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How should the IASB move forward with its project on provisions?

Issues Paper

Objective

- 1 At the July 2025 ASAF meeting, ASAF members will discuss the feedback on the IASB’s Exposure Draft [Provisions—Targeted Improvements](#) (the ‘ED’) and ASAF members will be asked how the IASB should move forward with its project in the light of that feedback.
- 2 The objective of this paper is accordingly to seek any comments from EFRAG CFSS and TEG members on the feedback provided to the IASB and how the IASB should move forward with its project.

Papers for the session

- 3 This paper only provides a very high-level summary of the feedback the IASB has received in response to the ED. This paper also only deals with specific suggestions highlighted in the papers for the ASAF meeting on which the IASB is seeking feedback.
- 4 More detailed summaries of the feedback and suggestions the IASB has received are presented in the papers prepared for the July 2025 ASAF agenda papers and have been made available as agenda papers 04-03—04-09 for this meeting.
- 5 As this paper is based on the papers for the July 2025 ASAF meeting, this paper makes use of the terms: almost all, most, many, some, a few similar to how it is done by the IASB Staff (see table below).

Term	Meaning
Almost all	All except a very small minority
Most	A large majority, with more than a few exceptions
Many	A small majority or a large minority
Some	A small minority, but more than a few
A few	A very small minority

Structure of this paper

- 6 This paper considers the feedback and suggestions related to:

- (a) the present obligation criterion;
- (b) costs to include in the measure of a provision;
- (c) discount rates;
- (d) other matters.

The present obligation criterion

High-level summary of feedback provided to the ED

- 7 The ED proposed updating the definition of a liability in IAS 37 and the wording of the present obligation recognition criterion to align them with the definition of a liability in the Conceptual Framework. Also, the requirements that support the present obligation recognition criterion were amended by:
- (a) removing the term ‘obligating event’ and instead identifying three conditions (obligation, transfer, and past-event conditions) within the present obligation criterion;
 - (b) redefining the past-event condition;
 - (c) adding requirements for threshold-triggered costs; and
 - (d) improving the working of the requirements for restructuring costs without changing the substance of those requirements.
- 8 In relation to the obligation condition (see (a) above), the ED specified that one condition for having an obligation is that the entity has no practical ability to avoid discharging a responsibility if it obtains specific economic benefits or takes a specific action. A present obligation can be legal or constructive. A legal obligation would typically arise from a contract or legislation. An entity would have no practical ability to avoid discharging its responsibility in relation to a legal obligation if the other party has a legal right to take action against the entity if it fails to discharge the responsibility; and the economic consequences for the entity of not discharging the responsibility are expected to be significantly more adverse than the economic consequences of discharging it.
- 9 In relation to the past event condition (see (a) and (b) in paragraph 7 above), the ED stated that an obligation only becomes a present obligation that exists as a result of a past event when the entity has obtained specific economic benefits or taken a specific action and, as a result, will or may have to transfer an economic resource it would not otherwise have had to transfer. The ED specified that if an entity is required to transfer an economic resource only if it takes two (or more) separate actions, the entity incurs a present

obligation when it takes the first action and has no practical ability to avoid taking the other action(s).

- 10 The ED also specified that if an entity is required to transfer an economic resource only if a measure of its activity in a period exceeds a threshold condition (paragraph 7 (c) above), a present obligation arises as the entity carries out the activity for which the threshold is related. A provision should thus be recognised for the portion of the total expected obligation before the threshold is met if: (1) it is also probable that the entity will be required to transfer an economic resource to settle the obligation; and (2) a reliable estimate can be made of the amount of the obligation.
- 11 Many respondents to the IASB's ED agreed (broadly) with the proposed amendments to the present obligation criterion. However, many of the respondents agreeing broadly with the proposed amendments, disagreed with, and suggested changes to, specific aspects of proposals—most frequently aspects of the obligation (see paragraph 8 above) and past-event (see paragraph 9 above) conditions. The respondents most critical about the proposals were primarily from Europe (not only EU), but also included some of the global accounting firms. The disagreement stems at least in part from concerns about how the proposals would apply to levies. Similar to EFRAG, some respondents also asked the IASB to do more work on the proposed amendments and revise them as necessary to ensure the final requirements have no unintended consequences.

