

## INVITATION TO COMMENT ON EFRAG'S ASSESSMENTS ON COVID-19-RELATED RENT CONCESSIONS

Once filled in, this form should be submitted by 17 March 2021 using the 'Comment publication link' available at the bottom of the respective news item. All open consultations can be found on EFRAG's web site: [Open consultations: express your views.](#)

EFRAG has been asked by the European Commission to provide it with advice and supporting material on *Covid-19-Related Rent Concessions beyond 30 June 2021* ('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:

Autorité des Normes Comptables (ANC)

- (b) Are you a:

Preparer  User  Other (please specify)

Standard setter

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

French standard setter

- (d) Country where you are located:

France

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

5 Place des Vins-de-France, 75573 Paris cedex 12

**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 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.

(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?

**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 5 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.

*IASB ED Covid-19-Related Rent Concessions beyond 30 June 2021  
Invitation to Comment on EFRAG's Initial Assessments*

*Costs and benefits*

- 5 EFRAG is also assessing the costs that are likely to arise for preparers and users on implementation of the Amendments in the EU. 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 6 to 11 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 due to the transition requirements, the reversal of lease modification accounting will be required by lessees that have published their annual report but had eligible concessions that fell outside the scope of the 2020 Amendments but are within the scope of the Amendments. This requirement could introduce additional costs. It is likely the relief from concessions that were within the scope of the amendments outweighs the costs due to reversal of lease modification for the noted eligible concessions. The Amendments are not likely to affect costs to users.

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?

- 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 12 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 it is unlikely that significant costs will be imposed on either preparers or users while preparers are likely to benefit from the Amendments that will reduce complexity and costs without compromising the quality of information provided to users.

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 to be derived from implementing the Amendments in the EU, as described in paragraph 6 above, are likely to outweigh the costs involved, 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.

*IASB ED Covid-19-Related Rent Concessions beyond 30 June 2021  
Invitation to Comment on EFRAG's Initial Assessments*

*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 as set out in 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.

Patrice de Cambourg