

EXPOSURE DRAFT

**EFRAG DUE PROCESS PROCEDURES FOR THE
EFRAG FINANCIAL REPORTING ACTIVITIES**

SEPTEMBER 2024



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Introduction

As a first step in the governance reform integrating the sustainability reporting pillar into the EFRAG structure, EFRAG developed its due process procedures for the sustainability reporting (SR DPP).

The EFRAG Administrative Board supported by its Due Process Committee (DPC), covering both financial reporting and sustainability reporting, recognised that a thorough due process is applied for financial reporting but it is only formalised at a high level in the EFRAG Internal Rules. Accordingly, the DPC requested that also the due process procedures (DPP) for EFRAG's financial reporting pillar be formalised.

This document sets out the due process requirements to be followed by EFRAG in its role as technical advisor to the European Commission, in its contribution to the IASB's standard-setting process by providing European views, including through proactive research activities, and providing technical advice to the European Commission on the endorsement of IFRS Accounting Standards. It details the requirements for the due process for the preparation of the documents as laid down in the EFRAG Statutes (Article 7.3.4 (b)) and EFRAG Internal Rules (Article 17). The DPP should be read in the context of these EFRAG Statutes and EFRAG Internal Rules ([here](#)).

EFRAG's due process is based on interaction with and input from stakeholders. Accordingly, stakeholders' acceptance of the DPP for EFRAG's financial reporting pillar is essential. This is why this Exposure Draft on DPP for the EFRAG financial reporting pillar has been developed and issued for public consultation.



QUESTIONS TO CONSTITUENTS

EFRAG invites comments on all matters in this Exposure Draft, particularly in relation to the questions set out below. Comments are more helpful if they:

- address the question as stated;
- indicate the specific paragraph reference to which the comments relate; and/or
- describe how you would suggest to change the wording and the process you are not supporting

All comments should be received by **31 December 2024**.

Currently, a thorough due process is applied for financial reporting but it is formalised only at a high level in the EFRAG Internal Rules. This document aims to formalise and explain in more detail the due process procedures to be followed by EFRAG when dealing with financial reporting issues

Question 1 Objective and general principles

Does the EFRAG financial reporting due process meet your needs?

Is the EFRAG DPP sufficiently clear and contains all information you would expect?

Currently EFRAG Internal Rules do not establish a minimum comment period on its consultations. In practice EFRAG's consultation deadlines depend on the IASB's consultation deadlines for each project and should normally (but not always) be a little shorter to allow the timely response to the IASB consultation. The EFRAG consultation deadlines also consider that the EFRAG Secretariat has sufficient time to analyse properly the comment letters received. However, EFRAG considered that it was important to establish a minimum comment period of 30 days on its consultations unless there is a need for an accelerated due process. In the latter case, the EFRAG Administrative Board, in its oversight role of due process, will need to provide approval (thus, the comment period can only be reduced to less than 30 calendar days after approval from the EFRAG Administrative Board supported by its DPC).

Question 2 Public consultation deadlines

Do you agree with EFRAG's proposals in paragraphs 5.6 and 5.7 on public consultation deadlines, including a minimum comment period of 30 days on its consultations?



Currently EFRAG Internal Rules do not provide detailed guidance on the treatment of comment letters received after its deadlines. In practice, the comment letters received after the comment deadline but before the EFRAG FR TEG meeting are included in the EFRAG agenda papers to the extent possible and uploaded on the EFRAG website. The Comment letters that are received after the EFRAG FR TEG (but before EFRAG FRB meeting) are not included in the EFRAG FR TEG advice. These comment letters may be considered by the EFRAG FRB for the purposes of the EFRAG (final) comment letter and (final) endorsement advice (i.e. are considered on a case-by-case basis, considering the timing of submission). However, comment letters received after EFRAG FRB meeting are not considered by the EFRAG FRB. In these cases, it is indicated on the EFRAG website that the comment letter was not considered by the EFRAG FRB. EFRAG decided to formalise this procedure by including it in the EFRAG Financial Reporting DPP.

Question 3 Comment letters received

Do you agree with EFRAG's proposals in paragraphs 6.7 to 6.11 on comment letters received after EFRAG's comment deadline?



CHAPTER 1: OBJECTIVE

- 1.1 A rigorous and transparent due process must underpin EFRAG's activities around standard-setting process and is critical for the long-term credibility and independence of EFRAG.
- 1.2 The Due Process Procedures for the EFRAG Financial Reporting activities (DPP) set out the due process requirements to be followed by EFRAG in its role as technical advisor to the European Commission, in its contribution to the IASB's standard-setting process by providing European views, including through proactive research activities, and providing technical advice to the European Commission on the endorsement of IFRS Accounting Standards.
- 1.3 The DPP detail the requirements for the due process for the preparation of the documents as laid down in the EFRAG Statutes (Article 7.3.4 (b)) and EFRAG Internal Rules (Article 17). **The DPP should be read in the context of these EFRAG Statutes and EFRAG Internal Rules ([here](#)). The EFRAG Statutes and EFRAG Internal Rules describe the working rules of the EFRAG Reporting Boards, EFRAG Reporting TEGs, EFRAG Consultative Forum of Standard Setters (CFSS) and related consultative working groups and advisory panels.**
- 1.4 EFRAG is requested to provide technical advice with proper due process, public oversight and transparency, and with the expertise of stakeholders to ensure:
 - a) Publication, with an open call for comments, of EFRAG draft comment letters to the IASB, IFRS Foundation or any other bodies, draft endorsement advice letters to the European Commission, and other position papers as appropriate;
 - b) Publication of EFRAG final comment letters;
 - c) Publication of due process feedback reports;
 - d) Publication of comment letters received;
 - e) Publication of summary reports on relevant outreaches and events, field tests and surveys if applicable; and
 - f) Endorsement advice to the European Commission within the agreed timeframe following a request by the European Commission to provide endorsement advice on an IFRS Accounting Standards.
- 1.5 In addition, as part of EFRAG's proactive research work, EFRAG may publish discussion papers for public consultation, related feedback reports, comment letters received and if applicable recommendations and other publications which aim mainly to raise debate both at European and international level, contribute to the IASB standard-setting process from a European perspective and inform stakeholders how financial reporting may affect them.
- 1.6 A robust, agile and adaptable due process is necessary to contribute to financial reporting standard setting by bringing the European views in a transparent, credible and independent way. All the steps described in this document may not need to be applied mechanically or sequentially in all instances. In some circumstances, an accelerated due process may be appropriate whereby a core of necessary due process steps will be defined. In such cases, the EFRAG Administrative Board, in its oversight role of due process, will be consulted.
- 1.7 Therefore, the DPP:



- a) Specify the minimum steps to be taken to ensure that the activities have benefited from a thorough and effective public consultation process; and
- b) Identify additional non-mandatory steps to be considered by the EFRAG Financial Reporting Board (EFRAG FRB), the EFRAG Financial Reporting Technical Expert Group (EFRAG FR TEG) and their working groups or panels for each project.

1.8 The DPP are reviewed at least every five years taking into account the developments in the financial reporting standard setting process and bringing the European views in this process and the wider environment within which the consultation process take place.



CHAPTER 2: PRINCIPLES

- 2.1 EFRAG's legitimacy is built on its transparency, governance, due process, public accountability and thought leadership. EFRAG serves the European public interest.
- 2.2 The due process allows all stakeholders to put forward their views for consideration by EFRAG. It ensures that the diversity of environments (including economic environment) and stakeholder views are taken into account in an inclusive way in its public consultation process and final positions and publications.
- 2.3 EFRAG conducts its activities in a transparent manner (Transparency), considering the perspectives of all stakeholders while ensuring the engagement of subject-matter experts through working groups, advisory panels and task forces in the process of development of its consultation documents – including investors and other users, standard setters, preparers, financial institutions, accountancy profession, regulators, etc. (Public Consultation) – and analysing the potential impacts of its proposals on affected parties and European public good.
- 2.4 The DPP address these principles.

Transparency

- 2.5 EFRAG conducts a transparent due process that is open to all stakeholders. Transparency is achieved in particular by technical discussions held in public meetings, a public consultation process with stakeholders, and through the publication of documents.

Public meetings

- 2.6 EFRAG conducts its activities in a transparent manner:
- a) The meetings of the EFRAG FRB and EFRAG FR TEG are open to the public (including those together with EFRAG Working Groups or Advisory Panels). The EFRAG FRB and EFRAG FR TEG may, at their discretion, hold certain discussions in private. When technical discussions are held in private, the EFRAG FRB Chair or EFRAG FR TEG Chair informs the EFRAG Administrative Board DPC including providing a justification for this choice¹.
 - b) Public sessions of EFRAG FRB and EFRAG FR TEG meetings are webcasted (audio and video recorded). The audio and video recording will be publicly available on the internet and will be later stored for on-demand viewing and made available for a period of one year on the EFRAG website. Thereafter, the recordings will be archived and made publicly available on-demand as long as needed².
 - c) Notice of forthcoming EFRAG FRB and EFRAG FR TEG public meetings and their agendas (including the public and closed sessions at the same meeting) are posted on the EFRAG website³.