Suggestions on how the IASB should move forward

- 12 The agenda papers for the July 2025 ASAF meeting, specifically ask for views on some proposals provided by respondents to the ED. These suggestions have been summarised in the table below together with the assessment of the EFRAG Secretariat of them.

Suggestion	EFRAG Secretariat assessment
Simpler application requirements for levies should be introduced, for example by specifying that for levies, the 'action' that satisfies the past-event condition (and hence could result in the recognition of a liability) is the activity the government is seeking to tax and by developing 'robust' application requirements and guidance for levies.	The EFRAG Secretariat notes that the requirements of the ED did not fully address the concerns users expressed in relation to IFRIC 21. Levies are often regarded as a charge that relates to a period of time, and many believe that a progressive recognition of an expense would be better understood by users. Accordingly, it may be an issue that some types of recurring levies that are currently recognised at a point in time will also be recognised at a point in time under the proposals. The EFRAG Secretariat could therefore be in favour of exploring simple application requirements for recurring levies, including specifying that (some) levies that are paid yearly relate to operating in the period between the levies being paid. These levies should accordingly be considered a cost of operating in a period. In this regard, the EFRAG Secretariat notes that many consider levies to be a manner to collect money from those who have money, rather than a tax on a specific activity (in order to, for example, reduce that activity). The

EFRAG Secretariat assesses that simplified requirements might even be done in a manner that could be considered to be in accordance with the definition of a liability included in the Conceptual Framework. The EFRAG Secretariat, however, notes that exploring simple application requirement for recurring levies was **not** a position reflected in EFRAG's comment letter in response to the ED.

The EFRAG Secretariat would also be in favour of guidance on the actions that would qualify as a relevant past event (see paragraph 9 above). This would include (but would not be limited to): specifying whether only actions that are strictly necessary for potentially having to transfer an economic resource should be considered as relevant past events; what the effect of the action should be (that is, whether the action should be necessary for the entity having to pay an (any) amount under a levy or only that it would result in an entity having to pay an additional amount under a levy); whether implicit actions should be considered (e.g., if a levy would depend on the entity holding an asset at a given date, should the action related to receiving that asset be considered a relevant action for the assessment of a liability covered by IAS 37); whether thresholds used to define the scope of a levy should also qualify as a threshold under the ED (see paragraph 10 above); how to distinguish between factors affecting recognition and factors affecting measurement. All these factors, and additional factors, were mentioned in EFRAG's comment letter in response to the ED.

Exclude levies (and other non-reciprocal transactions) from the scope of IAS 37 and either:

- leave IFRIC 21 in place, or
- develop a separate Standard for levies (and other non-reciprocal transactions)

The EFRAG Secretariat acknowledges that the requirements included in IFRIC 21 are likely less costly to apply than those proposed in the ED (as the requirements in IFRIC 21 would require less judgment) also the requirements in IFRIC 21 are considered to be clearer than those proposed in the ED. However, based on the input EFRAG collected from users when replying to the ED, users do not think that IFRIC 21 results in the most useful information. In accordance with the position expressed in EFRAG's comment letter in response to the ED, the EFRAG Secretariat accordingly suggests the IASB continue working on the project, although it could take some time to complete.

EFRAG's comment letter in response to the ED did not consider whether a separate Standard should be developed for levies (and other non-reciprocal transactions). The EFRAG Secretariat does not consider it beneficial to develop such a separate Standard. The EFRAG Secretariat acknowledges that the factors to consider when recognising a liability related to a non-reciprocal transaction could be different from those considered for reciprocal transactions. Also, the scope of IAS 37 is interpreted differently – and an advantage of having a separate standard for non-reciprocal transactions would then be that it would be necessary to clarify what an exchange transaction is, which the EFRAG Secretariat assesses would be useful. However, at least a very significant part of the liabilities currently accounted for under IAS 37 are related to non-reciprocal transactions, and it would therefore seem irrational

