

INVITATION TO COMMENT ON EFRAG'S ASSESSMENTS ON EXTENSION OF THE TEMPORARY EXEMPTION FROM APPLYING IFRS 9 (AMENDMENTS TO IFRS 4)

Once filled in, this form should be submitted by 3 July 2020 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 *Extension of the Temporary Exemption from Applying IFRS 9 (Amendments to IFRS 4)* ('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:

Financial Reporting Council (UK)

- (b) Are you a:

Preparer User Other (please specify)

Regulator

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

We regulate auditors, accountants and actuaries, and we set the UK's Corporate Governance and Stewardship Codes.

- (d) Country where you are located:

United Kingdom

*Extension of the Temporary Exemption from Applying IFRS 9 (Amendments to IFRS 4)
Invitation to Comment on EFRAG's Initial Assessments*

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

s.pustshah@frc.org.uk

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?

We note that, the longer the deferral of IFRS 17, the lesser the case for a consequential deferral of IFRS 9. We expressed this view in the FRC comment letter to the IASB's ED/2019/4 *Amendments to IFRS 17*.

We do not disagree with the IASB's decision to extend the temporary relief until 2023, a concurrent adoption of IFRS 17 and IFRS 9 is the preferable solution. However, the balance of benefits and disadvantages of a further deferral has become more subtle compared to the assessment performed in 2016/17.

A deferral may enable entities to implement IFRS 9 better or may limit the possibility of confusion by users, but these advantages seem less significant when IFRS 9 has been applied by other entities since 2018. On the other hand, concerns around comparability with entities that already apply IFRS 9 and the consequences of a delay on prudence, have gained in significance.

The views expressed by the Financial Reporting Council in this response are separate from and will not necessarily affect the conclusions in any endorsement assessment provided to the UK's Secretary of State for Business, Energy and Industrial Strategy on an amended International Accounting Standard.

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.

*Extension of the Temporary Exemption from Applying IFRS 9 (Amendments to IFRS 4)
Invitation to Comment on EFRAG's Initial Assessments*

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 7 and 8 of Appendix 3 of the accompanying *Draft Letter to the European Commission*). To summarise, EFRAG's initial assessment is that the Amendments will serve 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.

We do not express a view on EFRAG's assessment.

Costs and benefits

- 5 EFRAG is also assessing the costs that are likely to arise for preparers and for users on implementation 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 10 to 14 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 may add costs for preparers. However, not as significant compared to if the two standards were effective at different dates. In addition, users will not incur significant costs arising from these Amendments.

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?

We do not express a view on EFRAG's assessment.

- 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 15 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 will allow preparers to avoid recognising the volatility in profit or loss and accounting mismatches that would result from applying IFRS 9 before IFRS 17. In addition, users can continue using their existing models until IFRS 9 and IFRS 17 are applied.

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.

*Extension of the Temporary Exemption from Applying IFRS 9 (Amendments to IFRS 4)
Invitation to Comment on EFRAG's Initial Assessments*

We do not express a view on EFRAG's assessment.

- 7 EFRAG's initial assessment is that the benefits to be derived from 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.

We do not express a view on EFRAG's assessment.

Other factors

- 8 EFRAG has identified a number of other factors that could be considered in assessing whether the endorsement of the Amendments is conducive to the European public good (see Appendix 3, paragraphs 3 to 6 and paragraphs 18 to 21).

Do you agree with the assessment of these factors?

Yes No

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

We do not express a view on EFRAG's assessment.

Do you agree that there are no other factors to consider in assessing whether the endorsement of the Amendments is conducive to the European public good?

Yes No

If you do not agree, please identify the factors, provide your views on these factors and indicate how this could affect EFRAG's endorsement advice.

This question is not answered.

Overall assessment with respect to the European public good

- 9 EFRAG has initially concluded that endorsement of the Amendments would be conducive to the European public good (see paragraph 22 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.

We do not express a view on EFRAG's assessment.