¹ Internal Rules – articles 35.1 for EFRAG FRB and 45.1 for EFRAG FR TEG

² Internal Rules – articles 35.2 for EFRAG FRB and 45.2 for EFRAG FR TEG

³ Internal Rules – articles 35.3 for EFRAG FRB and 45.1 for EFRAG FR TEG



- 2.7 The EFRAG FRB Chair and the EFRAG FR TEG Chair can invite individuals to a meeting and they may be accorded speaking rights during any meeting as and when appropriate⁴.
- 2.8 The EFRAG FRB Chair and the EFRAG FR TEG Chair may invite additional permanent observers with speaking rights to attend EFRAG FR TEG meetings⁵.
- 2.9 The EFRAG Administrative Board will hold public sessions whenever the due process oversight is discussed. Meetings of the EFRAG Administrative Board DPC are not held in public.
- 2.10 The discussions are briefly summarised and the (tentative) decisions reached are published as part of the monthly EFRAG Update for each:
- a) EFRAG FRB meeting⁶;
 - b) EFRAG FR TEG meeting⁷;
 - c) EFRAG FR TEG and EFRAG CFSS⁸ meeting;
 - d) Joint EFRAG FRB and EFRAG FR TEG meeting;
 - e) Joint EFRAG FRB and EFRAG SRB⁹ meeting;
 - f) Joint EFRAG FR TEG and EFRAG SR TEG meeting; All EFRAG FRB and FR TEG meetings that are done jointly with other EFRAG working groups or advisory panels; and
 - g) Due process oversight session held in public in the EFRAG Administrative Board meetings¹⁰.
- 2.11 The EFRAG Update also indicates the documents that were approved by written procedure in the period and the written procedures that are expected to take place in the next month.
- 2.12 EFRAG working groups meetings (including EFRAG FIWG, EFRAG RRAWG, EFRAG IAWG, EFRAG Academic Panel, EFRAG Connectivity Panel and EFRAG User panel) are not public unless held jointly with EFRAG FR TEG or EFRAG FRB. EFRAG FR TEG receives the feedback from the working groups discussion in the form of a working group or advisory panel Chair's report.

Meeting papers

- 2.13 The documents published on the EFRAG website include:

⁴ EFRAG Internal Rules – articles 35.1 for EFRAG FRB and 45.1 for EFRAG FR TEG

⁵ EFRAG Internal Rules – articles 38.4

⁶ EFRAG Internal Rules – article 35.4

⁷ EFRAG Internal Rules – article 45.1

⁸ Consultative Forum of Standard Setters

⁹ Sustainability Reporting Board

¹⁰ EFRAG Internal Rules – article 16.2



- a) Draft and final comment letters on IASB and IFRS Foundation and other relevant global initiatives consultation documents and where relevant on consultation documents of other organisations;
 - b) Proactive research discussion papers;
 - c) Draft and final endorsement advice to the EC, including effect studies and the related bases for conclusions as submitted to the European Commission; and
 - d) Related due process documents including early-stage analyses, summary reports, feedback reports¹¹.
- 2.14 All papers and comment letters received as a part of EFRAG's due process are published on the EFRAG website unless confidentiality is requested by the respondent supported by good reason (e.g. it contains sensitive business information). It is expected that such circumstances would be rare and exceptional.
- 2.15 EFRAG FRB's and EFRAG FR TEG's agenda papers for public sessions are publicly available on the EFRAG website. The EFRAG FRB and the EFRAG FR TEG may decide to make selected agenda papers not publicly available. In such cases, the EFRAG FRB Chair or EFRAG FR TEG Chair informs the EFRAG Administrative Board DPC in a follow-up report, including providing a justification for this choice.
- 2.16 This may be the case, for instance, if it is determined that making the papers publicly available would be harmful to individual parties. However, it is expected that such circumstances would be rare and that most papers of the EFRAG FRB and EFRAG FR TEG will be publicly available.
- 2.17 Agenda papers are distributed to EFRAG FRB and EFRAG FR TEG members no later than five (5) working days before the meeting to allow members sufficient time to consider and assess the recommendations. It may be necessary to distribute agenda papers closer to the meeting date and in that case the EFRAG FRB and EFRAG FR TEG have to be informed in advance. The agenda papers are publicly available on the EFRAG website at the same time.

Information on EFRAG FR Projects

- 2.18 Information about the EFRAG's financial reporting projects is available on EFRAG's website.
- 2.19 The financial reporting project pages are updated periodically to reflect the latest developments, particularly when EFRAG publishes a public document or in case of a significant change in the project's status.
- 2.20 EFRAG issues news items to announce public consultations and final publications to seek views of relevant stakeholders and raise awareness about EFRAG's financial reporting activities.

¹¹ EFRAG Internal rules – article 35.6



EFRAG endorsement schedule

- 2.21 EFRAG publishes on its website an endorsement schedule that includes the endorsement status of the published IFRS Accounting Standards (and Interpretations). This schedule is updated for the EFRAG draft and final endorsement advices, the voting in ARC and the publication in the Official Journal.

Information on social media and other means

- 2.22 EFRAG uses social media to promote and raise awareness about its work.
- 2.23 EFRAG also communicates through conferences, articles, etc.

Public Accountability

- 2.24 Public accountability is ensured on the one hand by EFRAG's governance and on the other by EFRAG's due process. EFRAG is accountable to the public at large and the European institutions through its open and transparent due process, including public consultation on its positions; transparency of EFRAG's work; public meetings of the EFRAG FR TEG, EFRAG FR TEG-CFSS of the EFRAG FRB; and various joint meetings, public meeting papers and open nomination processes.
- 2.25 EFRAG publishes every year an Annual Review discussing its activities and presenting financials of the past year. The funding by the European Commission brings increased scrutiny to EFRAG's activities and expenses, including the publication of audited annual accounts and detailed activity reports to the European Commission.

Public Consultation

- 2.26 For each of its projects, EFRAG consults its stakeholders publicly. This public consultation can be carried out through various means such as comment letters, surveys, outreach events, early-stage analysis and field tests.
- 2.27 Public comment periods are indicated on the EFRAG website for each open consultation; any interested or affected stakeholders may provide comments and input (for more information see Public Consultation Deadlines).
- 2.28 Written comments received during the public comment periods are part of the EFRAG's publicly available documents. All public comments received are posted publicly on EFRAG's website (unless confidentiality is requested and supported by good reason). In such cases, the feedback provided will be considered without citing the name of the respondent (for more details, please see the section Comment Letters Received).
- 2.29 Responses received during the public comment period are considered when preparing and agreeing on the final comment letters and endorsement advice.
- 2.30 Some consultation procedures are mandatory. The main due process steps that are mandatory include:
- a) debating any proposals in one or more public meetings;
 - b) exposing for public comment a draft comment letter or draft endorsement advice on any proposed new or amended IFRS Accounting Standard or research papers;



- c) considering in a timely manner the comment letters received on a public consultation; and
- d) publishing a feedback statement for all EFRAG public consultations.

2.31 Other procedures are not mandatory but may be considered by the EFRAG FR TEG and/or EFRAG FRB as relevant. The due process steps that are non-mandatory include:

- a) publishing a document for discussion (for example, a briefing or a bulletin);
- b) establishing consultative groups or other types of specialist advisory groups;
- c) holding outreaches and public events; and
- d) undertaking field work.

2.32 Please see paragraph 3.12 for the related procedures.



CHAPTER 3: DUE PROCESS OVERSIGHT

- 3.1 EFRAG operates under a cascading oversight structure, where due process oversight is part of its governance. Specifically:
- a) The General Assembly exercises oversight over the EFRAG Administrative Board¹².
 - b) The EFRAG Administrative Board is responsible for EFRAG’s due process and the due process oversight of all EFRAG’s technical bodies ¹³.
- 3.2 The EFRAG Administrative Board is assisted by the EFRAG Administrative Board Due Process Committee (EFRAG Administrative Board DPC) ¹⁴.
- 3.3 The EFRAG Administrative Board ensures that EFRAG has an open and transparent due process, including a public consultation process with stakeholders on draft EFRAG positions such as discussion papers, draft consultation documents, technical advice to the European Commission ¹⁵.
- 3.4 The EFRAG Administrative Board DPC shall meet when substantial issues are raised by stakeholders or at the request of either any of its members or the EFRAG Administrative Board. The EFRAG Administrative Board DPC meeting shall be held at least twice a year by either a physical meeting or a conference call or a video conference webcast meeting ¹⁶.
- 3.5 The composition and role of the EFRAG Administrative Board DPC are further described in Article 19 of EFRAG [Internal Rules](#).
- 3.6 The EFRAG FRB organises the due process and may delegate the organisation of EFRAG’s due process including the public consultation process on both technical and other matters to the EFRAG FR TEG ¹⁷.

Areas of Responsibility

- 3.7 The EFRAG Administrative Board provides ongoing oversight over the due process throughout the public consultation process with stakeholders on draft EFRAG positions such as discussion papers, draft comment letters, draft consultation documents, draft endorsement advice, technical advice to the European Commission. The EFRAG Administrative Board is not involved in EFRAG’s technical work ¹⁸.
- 3.8 The due process oversight includes:

¹² EFRAG Statutes -article 7.2.2(e)

¹³ EFRAG Statutes -article 7.3.4

¹⁴ EFRAG Internal Rules - article 19

¹⁵ EFRAG Statutes - article 7.3.4

¹⁶ EFRAG Internal Rules - article 19.4

¹⁷ EFRAG Internal Rules - articles 17.5

¹⁸ EFRAG Statutes -article 7.3.4 and EFRAG Internal Rules - article 13



- a) Reviewing regularly, and in a timely manner, the due process activities of the EFRAG FRB and EFRAG FR TEG, including research activities.
- b) Reviewing, and proposing updates to the procedures in the Due Process Procedures so as to ensure that they continue to reflect good practice that could be subject to public consultation as part of the regular review of Due Process Procedures.
- c) Reviewing the composition of consultative groups to ensure an appropriate balance of perspectives and backgrounds, and overseeing the monitoring activities performed by the EFRAG FRB and EFRAG FR TEG of the effectiveness of those groups.
- d) Responding to correspondence from third parties about due process matters, in collaboration with the EFRAG Secretariat.

3.9 EFRAG FRB is responsible to apply an open and transparent due process including technical discussions held in public, and a public consultation process with stakeholders on draft EFRAG positions such as discussion papers, draft comment letters, draft consultation documents and draft endorsement advice ¹⁹.

