SWPA – Project Update

Issues Paper

Objective

1 The objective of this paper is to update EFRAG FR TEG members on the IASB's latest discussions and tentative decisions (since March 2023) on its Exposure Draft *Subsidiaries without Public Accountability: Disclosures* ('the ED') and to receive comments on the IASB´s tentative decisions and EFRAG Secretariat analysis.

2 The last project update was provided to EFRAG FR TEG-CFSS in March 2023 and to EFRAG IAWG in April 2023.

Structure of the document

3 The following topics are discussed in this paper:

(a) Relationship of the new IFRS Accounting Standard with the *IFRS for SMEs* Accounting Standard (IASB AP31, March 2023)

(b) Updating the language of the disclosure requirements (IASB AP31B, April 2023)

(c) Proposed disclosure requirements (IASB AP31A, April 2023; IASB AP31A, May 2023; IASB AP31A, July 2023)

(d) Disclosure requirements about transition in other IFRS Accounting Standards (IASB AP31C, May 2023)

(e) Paragraph 16 of the ED (IASB AP31B, May 2023)

(f) New disclosure requirements in IFRS Accounting Standards (IASB AP31D, May 2023)

(g) Effective date and transition (IASB AP31A, July 2023)

(h) Due process (IASB AP31B, July 2023)

(i) Approach to maintenance (IASB AP31, September 2023)

4 For each of the topics listed above, a summary of the IASB's initial proposals, EFRAG's position in its final comment letter, the latest IASB's discussions and decisions and the EFRAG Secretariat analysis are provided.

Project history

5 In July 2021 the IASB published the ED *Subsidiaries without Public Accountability* with the objective of developing a reduced-disclosure IFRS Standard that would apply on a voluntary basis to subsidiaries without public accountability.

6 In February 2022, after extensive consultation with constituents, EFRAG published its final comment letter ('FCL').

7 From April 2022 until now the IASB has been discussing the feedback and redeliberated the proposals in the ED to develop a new IFRS Accounting Standard. At this stage, the IASB has already given the IASB Staff permission to start balloting (IASB meeting in July 2023). However, it is likely that the IASB will discuss some sweep issues by the end of this year.

8 The EFRAG Secretariat has been providing updates to EFRAG FR TEG, with the last one being in March 2023. Since March 2023, the IASB discussed the topics outlined in 'Structure of the document' section.

Relationship of the new IFRS Accounting Standard with the IFRS for SMEs Accounting Standard

IASB proposal in the ED

9 In the ED, the IASB developed the disclosure requirements of the reduced disclosures IFRS Accounting Standard using *IFRS for SMEs* Standard as a starting point. Subsequently:

(a) when the recognition and measurement requirements in IFRS Standards and the IFRS for SMEs Standard are the same, the IASB made minor tailoring changes (e.g., changing terminology or/and updating cross-references);

(b) when the recognition and measurement requirements in IFRS Standards and the IFRS for SMEs Standard differ, the IASB applied the principles in BC34 of the Basis for Conclusions to the disclosure requirements in IFRS Standards (i.e., the principles in paragraph BC157 of the Basis for Conclusions of IFRS for SMEs Standard which were used, when the IASB originally developed the disclosure requirements for SMEs).

EFRAG Final Comment Letter

10 In its FCL, EFRAG generally agreed with the IASB's approach of using the *IFRS for SMEs Standard* as the starting point. EFRAG also welcomed the IASB's proposal to consider the principles in paragraph BC157 of the *IFRS for SMEs* Standard when there is a need to tailor the disclosure requirements.

11 However, EFRAG considered that the key principles proposed by the IASB in paragraph BC33 of the Basis for Conclusions should encompass cost-benefit considerations. EFRAG also highlighted the risks of not considering the existing disclosure requirements in IFRS Accounting Standards in the light of BC157 when there are no recognition and measurement differences between the *IFRS for SMEs* Standard and IFRS Accounting Standards but there are differences in timing between the two.

IASB discussions and tentative decisions

12 During the feedback period, some stakeholders expressed concerns regarding the approach used by the IASB in developing the proposed disclosure requirements. The feedback was discussed in the IASB's October 2022 meeting.

13 The concerns were related to:

(a) The use of *IFRS for SMEs* Standard as the starting point of the reduced disclosures IFRS Accounting Standard as:

(i) the ED will be part of an IFRS Accounting Standard; and

(ii) users' information needs from the financial statements of eligible subsidiaries are different to SMEs;

(b) The costs and benefits trade-off;

(c) The interaction between the new reduced disclosures IFRS Accounting Standard and the *IFRS for SMEs* Standard.

14 Considering the concerns received, the IASB Staff expressed intention to clarify in the Basis for Conclusions that:

(a) in developing the ED, the IASB started with the disclosure requirements in the *IFRS for SMEs* Standard;

(b) in the future the reduced disclosures IFRS Accounting Standard will be updated as new and amended IFRS Accounting Standards are developed;

(c) the *IFRS for SMEs* Standard will continue to be updated periodically;

(d) there will be separate consultations for updating the reduced disclosure Standard and the *IFRS for SMEs* Standard;

(e) Costs and benefits will be assessed separately for subsidiaries and SMEs that are not subsidiaries; and

(f) The reduced disclosures IFRS Accounting Standard and *IFRS for SMEs* Standard may have different disclosure requirements because of (a) recognition and measurement difference and (b) assessment of costs and benefits.

