The Chair
21 September 2020
ESMA32-61-421

Mr Jean-Paul Gauzès
President
European Financial Reporting
Advisory Group (EFRAG)
35 Square de Meeûs
1000 Brussels
Belgium

Ref: IASB's Exposure Draft *General Presentation and Disclosures*

Dear Mr Gauzès,

The European Securities and Markets Authority (ESMA) thanks you for the opportunity to contribute to the IASB's due process on the Exposure Draft (ED) *General Presentation and Disclosures*. We are pleased to provide you with the following comments, in order to improve the enforceability and consistent application of IFRSs.

Like EFRAG, ESMA welcomes the proposed amendments, which we believe will significantly improve how information is communicated inside and outside the financial statements. As shown in ESMA's recent report on Alternative Performance Measures (APMs)[1], the use of such measures is widespread amongst issuers and one of the reasons for this is that very few measures are defined or specified in IFRSs. We therefore expect that defining more subtotals or measures will have a positive impact on financial information provided both inside and outside the financial statements, by improving comparability between issuers and the understandability of their performance for users. We are therefore very supportive of the proposal to add new defined subtotals in the statement of profit or loss.

We also welcome the fact that these proposals focus especially on the profit or loss statement, since ESMA's report on APMs confirms that currently most of the alternative measures used by issuers relate to profit or loss. Nevertheless, as also highlighted in our report, issuers also extensively include measures derived from the statement of financial position and the statement of cash flow, and therefore the relevance of such measures in financial communication should not be underestimated. We therefore regret that the current ED excludes from the scope of the requirements linked to Management Performance Measures (MPMs) those figures which are derived from the statement of financial position and the statement of cash flows. We strongly recommend that the IASB extends at least some of the requirements relating to Management Performance Measures (or MPMs) also to measures beyond profit or loss because those figures (such as gearing ratio, net debt, free cash flow etc)

[1] ESMA, *Report on the use of Alternative Performance Measures and on the compliance with ESMA's APM Guidelines*, ESMA32-334-150, 20 December 2019

are also essential for an understanding of how management views the entity's financial position and cash flows, how the business is managed and the sustainability of its business model.

Furthermore, ESMA is very supportive of the IASB's proposal to create better discipline and strengthen enforceability around the use of "unusual" line items in the statement of profit or loss. ESMA observes that the way companies currently provide this information varies significantly and it is often unclear how or why items have been identified as unusual. ESMA is generally supportive of the IASB proposal to provide a definition of what is an "unusual" line item and to require disclosures in the Notes. However, as further detailed in the Appendix, ESMA believes that income and expenses which have arisen in past annual reporting periods or that are expected to arise in future reporting periods (such as restructuring costs or impairment losses) should generally not be considered as "unusual".

More detailed comments on the ED are set out in the Appendix to this letter. In case you have any questions or comments please do not hesitate to contact me or Evert van Walsum, Head of the Investors and Issuers Department (Evert.vanWalsum@esma.europa.eu).

Yours sincerely,

Steven Maijoor

Appendix I – ESMA's detailed answers to the questions in the ED

Question 1 —operating profit or loss

1. ESMA strongly supports the efforts of the IASB to improve the structure of the statement of profit or loss, which we expect will increase significantly the comparability of reporting and reduce diversity in practice. As shown in ESMA's recent report on APMs, the use of such measures is widespread amongst issuers and one of the reasons for this is the fact that very few measures are defined or specified in IFRS. Therefore, we expect that defining more subtotals or measures will have a positive impact on performance measures provided by issuers both inside and outside the financial statements.
2. In particular, we support the introduction of a subtotal for operating profit or loss. This is already one of the subtotals which is most used by preparers, but its usability by investors is currently impaired since its definition and labelling are not harmonised. Therefore, ESMA expects that this new subtotal will lead to more comparable and decision-useful IFRS financial statements.
3. Finally, we share the conclusions reached by the Board with regards to the subtotal EBIT (BC46 and BC 47) and note that the proposed subtotal "profit or loss before financing and income tax" could serve the purpose of allowing users of financial statements to analyse on a consistent and comparable basis an entity's performance independently of how that entity is financed.