Procedure

3.10 The due process oversight occurs throughout the preparation of draft and final comment letters, endorsement advice letters, effects analyses, discussion papers and other consultation documents. This is achieved through periodic reporting by, and in dialogue with, representatives of the EFRAG FRB, EFRAG FR TEG, EFRAG working groups and panels and supported by the EFRAG Secretariat.

3.11 For each technical project, the EFRAG FRB and the EFRAG FR TEG first self-assesses whether it has complied with its due process requirements, and:

- a) Provides evidence and evaluation of the process that was undertaken; and
- b) Concludes whether applicable due process steps have been complied with.

3.12 In addition, if the EFRAG FRB decided not to undertake a mandatory step for a specific project, it consults the EFRAG Administrative Board DPC on its decision and explains the reasons for not undertaking the step, giving it sufficient time to review them and react in a timely manner. The EFRAG Administrative Board DPC reviews and evaluates the evidence provided by the EFRAG FRB of compliance with the established due process. EFRAG Administrative Board DPC is informed once a year about non-mandatory steps not undertaken on significant projects (see paragraph 4.2).

3.13 On a yearly basis, the EFRAG Administrative Board reports to the EFRAG General Assembly on how the due process oversight has been carried out. On a case-by-case basis, the due process applied for an individual project may be considered.

¹⁹ EFRAG Internal Rules -article 28(b)



Communication

- 3.14 The EFRAG Administrative Board supported by the EFRAG Administrative Board DPC operates transparently and with fair consideration of the matters raised by stakeholders. The EFRAG Administrative Board meets in public when addressing matters related to the due process and the related meeting papers and recordings of the meeting are made available on EFRAG's website. Meetings of the EFRAG Administrative Board DPC are not public ²⁰.
- 3.15 The EFRAG Administrative Board responds, when appropriate, to matters raised about the due process of the EFRAG FRB and EFRAG FR TEG and ensures that such matters are addressed satisfactorily.

²⁰ EFRAG Internal Rules - article 15.4



CHAPTER 4: AGENDA SETTING

Technical Work Plan

- 4.1 EFRAG FR TEG and EFRAG FRB agenda is prepared based on the latest approved EFRAG Technical Work Plan. EFRAG's Technical Work plan is regularly updated and presented by the EFRAG Secretariat for approval at EFRAG FRB meetings. The general update on the work plan is available as part of the public papers of EFRAG FRB meetings.
- 4.2 The work plan classifies all current IASB projects as 'significant' and 'less significant'. When a project is classified as 'less significant', the approval from EFRAG FRB will be managed based on a written procedure (please see Appendix 2), i.e., the (draft) comment letter or (draft) endorsement advice is not being brought to the EFRAG FRB at a public meeting, but instead EFRAG FRB members are asked for approval by written procedure.
- 4.3 The following are considered for classifying an IASB project as 'significant' and 'less significant':
- a) All IASB 'standard-setting projects' are classified as 'significant';
 - b) Normally IASB 'maintenance' projects are classified as 'less significant'. In some cases, the EFRAG FRB may decide to classify an IASB's 'maintenance' project as 'significant' and consider it at a meeting. This would usually be the case, for example, when there have been significant discussions among EFRAG FR TEG members or the draft comment letter or draft endorsement advice triggered substantial disagreement with one or more EFRAG FRB members. EFRAG's Technical Work plan provides an explanation for IASB 'maintenance' projects that are classified as 'significant'²¹; and
 - c) The classification of IASB 'research' projects is performed on a case-by-case basis.

Reactive: Work related to Financial Reporting Consultation and Endorsement Advice

- 4.4 EFRAG's role is to ensure that the European views are properly considered in the IASB's standard-setting process and in related international debates. EFRAG ultimately provides advice to the European Commission on whether newly issued or revised IFRS Accounting Standards meet the criteria of the IAS Regulation (see paragraph 6.18 for definition) for endorsement for use in the EU, including whether endorsement would be conducive to the European public good.
- 4.5 For this purpose, EFRAG closely follows the IASB technical agenda including its agenda consultation, research, standard-setting and maintenance programmes by creating corresponding technical financial reporting projects.
- 4.6 The timing of the EFRAG projects is dependent on the timing of the related IASB projects.

²¹ Considerations may include importance for stakeholders, pervasiveness of the issue, its impact, national request and political sensitivity.



Proactive: Research Activities

- 4.7 EFRAG is required to undertake a public consultation on its research work plan on a regular basis.
- 4.8 The primary objective of the consultation on EFRAG research work plan is to seek formal public input on the strategic direction and balance of the EFRAG's research work plan and to also seek views on financial reporting issues that stakeholders think should be given priority by EFRAG.
- 4.9 EFRAG FRB is responsible to decide on the agenda of EFRAG's research activities, after public consultation and after consultation with the European Commission based on EFRAG Internal Rules on possible projects to be included in the research agenda to stimulate the financial reporting debate in Europe and worldwide and to influence the IASB²². The factors considered when selecting projects to include on EFRAG's proactive research agenda include, but are not limited to, whether a project is considered important by European constituents and whether it would be suitable for an EFRAG proactive research project.

Connectivity and coordination between financial and sustainability reporting

- 4.10 The EFRAG Reporting Board in charge of the connectivity project is responsible for the related due process.
- 4.11 As explained in Article 46 of EFRAG's Internal Rules, connectivity and coordination between financial and sustainability reporting is ensured by:
- a) Observership of the Chairs of the EFRAG Reporting Boards in the other EFRAG Reporting Board;
 - b) Joint regular meetings between the EFRAG Reporting Boards;
 - c) Joint oversight of the EFRAG Reporting Boards over the European Lab function carried out by the Project Task Forces (see next section);
 - d) Observership of the Chairs of the EFRAG Reporting TEGs in the other EFRAG Reporting TEG; and
 - e) Consideration of the connectivity aspect in the development of technical positions and technical advice for the projects dealing with connectivity.
- 4.12 When appropriate, the EFRAG Reporting Boards and EFRAG Reporting TEGs may jointly develop (research) projects.

²² Based on EFRAG Internal Rules – article 28.2(g)



Identifying Good Practices

- 4.13 The European Lab function's objective of identifying and sharing good practices and stimulating innovation will be exercised by project task forces (or other models can be used) accountable to either the EFRAG FRB or the EFRAG SRB or both depending on the subject matter. The two EFRAG Reporting Boards appoint the Project Task Forces based on the recommendations of the EFRAG Administrative Board supported by its Nominating Committee.
- 4.14 The European Lab function's activities may also go beyond identification of good practice and consider proactive research on some topics or help with the development of education-oriented material. Through its attachment to both the Financial and Sustainability reporting pillars, the European Lab function's activities may also help to foster interconnectivity between financial and sustainability reporting.

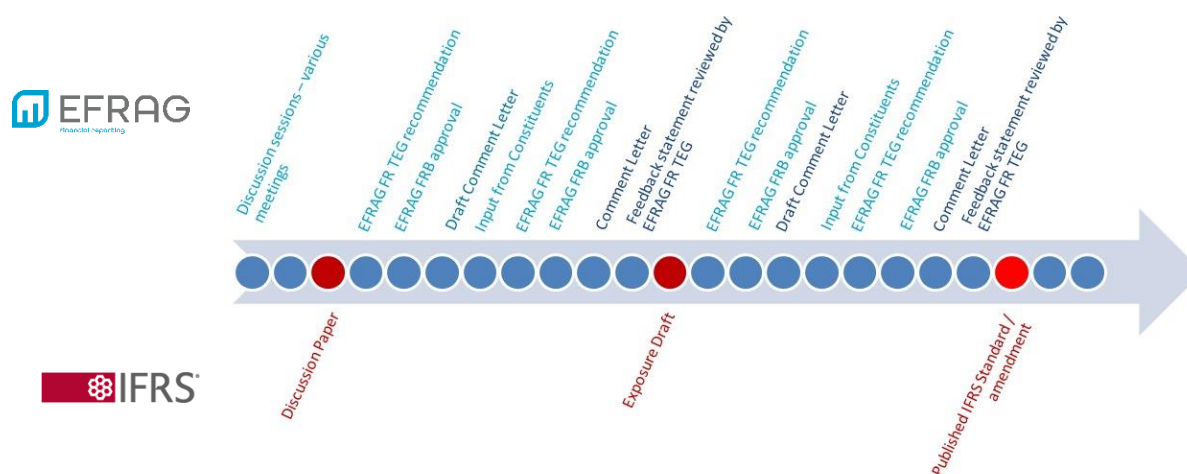


CHAPTER 5: TECHNICAL WORK PROGRAMME

Reactive: Work related to Financial Reporting Consultation and Endorsement

Consultation

- 5.1 EFRAG gains insight on the likely effects of the proposals for new or revised Standards through the formal exposure of proposals and through its field work, analysis and consultations with relevant stakeholders through outreach activities.
- 5.2 EFRAG runs an open consultation process, the results of which contribute to the determination of the final EFRAG position and endorsement advice.
- 5.3 The EFRAG Secretariat closely follows the IASB deliberations and discusses the IASB project developments with related EFRAG technical bodies (including EFRAG FR TEG, EFRAG CFSS and EFRAG working groups and advisory panels). The feedback from these discussions as well as from other types of public consultation forms part of the EFRAG position expressed in EFRAG's draft and final comment letters and endorsement advices.
- 5.4 The following chart represents the stages of the financial reporting consultation process:



- 5.5 EFRAG considers the comment letters received from its stakeholders and the results of other types of public consultation (if any) for the purposes of reaching its final position in its final comment letter.