15 After discussing this topic, in March 2023 the IASB tentatively decided that, in developing reduced disclosure requirements, it will assess separately the costs and benefits for subsidiaries applying the IFRS Accounting Standard *Subsidiaries without Public Accountability: Disclosures* and the costs and benefits for SMEs applying the IFRS for SMEs Accounting Standard.

EFRAG Secretariat analysis

16 The EFRAG Secretariat generally supports an approach where the new reduced disclosures IFRS Accounting Standard will be updated when other IFRS Accounting Standards are being updated or issued and that the *IFRS for SMEs* Standard will be updated periodically in a separate consultation.

17 The EFRAG Secretariat also supports that the costs and benefits are assessed separately.

18 In the EFRAG Secretariat's view, when there is a comprehensive review of *the IFRS for SMEs* Standard, we agree that there should not be an obligation to consider an update to the forthcoming new reduced disclosures IFRS Accounting Standard. However, if deemed necessary, a separate consultation should be done after the *IFRS for SMEs* consultation is completed (e.g. in a separate ED focused on the reduced disclosures IFRS Accounting Standard).

19 New disclosure requirements in the reduced disclosures IFRS Accounting Standard may also require an update of *IFRS for SMEs* Standard, which should be done within its comprehensive review if deemed necessary.

Questions for EFRAG FR TEG

20 Does EFRAG FR TEG have any comments on the IASB's tentative decisions on the relationship of the new IFRS Accounting Standard with IFRS for SMEs?

21 Does EFRAG FR TEG agree with the separate assessment of costs and benefits of both standards?

22 Does EFRAG FR TEG agree with the EFRAG Secretariat analysis?

Updating the language of the disclosure requirements

IASB proposal in the ED

23 As mentioned above, the disclosure requirements proposed in the ED were based on disclosure requirements in the *IFRS for SMEs* Standard and IFRS Accounting Standards. In the ED, the IASB proposed minor tailoring to the disclosure requirements that came from the *IFRS for SMEs* Standard. For example, to align terms and language with IFRS Accounting Standards (e.g., continent rent vs variable lease payments).

EFRAG Final Comment Letter

24 In its FCL, EFRAG did not include a recommendation on the language used in developing the proposed disclosure requirements. However, EFRAG highlighted the risk of not considering the latest developments in IFRS Accounting Standards when there were no recognition and measurement differences (including the risk of not using new terminology).

IASB discussions and tentative decisions

25 In its October 2022 meeting, after considering the feedback from stakeholders that the language and structure of the disclosure requirements should be the same as in IFRS Accounting Standards (to facilitate consistent application), the IASB tentatively decided to modify its approach to ensure that the language used in the disclosure requirements is the same as the language in full IFRS Standards.

26 In March 2023, the IASB discussed the challenges of updating the language (as tentatively decided in October 2022) and the approach to be followed by the IASB staff.

27 In particular, the IASB staff identified cases where updating the language is not straightforward as:

(a) judgement is required in some cases;

(b) there are cases where the IASB's decisions relate to paragraphs of an IFRS Accounting Standards that include both some disclosure requirements that were decided to be included and some elements that were decided to be omitted;

(c) inconsistency in the terms used in different IFRS Accounting Standards;

(d) abbreviations, terms and standard phrasing in older standards are not consistent with the latest IFRS Foundation style; and

(e) references to specific paragraphs may need to be updated.

28 At its April 2023 meeting, the IASB staff also proposed that when drafting the disclosure requirements in the new reduced disclosures IFRS Accounting Standard, to use the language in the full IFRS Accounting Standards and only adjust the language to make the disclosure requirements more consistent and understandable by:

(a) adapting the structure of the requirements where disclosure objectives or other aspects of the requirements have not been retained in the reduced disclosures IFRS Accounting Standard;

(b) using a consistent term for the same concept (for example, 'reporting period');

(c) updating language to be consistent with the latest IFRS Foundation style (for example, using 'table' rather than 'tabular format');

(d) using standard phrasing for disclosure requirements (for example, 'an entity shall disclose');

(e) updating references to specific paragraphs to include a reference to the applicable IFRS Accounting Standard or a reference to the relevant paragraph in the reduced disclosures IFRS Accounting Standard.

29 The IASB Staff also considered the impact of the modified approach on disclosure requirements proposed in the ED that were based on disclosure requirements in the *IFRS for SMEs* Standard that were not derived from requirements in the latest full IFRS Standard and recommended deleting them.

30 The IASB did not make any decisions during its April 2023 meeting.

EFRAG Secretariat analysis

31 The EFRAG Secretariat remarked that the language and structure used in the ED was sometimes simplified and inconsistent with full IFRS Accounting Standards. This could create confusion and inconsistent application of the proposed requirements and would also involve complexity when amendments to other IFRS Standards are included in the reduced disclosures IFRS Accounting Standard.

32 Therefore, the EFRAG Secretariat welcomes the IASB's tentative decision in October 2022 and discussions in April 2023 to ensure that the language and structure used in the new reduced disclosure IFRS Accounting Standard will be in line with the full IFRS Accounting Standards.

Questions for EFRAG FR TEG

33 Does EFRAG FR TEG have any comments on the IASB approach to updating the language of the disclosure requirements?

34 Does EFRAG FR TEG agree with the EFRAG Secretariat analysis?

Proposed disclosure requirements

35 Based on the feedback received, the IASB tentatively decided to revise the proposed disclosure requirements related to different IFRS Accounting Standards. The IASB discussed these disclosures in different meetings.

