

**Organismo Italiano di Contabilità – OIC
(The Italian Standard Setter)**
Italy, 00187 Roma, Via Poli 29
Tel. 0039/06/6976681 fax 0039/06/69766830
e-mail: presidenza@fondazioneoic.it

EFRAG
Square de Meeus 35
1000 B-Brussels
BELGIUM
commentletter@efrag.org

23 March 2012

Re: Draft comment letter on the ESMA Consultation Paper – *Considerations of materiality in financial reporting*

Dear Sir/Madam,

We are pleased to have the opportunity to comment on your Draft Comment letter on the ESMA Consultation Paper – *Considerations of materiality in financial reporting* (paper).

We share the positions expressed by EFRAG in its draft comment letter.

We would like to highlight that, even though we recognise that there are issues arising from different approaches to materiality in practice, it is the IASB's role to address these issues and providing specific guidance.

In this sense, we reiterate the opinion expressed in the last IASB-EFRAG meeting in London. Furthermore, we point out that the need of a clarification of relevant IFRS requirements is confirmed by the EFRAG proactive project on the Disclosure Framework.

The IASB is in the best position to play a role of coordination between the various stakeholders in order to help in clarifying the more controversial issues.

With regard to the specific questions raised in the paper we agree with EFRAG's comments.

We particularly stress that the potential revision of the materiality guidance in IFRS should be driven by a principle-based approach instead of a mechanical compliance approach. In accordance to this approach, the lists of indicators like that one contained in paragraph 22 should be avoided.

Should you need any further information, please do not hesitate to contact us.

Yours sincerely,

Angelo Casò
(Chairman)