Public consultation deadlines

- 5.6 EFRAG's consultation deadlines depend on the IASB's consultation deadlines for each project and should normally (but not always) be a little shorter to allow the timely response to the IASB consultation. The EFRAG consultation deadlines also consider that the EFRAG Secretariat has sufficient time to analyse properly the comment letters received. In some cases, EFRAG's comment deadline can be very close to or even the same as the IASB's deadline to allow collection of most of the input from the stakeholders. In such cases EFRAG's final comment letter is published after the IASB consultation deadline. These exceptional cases should be agreed with the IASB in advance.



- 5.7 EFRAG aims at having the longest possible comment period for its stakeholders (depending on the specific circumstances and stages of the project) and applies a minimum comment period of 30 days on its consultations unless there is a need for an accelerated due process (this may involve shorter comment periods and/or approvals by written procedure). In the latter case, the EFRAG Administrative Board, in its oversight role of due process, will need to provide approval.

Responsibility for EFRAG financial reporting positions and approval process

- 5.8 EFRAG FRB is responsible for all positions of EFRAG on financial reporting, after having considered the technical advice provided by EFRAG FR TEG and reflecting the results of EFRAG's due process²³. The responsibility remains with the EFRAG FRB for projects classified as less significant but that take place in form of a written procedure. All technical financial reporting positions and letters are the responsibility of the EFRAG FRB, including contributions to post-implementation reviews and other documents that include recommendations or positions (e.g. summary reports and feedback statements that include recommendations and other positions). EFRAG FR TEG has no authority to issue letters or positions without explicit agreement on delegation of the EFRAG FRB. Also in this case, the responsibility remains with the EFRAG FRB.
- 5.9 In particular, EFRAG FRB is responsible to provide directions to and request technical advice from EFRAG FR TEG on issues relevant for the EFRAG FRB's positions, including the due process; oversees the technical work of the EFRAG FR TEG; and provides guidance and feedback to the EFRAG FR TEG on its technical work.
- 5.10 The consultation documents (e.g. draft comment letters) have to be discussed with EFRAG FR TEG and when considered relevant with related EFRAG working groups and advisory panels. The feedback from these discussions forms part of the EFRAG initial or final position. The EFRAG working groups and advisory panels give input to EFRAG FR TEG.
- 5.11 The consultation document has to be recommended by EFRAG FR TEG for approval by the EFRAG FRB (see section Voting – EFRAG FR TEG). EFRAG FR TEG provides a technical advice to the EFRAG FRB. The EFRAG FRB is responsible for and decides on the final consultation document. EFRAG FRB approves the consultation document for publication (see section Voting – EFRAG FRB) and the final document is signed by the EFRAG FRB Chair.
- 5.12 If the EFRAG FRB does not follow the technical recommendation of the EFRAG FR TEG, it provides an explanation to the EFRAG FR TEG as to why the technical advice was not followed.

Feedback Statement

- 5.13 After the publication of a final comment letter, EFRAG publishes a feedback statement summarising the feedback received from the public consultation (through various activities: comment letters, outreach, questionnaires, field tests, etc.) explaining how EFRAG has reached its final position. The feedback statement should be reviewed by EFRAG FR TEG.

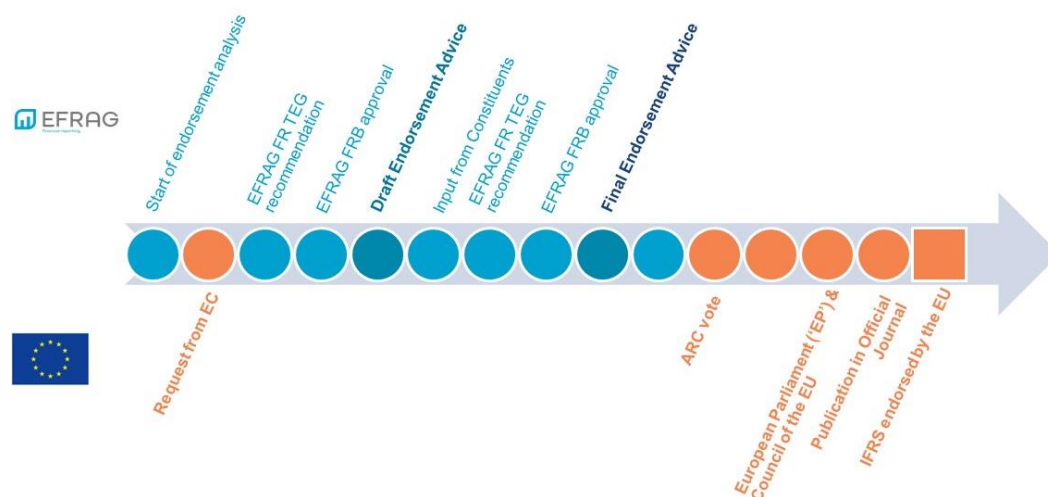
²³ EFRAG Internal Rules - article 28 a)



Endorsement

5.14 After the publication of the final IFRS Accounting Standards (Amendments, Standards and Interpretations issued by the IASB) and following the request from the European Commission (typically through a letter), EFRAG provides its endorsement advice to the European Commission within the agreed timeframe.

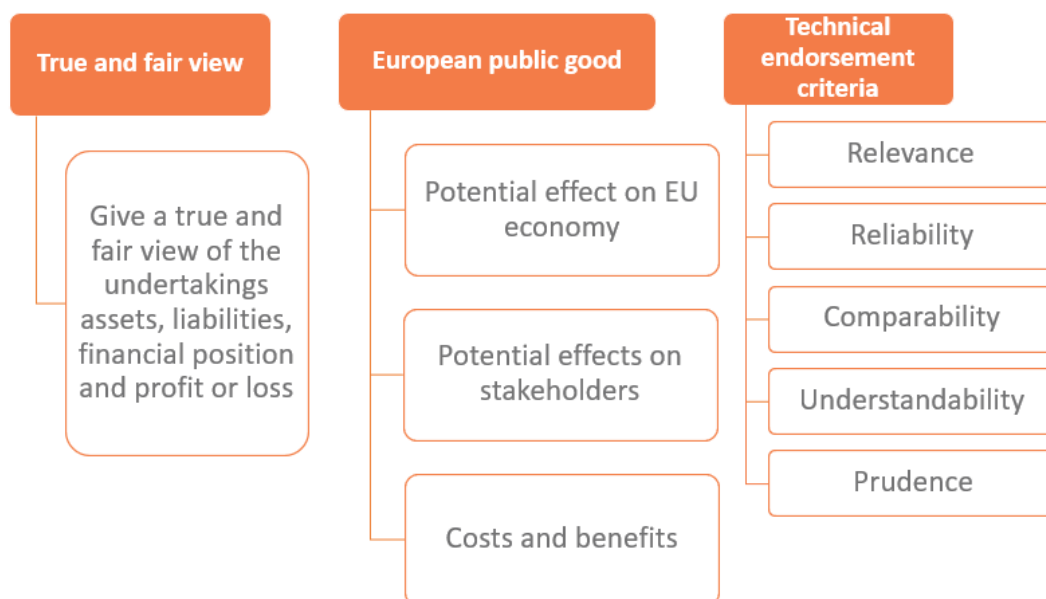
5.15 The following chart represents the stages of the financial reporting endorsement process:



5.16 Following a request from the European Commission, EFRAG prepares a draft endorsement advice based on the discussions with EFRAG FRB, EFRAG FR TEG and other EFRAG working groups if needed. Final endorsement advice reflects the feedback received from a public consultation.

5.17 The objective of an endorsement process is to assess whether the newly issued or amended IFRS Accounting Standard meets the technical endorsement criteria and is conducive for European public good. The following criteria, included in the Regulation (EC) No 1606/2002 (The IAS Regulation), are assessed²⁴:

²⁴ In addition to the four criteria included in the Regulation, EFRAG also adds an assessment of prudence as an additional criterion.



- 5.18 EFRAG FRB is responsible to provide directions on the field work of EFRAG where specific consultations or investigations are deemed necessary to provide an economic assessment. Such consultations or investigations may be related to a specific request made by the European Commission in its request for endorsement advice, in particular on the possible interactions of financial reporting standards with economic growth and financial stability, and, more generally, in the areas where the EFRAG FRB requires support by the EFRAG Secretariat and may require the involvement of experts to assess the wider economic aspects (which could involve outsourcing part of the work under the responsibility of EFRAG)²⁵.
- 5.19 The EFRAG endorsement schedule is reflected in the EU Endorsement ²⁶ Status Report that is publicly available on the EFRAG website.
- 5.20 The final text of a (draft) endorsement advice has to be recommended by EFRAG FR TEG for approval by the EFRAG FRB (see section Voting – EFRAG FR TEG). EFRAG FR TEG provides a technical advice to the EFRAG FRB. The EFRAG FRB is responsible for and decides on the (draft) endorsement advice. EFRAG FRB approves the (draft) endorsement advice for publication (see section Voting – EFRAG FRB) and the final document is signed by the EFRAG FRB Chair.
- 5.21 If the EFRAG FRB does not follow the technical recommendation of the EFRAG FR TEG, it provides an explanation to the EFRAG FR TEG as to why the technical advice was not followed.

²⁵ EFRAG Internal Rules – article 28.2(c)

²⁶ The European Commission has the following powers to modify IFRS Accounting Standards as applicable in EU:

- a) Can reject an IFRS Accounting Standard, 'carve-out' (i.e., reject part of an IFRS Accounting Standard), 'top-up' and/or amend effective date;
- b) Cannot 'carve-in' (i.e., replace IASB's requirements with EU requirements).



