



19 September 2008

Our ref: ICAEW Rep 102/08

Mr Stig Enevoldsen
Chairman
European Financial Reporting Advisory Group
13-14 Avenue des Arts
B-1210 Brussels

By email: commentletter@efrag.org

Dear Stig

**INITIAL ASSESSMENTS OF IFRIC 15 'AGREEMENTS FOR THE
CONSTRUCTION OF REAL ESTATE'**

The Institute of Chartered Accountants in England and Wales welcomes the opportunity to respond to EFRAG's Invitation to Comment on its Assessments of IFRIC 15 *Agreements for the Construction Of Real Estate*.

The Institute operates under a Royal Charter, working in the public interest. Its regulation of its members, in particular its responsibilities in respect of auditors, is overseen by the Financial Reporting Council. As a world-leading professional accountancy body, the Institute provides leadership and practical support to over 130,000 members in more than 140 countries.

We are satisfied that:

- (a) IFRIC 15 meets the technical criteria for endorsement by the EU; and
- (b) the benefits to be derived from applying IFRIC 15 will exceed any costs involved.

We therefore fully support endorsement.

Our responses to the relevant questions raised by EFRAG are attached as an appendix to this letter.

Please contact me if you would like to discuss any of the points raised in this response.

Yours sincerely

Desmond Wright
Senior Manager, Corporate Reporting
T +44 (0)20 7920 8527
E desmond.wright@icaew.com

**INVITATION TO COMMENT ON THE EFRAG'S ASSESSMENTS OF IFRIC 15
'AGREEMENTS FOR THE CONSTRUCTION OF REAL ESTATE'**

**Comments should be sent to commentletter@efrag.org or
uploaded via our website by 22 September 2008**

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:**

The Institute of Chartered Accountants in England and Wales.

- (b) Are you/ls your organisation or company a:**

Other: professional accountancy body.

- (c) Please provide a short description of your activity/ the general activity of your organisation or company:**

See covering letter.

- (d) Country where you/your organisation or company is located:**

United Kingdom.

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

See covering letter: desmond.wright@icaew.com

2 EFRAG's initial assessment of IFRIC 15 is that it meets the technical criteria for endorsement. In other words, it is not contrary to the true and fair principle 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

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.

Not applicable

- (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 IFRIC 15? If there are, what are those issues and why do you believe they are relevant to the evaluation?**

We are not aware of any other issues.

3 EFRAG is also assessing the costs that will arise for preparers and for users to implement IFRIC 15, 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.

The results of the initial assessment are set out in Appendix 3. To summarise, EFRAG's initial assessment (see Appendix 3, paragraph 14) is that IFRIC 15 is:

- (a) likely to involve some preparers in some additional year one and ongoing costs. However, EFRAG's initial assessment is that, when considered in aggregate, those costs will not be significant.**
- (b) likely to involve users in no year one or ongoing incremental costs.**

Do you agree with this assessment?

Yes

If you do not, please explain why you do not and (if possible) explain broadly what you believe the costs involved will be?

Not applicable.

- 4 IFRIC 15 is likely to result in improvements in the quality of the information provided. EFRAG's initial assessment is that the benefits to be derived from applying IFRIC 15 will exceed the costs involved (Appendix 3, paragraphs 14 – 15).**

Do you agree with this assessment?

Yes

If you do not, please explain why you do not and what you think the implications should be for EFRAG's endorsement advice?

Not applicable.

- 5 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 IFRIC 15.**

Do you agree that there are no other factors?

Yes

If you do not, please explain why you do not and what you think the implications should be for EFRAG's endorsement advice?

Not applicable

© The Institute of Chartered Accountants in England and Wales 2008. All rights reserved.

This document may be reproduced without specific permission, in whole or part, free of charge and in any format or medium, subject to the conditions that:

- it is reproduced accurately and not used in a misleading context;
- the source of the extract or document, and the copyright of The Institute of Chartered Accountants in England and Wales, is acknowledged; and
- the title of the document and the reference number (ICAEW Rep 102/08) are quoted.

Where third-party copyright material has been identified application for permission must be made to the copyright holder.

www.icaew.com