Question 2 —the operating category

4. ESMA welcomes the introduction of an operating category for the statement of profit or loss, consistently with the introduction of a subtotal for "operating profit or loss". We note that the ED proposes that such category is defined in a residual way (information about income and expenses not classified in other categories). ESMA understands and agrees with the rationale described in the Basis for Conclusion paragraphs BC55(b) and (c) and with the usefulness of defining the category in this way.
5. However, ESMA questions whether the current misalignment between the three proposed categories of profit or loss and the existing categories in cash flow statement is fully justified. We realise that full alignment has been discussed in the past (in the context of the Discussion Paper on Financial Statements Presentation in 2009) and was not deemed achievable. However, we urge the IASB to align these categories as much as possible and, whenever not possible, provide an explanation with regards to this misalignment in the Basis for Conclusion. Moreover, we believe that different labels could be used for the categories in the profit or loss statement and the cash flow statement to avoid confusion.

Question 3 —the operating category: income and expenses from investments made in the course of an entity's main business activities

6. As already mentioned, ESMA supports the creation of an operating category. However, we believe that it would be important to provide additional guidance for determining what are the “main business activities” of an entity, since this assessment might require significant judgment and other notions, such as that of integral and non-integral associates and joint ventures, rely on it.
7. For instance, it would be relevant for conglomerates or for companies with several business activities (e.g. corporate and financing activities) to have clarity on how to assess which activities in a conglomerate entity are to be considered “main business activity/ies” and what should the presentation be in the case. ESMA is concerned that the lack of guidance might give rise to significant diversity in practice.
8. Furthermore, ESMA believes that it is essential that the IASB ensures a high degree of consistency between standards. For that purpose, the IASB should consider what is the interaction between the concept of “main business activities” introduced by this ED and the definition of revenue contained in IFRS 15 *Revenue from Contracts with Customers* as income arising “in the course of an entity’s ordinary activities”. For example, with reference to the recent Agenda Decision on Player Transfer Payments (IAS 38), are the transfer activities to be considered “main business activities”? Furthermore, the IASB should assess what are the interactions between this ED and the notion of “main business activities” used in IFRS 8 *Operating Segments*. ESMA is concerned that the current lack of interaction between these concepts might have unintended consequences.
9. Finally, ESMA encourages the IASB to provide further guidance to clarify how to deal with income and expenses from investments made in the course of an entity’s main business activities other than investments in associates and joint arrangements. For example, should the depreciation, impairment and amortisation of a non-current asset used in industrial production be classified as operating or as investing expenses?

Question 4 —the operating category: an entity that provides financing to customers as a main business activity

10. ESMA agrees with the proposal of the IASB that entities whose main business activity is providing financing to customers should classify in the operating income category income and expenses from financing activities and from cash and cash equivalent.
11. However, ESMA is not in favour of allowing the accounting policy choice described in paragraph 51 and in particular we are not in favour of the option provided by paragraph 51(b) of the ED. This is because such accounting policy choice would hinder comparability between issuers. Furthermore, this policy choice combined with the lack of clarity on how the notion of “main business activity” applies to preparers with several business lines, could potentially create the risk that non-financial institutions who provide financing to customers as one of their main business activities (for example, a car manufacturer that provides financing to their customers to buy cars) would withhold from investors useful information. This is because, if the option under paragraph 51(b) is retained, such entities would be allowed *not* to present a financing category at all, despite their financing activity being material. We expect that if providing financing is a “main business activity”, the entity should be able to identify the components of this activity’s performance. Therefore, we do not see

a strong argument for permitting some entities to allocate all income and expenses from financing activities and from cash and cash equivalents to the operating category.

12. In order to reduce the level of judgement required and to facilitate allocation of expenses between the different categories, ESMA suggests that it may be worth to explore a connection with IFRS 8 *Operating segments*. Linking the classification of income and expenses with operating segments could potentially mean that such income and expenses are classified as "operating" only if the entity disposes of "discrete financial information" (IFRS 8 paragraph 5), thus removing the obstacle of difficult allocation of income and expenses.

Question 5 —the investing category

13. ESMA supports the proposal to create a new separate category in the profit or loss statement for "investing" income and expenses, as we agree that it will provide useful information to users of financial statements about the returns from investments that are not part of the entity's main business activities.
14. However, as already discussed, ESMA notes that drawing a clear distinction between operating, investing and financing expenses might require judgement and therefore further guidance on whether an investment is made in the course of the entity's main business activities would be helpful to prevent diversity in practice. For instance, it is not clear from the current ED how entities should classify the interests paid on investments, negative interest payments, FX gains/losses on trade payable, or impairments of goodwill. In order to address this concern, the list in paragraph B32 and B33 could be expanded and the principles guiding this judgement further explained.
15. Furthermore, as already discussed, ESMA highlights that the existing misalignment between this new category of profit or loss and the corresponding category in the statement of cash flows might create confusion for users and preparers.