- 5.22 After the approval by the EFRAG FRB based on the technical advice provided by EFRAG FR TEG, the draft endorsement advice is published on the EFRAG website (together with the new or amended IFRS Accounting Standard). The results of the vote are recorded internally in a Summary of Decisions (SoD) and made public through the monthly EFRAG Update.
- 5.23 In some cases, the (draft) endorsement advice can also be approved by written procedure (e.g., for 'less significant' projects or in an urgent and accelerated due process). In this case the EFRAG FR TEG or EFRAG FRB members can vote by e-mail. The results of the vote are reflected in the EFRAG Update and are publicly available.
- 5.24 EFRAG endeavours to publish its final endorsement advice and update the EFRAG endorsement schedule on the day it is delivered to the European Commission²⁷.

Proactive: Research Activities

- 5.25 EFRAG aims to influence future financial reporting developments by engaging with its stakeholders and providing timely and effective input to early phases of the IASB's work. EFRAG may carry out this research work in partnership with National Standard Setters to ensure resources are used efficiently and to promote stronger coordination. Four strategic aims underpin proactive work:
- a) Engaging with EFRAG's stakeholders to understand their issues and how financial reporting affects them;
 - b) Influencing the development of IFRS Accounting Standards;
 - c) Providing thought leadership in developing the principles and practices that underpin financial reporting; and
 - d) Promoting solutions that improve the quality of information, are practical, and enhance transparency and accountability.
- 5.26 The main output of the EFRAG's research work is expected to be discussion papers. The discussion paper is prepared by the EFRAG Secretariat and is informed by the input from EFRAG working groups, advisory panels, academics and other stakeholders and by public consultations (outreach events, questionnaires, studies, etc) which might be considered useful.
- 5.27 The final text of a discussion paper has to be recommended by EFRAG FR TEG for the approval of the EFRAG FRB (see section Voting – EFRAG FR TEG). EFRAG FR TEG provides a technical advice to the EFRAG FRB. The EFRAG FRB is responsible for and decides on the final discussion paper. EFRAG FRB approves the discussion paper for publication (see section Voting – EFRAG FRB) and the final document is signed by the EFRAG FRB Chair.
- 5.28 If the EFRAG FRB does not follow the technical recommendation of the EFRAG FR TEG, it provides an explanation to the EFRAG FR TEG as to why the technical advice was not followed.
- 5.29 The discussion paper is published on the EFRAG website after its approval by EFRAG FRB.

²⁷ News items are issued on the FCL and FEA after the FCL and FEA are submitted respectively to the IASB and EC.



- 5.30 After the end of the public consultation period, EFRAG publishes a summary report of the feedback received that may include conclusions on the way forward. The summary report summarises the feedback received from the public consultation (through various activities: comment letters, outreach, questionnaires, field tests, etc) and may indicate the next steps recommended by EFRAG. The summary report should be reviewed by EFRAG FR TEG. However, the EFRAG FRB is involved when the summary report of the feedback received includes recommendations.

Field Work

- 5.31 During a public consultation process on the EFRAG (research) projects, field work may be undertaken as part of the EFRAG due process including the involvement of other organisations such as National Standard Setters. The purpose of field work is to gather facts and evidence, relying on real-life examples and circumstances, drawn from local jurisdictions in Europe. The priority should be given to academic and empirical type of evidence gathered for example through EFRAG Academic Panel, EAA symposium, etc. The ultimate purpose is to help the IASB prepare IFRS Accounting Standards that will deliver high quality financial reporting, taking into account European-specific circumstances and views.
- 5.32 Field work may include, but is not limited to:
- a) Surveys: are organised with a focus on structured written input to gather data, information, and facts on a specific subject;
 - b) Field tests: include testing the application of proposed/pre-final/final requirements to existing contracts and transactions in order to assess the quality of the outcomes and/or the understandability of the requirements and/or the conditions of implementation. Field tests can be based on case studies, shortcuts and approximations in case major system changes would be necessary; and
 - c) Workshops/interviews/roundtables: may be independent of other field work or may be organised as a subsequent step to a survey or a field test. In the latter case, workshops/interviews allow for a supplementary step of in-depth analysis or to ensure the correct understanding of the results of a survey or field test.
- 5.33 Field work can be undertaken at any point of the due processes of EFRAG:
- a) To gather input at different stages of EFRAG research projects possibly jointly with interested National Standard Setters;
 - b) To gather input for a comment letter or in advance to an exposure draft, if specific concerns arise while monitoring any IASB's deliberations;
 - c) To assess new IFRS pronouncements in the course of the European endorsement process (impact analysis) in particular in the European public good assessment; or
 - d) To prepare for, or participate in, an IASB post-implementation review.
- 5.34 The feedback received from field work will be considered in EFRAG consultation documents (e.g., (draft) comment letter, feedback statement, etc) and made public on the EFRAG website. More details can be found in EFRAG field work policy (in Appendix 1).



- 5.35 In some cases, EFRAG supports research studies (e.g. academic study on the effects of the adoption of an IFRS Accounting Standard) or subcontracts to an external entity an impact analysis or a specific task (e.g. analysis of potential changes in the behaviour of preparers and investors arising and the economic impact from the implementation of a new IFRS Accounting Standard).
- 5.36 In the case of outsourcing part of the impact analysis for an endorsement advice due to the lack of in-house knowledge, the report of the contractor may be published as part of the impact analysis, but the overall impact analysis remains the responsibility of EFRAG (EFRAG FRB with technical advice from EFRAG FR TEG).
- 5.37 In case of outsourcing a specific task due to lack of resources or lack of in-house technical knowledge, the report would be considered as a contribution to EFRAG’s technical work and is normally not separately published.
- 5.38 In case of outsourcing a research study, the resulting report is published with an introduction or covering note indicating that EFRAG is not responsible for the contents of the research study.
- 5.39 In cases where the report or study is separately published, the information and views set out in these reports or studies are those of the author(s) and do not necessarily reflect the views or opinion of EFRAG. The contractor shall take all necessary measures to prevent any situation that could compromise the impartial and objective performance of the contract, and any conflict of interest which could arise during performance of the contract must be notified to EFRAG. EFRAG does not guarantee the accuracy of the data or information included in those assessments or studies and may not be held responsible for the use which may be made of the information contained therein.
- 5.40 The objective of the outsourced studies is to inform the EFRAG FRB and EFRAG TEG and its working groups and advisory panels on a particular subject and help to reach its final position, but they do not present a technical position in their own right. EFRAG’s positions are the responsibility of the EFRAG FRB and are published as comment letters, discussion or position papers, or in any other form considered appropriate in the circumstances.

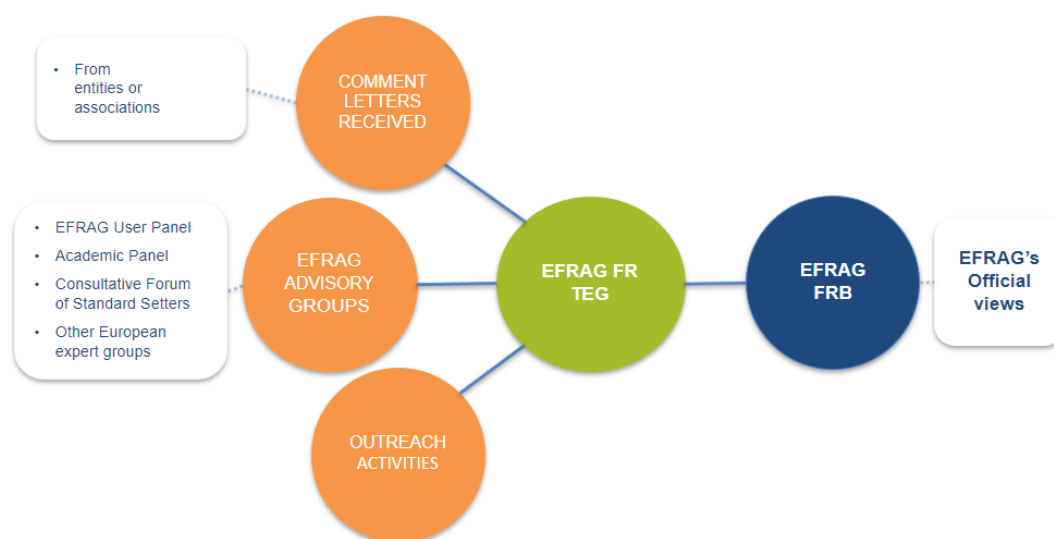
Approval Process

- 5.41 The consultation documents (comment letters, discussion papers, endorsement advices) have to be discussed with EFRAG FR TEG and when considered relevant with related EFRAG working groups and advisory panels. The feedback from these discussions forms part of the EFRAG initial or final position.
- 5.42 The final text of a recommendation on a consultation document has to be approved by EFRAG FR TEG (see section Voting – EFRAG FR TEG). It votes to provide a technical advice to the EFRAG FRB to recommend the consultation document for approval to the EFRAG FRB. EFRAG FR TEG may recommend the drafting changes to the document to be incorporated by the EFRAG Secretariat before sending the document to EFRAG FRB.
- 5.43 EFRAG FRB in turn votes to approve the document for publication (see section Voting – EFRAG FRB). EFRAG FRB may recommend the drafting changes to the document to be incorporated by the EFRAG Secretariat before the publication.
- 5.44 The final document is signed by the EFRAG FRB Chair.



- 5.45 If the EFRAG FRB does not follow the technical recommendation of the EFRAG FR TEG, it provides an explanation to the EFRAG FR TEG as to why the recommendation was not followed.

EFRAG'S PROCESS TO REACH A POSITION IN FINANCIAL REPORTING



- 5.46 The results of the vote as well as the members' discussions are recorded internally in the SoD of the related EFRAG FR TEG or EFRAG FRB meeting and made public through the monthly EFRAG Update. The information on voting is included in the SoD, including those that voted in favour, abstained, dissented and were absent. The SoD of EFRAG FR TEG is approved by EFRAG FR TEG. The SoD of EFRAG FRB is approved by EFRAG FRB.
- 5.47 For projects classified as "less significant" in the EFRAG Technical Workplan, the consultation documents can also be approved by written procedure. In this case the EFRAG FR TEG or EFRAG FRB members can vote by e-mail. The results are reflected in the EFRAG Update and are publicly available.
- 5.48 If the project is considered less significant (but not limited to less significant), the EFRAG FRB may agree to delegate all the due process work on a consultation document with the exception of (draft) endorsement advice to the EFRAG FR TEG but remains responsible also in these cases, and the EFRAG FRB Chair signs the consultation document.