<p>Abandoning the proposed amendments to IAS 37. Instead, the current weaknesses in levy accounting could be addressed by reviewing the requirements of, or adding disclosure requirements to, IFRIC 21.</p>	<p>to remove these from the standard. Also, in order for all levies to still be covered by a standard if the scope of IAS 37 be amended, it would require the development of a separate standard for levies before finalising the targeted improvements to IAS 37. It would therefore seem most efficient to improve the guidance on when to recognise liabilities for non-reciprocal transactions in IAS 37, including clarifying or stating what non-reciprocal transactions are (e.g., stating that levies are non-reciprocal transactions).</p> <p>EFRAG's comment letter in response to the ED did not propose abandoning the proposed amendments to IAS 37. In support of that position, the EFRAG Secretariat also considers that recognition requirements that do not result in the most useful information should not be 'fixed' by introducing additional disclosure requirements. The EFRAG Secretariat assesses that there are many aspects that need to be addressed in the proposals and that this will take time to get right, but it would be possible to fix the issues.</p>
<p>Changing the 'no practical ability to avoid' criterion, so that it is sufficient that a responsibility is legally enforceable (the requirement to consider the economic consequences of non-compliance would then apply only to laws and regulations that, although not legally enforceable, include other incentives to encourage or discourage particular behaviours ('soft law'))</p>	<p>In accordance with EFRAG's comment letter in response to the ED, the EFRAG Secretariat assesses that the IASB should further explore stating that an entity has no practical ability to avoid a responsibility that is legally enforceable. This could address issues related to the assessment of how to assess whether economic consequences of not complying with a legislation are significantly more adverse than complying with these requirements and also the irrational outcome that a provision would not be recognised in cases where it only results in marginally more adverse economic consequences not to comply with a legislation (see paragraph 8 above).</p>
<p>Retaining the requirement currently included in IAS 37 (par. 17) that settlement of a legal responsibility can be enforced by law, but assessing whether the requirement is met will require the exercise of judgement in some circumstances (for example, in relation to soft law).</p>	<p>EFRAG's comment letter in response to the ED did not consider the exercise of judgement in relation to the current requirements in paragraph 17 of IAS 37. The EFRAG Secretariat notes that currently paragraph 17 of IAS 37 states that an entity has no realistic alternative to settling an obligation only where the settlement can be enforced by law or in case of a constructive obligation where a valid expectation has been created that the entity will discharge the obligation. The EFRAG Secretariat understands that these requirements create issues for some types of soft law requirements. If the objective would be to recognise obligations for some settlements that would follow by soft law, the EFRAG Secretariat does not assess the most useful manner to do this would be to 'soften' an interpretation of what can be 'enforced by law'. For these types of obligations an assessment of the economic consequences of not settling the obligation, as suggested in the ED, might seem as a more promising way to move forward.</p>
<p>State that an obligation arises only when legislation has been enacted (instead of virtually certain). Align the threshold in IAS 37 with the substantively-enacted threshold in IAS 12 (and providing more guidance on interpreting the substantively-enacted threshold).</p>	<p>In line with EFRAG's comment letter in response to the ED, the EFRAG Secretariat considers that it could reduce unnecessary complexity to align the 'virtually certain' term in IAS 37 with the term 'substantively enacted' term used in IAS 12 (par. 46), or at least describe how the two terms differ.</p>
<p>Provide more guidance on interpreting the virtually-certain threshold, including on whether and how it differs from the substantively-enacted threshold in IAS 12.</p>	

Require entities to disclose management's judgements in reaching its conclusions on whether the virtually-certain threshold has been met.

EFRAG's comment letter in response to the ED did not include a recommendation to disclose management's judgement in reaching its conclusion on whether the virtually-certain threshold has been met.

The EFRAG Secretariat would not suggest that such a requirement be introduced. The EFRAG Secretariat considers that if this information were material, it would already be required by IFRS 18 *Presentation and Disclosure in Financial Statements*.

Costs to include in the measure of a provision

High-level summary of feedback provided to the ED

- 14 The ED proposed to specify that the expenditure required to settle an obligation comprises the costs that relate directly to the obligation and that such costs consist of both (a) the incremental costs of settling that obligation and (b) an allocation of other costs that relate directly to settling obligations of that type.
- 15 Most respondents agreed with the proposal on costs to include, as this would align requirements within IAS 37 and across IFRS Accounting Standards, improving comparability and reducing diversity in practice. On the other hand, some respondents expressed concern about including an 'allocation of costs that relate directly to settling obligations of that type' in the measurement of a provision, as it would be costly and difficult to apply, would be subject to judgement (increasing diversity in practice and reducing comparability), costly, difficult to apply, and would not provide useful information. Some respondents requested additional guidance and illustrative examples to clarify which types of costs should be included in the measurement of provisions.
- 16 With regard to the scope of the proposal, some respondents asked to clarify whether the requirement would apply to all provisions or only to the provisions that will be settled by transferring goods or services, rather than by paying cash. These respondents recommended that the IASB clarify the implications of the proposed costs to include requirements for ancillary costs (i.e. costs of legal services incurred by an entity on its own behalf in settling the obligation).