36 The IASB discussed the overall feedback received. Several of EFRAG requests did not lead to a change compared to the proposals in the ED. Particularly, to mention are those disclosures not required in the ED but required by the EU Accounting Directive (EFRAG Secretariat Briefing - Compatibility study - SWPA.pdf):

(a) an entity to provide information that enables users of consolidated financial statements to understand the composition of a group (as required by paragraphs 10(a)(i), B4(a) and B5-B6 of IFRS 12);

(b) detailed information on subsidiaries that have non-controlling interests that are material to the reporting entity, including the name of the subsidiary (as required by paragraph 12 of IFRS 12);

(c) an entity to disclose the name of each material joint arrangement or associate (as required by paragraph 21 of IFRS 12);

(d) an entity to disclose the nature of the entity's relationship with the joint arrangement or associate (as required by paragraph 21 of IFRS 12);

(e) disclosures on the proportion of ownership interest or participating share held by the entity and, if different, the proportion of voting rights held (as required by paragraph 21 of IFRS 12);

(f) for separate financial statements, a list of significant investments in subsidiaries, joint ventures and associates, including the name of those investees, the principal place of business (and country of incorporation, if different) of those investees. Also, its proportion of the ownership interest (and its proportion of the voting rights, if different) held in those investees (as stated in paragraph 16 of IAS 27);

(g) disclosures on the nature of expenses when an entity classifies expenses by function, including depreciation and amortisation expense and employee benefits expense (as stated in paragraph 104 of IAS 1).

37 There were also a number of additional disclosures requested by EFRAG which were not included such as those related to IAS 12 *Income Tax* and IAS 36 *Impairment of Assets*.

38 The summary of the changes is presented in the table below.

EFRAG recommendation in its FCL	**IASB decision**	**Issue solved?**
IFRS 1 *First-time Adoption of International Financial Reporting Standards*		
The disclosure requirements in paragraph 25(a) of the ED do not exist in IFRS 1. Thus, the IASB's approach seems to result in having subsidiaries being required to provide more disclosures than in full IFRS. *Please refer to paragraph 69 of the FCL.*	To remove paragraph 25(a) of the ED, requiring to provide a description of the nature of each change in accounting policy in an entity's first financial statements (the proposed disclosure was more onerous than IFRS 1).	In line with EFRAG recommendation.
	Not to add paragraph 24(c)[1] of IFRS 1 to the prospective Standard (requires disclosure on impairment losses (and reversals) recognised in an entity preparing its opening IFRS statement of financial position). Otherwise, it would be an exception to IASB's approach for developing disclosure requirements.	Not suggested by EFRAG.
Section "Reconciliations", ED is silent on the statement of cash flows. Users focused on cash flows would like to see the material adjustments to the statement of cash flows (paragraph 25 of the ED).	No changes.	**Not addressed.**

[1] if the entity recognised or reversed any impairment losses for the first time in preparing its opening IFRS statement of financial position, the disclosures that IAS 36 Impairment of Assets would have required if the entity had recognised those impairment losses or reversals in the period beginning with the date of transition to IFRSs.

EFRAG recommendation in its FCL	**IASB decision**	**Issue solved?**
Please refer to paragraphs 70-71 of the FCL.		
IFRS 2*: Share-based Payment*		
The ED does not reflect the improvements from the Amendments to IFRS 2, which introduced clarifications and additional disclosures on share-based payment transactions with a net settlement feature for withholding tax obligations (Paragraph 52 of IFRS 2). *Please refer to paragraphs 73-76 of the FCL.*	No changes.	**Not addressed.**
IFRS 3 *Business Combinations*		
Primary reasons for the business combination: Users of financial statements usually find useful the information about the primary reasons for the business combination as in paragraph B64(d) of IFRS 3. *Please refer to paragraph 77 of the FCL.*	No changes.	**Not addressed.**
	To add subparagraph B64(j)(i)[2] without the first sentence of paragraph B64(j) of IFRS 3 to the prospective Standard as it provides information about contingencies and measurement uncertainties.	Not suggested by EFRAG.
Business combinations not finalised at the end of the reporting period - If a business combination is not finalised at the end of the reporting period, users of FS usually find information about amounts recognised in the FS for the business combination that have been determined	No changes	**Not addressed.**

[2] … If a contingent liability is not recognised because its fair value cannot be measured reliably, the acquirer shall disclose: (i) the information required by paragraph 86 of IAS 37; …

EFRAG recommendation in its FCL	**IASB decision**	**Issue solved?**
provisionally (paragraph B67(a) of IFRS 3). *Please refer to paragraph 78 of the FCL.*		
Business combination achieved in stages: For business combinations that are completed in different stages, users look for information about the amount of any gains or losses recognised as a result of remeasuring in fair value the equity interest in the acquiree held by the acquirer before the business combination (paragraph B64(p) of IFRS 3). *Please refer to paragraph 79 of the FCL.*	No changes	**Not addressed.**
IFRS 5 ***Non-current Assets Held for Sale and Discontinued Operations***		
	To add paragraphs 33(c)[3] and 41(d)[4] of IFRS 5 as they provide information about short-term cash flows and consistent with approach in IFRS 8.	Not suggested by EFRAG.
IFRS 6 ***Exploration for and Evaluation of Mineral Resources***		
Full disclosures on IFRS 6 should be required, including the disclosures in paragraphs 23 and 24 of IFRS 6 *Please refer to paragraphs 80-81 of the FCL.*	No changes.	**Not addressed.**
IFRS 7 ***Financial Instruments: Disclosures***		
	To restrict the application of paragraphs 62, 66 and 67 of the	Not suggested by EFRAG.