Voting – EFRAG FR TEG ²⁸

- 5.49 To take a valid decision, a minimum of 60 % of the EFRAG FR TEG members must attend the meeting. Proxy voting is not permitted in the decisions by EFRAG FR TEG.
- 5.50 In all decisions of EFRAG FR TEG, a simple majority will apply. In a vote on draft or final endorsement advice for submission to the EFRAG FRB, EFRAG FR TEG members are not permitted to abstain. The EFRAG FRB is informed about the voting choices.
- 5.51 Detailed voting rules are defined in Internal Rules by Articles 42 and 43.

²⁸ Internal Rules - article 42



Voting – EFRAG FRB ²⁹

- 5.52 The EFRAG FRB can only deliberate if at least two thirds (2/3) of its members are present in person or by webcast meeting. The EFRAG FRB Chair has the discretion to accept that EFRAG FRB members be represented by written proxies in exceptional cases. The EFRAG FRB's decisions are made by consensus of the EFRAG FRB members. Should it not be possible to reach a consensus-based decision, all decisions are taken by a qualified majority of two-thirds (2/3) of the EFRAG FRB members present. It is the role of the EFRAG FRB Chair to use best efforts to achieve consensus decision-making.
- 5.53 Detailed voting rules are defined in Internal Rules by Article 36.

Voting by written procedure

- 5.54 When a project is classified as 'less significant' (see section Technical Work Plan) or in an urgent and accelerated due process, the approval by EFRAG FRB/EFRAG FR TEG may be managed based on a written procedure. The detailed procedure is publicly available on the EFRAG website (see Appendix 2). In the case that substantial issues are raised by EFRAG FR TEG, particularly when there are dissenting views, the topic should in principle be discussed at an EFRAG FRB meeting.

²⁹ EFRAG Internal rules – article 36



CHAPTER 6: TYPES OF PUBLICATIONS AND CONSULTATION DOCUMENTS

- 6.1 EFRAG launches public consultations on its draft comment letters, draft endorsement advice and discussions papers (and other types of publications) to stimulate comments and the expression of views by stakeholders. Public consultations may include outreach events and field work including field tests and surveys.
- 6.2 Additional non-mandatory materials to support the public consultation and public meetings can be issued by the EFRAG Secretariat in consultation with EFRAG FR TEG: The EFRAG Secretariat briefings, podcasts, videos, other explanatory or educational material, Q&As, presentations and public EFRAG FR TEG or EFRAG FRB agenda papers. Such materials are not subject to formal approval by EFRAG FR TEG or EFRAG FRB.
- 6.3 In addition, as part of EFRAG’s research work, EFRAG may publish non-consultation documents which aim mainly to raise debate and inform stakeholders on how financial reporting may affect them.
- 6.4 During its public consultation process and as part of its research work, EFRAG typically publishes the following documents:

EFRAG Reactive projects	EFRAG Proactive projects
Draft comment letter	Discussion paper
Final comment letter	Summary Report of feedback received
Feedback statement	Summary report of an outreach event (or included in feedback report)
Draft endorsement advice	Additional non-mandatory materials
Final endorsement advice	
Early-stage impact analysis	
Summary report of an outreach event (or included in feedback report)	
Additional non-mandatory materials	
Other EFRAG technical financial reporting letters	



Draft Comment Letter

- 6.5 The EFRAG draft comment letter is developed in response to the IASB discussion paper (for the IASB research projects) or exposure draft (for the IASB standard-setting and maintenance projects) with input from EFRAG FR TEG discussions and relevant EFRAG working groups and advisory panels.
- 6.6 After the approval of the final text of the draft comment letter by the EFRAG FRB based on the technical advice provided by the EFRAG FR TEG (see Approval Process section), the draft comment letter is published on the EFRAG website with an open call for comments.

Comment letters received

- 6.7 Comment letters received from stakeholders play a pivotal role in the deliberations process of both the EFRAG FR TEG and EFRAG FRB, because they provide public responses to a formal consultation.
- 6.8 All comment letters received are published on EFRAG website unless confidentiality is requested. Portions of a (or an entire) comment letter may be withheld from the public if publication would be harmful to the submitting party, for example, a potential breach of securities disclosure laws or contains sensitive business information. All the comment letters are published on the EFRAG website as soon as they are received and are presented in chronological order.
- 6.9 The EFRAG Secretariat obtains to the extent possible draft comment letters from stakeholders (organisations) that cannot meet the EFRAG deadline so that they can be considered in preparing the public agenda papers for EFRAG FR TEG. If draft comment letters are received from stakeholders to facilitate the work of the EFRAG Secretariat in preparation for the public agenda papers, they are not uploaded and treated confidentially: only the official comment letters of the stakeholders are published on the EFRAG website.
- 6.10 The comment letters received after the comment deadline but before the EFRAG FR TEG meeting will be included in the EFRAG agenda papers to the extent possible and otherwise – orally reported in the EFRAG FR TEG meeting and will be considered by EFRAG FR TEG in formulating its advice. These comment letters are uploaded on the EFRAG website.
- 6.11 The Comment letters that are received after the EFRAG FR TEG (but before EFRAG FRB meeting) are not included in the EFRAG FR TEG advice. These comment letters may be considered by the EFRAG FRB for the purposes of the EFRAG (final) comment letter and (final) endorsement advice (i.e. are considered on a case-by-case basis, considering the timing of submission). Comment letters received after EFRAG FRB meeting are not considered by the EFRAG FRB. In these cases it is indicated on the EFRAG website that the comment letter was not considered by the EFRAG FRB.

Final Comment Letter

- 6.12 The final EFRAG position is informed by the results of the public consultation, such as but not limited to comment letters received, outreach events held, questionnaires, and field tests.



- 6.13 When considering comment letters received, EFRAG assesses the matters raised and the related explanations and evidence provided by respondents. The strength of the analysis provided in comment letters, and the evidence supporting the analysis, is important. An analysis of the type of respondent and their geographical origin can help EFRAG assess whether there are any areas or types of respondents for which additional outreach might be appropriate. For some technical matters it can be helpful if the EFRAG Secretariat provides an analysis of the extent to which the views of particular sectors/professional backgrounds are shared or divided – for example, the extent to which investors have a common view or whether views differ between the types of respondent or regions.
- 6.14 The EFRAG final position is expressed in EFRAG final comment letter which is published on EFRAG website³⁰ after being approved by the EFRAG FRB taking into account the technical advice provided by the EFRAG FR TEG.

Feedback Statement

- 6.15 A feedback statement summarises feedback received from the public consultation (through various activities: comment letters received, outreach, questionnaires, field tests, etc) and explains how EFRAG has reached its final position in the final comment letter (see 5.10).
- 6.16 The Feedback statement is reviewed by the EFRAG FR TEG³¹ before publication on the EFRAG website. The EFRAG FRB is not involved.

Draft Endorsement Advice

- 6.17 Upon a request by the European Commission to give endorsement advice on an IFRS Accounting Standard (and not before), EFRAG prepares a draft endorsement advice.
- 6.18 The draft endorsement advice is prepared based on the discussions with EFRAG FR TEG with input from EFRAG working groups and advisory panels where relevant.
- 6.19 In the draft endorsement advice, EFRAG considers whether the new or amended IFRS Accounting Standard meets the technical requirements on the application of international accounting standards, as set out in Regulation (EC) No 1606/2002 (The IAS Regulation); in other words, that the Standard:
- a) is not contrary to the principle set out in Article 4 (3)³² of Council Directive 2013/34/EU (The Accounting Directive);
 - b) meets the criteria of understandability, relevance, reliability, and comparability required of the financial information needed for making economic decisions and assessing the stewardship of management; and
 - c) is conducive to the European public good.

³⁰ News items are issued on the FCL and FEA after the FCL and FEA are submitted respectively to the IASB and EC

³¹ EFRAG Internal Rules – article 39.1

³² The annual financial statements shall give a true and fair view of the undertaking's assets, liabilities, financial position and profit or loss. Where the application of this Directive would not be sufficient to give a true and fair view of the undertaking's assets, liabilities, financial position and profit or loss, such additional information, as it is necessary to comply with that requirement, shall be given in the notes to the financial statements.



- 6.20 After the approval of the EFRAG FRB taking into account the technical advice provided by EFRAG FR TEG, the draft endorsement advice is published on the EFRAG website for public consultation (together with the new or amended IFRS Accounting Standard and related Basis for Conclusions) to seek comments from stakeholders.

Final Endorsement Advice

- 6.21 Final endorsement advice contains the EFRAG final position on the suitability of the IFRS Accounting Standard for use in Europe.
- 6.22 Final endorsement advice is submitted to the European Commission after approval by the EFRAG FRB taking into account the technical advice of the EFRAG FR TEG and is published on the EFRAG website including publication of the updated EFRAG endorsement schedule.
- 6.23 The technical advice provided by EFRAG FR TEG considers the results of public consultation and subsequent working groups and advisory panel discussions (if any).
- 6.24 EFRAG endeavours to publish its final endorsement advice on the day it is delivered to the European Commission³³.

