

**INVITATION TO COMMENT ON EFRAG'S ASSESSMENTS ON
Amendments to IFRS 19 *Subsidiaries without Public Accountability:*
*Disclosures***

Once filled in, this form should be submitted by 28 November 2025 using the 'Comment publication link' available at the bottom of the respective news item. All open consultations can be found on EFRAG's website: [Open consultations: express your views](#).

EFRAG has been asked by the European Commission to provide it with advice and supporting material on Amendments to IFRS 19 *Subsidiaries without Public Accountability: Disclosures* ('Amendments to IFRS 19'). In order to do so, EFRAG has been carrying out an assessment of Amendments to IFRS 19 against the technical criteria for endorsement set out in Regulation (EC) No 1606/2002, and has also been assessing the costs and benefits that would arise from their implementation in the European Union ('the EU') and the European Economic Area.

A summary of Amendments to IFRS 19 is set out in Appendix 1 of the accompanying *Draft Letter to the European Commission* regarding the endorsement of Amendments to IFRS 19.

Before finalising its assessment, EFRAG would welcome your views on the issues set out below. Please note that all responses received will be placed on the public record unless the respondents request confidentiality. In the interest of transparency, EFRAG will wish to discuss the responses it receives in a public meeting, so it is preferable that all responses can be published.

EFRAG's initial assessments, summarised in this questionnaire, will be updated for comments received from constituents when EFRAG is in the process of finalising its *Letter to the European Commission* regarding the endorsement of Amendments to IFRS 19.

Your details

1 Please provide the following details:

- (a) Your name or, if you are responding on behalf of an organisation or company, its name:

- (b) Are you a:

Preparer User Other (please specify)

- (c) Please provide a short description of your activity:

- (d) Country where you are located:

- (e) Contact details, including email address:

EFRAG's initial assessment with respect to the technical criteria for endorsement

- 2 EFRAG's initial assessment of Amendments to IFRS 19 is that they meet the technical criteria for endorsement. In other words, Amendments to IFRS 19 are not contrary to the principle of true and fair view, meet the criteria of understandability, relevance, reliability and comparability, and lead to prudent accounting. EFRAG's reasoning is set out in Appendix 2 of the accompanying *Draft Letter to the European Commission* regarding the endorsement of Amendments to IFRS 19.

- (a) Do you agree with this assessment?

Yes No

If you do not agree, please provide your arguments and what you believe the implications of this could be for EFRAG's endorsement advice.

- (b) Are there any issues that are not mentioned in Appendix 2 of the *accompanying Draft Letter to the European Commission* regarding the endorsement of Amendments to IFRS 19 that you believe EFRAG should take into account in its technical evaluation of Amendments to IFRS 19? If there are, what are those issues, and why do you believe they are relevant to the evaluation?

The European public good

- 3 In its assessment of the impact of Amendments to IFRS 19 on the European public good, EFRAG has considered a number of issues that are addressed in Appendix 3 of the accompanying *Draft Letter to the European Commission* regarding the endorsement of Amendments to IFRS 19.

Improvement in financial reporting

- 4 EFRAG has identified that, in assessing whether the endorsement of Amendments to IFRS 19 is conducive to the European public good, it should be considered whether Amendments to IFRS 19 are an improvement over current requirements across the areas which have been

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subject to changes (see paragraphs 54 to 56 of Appendix 3 of the accompanying *Draft Letter to the European Commission*). To summarise, EFRAG's initial assessment is that Amendments to IFRS 19 will streamline the consistent application of the requirements included in IFRS 19 and will therefore improve the quality of financial reporting.

Do you agree with the assessment?

Yes No

If you do not agree, please provide your arguments, and indicate how this could affect EFRAG's endorsement advice.

Costs and benefits

- 5 EFRAG is also assessing the costs that are likely to arise for preparers and for users following the implementation of Amendments to IFRS 19 in the EU, 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 of costs are set out in paragraphs 63 to 70 of Appendix 3 of the accompanying *Draft Letter to the European Commission* regarding the endorsement of Amendments to IFRS 19. To summarise, EFRAG's initial assessment is that Amendments to IFRS 19 are likely to result in marginally reduced costs for preparers and users related to implementation and ongoing costs of complying with these requirements.

Do you agree with this assessment?

Yes No

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

- 6 In addition, EFRAG is assessing the benefits that are likely to be derived from Amendments to IFRS 19. The results of the initial assessment of benefits are set out in paragraphs 71 to 73 of Appendix 3 of the accompanying *Draft Letter to the European Commission* regarding the endorsement of Amendments to IFRS 19. To summarise, EFRAG's initial assessment is that that both preparers and user are likely to benefit from Amendments to IFRS 19 resulting

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from updating the disclosure requirements in IFRS 19 by using a consistent approach to developing reduced disclosures for eligible unlisted subsidiaries.

Do you agree with this assessment?

Yes No

If you do not agree with this assessment, please provide your arguments, and indicate how this could affect EFRAG's endorsement advice.

- 7 EFRAG's initial assessment is that the benefits to be derived from implementing Amendments to IFRS 19 in the EU, as described in paragraph 6 above, are likely to outweigh the costs involved, as described in paragraph 5 above. The implementation of Amendments to IFRS 19 will improve financial information by being available on a more relevant, understandable and comparable basis.

Do you agree with this assessment?

Yes No

If you do not agree with this assessment, please provide your arguments, and indicate how this could affect EFRAG's endorsement advice.

Overall assessment with respect to the European public good

- 8 EFRAG has initially concluded that the endorsement of Amendments to IFRS 19 would be conducive to the European public good (see paragraphs 75 to 77 of Appendix 3 of the accompanying *Draft Letter to the European Commission*).

Do you agree with this conclusion?

Yes No

If you do not agree, please explain your reasons.