Question 6 —profit or loss before financing and income tax and the financing category

16. ESMA generally agrees with the proposal that all entities, except those specified in paragraph 64 of the ED, shall present a profit or loss before financing and income tax subtotal in the statement of profit or loss.
17. However, as already discussed, ESMA highlights that the misalignment between this new category of profit or loss and the corresponding category in the statement of cash flows might create confusion for users and preparers. In this regard, ESMA would like to highlight that the definition of "financing activities" currently provided in paragraph 50 of the ED seems to be oriented towards debt, even if issuing equity is also normally considered a financing activity. Furthermore, the current definition seems not to take into account instruments where the resource will *not* be returned to the provider of finance (perpetual debt) or where a different resource is returned to the provider (convertible debt). Therefore, the label of this category could be particularly misleading.

Question 7—integral and non-integral associates and joint ventures

18. ESMA's Report on APMs highlighted wide diversity in practice regarding how entities present the share of the profit or loss of investments accounted for using the equity method. Therefore, ESMA welcomes the proposal of the IASB to require entities to identify "integral associates and joint ventures" and "non-integral associates and joint ventures" and to present a subtotal for "operating profit or loss and income and expenses from integral associates and joint ventures". Indeed, this is likely to reduce diversity in the way entities present the share of the profit or loss of associates and joint ventures accounted for using the equity method.
19. ESMA however is concerned that the principle to determine which associates and joint ventures are integral or non-integral is not entirely clear and is linked to the notion of "main business activity", which, as already discussed in our answer to Question 3, currently seems highly judgmental. ESMA would thus encourage the IASB to provide further clarity on this.
20. ESMA tends to agree with the proposal of the IASB that an entity shall change the classification of an associate or joint venture as integral or non-integral if and only if the relationship between the reporting entity and the associate or joint venture changes. ESMA would welcome further guidance on the type of situations where it can be concluded that such relationship has changed, in order to improve the enforceability and prevent opportunistic changes in category driven by the profitability of different joint ventures and associates.
21. In addition, in order to prevent diversity in practice from appearing, we encourage the IASB to provide further guidance in addition to the indicators in paragraph 20D of IFRS 12, by expanding the guidance already given in the ED and including illustrative examples which may showcase how to make that assessment. For instance, would a different functional currency, a different region of operations or different types of revenues (i.e. financial versus non-financial) between the entity and its associates and joint ventures be relevant factors in establishing the classification of integral or non-integral?

Question 8 —roles of the primary financial statements and the notes, aggregation and disaggregation

22. ESMA agrees with the IASB's proposal to describe the roles of primary financial statements and the notes, as we expect this will reduce the diversity we currently observe during our enforcement activity, and welcomes the principles for aggregation and disaggregation which are set out in the proposal.
23. In these regards, we would like to highlight that assessing whether items should be grouped in a single line requires judgement, and we would welcome more guidance to exercise such judgement. For instance, there is currently no indication whether any restrictions, other than materiality considerations, apply to the maximum level of disaggregation allowed. For example, can the unit of account be split for presentation purposes, i.e. can the depreciation/amortisation charge be split between the component relating to the carrying amount before the purchase price allocation (PPA) and the fair value adjustment resulting from the PPA?

24. Another example (beyond the profit or loss statement, since the principles of aggregation / disaggregation would also apply to other statements) is whether assets can be grouped in a single line item if they share a common operational purpose (i.e. all assets are controlled for the purpose of a rental activity) but differ in the way they are financed (for example, if purchased with or without a buy-back agreement). We can also mention whether fair value adjustments can be separated from other income/expenses from the asset (for example, should cost of sales include fair value adjustments on biological assets harvested and sold?). ESMA would welcome further guidance in these regards to improve the enforceability of the standards.
25. Furthermore, as part of this ED, ESMA recommends that the IASB proposes examples relating to aggregation / disaggregation which may showcase the separate presentation of trade payables covered by reverse factoring if they present different characteristics from other types of trade payables. This would be very important for users of financial statements to address the current asymmetry of information faced by users of financial statements.