[3] An entity shall disclose: … (c) the net cash flows attributable to the operating, investing and financing activities of discontinued operations. These disclosures may be presented either in the notes or in the financial statements. These disclosures are not required for disposal groups that are newly acquired subsidiaries that meet the criteria to be classified as held for sale on acquisition.

[4] An entity shall disclose the following information in the notes in the period in which a non-current asset (or disposal group) has been either classified as held for sale or sold: … (d) if applicable, the reportable segment in which the non-current asset (or disposal group) is presented in accordance with IFRS 8 *Operating Segments*.

EFRAG recommendation in its FCL	IASB decision	Issue solved?
	ED (on credit risk management practices, expected credit losses and changes in the loss allowance) to eligible subsidiaries that provide financing to customers as a main business activity, considering costs and benefits of applying the proposed disclosure requirements in IFRS 7.	
	To withdraw paragraphs 55 (disclosures on hedge accounting) and 60 (disclosures on interest rate benchmark reform) of the ED as other proposed disclosure requirements provide similar information.	Not suggested by EFRAG.
Add disclosures on maturity analysis for derivatives and non-derivative financial liabilities that show the remaining contractual maturities (paragraph 39 of IFRS 7). *Please refer to paragraph 82 of the FCL.*	To add paragraph 39 of IFRS 7, containing maturity analysis for liquidity risk disclosures to the reduced disclosures IFRS Accounting Standard as it provides information about liquidity and solvency	In line with EFRAG recommendation.

EFRAG recommendation in its FCL	IASB decision	Issue solved?
IFRS 12 *Disclosure of Interests in Other Entities*		
Add several disclosures for intermediate parents and/or subsidiaries that have significant investments: • When a subsidiary is also a parent, disclosures that help users to understand the **composition of a group** (paragraph 10(a)(i) of IFRS 12) like detailed information on subsidiaries that have non-controlling interests that are material to the reporting entity (paragraph 12 of IFRS 12). • Disclosure on **consolidated and unconsolidated structured entities** (paragraph 14 of IFRS 12). • Disclosures on any current **commitments or intentions to provide financial or other support**	To add paragraphs 14[5], 15[6], 19D(b), 19E, 19F[7], 30[8] and 31[9] of IFRS 12 to the reduced disclosures IFRS Accounting Standard as they provide information about (i) cash flows, obligations and commitments, and (ii) liquidity and solvency.	**Partly in line with EFRAG recommendation (paragraphs 10(a)(i), 12 and 21 were not included).**

[5] An entity shall disclose the terms of any contractual arrangements that could require the parent or its subsidiaries to provide financial support to a consolidated structured entity, including events or circumstances that could expose the reporting entity to a loss (e.g. liquidity arrangements or credit rating triggers associated with obligations to purchase assets of the structured entity or provide financial support)

[6] If during the reporting period a parent or any of its subsidiaries has, without having a contractual obligation to do so, provided financial or other support to a consolidated structured entity (e.g. purchasing assets of or instruments issued by the structured entity), the entity shall disclose: (a) the type and amount of support provided, including situations in which the parent or its subsidiaries assisted the structured entity in obtaining financial support; and (b) the reasons for providing the support.

[7] 19D: An investment entity shall disclose: … (b) any current commitments or intentions to provide financial or other support to an unconsolidated subsidiary, including commitments or intentions to assist the subsidiary in obtaining financial support.

19E: If, during the reporting period, an investment entity or any of its subsidiaries has, without having a contractual obligation to do so, provided financial or other support to an unconsolidated subsidiary (e.g. purchasing assets of, or instruments issued by, the subsidiary or assisting the subsidiary in obtaining financial support), the entity shall disclose: (a) the type and amount of support provided to each unconsolidated subsidiary; and (b) the reasons for providing the support.

19F: An investment entity shall disclose the terms of any contractual arrangements that could require the entity or its unconsolidated subsidiaries to provide financial support to an unconsolidated, controlled, structured entity, including events or circumstances that could expose the reporting entity to a loss (e.g. liquidity arrangements or credit rating triggers associated with obligations to purchase assets of the structured entity or to provide financial support).

[8] If during the reporting period an entity has, without having a contractual obligation to do so, provided financial or other support to an unconsolidated structured entity in which it previously had or currently has an interest (for example, purchasing assets of or instruments issued by the structured entity), the entity shall disclose: (a) the type and amount of support provided, including situations in which the entity assisted the structured entity in obtaining financial support; and (b) the reasons for providing the support.

[9] An entity shall disclose any current intentions to provide financial or other support to an unconsolidated structured entity, including intentions to assist the structured entity in obtaining financial support.