EFRAG Secretariat suggestions on how the IASB should move forward

- 17 In the agenda papers for the July 2025 ASAF meeting, ASAF members are asked how the IASB should move forward in the light of the feedback received, in particular whether and, if so, how the requirements should apply to ancillary costs.
- 18 The EFRAG Secretariat notes that the feedback received by the IASB generally aligns with the position expressed in EFRAG's comment letter on the ED. Considering the feedback, the Secretariat emphasises the need for additional guidance and accompanying examples specifying how the requirements should apply. In relation to ancillary costs, EFRAG's

comment letter in response to the ED did not express a specific view. The EFRAG Secretariat has considered an example where an entity expects to settle specific obligations covered by IAS 37 by paying cash to the counterparties in the future. There would need to be one or several persons to transfer the cash in the future and these persons will require to be paid a salary, having a desk in an office, relevant software licences etc. If the only task of those people would be to pay claims from previous periods, the EFRAG Secretariat could see a case for including the related cost in the measurement of the provision. However, if the people, desks, offices, software licences etc. would anyway be needed in the future for future operations, the EFRAG Secretariat would be concerned that including part of these cost in the measurement of the provision could result in recognising future operating expenses as expenses of the current period. Accordingly, the EFRAG Secretariat would only consider that incremental ancillary costs (and not an allocation of other costs that relate directly to transferring the money) should be included in the measurement of a provision.

Discount rates

High-level summary of feedback provided to the ED

- 19 The ED proposed specifying that the discount rate used to discount provisions should exclude non-performance risk and be a pre-tax rate (or rates) that reflect (i) current market assessments of the time value of money, represented by a risk-free rate; and (ii) risks surrounding the amount or timing of the expenditure required to settle the obligation if these risks are not reflected in the estimates of the future cash flows.
- 20 The ED also proposed an entity to disclose:
- (a) the discount rate (or rates) used in measuring a provision; and
 - (b) the approach used to determine that rate (or those rates).
- 21 Constituents provided feedback on:
- (a) which discount rate to use to discount provisions; and
 - (b) the information to disclose about the discount rate used.

Discount rate used

Excluding non-performance risk

- 22 Many respondents agreed with excluding non-performance risk from the discount rate, considering that this will decrease diversity in practice and subjectivity of measuring the discount rate, and increase comparability across entities. They further pointed out that excluding non-performance risk negates a counterintuitive accounting outcome whereby

entities with higher credit risk would recognise lower provisions, and reduces costs for preparers.

- 23 However, some respondents disagreed with the proposal, particularly because it would create a divergence between US GAAP (that require including non-performance risk in the discount rate) and IFRS. This may result in a competitive disadvantage when raising capital in the US market. In addition, they noted that directly observable risk-free rates are typically not available in the market, and questioned whether they reflect the underlying economics of a provision, by not taking into account the cost of capital for an entity.
- 24 As alternatives, they suggested either increased disclosures about the discount rates used or rates determined by reference to market yields of high-quality corporate bonds or government bonds, akin to IAS 19 *Employee Benefits*.

Other matters

- 25 Respondents commented on the interaction between IAS 37 *Provisions, Contingent Liabilities and Contingent Assets* and IFRS 3 *Business Combinations*. At acquisition date, a provision would be measured at the fair value of the obligation, which can be estimated by discounting the expected future cash flows using a credit-adjusted discount rate. If after the date of acquisition, a provision is re-measured using a risk-free rate, as is currently proposed, the amount of the provision would increase, requiring a 'day 2' adjustment. They suggested introducing exceptions either in IAS 37 or IFRS 3, or provide guidance/a related illustrative example.
- 26 Furthermore, respondents noted that IAS 37 does not specify whether the cash flows for estimating a provision should be inflation-adjusted, noted that the ED did not specify whether non-performance risk should be excluded from the estimates of cash flows required to settle a provision, and requested guidance on determining the risk-free rate and making liquidity adjustments.

