

**Organismo Italiano di Contabilità – OIC
(The Italian Standards Setter)**
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EFRAG
35 Square de Meeûs
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29 September 2011

**Re: EFRAG DRAFT ENDORSEMENT ADVICE AND EFFECTS STUDY REPORT ON IAS
19 EMPLOYEE BENEFITS (AS AMENDED IN JUNE 2011)**

Dear Sir/Madam

We are pleased to provide EFRAG with our comments in order to contribute to the finalization of the EFRAG endorsement advice on IAS 19 *Employee Benefits* (as amended in June 2011).

With regard to the EFRAG's technical assessment of IAS 19 (2011) against the endorsement criteria and the EFRAG's evaluation of the costs and benefits of IAS 19 (2011), we agree with both its two assessments.

Our responses to your invitation to comment are provided in the Appendix A to this letter.

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

Yours sincerely,

Angelo Casò
(Chairman)

Appendix A

Specific responses

1 Please provide the following details about yourself:

- (a) Your name or, if you are responding on behalf of an organisation or company, its name:

Organismo Italiano di Contabilità (The Italian Standards
Setter)

- (b) Are you a:

Preparer User Other (please specify)

National Standards Setter

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

- (d) Country where you are located:

Italy

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

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2 EFRAG's initial assessment of IAS 19 (2011) is that it meets the technical criteria for endorsement. In other words, it is not contrary to the principle of true and fair view and

it meets the criteria of understandability, relevance, reliability and comparability. EFRAG's reasoning is set out in Appendix 2.

(a) Do you agree with this assessment?

Yes No

If you do not, please explain why you do not agree and what you believe the implications of this should be for EFRAG's endorsement advice.

(b) Are there any issues that are not mentioned in Appendix 2 that you believe EFRAG should take into account in its technical evaluation of IAS 19 (2011)? If there are, what are those issues and why do you believe they are relevant to the evaluation?

No, there are not.

3 EFRAG is also assessing the costs that are likely to arise for preparers and for users on implementation of IAS 19 (2011) 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.

4 The results of the initial assessment of costs are set out in paragraphs 1-12 of Appendix 3. To summarise, EFRAG's initial assessment is that the Amendments are likely to result in an increase in costs for preparers (mainly one-off costs) and in cost savings for 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?

5 In addition, EFRAG is assessing the benefits that are likely to be derived from IAS 19 (2011). The results of the initial assessment of benefits are set out in paragraphs 13-17 of Appendix 3. To summarise, EFRAG’s initial assessment is that users and preparers are likely to benefit from the Amendments.

Do you agree with this assessment?

Yes No

If you do not agree with this assessment, please provide your arguments and indicate how this should affect EFRAG’s endorsement advice?

6 EFRAG has tentatively concluded that the benefits to be derived from implementing IAS 19 (2011) in the EU as described in paragraph 5 above are likely to outweigh the costs involved as described in paragraph 4 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 should affect EFRAG’s endorsement advice?

7 EFRAG is not aware of any other factors that should be taken into account in reaching a decision as to what endorsement advice it should give the European Commission on IAS 19 (2011).

Do you agree that there are no other factors?

Yes No

If you do not agree, please provide your arguments and indicate how this should affect EFRAG’s endorsement advice?