Early-stage Analysis

- 6.25 EFRAG is committed to assessing and sharing knowledge about the likely costs of implementing proposed new requirements and the likely ongoing associated costs and benefits of each. It is usually performed for major projects.
- 6.26 EFRAG's views on the likely effects of the IASB's proposal typically include the results of an early-stage analysis. The early-stage analysis would typically be carried out at the IASB exposure draft stage or before and, when used, it should be carried out before the publication of its final comment letter.
- 6.27 In forming its judgement on the evaluation of the likely effects, EFRAG considers issues such as:
- a) how the proposed changes are likely to affect how activities are reported in the financial statements of those applying IFRS Accounting Standards;
 - b) how those changes improve the comparability of financial information between different reporting periods for an individual entity and between different entities in a particular reporting period;
 - c) how the changes will improve the user's ability to assess the future cash flows of an entity;
 - d) how the improvements to financial reporting will result in better economic decision-making;
 - e) the likely effect on compliance costs for preparers, both on initial application and on an ongoing basis; and

³³ EFRAG Internal Rules – article 17.7



- f) how the likely costs of analysis for users (including the costs of extracting data, identifying how the data has been measured and adjusting data for the purposes of including them in, for example, a valuation model) are affected.

6.28 The analysis is not expected to include a formal quantitative assessment of the overall effect of a Standard. Initial and ongoing costs and benefits are likely to affect different parties in different ways. The level of analysis is tailored to the type of changes proposed, with more analysis undertaken for new Standards and major amendments.

Discussion Paper

6.29 The results of EFRAG's proactive research work are presented in EFRAG discussion papers which can be found on EFRAG's website. The discussion paper is informed by the input from EFRAG working groups, academics and any other public consultations (outreach events, questionnaires, studies, etc) which might be considered useful.

Summary Report of feedback received and recommendations

6.30 The summary report of the feedback received summarises the feedback from the public consultation (through various activities: comment letters received, outreach, questionnaires, field tests, etc).

6.31 The summary report of the feedback received is reviewed by EFRAG FR TEG before publication on the EFRAG website. The EFRAG FRB is involved when the summary report of the feedback received includes recommendations.

Summary Report of an outreach event

6.32 EFRAG may organise, in coordination with National Standard Setters and other organisations, outreach events (physical or online, including workshops and round table discussions). These outreach events are usually open to the public but can be held as a closed meeting to provide a safe space for stakeholders to express their views. These events are an opportunity to hear views directly from stakeholders and to stimulate debate.

6.33 The feedback received from an outreach event, be it public or closed, is reported in a Summary Report. Summary Reports of the outreach events are published on the EFRAG website. A Summary Report is prepared by the EFRAG Secretariat and, depending on the format, approved by all speakers before publication. The Summary Report of a closed event does not attribute views to individual participants but a list of participants may be included in the Summary Report.

6.34 A Summary Report is not subject to approval by EFRAG FR TEG or the EFRAG FRB.

6.35 A Summary Report can be part of the feedback report of a public consultation.

Additional non-mandatory materials

6.36 Additional non-mandatory materials to support the public consultation and public meetings can be issued by the EFRAG Secretariat in consultation with the EFRAG FR TEG, such as EFRAG Secretariat briefings, bulletins, short series discussion papers, podcasts, videos, other explanatory or educational material, Q&As, presentations and public EFRAG FR TEG or EFRAG FRB agenda papers.



- 6.37 These materials are not subject to approval by EFRAG FR TEG or EFRAG FRB and they do not represent the views of EFRAG but of the EFRAG Secretariat only.
- 6.38 However, any non-mandatory materials that include a position or a recommendation have to be approved by EFRAG FR TEG and EFRAG FRB.

Other EFRAG letters

- 6.39 In some circumstances EFRAG may decide to comment on a particular IASB document which is not a discussion paper, request for information, exposure draft or new or amended IFRS Accounting Standards. In this case EFRAG FR TEG and EFRAG FRB may decide the form of such a comment: comment letter or other documents. Such circumstances are expected to be rare and represent a financial reporting issue which is pervasive, wide-spread and have significant reporting implications.
- 6.40 For example, the EFRAG FRB may exceptionally decide to comment on an IFRS IC agenda decision. The comment period for an agenda decision is typically very short. Therefore, in this case the EFRAG FRB should inform the EFRAG DPC about its decision and the steps it plans to perform (e.g. shorter consultation period or no consultation).
- 6.41 Such documents follow the same due process as for comment letters for public consultation as set out in section 5.

Other additional important information

- 6.42 Please see on EFRAG Website our Field Work Policy ([here](#)).
- 6.43 Please see on EFRAG Website our policy for approval by Written Procedure by the EFRAG FRB ([here](#)).



APPENDIX 1: FIELD WORK POLICY INCLUDED FOR CONVENIENCE - IN THE FINAL DPP ONLY THE LINK TO THE POLICY WILL BE INCLUDED

Objective

A1.1 This policy sets out how field work is undertaken as part of the EFRAG due process including the involvement of other organisations such as National Standard Setters.

Introduction

A1.2 Ensuring that new or revised financial reporting requirements are of high quality includes evidencing or testing the following elements in practice:

- a) The needs for revised or new accounting requirements;
- b) Whether sufficient guidance is provided, so that judgement can be exercised and uncertainty as to how the standard is meant to be applied is avoided;
- c) Whether the requirements provide outcomes consistent with the objectives specified in the standard;
- d) Other possible effects, upon certain circumstances;
- e) Whether implementation difficulties can be overcome at a reasonable cost;
- f) How much time is needed up to the mandatory application of the new requirements so that all preparers, auditors, regulators and users can be well prepared to manage and understand the resulting changes in financial reporting;
- g) In the case of post-implementation reviews, whether practice after mandatory application satisfies financial information needs in accordance with the objectives set at the inception of the new or revised requirements; and
- h) How the requirements contribute to the European public good.

A1.3 The purpose of field work is to gather facts and evidence, relying on real-life examples and circumstances, drawn from jurisdictions in Europe. This comes in addition to developing an understanding of the economic reality that is considered and to forming a view as to whether proposed requirements would best depict it. The ultimate purpose is to help the IASB prepare IFRS Accounting Standards that will deliver high quality financial reporting, taking into account European-specific circumstances and views.

A1.4 As described later in this policy, there are a variety of ways to undertake field work and different approaches may serve different objectives. However, field work always requires the involvement of practitioners.

A1.5 As EFRAG expects that National Standard Setters in Europe and EFRAG have similar mandates and objectives in the development of IFRS Accounting Standards, EFRAG believes that cooperation between EFRAG and National Standard Setters in carrying out some of EFRAG's field work involving European constituents contributes to greater transparency, greater consistency and greater efficiency. It is, however, recognised that there may be circumstances preventing the desired level of cooperation, for instance in the event of a specific confidential request of the European Commission.



- A1.6 The next sections present:
- a) The main characteristics of field work; and
 - b) The principles that, in EFRAG's view, apply to European field work.

Main characteristics of field work

Field work is designed to gather evidence

- A1.7 Gathering evidence and facts requires the involvement of practitioners. This can be done in a variety of ways, which can be undertaken separately and combined where appropriate. Field work includes, but is not limited to:
- a) *Surveys*: are organised with a focus on structured written input to gather data, information, and facts on a specific subject;
 - b) *Field tests*: include testing the application of proposed/pre-final/final requirements to existing contracts and transactions in order to assess the quality of the outcomes and/or the understandability of the requirements and/or the conditions of implementation. Field tests can be based on case studies, shortcuts and approximations in case major system changes would be necessary; and
 - c) *Workshops/interviews*: may be independent of other field work or may be organised as a subsequent step to a survey or a field test. In the latter case, workshops/interviews allow for a supplementary step of in-depth analysis or to ensure the correct understanding of the results of a survey or field test.
- A1.8 Each field work initiative should be designed to best respond to its set objective in the most efficient manner available. Particular care must be taken to not over burden constituents.
- A1.9 Field work can focus on one or more specific groups of practitioners (preparers, auditors, users and regulators). Surveys and field tests are designed based on a specific subset of practitioners.
- A1.10 The usual steps in undertaking surveys/field tests include setting up a questionnaire and launching a public call for participants. In some cases, questionnaires can be discussed with participants in individual meetings. Following the receipt of questionnaires, interviews with participants can be held to deepen the analysis and understand some findings. In some cases, industry specific workshops can further support the process. Analysis of the findings is provided, and possible conclusions are submitted for approval in accordance with EFRAG's approval processes. The process ends with the publication of a feedback statement and may be included in a letter to the IASB or the European Commission commenting on the findings, conclusions, and, if applicable, recommendations.

Why should field work be performed?

- A1.11 EFRAG considers that, given its mandate to comment on IASB proposals and issued standards from a European perspective and to provide independent advice to the European Commission in respect of endorsement of final IASB pronouncements, it is its duty to conduct its own field work, since there might be specific European issues which need to be taken into account. Furthermore, to meet its objectives, it is necessary that EFRAG is able to form its own independent views.



When should field work be performed?

- A1.12 To be effective in ensuring that IFRS Accounting Standards are suitable for adoption in Europe, field work has to be conducted in the course of the standard-setting process so that the IASB can address the inadequacies and difficulties identified. Field work can be necessary at any point of the due processes of EFRAG:
- a) To gather input at different stages of EFRAG research projects possibly jointly with interested National Standard Setters;
 - b) To gather input for a comment letter or in advance of an exposure draft, if specific concerns arise while monitoring any IASB's deliberations;
 - c) To assess new IFRS pronouncements in the course of the European endorsement process (impact analysis), in particular in the European public good assessment; or
 - d) To prepare for, or participate in, an IASB post-implementation review.

Principles applying to European field work

- A1.13 Three principles need to be observed if European field work is to be effective and bring to stakeholders and the European Commission the assurance that it has been done independently.
- A1.14 Exceptions to these principles would be considered and justified on a case-by-case basis.
- A1.15 EFRAG also considers these principles relevant if it participates in field work initiated by other organisations such as the IASB.