Disclosures

- 27 Many respondents agreed with the proposed disclosure requirements, including those who disagree with the proposal to specify that the discount rate excludes non-performance risk. They consider the proposed disclosure requirements will improve comparability and transparency of the rates used, and provide useful information. More specifically, a user group noted that the proposed disclosure requirement is particularly important given the difference between the rates required by IAS 37 and those used by entities applying US GAAP.

- 28 A few respondents disagreed with the proposed disclosure requirements, considering that entities operating in multiple jurisdictions would have difficulty complying. A few other respondents specifically disagreed either with the proposed requirement to disclose the discount rate (or rates) used to discount a provision (considering it will not contribute to useful information), or with the proposed requirement to disclose the approach used to determine the discount rates (considering this disclosure unnecessary if the rates used are disclosed).
- 29 A few other respondents suggested additional disclosure requirements, e.g., more detailed information about the components of the discount rate used— namely the base rate and any adjustments made—in addition to the actual rate as proposed, an explanation of the assumptions and related narrative information on how the measurement of a provision has been affected by a change in discount rates.

EFRAG Secretariat suggestions on how the IASB should move forward

Discount rate used

Excluding non-performance risk

- 30 Consistent with the feedback received by EFRAG’s stakeholders and the view expressed in EFRAG’s comment letter in response to the ED, the EFRAG Secretariat concurs with excluding non-performance risk from the discount rate used to measure provisions. The EFRAG Secretariat agrees with respondents that including non-performance risk would lead to a counterintuitive outcome.
- 31 At the same time, the EFRAG Secretariat acknowledges the conceptual and US GAAP-comparability arguments primarily made by Canadian respondents. On the concerns about the latter, the EFRAG Secretariat, however, notes that there are other factors that would still not make the information between IFRS and US GAAP comparable¹. Nevertheless, the proposals would mean that some entities reporting under IFRS would, everything being equal, report higher provisions than their US GAAP peers. On balance, however, the EFRAG Secretariat considers that the benefits of the proposals (more comparable information between IFRS preparers and no counterintuitive outcome resulting from reflecting non-performance risks) outweigh the listed disadvantages.

Other matters

- 32 The EFRAG Secretariat is of the view that the IASB should consider the additional matters raised by respondents with respect to the discount rate proposals, that were also raised

¹ [A paper](#) analysing the proposals of the ED against requirements included in US GAAP was presented at the 27 February 2025 EFRAG FRB meeting.

during EFRAG's outreach on the ED and reflected in EFRAG's comment letter in response to the ED. These matters include:

- (a) The interaction with IFRS 3, for which the EFRAG Secretariat recommends providing an exception from fair value accounting in IFRS 3, consistently with some respondents to the ED;
- (b) Adjusting for inflation, regarding which the EFRAG Secretariat suggests the IASB require entities to disclose whether they have applied a nominal or real discount rate;
- (c) Double-counting of non-performance risk, for which the EFRAG Secretariat recommends explicitly stating that it should not be included in the expected cash flows of the related provisions, similarly to the discount rate(s); and
- (d) Liquidity adjustments, whereby the EFRAG Secretariat calls for additional guidance on when and how liquidity adjustments should be made for risk-free rates.

Disclosures

- 33 Consistent with stakeholders' feedback provided to the IASB, including EFRAG's comment letter in response to the ED, the EFRAG Secretariat supports the proposals to require an entity to disclose the discount rate (or rates) it has used and the approach it has used to determine that rate (or those rates). The EFRAG Secretariat considers that the proposed disclosures will provide investors with information to be able to make any adjustments they consider necessary in their own analysis and alleviate concerns on the use of different approaches to determine a risk-free rate(s). The proposed disclosures may also alleviate some of the concerns noted above about the comparability with US GAAP.
- 34 At the same time, the EFRAG Secretariat, in line with EFRAG's comment letter in response to the ED, recommends that the IASB consider how the principles of aggregation and disaggregation in relation to the disclosure developed in IFRS 18 *Presentation and Disclosure of Financial Statements* could be applied to possibly require entities to disclose the proposed information in a more 'aggregated' manner. In this respect, the EFRAG Secretariat considers that the disclosures are already sufficiently detailed, so the additional disclosures suggested by respondents to the ED are not needed (this issue was not considered in EFRAG's comment letter in response to the ED).

