



IASB Exposure Draft ED/2013/4
Draft Comment Letters
European Financial Reporting Advisory Group
35 Square de Meeûs
Brussels B-1000
Belgium

Dear Madam/Sir,

In the present letter ICAC gives its view on EFRAG's Draft Comment Letter on IASB's Exposure Draft 2013/4"Defined Benefit Plans: Employee Contributions. Proposed amendments to IAS 19". For the sake of clarity, we have included the EFRAG's response to IASB and the questions to EFRAG constituents:

EFRAG's responses to the questions raised in the Exposure Draft:

Response to Question 1

EFRAG supports the IASB's proposal on the basis that it clarifies existing requirements in IAS 19 (2011) and provides helpful relief for preparers.

Question to EFRAG constituents

11 Are constituents aware of any circumstances where the application of the practical expedient would result in contributions being inappropriately recognised as reductions in service cost? If so, please provide details

We agree with the EFRAG's response, we aren't aware of any circumstances where the application of the practical expedient that allows entities to choose between accounting for contributions from employees or third parties either as a reduction in service cost or considering them as a negative benefit, would result in contributions being inappropriately recognised.

Response to Question 2

EFRAG supports the IASB's proposal on the basis that it addresses an existing inconsistency in IAS 19 (2011).



INSTITUTO DE CONTABILIDAD Y AUDITORÍA DE CUENTAS

We also support the IASB's proposal and are in agreement with your opinion issued in paragraph 13.

Please don't hesitate to contact us if you would like to clarify any point of this letter,

Ana Martínez-Pina Chairman of ICAC

Madrid, 11<sup>th</sup> July 2013