Question 9 —analysis of operating expenses

26. ESMA welcomes the IASB proposal to require that entities shall present their expenses using a classification based on either their nature or their function. We agree that a "mixed presentation" should not be allowed, but we think that it is not entirely clear from the current ED what is the interaction between such a prohibition and the minimum line items required by paragraph 65 of the ED, some of which are expenses by nature. It seems to us that this means that an issuer preparing its profit or loss statement by function will inevitably have a mixed presentation. If the Board's intention is that those minimum line items constitute an exception to the general principle, ESMA believes that such exception should be more clearly spelled out to facilitate its understandability and a harmonised implementation by preparers.
27. We support the proposal to require that entities presenting an analysis of expenses by function also disclose an analysis by nature in the notes to the financial statements, as we understand that this information is valuable for users who need it to reconcile the profit or loss statement with the cash flow statement.
28. Finally, ESMA welcomes the guidance in B45(c) indicating that industry practice helps issuers in deciding which method of expense analysis provides the most useful information as we agree that this will lead to increased comparability among entities in the same sector. However, we would encourage the IASB to provide further concrete examples and guidance on how entities should make such choice, to improve the future enforceability of such provisions and reduce diversity in application.

Question 10 —unusual income and expenses

29. ESMA is very supportive of the proposal to create discipline around the use of "unusual" line items in the statement of profit or loss. However, we think that income and expenses with limited predictive value are not only those which are not expected to arise for future periods, but also those which have not arisen in the past annual reporting periods. We

therefore recommend that the IASB expands the existing definition contained in the ED to also encompass past periods. Expanding the definition will reduce the degree of judgement required in assessing the predictive value and improve its future enforceability since introducing such a condition based on the entity's historical data would provide clearer guidance regarding the items that may be considered unusual.

30. In these regards, we would like to note that the Illustrative example presented in Note 2 probably should not constitute unusual income since the expenses related to the abolition of the property tax is income that arose in past years and should not be considered unusual just because it is not expected in future years. We would encourage the IASB to better clarify the conclusions drawn in that example. In addition, we disagree with example given in the paragraph B73 and consider that the revenue should not be considered as unusual even if it was generated by a single contract (this case is very frequent in the biotechnology activity for instance).
31. In addition, as indicated in ESMA's Guidelines on Alternative Performance Measures[2], ESMA believes that items that affected past periods and will affect future periods should rarely be considered as non-recurring, infrequent or unusual. We are concerned that the current wording used in the ED ("several future annual reporting periods") leaves open the possibility to classify expenses which are expected to arise only for two or three future periods as "unusual". We think for instance that expenses such as restructuring or impairment losses should not be mislabelled as "unusual", even if they are only expected to arise in few future reporting periods.
32. Furthermore, we would like to highlight that it is not entirely clear from the ED whether issuers would be allowed to present "unusual" line items on the face of the financial statements. If they are allowed to present "unusual" line items, it is not clear whether they could be used as standalone or whether they could only be used to disaggregate a "by nature" or "by function" income or expense into a "usual" and an "unusual" component. We believe that the current ED does not prohibit the presentation of unusual elements on the face of the financial statements, since paragraph 42 allows entities to "present additional line items […] when such presentations are relevant to an understanding of the entity's financial performance". However, more explicit wording would prevent any confusion.
33. Finally, we think it would be helpful if the proposals in paragraph 110 of the ED specified that entities shall not use additional columns to present unusual line items, since our enforcement experience shows that this type of presentation is sometimes used (for example, to separately disclose items that consist in one-off costs from integrations, acquisitions, reorganisations or discontinued operations) and the figures presented in columns might not necessarily fall under the definition of management performance measures.

Question 11 —management performance measures

34. ESMA welcomes the IASB proposal to introduce discipline on the use of management performance measures (MPMs). We are strongly supportive in particular of the proposal to

[2] ESMA/2015/1415 ESMA Guidelines on Alternative Performance Measures, 05 October 2015

require that companies disclosing MPMs shall include a description of why such MPMs communicates management's view of performance, details on its calculation, a reconciliation to the most directly comparable IFRS-defined subtotal and additional disclosures in case an entity changes the calculation of its MPMs. Given the positive experience in the EU with ESMA's Guidelines on APMs, we expect that these proposals will improve the transparency and reliability of financial communication across all IFRS jurisdictions when it comes to alternative profit or loss measures.