EFRAG recommendation in its FCL	**IASB decision**	**Issue solved?**
to an unconsolidated subsidiary (paragraph 19F and 19D of IFRS 12). • Disclosures on **significant investments** as users are typically focused on the economic value of the investments, on the return on such investments and nature of an entity's relationship (paragraph 21 of IFRS 12). *Please refer to paragraphs 84-88 of the FCL.*		
	To amend paragraph 68 of the ED to add 'joint operations' from paragraph B4 of IFRS 12 as it clarifies how information required are presented.	Not suggested by EFRAG.
IFRS 13 *Fair Value Measurement*		
	Withdraw paragraph 81 of ED (guidance on determining appropriate classes of assets and liabilities) as it refers to guidance on how to apply proposed disclosure requirements.	Not suggested by EFRAG.
IFRS 14 *Regulatory Deferral Accounts*		
Disclosure requirements in the ED need to be simplified. RRA IFRS Standard, and not IFRS 14, should be analysed and included in the reduced-disclosure IFRS Standard. *Please refer to paragraphs 89-90 of the FCL.*	No changes.	**Not addressed.**
IFRS 15 *Revenue from Contracts with Customers*		
Include cross reference to paragraph 124(a) of the ED as disclosures on significant judgements, and changes in the judgements, made in applying	No changes	**Not addressed.**

EFRAG recommendation in its FCL	IASB decision	Issue solved?
IFRS 15 to the contracts that significantly affect the determination of the amount and timing of revenue from contracts with customers should be included (paragraph 123 of IFRS 15). *Please refer to paragraph 91 of the FCL.*		
	To withdraw paragraph 93 of the ED (information about significant changes in the contract asset and contract liability balances) for cost-benefit reasons.	Not suggested by EFRAG.
	To add paragraph 119(a)[10] of IFRS 15 (information about performance obligations) as it provides information about accounting policy choices.	Not suggested by EFRAG.
IFRS 16 *Leases*		
	To withdraw paragraphs 100(d) and 105 of the ED (information about leases that leases that have commenced by the end of the reporting period and the use of practical expedient) as other proposed disclosure requirements provide similar information.	Not suggested by EFRAG.
The disclosures (by lessees) on leases with variable payment could be expanded as it is relevant for users to assess future cash flows (similar to paragraph 53(e) of IFRS 16).	To add subparagraphs (e), (g) and (i) of paragraph 53[11] of IFRS 16 as they provide information about (i) cash flows, cash flow and commitments, and (ii) disaggregation of amounts.	In line with EFRAG recommendation.

[10] An entity shall disclose information about its performance obligations in contracts with customers, including a description of all of the following: (a) when the entity typically satisfies its performance obligations (for example, upon shipment, upon delivery, as services are rendered or upon completion of service), including when performance obligations are satisfied in a bill-and-hold arrangement…

[11] A lessee shall disclose the following amounts for the reporting period: … (e) the expense relating to variable lease payments not included in the measurement of lease liabilities; … ; (g) total cash outflow for leases; … (i) gains or losses arising from sale and leaseback transactions…

EFRAG recommendation in its FCL	IASB decision	Issue solved?
Please refer to paragraph 92 of the FCL.		
Disclosure required in paragraph 109 of the ED on sale and leaseback transactions could be expanded. *Please refer to paragraph 93 of the FCL.*	No changes.	**Not addressed.**
IAS 1 Presentation of Financial Statements		
To add disclosures on the nature of expenses when an entity classifies expenses by function, as required by paragraph 104 of IAS 1. *Please refer to paragraph 94 of the FCL.*	No changes.	**Not addressed.**
	To withdraw paragraphs 120–122 of the ED and to retain paragraphs 112–114 of IAS 1 as it is consistent with the IASB's tentative decision to not include guidance in the reduced disclosures IFRS Accounting Standard.	Not suggested by EFRAG.
To disclose the amounts of dividends proposed or declared before the financial statements were authorised for issue but not recognised as a distribution to owners during the period, and the related amount per share (paragraph 137 (a) of IAS 1). *Please refer to paragraph 95 of the FCL.*	To add paragraph 137[12] of IAS 1 as it provides information about liquidity and solvency.	In line with EFRAG recommendation.
IAS 12 Income Taxes		
	To withdraw paragraph 145 of the ED (disclosure objective of	Not suggested by EFRAG.

[12] An entity shall disclose in the notes: (a) the amount of dividends proposed or declared before the financial statements were authorised for issue but not recognised as a distribution to owners during the period, and the related amount per share; and (b) the amount of any cumulative preference dividends not recognised.

EFRAG recommendation in its FCL	**IASB decision**	**Issue solved?**
	IAS 12) as it is a disclosure objective.	
To present the disclosure required by paragraph 147(c) of the ED in the form of a numerical reconciliation (paragraph 81(c) of IAS 12). To add disclosure on discontinued operations (paragraph 81 (h) of IAS 12). For an entity with significant investment, to add disclosures on the aggregate amount of temporary differences associated with investments in subsidiaries, branches and associates and interests in joint arrangements (paragraph 81(f) of IAS 12). To add disclosures on evidence of deferred tax asset (paragraph 82 of IAS 12). *Please refer to paragraphs 96-99 of the FCL.*	No changes.	**Not addressed.**
IAS 19 *Employee Benefits*		
	To add paragraph 141(b)[13] of IAS 19, in particular the requirement to disclose separately the effects of interest income to have more disaggregation.	Not suggested by EFRAG.
	To add paragraph 147(b)[14] of IAS 19 as it provides information about short-term cash flows, liquidity and solvency.	Not suggested by EFRAG.
	To replace paragraph 152(c)(iii) of the ED with paragraph	Not suggested by EFRAG.