First principle: Every field work initiative requires the explicit definition of its objective before preparations can start

- A1.16 Field work can be run to achieve the different objectives described in the introduction. It is important, from the start of an activity, to be specific about the objective of a particular field work initiative.
- A1.17 The objective may be based on a proposal made by EFRAG or jointly with one or more National Standard Setters. Also, National Standard Setters may propose field work that can be undertaken jointly with EFRAG and possibly with other National Standard Setters.
- A1.18 When field work is carried out at the request of the European Commission, the objective is set in the request for advice.
- A1.19 Where there is agreement on the objective, cooperation in the development of the supporting material - timetable and other practical details – ensures that every party involved is satisfied that the joint work will meet the defined objectives in an efficient and timely manner.
- A1.20 Agreement on the objective includes agreement on timing so as to enable the evidence and its assessments to be available in a timely manner, which is consistent with the purpose of the field work. Coordination efforts must remain compatible with the appropriate effectiveness in timing.



Second principle: Time is of the essence

A1.21 Whenever European field work is carried out as part of the activities of EFRAG possibly in cooperation with the National Standard Setters in the IASB due process, time is of the essence. To make European influence effective and ensure that proper action can be requested from the IASB at the appropriate time without unnecessarily disrupting the IASB workplan, EFRAG and participating National Standard Setters should be in a position to make their assessments, either within the IASB deadlines or, if the purpose is to bring input to the IASB in the course of their deliberations, before they issue a consultation document or reach final conclusions.

Third principle: Participating staff must have access, on a confidential basis, to all detailed evidence and report independently

A1.22 To reach independent conclusions, analysing findings must not be influenced by any form of vested interest. This requires that all detailed evidence gathered during field work from each jurisdiction be available to both the staff of EFRAG and, in the case of cooperation, the staff of the National Standard Setter of that local jurisdiction. Only evidence accessible to staff can be taken into account in developing these conclusions and recommendations.

A1.23 Notwithstanding the above, appropriate coordination is required to avoid duplication of work. Review processes may help achieve efficient cooperation whilst satisfying the need for independent assessment.

A1.24 To ensure confidentiality of the data gathered during the field work, a data protection and confidentiality policy is adopted, applicable to all staff from EFRAG and National Standard Setters involved in the exercise. This policy is based on European law³⁴ and is included below.

Data protection and confidentiality policy on field work

A1.25 This document describes the data protection and confidentiality policy of EFRAG in respect of field work. It has been derived from European legislation.³⁵

A1.26 The objective of the field work and the identity of participating National Standard Setters should be communicated to the information providers in advance.

A1.27 The information collected in the field work can only be used in relation to the objective of the exercise.

A1.28 When participating in the field work, the information provider gives its implicit consent on the access to and the use and processing of the information. Any restriction should be requested explicitly.

³⁴ Regulation 2016/679 on General Data Protection

³⁵ Regulation 2016/679 on General Data Protection. Although this regulation focuses on data of personal individuals and is therefore not applicable to the kind of information that EFRAG gathers in its field work activities, EFRAG considers the approach of the regulation and the adopted principles to be a good starting point for its own policy. EFRAG's general privacy policy is available on EFRAG's website



- A1.29 EFRAG and National Standard Setters should implement appropriate technical and organisational measures to protect the information against accidental or unlawful destruction, accidental loss, alteration, or unauthorised disclosure or access. Such measures shall ensure a level of security appropriate to the risks represented by the processing and the nature of the information to be protected.
- A1.30 The information should be maintained as long as needed for the project and internal research purposes.
- A1.31 The access to information is restricted to EFRAG and participating National Standard Setters who have been assigned to the specific field work exercise.
- A1.32 The collected information will remain confidential. Information used in any reports will be presented in such a way that no individual company or person can be identified. However, the list of information providers in the field work will be made public, unless they explicitly requested anonymity.
- A1.33 The output of the field work will be shared between EFRAG and participating National Standard Setters and - where applicable - the IASB. Reports on the findings of a field work exercise are made public, including field tests and surveys.



APPENDIX 2: WRITTEN PROCEDURE (INCLUDED FOR CONVENIENCE - IN FINAL THE DPP ONLY THE LINK TO THE POLICY WILL BE INCLUDED)

Policy for Approval by Written Procedure by the EFRAG FRB

When is approval by written procedure used?

- A2.1 EFRAG's Technical Work plan is updated and presented by the EFRAG Secretariat for approval at every EFRAG FRB meeting. The work plan is available as part of the public papers of each EFRAG FRB meeting.
- A2.2 The work plan classifies all current IASB projects as 'significant' and 'less significant'.
- A2.3 When a project is classified as 'less significant', the approval from EFRAG FRB will be managed based on a written procedure, i.e. the (draft) comment letter or (draft) endorsement advice is not being brought to the EFRAG FRB at a public meeting, but instead EFRAG FRB members are asked for approval by written procedure.
- A2.4 If the project is considered less significant (but not limited to less significant), the EFRAG FRB may agree to delegate all the due process work on a consultation document with the exception of (draft) endorsement advice to the EFRAG FR TEG but remains responsible also in these cases, and the EFRAG FRB Chair signs the consultation document.
- A2.5 The following are considered for classifying an IASB project as 'significant' and 'less significant':
- a) All IASB 'standard-setting projects' are classified as 'significant';
 - b) Normally IASB 'maintenance' projects are classified as 'less significant'. In some cases, the EFRAG FRB may decide to classify an IASB 'maintenance' project as 'significant' and consider it at a physical meeting. This would usually be the case, for example, when there had been significant discussions among EFRAG FR TEG members or the draft comment letter or draft endorsement advice triggered substantial disagreement with one or more EFRAG FRB members. EFRAG's Technical Work plan provides an explanation for IASB 'maintenance' projects that are classified as 'significant'; and
 - c) The classification of IASB 'research' projects is performed on a case-by-case basis.
- A2.6 The final output of all EFRAG Research projects is discussed and approved at a physical meeting of the EFRAG FRB.

Process for approval by written procedure

- A2.7 The EFRAG Secretariat initiates the approval by written procedure by sending an e-mail to EFRAG FRB members and observers with speaking rights (EFRAG Internal Rules Art 8). The e-mail should include:
- a) information about the votes of EFRAG FR TEG members;
 - b) the document supported by EFRAG FR TEG for approval (i.e. (draft) comment letter or (draft) endorsement advice); and



- c) some background information, such as the relevant IASB document and/or the request for endorsement advice by the European Commission.

A2.8 The deadline for responding to the e-mail is normally four working days. The EFRAG Secretariat will send a reminder to the EFRAG FRB members that have not replied 24 hours before the deadline indicated in the original e-mail.

Quorum

A2.9 In the case of a physical meeting (EFRAG Statutes, Art 7.3.5), the EFRAG FRB can only deliberate if at least two thirds (2/3) of its members are present in person or by telecommunication.

A2.10 In the case of approval by written procedure, at least 2/3 of the EFRAG FRB members must respond to the e-mail of the written procedure for an approval to take place.

A2.11 EFRAG FRB members that do not reply by the deadline will be recorded as not participating in the process, i.e. as if they are absent from a physical meeting.

Consensus

A2.12 In accordance with Art 7.3.5 of the EFRAG Statutes, the EFRAG FRB's decisions are made by consensus.

A2.13 At a public meeting, when an EFRAG FRB member disagrees with the position expressed in a document, it may be possible to reach consensus through discussion and agreement on changes to the document. However, this is not possible to achieve in a written procedure, because it would require a new round of consultation with all EFRAG FRB members that have already expressed their view.

A2.14 In the rare circumstances that no consensus can be reached, the following applies.

Final Endorsement Advice

A2.15 Based on Art 7.3.5(b)(iv) of the EFRAG Statutes, formal dissenting opinions are expressed and included only at the final endorsement advice stage.

A2.16 For projects planned to be considered by written procedure, EFRAG FRB members need to inform their intention to formally dissent as early as possible and require discussion on the topic at a public EFRAG FRB meeting. This should normally be the case at draft endorsement advice stage, whereby the EFRAG FRB member should indicate their intention and reason to dissent if the final endorsement advice were the same or similar as the draft endorsement advice. The draft endorsement advice should indicate the alternative view(s), without mentioning the name(s) of the EFRAG FRB member(s) and seek the views of the constituents.

A2.17 In the rare circumstances where an EFRAG FRB member does not support the final endorsement advice and has not informed the EFRAG FRB in advance as mentioned in paragraph 14, the member can choose to:

- a) express disagreement via mail but accepting that EFRAG's position is based on the majority view. In that case, no formal dissenting opinion will be included in the final endorsement advice; or
- b) immediately inform the EFRAG FRB Chair to request that the EFRAG FRB discuss the issue, either in a physical meeting or a conference call, when the reason for



disagreement is such that it would, in the EFRAG FRB member's view, deserve a round of plenary discussion.

Other documents

- A2.18 Decisions are taken by a qualified majority of two-thirds (2/3) of EFRAG FRB members that respond to the written procedure in the following cases (Art 7.3.5(b)(i)-(iii)):
- a) for draft or final comment letters to the IASB and other draft or final positions and draft or final position papers for public consultation purposes; and
 - b) for draft endorsement advice for public consultation purposes.

Transparency of the process

- A2.19 In cases of approval by written procedure, the final approval of EFRAG's position does not take place in the public domain.
- A2.20 To make the process more transparent, the following steps are implemented each time a written procedure is used:
- a) The results of the EFRAG FR TEG meeting are reported in the relevant section of the EFRAG Update; and
 - b) The EFRAG Update indicates the documents that were approved by written procedure in the period and the written procedures that are expected to take place in the next month.
- A2.21 In the case that substantial issues are raised by EFRAG FR TEG, usually the topic is discussed at an EFRAG FRB physical meeting or conference call.



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