Other matters

High-level summary of feedback provided to the ED

- 35 Constituents provided feedback on:

- (a) transition requirements
- (b) disclosure requirements proposed for subsidiaries without public accountability
- (c) other matters

Transition requirements

- 36 Most respondents agreed with the proposals of the ED (retrospective application with two simplifying exceptions), but similar to EFRAG, some thought that the two simplifying exceptions should be used as of the same date (instead of as of the date of initial application and the transition date, respectively, as suggested in the ED). The first exception requires a modified retrospective approach for changes in the cost included in measuring the expenditure required to settle a provision. When measuring the cost, the proposed requirements should only be applied to unsettled obligations, with the impact recognised in equity or a related asset and without restating comparatives. The second exception allows a simplified retrospective approach for discount rate changes, enabling entities to allocate transition adjustments between the related asset and retained earnings.

Disclosure requirements proposed for subsidiaries without public accountability

- 37 Most respondents agreed with the proposed disclosure requirements for subsidiaries without public accountability. Some respondents noted that the IASB approach aligns with the six principles outlined in IFRS 19 *Subsidiaries without Public Accountability: Disclosures* and highlighted the importance of disclosing the discount rate which some did not consider to be burdensome.

Other matters

- 38 A few respondents raised concerns about other matters. For example, that the new definition of an executory contract could lead to entities having to consider proportions of contracts for the onerous contract assessment; that the proposed requirements to exclude the effects of non-performance risk from the measure of a provision could give the impression that entities should also not consider the risk of non-performance by parties with whom the entity is jointly and severally liable when accounting for such liabilities; that the measurement objective was unclear (EFRAG included a similar comment); that disclosures were insufficient (on joint and several liabilities, decommissioning obligations, and off-balance sheet liabilities); that the scope of IAS 37 was unclear (for penalties for early cancellation of a lease agreement and boundaries between IAS 37 and IFRS 9); that it should be clarified how the requirements of IAS 37 align with or complement sustainability reporting requirements; that the reference was made to 'reliable measurement', which is an outdated term as the Conceptual Framework refers to faithful representation; that

guidance on how to reflect risk in measures of provisions should be was ‘somewhat casual’ and not wholly accurate and balanced; that requirements for contingent liabilities and contingent assets were asymmetrical; that the term ‘virtually certain’ was not used in the Conceptual Framework; and that there was insufficient guidance on the intended meaning of the terms ‘probable’ and ‘reliable’.

EFRAG Secretariat suggestions on how the IASB should move forward

Transition Requirements

- 39 Following the feedback provided to the IASB, the EFRAG Secretariat generally considers the transition requirements proposed in the ED reasonable, however, the IASB should consider requiring the two exceptions to be applied as of the same date. Also, similar to what was noted in EFRAG’s comment letter in response to the ED, the EFRAG Secretariat suggests that the example from the IASB staff paper (June 2024), or a similar one, should be included to illustrate who the exception related to the determination of the discount rate. These views are consistent with the views expressed in EFRAG’s comment letter in response to the ED.

Disclosure Requirements for subsidiaries without public accountability

- 40 The EFRAG Secretariat notes that most respondents, who provided a view on the issue, supported the proposals included in the ED on the disclosure to be provided by entities reporting under IFRS 19. The EFRAG Secretariat notes that there could be arguments in favour of providing additional disclosures than those proposed, but does, on balance, and similar to the view expressed in EFRAG’s comment letter in response to the ED, suggest not introducing additional disclosures. The EFRAG Secretariat would, however, support clarification on how IFRS 19’s disclosure reduction principles are intended to apply (as also noted in EFRAG’s comment letter in response to the ED).

Other matters

- 41 On the other matters mentioned by respondents to the ED, the EFRAG Secretariat particularly considers that it would be useful to clarify the scope of IAS 37 and the measurement objective. The EFRAG Secretariat thus notes that when consulting on the IASB’s ED, the EFRAG Secretariat was presented with quite different views on the scope of IAS 37, and EFRAG’s comment letter in response to the ED also recommended that the IASB clarify whether a provision should be measured based on fulfilment value or on the basis of a transfer value.

Questions for EFRAG FR TEG/CFSS

42 Does EFRAG FR CFSS agree/disagree with the suggestions of the EFRAG Secretariat in paragraphs 12, 18, 30–34, and 39–41 on how the IASB should deal with some of the feedback received in response to the ED?