Practice Statement, it could be helpful to include additional examples to illustrate situations where the information on the accounting policy is judged to be immaterial, although the accounting policies relates to material transactions. Indeed, these fact patterns seem to be those that require more judgement.

Should you need any further information, please do not hesitate to contact us.

Yours sincerely,

Angelo Casò
(Chairman)