

International Accounting Standards Board

RFR-rs 2021:08

Columbus Building,
7 Westferry Circus
Canary Wharf
London E14 4HD
United Kingdom

Third Agenda Consultation

Dear Trustees,

The Swedish Financial Reporting Board welcomes the opportunity to respond to your invitation to comment on the IASBs agenda for the forthcoming five-year period.

Initially, we would like to take the opportunity to underline our position that priority should be given to the formation of the ISSB and the development of IFRS Sustainability Standards. To achieve global convergence within the sustainability reporting area is an important and urgent matter, and to be successful we believe that a large portion of the Foundations attention and resources going forward need to be dedicated to this task.

Concerning the development of IFRS we believe that the IASB should identify those areas where it is most crucial to update the current standards. One such area is the recognition criteria in IAS 38, which don't fit some of the current project management approaches for internal development of intangible assets and fails to adequately reflect the value of software investments. Among the other potential projects mentioned in the consultation we believe that Variable and contingent considerations and Cryptocurrencies are of interest.

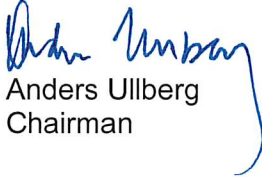
Finally, we would like to comment on the increasing activity of the IFRS IC and the growing significance of IFRS IC agenda decisions. We believe that the institutional environment surrounding financial reports, with a growing demand from auditors and enforcers to provide guidance in particular accounting regulatory issues, will create increasing challenges. However, the focus must be to identify major issues that can lead to amendments of existing standards otherwise the Agenda Decisions will challenge the principles based approach. We recommend the Board during the next period to address the question of how to achieve a long-term balance between a maintained principles-based approach and the growing demands from the institutional environment.

Rådet **för** **finansiell rapportering**

If you have any questions concerning our comments, please address our Executive member Carina Edlund by e-mail to: Carina.Edlund@radetforfinansiellrapportering.se.

Stockholm, 31 August 2021

Yours sincerely



Anders Ullberg
Chairman