35. However, we regret that the ED restricts the scope of MPMs to measures which complement totals or subtotals of financial performance. We understand and support the fact that this ED focuses mainly on the profit or loss statement, but we think that restricting the scope of MPMs only to the proposed subset of figures would be a missed opportunity for promoting transparency, comprehensibility and reliability of issuers' financial information. The recent ESMA's Report on APMs highlights that measures other than profit or loss subtotals are also widely used by the issuers – for example net debt, return on equity, free cash flow, cost to income ratio or adjusted EPS. Our enforcement experience of IFRS financial statements suggests that IAS 1 principles applicable to the notes to the financial statements are not always sufficient to ensure that users have a comprehensive understanding of alternative measures used by issuers in their accounts and we do not see significant reasons for excluding a subset of APMs from at least *some* of the requirements set out in the ED (for instance, those included under paragraphs 106(a) and 106(b) of the ED). Therefore, whilst we think that the current proposal would be a significant step forward for measures which are subtotals of the profit or loss statement, we encourage the IASB to expand the proposal to all financial measures which are not defined by IFRS, except for prudential ratios and other ratios required by law (for example, pro forma information). This is, for instance, the approach that ESMA has taken in its Guidelines on APMs.
36. In this regard, we would also like to highlight that the current proposal to require disclosure of the tax and NCI impact for all MPMs might not provide useful information for all subtotals of profit and loss but are (at least in some cases) expected to be quite costly for issuers to disclose. We would therefore suggest that the IASB carefully assess the cost and benefit of such requirement. Furthermore, ESMA very much agrees with the fact that the IASB requires that issuers provide comparatives for the corresponding previous periods, regardless of whether the entity has changed the method for calculating its MPMs.
37. With regards to scope, ESMA agrees with the proposed definition of MPMs as subtotals […] which are "used in public communication outside financial statements". ESMA thinks that this will improve the reliability and transparency of issuers' financial communication and ensure that the financial statements include all information which is deemed relevant by management. However, ESMA strongly recommends that the IASB clarifies the meaning of the term "public communication" and provides examples of the types of documents and communication it is intended to encompass, to support the harmonised application of the requirement.
38. Finally, we disagree that the subtotals listed in paragraph 104 (b) to (e) do not need to be considered as MPMs. We understand that the rationale for the proposal in this ED is that these subtotals are calculated on the basis of figures specified by IFRSs. However, ESMA thinks that only subtotals which are calculated from IFRS figures and are *defined* in IFRSs should be exempted from MPM requirements. For instance, while "gross profit" is indeed

calculated as “revenue less cost of sales”, “cost of sales” itself is not a figure defined by any IFRS and as such issuers calculate it in different ways. The resulting “gross profit” should therefore be considered as an MPM. In the same way, we disagree that “operating profit or loss before depreciation and amortisation” should not be considered as an MPM since companies diverge in the way they disclose depreciation and amortisation. We therefore think that, unless a requirement is introduced for issuers to disclose separately “depreciation” and “amortisation”, either in the face of the financial statement or in the Notes, “operating profit or loss before depreciation and amortisation” should be considered an MPM. We therefore invite the IASB to clearly define how such figures, and their components, must be calculated and/or disclosed or, alternatively, to reconsider the exemption from the MPM requirements for the subtotals listed in paragraph 104, since this would deprive users of precious information on some of the figures which are most used and valued.

Question 12 —EBITDA

39. ESMA tends to agree that despite it being widely used by investors, there is no consensus among users and prepares of financial statements about what EBITDA represents. Therefore, we sympathise with the reasons why the Board has not proposed requirements relating to EBITDA.
40. However, ESMA does not agree that when an EBITDA measure equals to the amount of “operating profit of loss before depreciation and amortisation” then EBITDA should not be an MPM. In fact, we think that it would be confusing for users if some issuers disclosed how that measure is calculated and why it is useful, whilst others did not. Furthermore, since that EBITDA is one of the most commonly used measures in communications with users, we think that EBITDA should always be an MPM.