[13] Each reconciliation listed in paragraph 140 shall show each of the following, if applicable: … (b) interest income or expense…

[14] To provide an indication of the effect of the defined benefit plan on the entity's future cash flows, an entity shall disclose: … (b) the expected contributions to the plan for the next annual reporting period…

EFRAG recommendation in its FCL	IASB decision	Issue solved?
	141(c)(i)[15] of IAS 19 to provide more disaggregation.	
To specify how a subsidiary should quantify the principal actuarial assumptions used (paragraph 144 of IAS 19). *Please refer to paragraph 100 of the FCL.*	No changes.	**Not addressed.**
IAS 24 *Related Party Disclosures*		
	To add paragraph 26[16] of IAS 24 to be consistent with the requirements in IAS 24 when an exemption is applied for government-related entities.	Not suggested by EFRAG.
IAS 27 *Separate Financial Statements*		
	To amend paragraphs 177–180 of the ED to reference the applicable IFRS 12 disclosure requirements to be consistent with the IASB's tentative decision to update the language.	Not suggested by EFRAG.
To disclose a list of significant investments in subsidiaries, joint ventures and associates, including the name of those investees and their principal place of business, and a proportion of the ownership interest held in those investees (paragraph 16 of IAS 27). *Please refer to paragraph 101 of the FCL.*	No changes.	**Not addressed.**

[15] (c) (i) remeasurements of the net defined benefit liability (asset), showing separately: the return on plan assets, excluding amounts included in interest in 141 (b)…

[16] If a reporting entity applies the exemption in paragraph 25, it shall disclose the following about the transactions and related outstanding balances referred to in paragraph 25: (a) the name of the government and the nature of its relationship with the reporting entity (i.e. control, joint control or significant influence); (b) the following information in sufficient detail to enable users of the entity's financial statements to understand the effect of related party transactions on its financial statements: (i) the nature and amount of each individually significant transaction; and (ii) for other transactions that are collectively, but not individually, significant, a qualitative or quantitative indication of their extent. Types of transactions include those listed in paragraph 21.

EFRAG recommendation in its FCL	IASB decision	Issue solved?
IAS 34 *Interim Financial Reporting*		
	To withdraw paragraph 185(k) of the ED (disclosures on transfers between levels of the fair value hierarchy used in measuring the fair value of financial instruments) as corresponding disclosure removed from IFRS 13.	Not suggested by EFRAG.
IAS 36 *Impairment of assets*		
The following information could be required when calculating unit's recoverable amount: (a) the period over which management has projected cash flows (*); (b) the growth rate used to extrapolate cash flow projections; (c) the discount rate(s) applied to the cash flow projections. Detailed information about impairments and reversal of impairments (*). Paragraph 193 of the ED could be expanded to include a 'description of the cash-generating unit (paragraph 130(d) of IAS 36). *Please refer to paragraphs 102-108 of the FCL.*	To add paragraphs 130(d)(i) and (iii), 134(d)(iv)–(v) and 134(e)(iv)–(v) of IAS 36 as they provide information about measurement uncertainty, short-term cash flow and liquidity.	**Partly in line with EFRAG recommendation. Items with (*) not addressed.**
IAS 37: *Provisions, Contingent Liabilities and Contingent Assets*		
To expand paragraph 196(a) of the ED to mention the increase during the period in the discounted amount (paragraph 84(e) of IAS 37). *Please refer to paragraph 109 of the FCL.*	No changes.	**Not addressed.**

EFRAG recommendation in its FCL	IASB decision	Issue solved?
IAS 40 *Investment Property*		
	To add paragraph 79(e)[17] of IAS 40 as it provides information about solvency.	Not suggested by EFRAG.

Questions for EFRAG FR TEG

39 Does EFRAG FR TEG agree with the proposed changes to the disclosure requirements? Do members consider that any additions to the disclosure requirements not suggested in EFRAG comment letter or omissions of the disclosure requirements suggested in EFRAG comment letter as crucial points that should be amended in the final standard?

Disclosure requirements about transition in other IFRS Accounting Standards

IASB proposal in the ED

40 In the ED, the IASB proposed that disclosure requirements about transition to a new or amended IFRS Accounting Standard, as specified in those Standards would also apply to eligible subsidiaries that apply the ED.

EFRAG Final Comment Letter

41 In its FCL, EFRAG generally agreed with the IASB's proposal of applying the same transition requirements included in new or amended Standards by eligible subsidiaries that apply the ED. In EFRAG's view, it is also important that the transition requirements of new and amended Standards apply, even when the disclosure requirements are not included in the ED itself.

42 However, EFRAG considered that the IASB should query whether the transition disclosure requirements are relevant for entities that apply the reduced-disclosure requirements of the IFRS Standard and whether a simplification of the transition disclosure could be useful.

IASB discussions and tentative decisions

43 In May 2023, the IASB discussed whether to confirm the proposal included in the ED, of applying the disclosure requirements, about transition to a new or amended IFRS Standard that eligible subsidiaries adopting the reduced disclosures IFRS Accounting Standard would also apply.

44 During the feedback period, almost all respondents agreed with the proposal since disclosure requirements about transition:

(a) provide useful information to users of eligible subsidiaries' financial statements without bringing a significant increase in costs, since the related disclosures are only provided once;

(b) are expected to be material.

