

EFRAG – European Financial Reporting Advisory Group  
35 Square de Meeûs  
B-1000 Brussels  
Belgium  
Att.: Isabel Batista and Vincent van Caloen  
By e-mail: [Commentletters@efrag.org](mailto:Commentletters@efrag.org)

14 October 2016

Dear EFRAG Board,

**EFRAG Draft Comment Letter on the IASB’s Exposure Draft ED/2016/1,  
Definition of a Business and Accounting for Previously Held Interests**

The Danish Accounting Standards Committee set up by “FSR – danske revisorer” considered this issue during its September meeting. Our comments are:

In general, we find that it is helpful to add some illustrative examples on what constitutes a business.

We would be happy if the IASB would elaborate further on the illustrative examples or at least some of them.

We agree with EFRAG that the illustrative examples should focus on the areas where significant judgement is required, e.g. more variations of the Example H and Example I to illustrate practical borderline cases between what constitutes and what does not constitute a business. The existence of a workforce as a factor to constitute a business should also be explained better. In general, we support EFRAG’s comments concerning improvements of the illustrative examples.

Regarding possible differences between IFRS and US GAAP, we do not find that it is a very important priority for the IASB to avoid such differences.

If you have any questions or comments, please do not hesitate to contact us.

Kind regards

Jan Peter Larsen  
Chairman of the Danish Accounting  
Standards Committee

Ole Steen Jørgensen  
Chief Consultant

FSR – danske revisorer  
Kronprinsessegade 8  
DK - 1306 København K

Telefon +45 3393 9191  
fsr@fsr.dk  
www.fsr.dk

CVR. 55 09 72 16  
Danske Bank  
Reg. 4183  
Konto nr. 2500102295