

IASB Agenda Consolidation

EFRAG has published a comment letter regarding the IASB agenda consolidation (<http://www.efrag.org/Front/p229-3-272/IASB-Agenda-Consultation-2011.aspx>). From our perspective, the comment letter covers all relevant points. However, in this short statement we answer the questions which are most important to us.

First of all, we want to mention that the IFRS Advisory Council as well as EFRAG are of the opinion that a “period of calm” is needed, to ensure proper understanding by users and preparers of changes made to IFRS. We are of the same opinion (see question 1 below).

Question 1 — What do you think should be the IASB’s strategic priorities, and how should it balance them over the next three years?

One of the main priorities within the next three years should be to give the enterprises time to adopt the existing standards. It would be useful to have a “period of calm”, where no new IFRSs are endorsed. The adoption of new IFRS often need a longer time of preparation (i.e. retrospective application).

IASB should obtain the suggested post-implementation reviews and adapt them where needed (use the feedback provided by the enterprises).

At the moment we don’t have the impression, that feedback given by the enterprises is always integrated in the developing of standards.

Before starting with a project, a survey among the IFRS community (including the enterprises) would be useful, to find out in advance if the collection of the data is reasonable (time factor and information) and if the investors can use the information provided.

Regarding the agenda (too many projects) we refer to the EFRAG comment letter (page 4 & 5).

Question 1(a): — Do you agree with the two categories we identified and the five strategic areas within them? If you disagree, how do you think the IASB should develop its agenda, and why?

We refer to the EFRAG comment letter.

Question 1(b) — How would you weight the two categories and five strategic areas? If you have identified other areas for the IASB’s agenda, please include these in your answer.

We refer to the EFRAG comment letter.

Question 2 — What do you see as the most pressing financial reporting needs for standard-setting action from the IASB?

At the moment the most pressing is to finalize IFRS 9, financial instruments. Many companies started with the first preparations and now IFRS 9 is postponed. IFRS 9 is included in the IASB project list for 2011.

Question 2(a): — Considering the various constraints, to which projects should the IASB give priority, and why? Where possible, please explain whether you think that a comprehensive project is needed or whether a narrow, targeted improvement would suffice?

From our point of view the two projects “discount rate” and “trading emissions” should be given priority. For our annual report reporting standards regarding these projects could be from advantage.

Question 2(b) — Adding new projects to the IASB’s agenda will require the balancing of agenda priorities with the resources available. Which of the projects previously added to the IASB’s agenda but deferred (see table page 14) would you remove in order to make room for new projects, and why? Which of the projects previously added to the IASB’s agenda but deferred do you think should be reactivated and why? Please link your answer to your answer to question 2(a).

At the moment we would not remove any project to make room for new projects.