[17] In addition to the disclosures required by paragraph 75, an entity that applies the cost model in paragraph 56 shall disclose: … (e) the fair value of investment property. In the exceptional cases described in paragraph 53, when an entity cannot measure the fair value of the investment property reliably, it shall disclose: (i) a description of the investment property; (ii) an explanation of why fair value cannot be measured reliably; and (iii) if possible, the range of estimates within which fair value is highly likely to lie.

45 Few of the respondents considered that:

(a) disclosure requirements about transition should only be applied if they provide useful information to users;

(b) requirements could be simplified.

46 The IASB proposed to apply these transition requirements to eligible subsidiaries because they provide useful information to users of eligible subsidiary's financial statements about the impact of initial application of a new or amended IFRS Standard.

47 The IASB is also open to the possibility of proposing reduced disclosure requirements about transition to a new or amended IFRS Accounting Standards in the future. Those disclosure requirements expand, and occasionally replace, the disclosure requirements in IAS 8 *Accounting Policies, Changes in Accounting Estimates and Errors*.

48 In May 2023, the IASB tentatively decided to proceed with its proposal in the Exposure Draft that disclosure requirements about the transition to a new or amended IFRS Accounting Standard set out in that new or amended Standard apply to eligible subsidiaries.

EFRAG Secretariat analysis

49 The EFRAG Secretariat agrees with the IASB's proposal to maintain the transition disclosure requirements for the eligible subsidiaries and to consider ways to simplify these requirements in order to reduce the costs of eligible subsidiaries' preparation of financial statements and maintaining at the same time the useful information for users. The IASB's tentative decision is in line with EFRAG comment letter.

Question for EFRAG FR TEG

50 Does EFRAG FR TEG agree with the IASB tentative decision that disclosure requirements about the transition to a new or amended IFRS Accounting Standard set out in that new or amended Standard apply to eligible subsidiaries?

Paragraph 16 of the ED

IASB proposal in the ED

51 In paragraph 16 of the ED, the IASB affirms (in conformity with paragraph 31 of IAS 1) that if the information resulting from a disclosure requirement of the ED is not material, the entity does not have to apply that disclosure requirement. By contrast, an entity should consider providing additional disclosures if the requirements in the ED are considered to be insufficient for users of financial statements to understand the impact of specific events on the entity's financial position and performance.

EFRAG Final Comment Letter

52 In its FCL, EFRAG did not discuss specifically the application of paragraph 16.

IASB discussions and tentative decisions

53 Although the IASB did not ask a question on paragraph 16 of the ED, respondents provided feedback. Most of them agreed on the usefulness of this paragraph but they were concerned about assessing materiality on disclosures. More specifically stakeholders considered that it would be useful to:

(a) develop application guidance on how eligible subsidiaries would perform the materiality assessment of disclosure requirements in the ED;

(b) add an overall disclosure objective; and

(c) underline the importance of the disclosure requirements in paragraph 16.

54 The IASB considered that application guidance is not necessary because there is already a non-mandatory guidance for entities which apply IFRS (Practice Statement 2 *Making Materiality Judgements*) and in their view an overall disclosure objective it is not necessary. The IASB agreed with the feedback received on the importance of paragraph 16.

55 Hence, the IASB tentatively decided:

(a) to retain paragraph 16 of the Exposure Draft and not add guidance; and

(b) an overall disclosure objective for the Standard was not necessary.

EFRAG Secretariat analysis

56 The EFRAG Secretariat generally welcomes the IASB's decision to retain Paragraph 16 and not to add guidance or include an overall disclosure objective of the Standard.

Question for EFRAG FR TEG

57 Does EFRAG FR TEG agree with the IASB tentative decision and the EFRAG Secretariat analysis on retaining paragraph 16 of the ED?

New disclosure requirements in IFRS Accounting Standards

IASB proposal in the ED

58 The proposed disclosure requirements in the ED were developed considering all IFRS Accounting Standards issued as of 28 February 2021 and exposure drafts published as of 1 January 2021, except for the Exposure Draft *General Presentation and Disclosures*.

EFRAG Final Comment Letter

59 In its FCL, EFRAG welcomed the IASB's proposal to provide amendments to the ED whenever the IASB publishes an ED of a new or amended IFRS Standard. This approach would be useful for preventing issues like measurement and/or recognition mismatches and at the same time would not delay the benefits of any improvements to other IFRS Standards.

IASB discussions and tentative decisions

60 The IASB staff considered that the reduced disclosures IFRS Accounting Standard should include disclosure requirements from new and amended Standards, (subject to a materiality assessment).

61 In June 2022, the IASB tentatively decided to include the disclosure requirements of IFRS Accounting Standards issued as of 28 February 2021 and consider amendments to the disclosure requirements in IFRS Accounting Standards issued after 28 February 2021 after the reduced disclosures IFRS Accounting Standard is issued (in a catch-up ED).

62 In May 2023, the IASB tentatively decided that until the IASB issues an amendment to the prospective Standard, eligible subsidiaries would be required to comply with disclosure requirements in amendments to IFRS Accounting Standards that have been issued after the publication of the Exposure Draft.