Question 13 —statement of cash flows

41. ESMA generally agrees with the IASB proposals with regards to the statement of cash flows. We welcome in particular the removal of the choice with respect to starting point for the indirect method, which shall be uniquely operating profit or loss, and the proposed classification of interest paid, interest received, and dividends received.
42. However, as already mentioned, ESMA questions whether the current misalignment of the definitions of the three proposed categories of profit or loss and the existing categories in cash flow statement is fully justified.

Question 14 —other comments

43. ESMA welcomes the proposal of the IASB to amend other standards (IAS 7, IAS 33, IAS 34, IAS 8) which will ensure the consistency with other proposals in the ED and with the Conceptual Framework.

44. Our enforcement experience has highlighted that no requirement currently exists (nor is proposed by the ED) whereby all line items included in the statement of profit or loss should be amounts which are included in the calculation of a subtotal and of the total profit or loss. This is particularly problematic for issuers who present additional line items on the face of the financial statements which are not IFRS-defined figures. We encourage the IASB to explicitly require that all line items included in the statement of profit or loss should be part of the calculation of a subtotal and of the total profit or loss.
45. Regarding IAS 34 *Interim financial reporting*, even if we agree that the information disclosed in the Notes for interim periods could be more limited than for full year periods, we regret that paragraph 6 of IAS 34 was not part of this consultation. In particular, we consider that companies should present for interim periods the same structure of primary financial statements as for year-end periods. This would significantly improve comparability and allow better monitoring of the performance by investors between different periods. Specifically, with regard to the proposals contained in this ED, we strongly recommend that the requirement to present expenses by nature either on the face or in the notes of the financial statements should be expanded to interim financial statements given its purported value to users.
46. We would also like to highlight that a stable structure for primary financial statements would be instrumental to the progressive digitalisation of financial reporting. In fact, whilst the tagging requirements related to the European Single Electronic Format (ESEF) Regulation in the EU only apply to yearly financial statements, a stable primary financial statement structure would facilitate the voluntary preparation of iXBRL reports using the IFRS Taxonomy also for interim periods. The stability of companies' taxonomies between the year-end and the interim periods would be beneficial to users of machine-readable information.
47. Furthermore, we regret that the Board did not take this opportunity to provide clarity on the scope and common features of items to be presented within Other Comprehensive Income (OCI). In this regard we highlight however that paragraph 74 of the ED refers to items that are permanently reported outside profit or loss as "remeasurements", whereas items that will be included in profit or loss in the future are labelled as "income and expenses". However, "remeasurements" is not a term which is defined in IFRS and the definition of OCI in Appendix A of IAS 1 only refers to "income and expenses". We recommend that the IASB addresses this inconsistency and undertakes further work on the OCI category to clarify its scope and features. In a similar vein, we think that the IASB should undertake further work on the concept of "capital", which is used in paragraphs 111-113 of this ED but not defined in IFRS.
48. In addition, we urge the Board to seize this opportunity to provide more guidance on the disclosures required for reverse factoring programs - the lack of information about such transactions is a widespread issue that involves significant amounts. To do so, in addition to the example of aggregation/ disaggregation already recommended in our answer to Question 8, ESMA encourages the IASB to take this opportunity to provide a definition of trade payables and provide further guidance on the distinction between trade payables and other financial liabilities.
49. Finally, we present in Appendix II some detailed drafting comments which might help improve the overall consistency of the future standard with other standards.

Appendix II

50. Please find below some suggestions the IASB could take into consideration in the next phase of the project to ensure that the drafting is consistent across Standards and within the new Standard:
    - The term “hedging instrument” (paragraphs 57-59 and B40-B43) may not be precise enough, as there are hedging instruments applying hedge accounting under IAS 39 and IFRS 9 and economic hedges which are considered as trading derivatives under IFRS 9. There should be a clear distinction between hedge accounting derivatives and economic (trading) derivatives.
    - The table in paragraph B40 does not use the same categorising as IFRS 9.
    - The reference to materiality could only be one general statement at the beginning of the standard, stating that requirements are only to be applied if the information is material.
    - With regards to line items to be presented in the statement of profit or loss, paragraph 65 makes a distinction between amounts required by the new standard, line items required by IFRS 9 and line items required by IFRS 17. It is not clear why this paragraph does not include line items required by all other standards, or only the line items required by the new standard.
    - As minor drafting remarks, we suggest that in paragraph 58 “in which case” should be changed to “in this case”.