EFRAG Secretariat analysis

63 The EFRAG Secretariat notes that at the time of publication of the forthcoming IFRS Accounting Standard on reduced disclosures, the IASB will have issued the following new or amended IFRS Accounting Standards:

(a) amendments to the disclosure requirements in IAS 1 *Presentation of Financial Statements* as a result of its *Non-current Liabilities with Covenants* project (effective date: 1 January 2024);

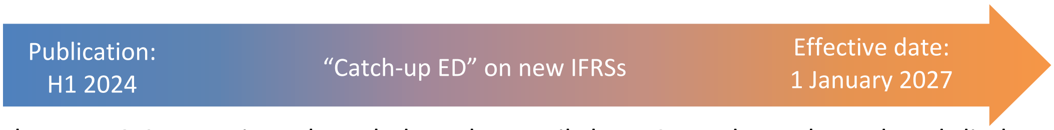
(b) International Tax Reform—Pillar Two Model Rules (which would amend the disclosure requirements in IAS 12 *Income Taxes*) (effective date: immediately);

(c) Supplier Finance Arrangements (which would amend the disclosure requirements in IFRS 7 *Financial Instruments: Disclosures* and IAS 7 *Statement of Cash Flows*) (effective date: 1 January 2024);

(d) Lack of Exchangeability (which would amend the disclosure requirements in IAS 21 *The Effects of Changes in Foreign Exchange Rates*) (effective date: 1 January 2025); and

(e) IFRS 18 *Presentation and Disclosures*, a new IFRS Accounting Standard that will replace IAS 1 *Presentation of Financial Statements*. That new IFRS Accounting Standard will include new disclosure requirements (effective date: 1 January 2027).

64 The disclosures in these new IFRS Accounting Standards will be integrated into the reduced disclosures IFRS Accounting Standard through a catch-up ED.



65 The EFRAG Secretariat acknowledges that until the IASB updates the reduced disclosure IFRS Accounting Standard (in a catch-up ED), users should be able to access all information from the improved disclosure requirements in other IFRS Accounting Standards when they become effective. That is, when the IFRS Accounting Standards issued after 28 February 2021 become effective (not on publication date), an entity should not apply the disclosure requirements in the reduced-disclosures IFRS Accounting Standard but instead apply the disclosure requirements of the new or amended IFRS Accounting Standards (subject to materiality), until the IASB updates the reduced disclosure IFRS Accounting Standard (catch-up ED).

66 Nonetheless, the IASB will need to clearly explain this situation to stakeholders and provide implementation guidance to those who decide to early adopt the reduced disclosures IFRS Accounting Standard (and probably list the IFRS Accounting Standards mentioned above) as the situation will be complex for small and medium companies in the scope of the reduce-disclosures IFRS Accounting Standard.

67 More specifically, for IFRS Accounting Standards issued after 28 February 2021 and that are effective, preparers should use the disclosures in those new or amended IFRS Accounting Standards (without reductions) rather than those in the reduced-disclosure IFRS Accounting Standard.

Effective date and transition

IASB proposal in the ED

68 In the ED, the IASB proposed a transition period of 18-24 months from the effective date of the Standard, with an earlier application permitted. The IASB did not propose transition requirements for entities that had applied IFRS Accounting Standards in the preceding period. For first-time adopters of IFRS Accounting Standards, the IASB proposed to apply the requirements of the reduced disclosures IFRS Accounting Standard, and not those of IFRS 1 *First Time Adoption of International Financial Reporting Standards.*

EFRAG Final Comment Letter

69 In its final comment letter, EFRAG did not comment on the transition period, but considered that the requirements of the reduced disclosures IFRS Accounting Standard would be easier to be applied in jurisdictions where *IFRS for SMEs* Standard is adopted.

70 EFRAG generally agreed with the IASB's proposal concerning the transition requirements, the interaction with IFRS 1 *First-time Adoption of International Financial Reporting Standards* and IAS 8 *Accounting Policies, Changes in Accounting Estimates and Errors* (which relate to tentative decisions made in January 2023). In its FCL, EFRAG also welcomed the clarification of paragraph 11 of the ED on comparative information.

IASB discussions and tentative decisions

71 The IASB did not receive feedback on the effective date, however some stakeholders indicated that some jurisdictions might need time to incorporate the reduced disclosures IFRS Accounting Standard into their regulations. Although, the new IFRS Accounting Standard does not introduce new requirements, which suggests a shorter period from the date of issuing the reduced disclosures IFRS Accounting Standard to the effective date, the above feedback may justify a normal transition period (12-18 months).

72 The IASB also considered the interaction between the new reduced disclosures IFRS Accounting Standard and the issuance of the PFS Standard, the publication of which will result in changes to the disclosure requirements proposed in the ED which are currently based on IAS 1.

73 As it is expected that the PFS Standard will be issued before the new reduced disclosures IFRS Accounting Standard is issued and that both these new IFRS Accounting Standards are likely to permit early adoption, the IASB staff suggested to align the effective dates of both Standards.

74 If the effective dates are the same but an eligible subsidiary wishes to early adopt the reduced disclosures IFRS Accounting Standard, the IASB staff recommended to already include some references to the disclosures from PFS Standard in the main body of the reduced disclosures IFRS Accounting Standard and to add an appendix to the reduced disclosures IFRS Accounting Standard with the disclosure requirements that would be applicable if an entity did not early adopt PFS Standard (i.e. would apply IAS 1 disclosures). From the perspective of maintaining the reduced disclosures IFRS Accounting Standard, when the PFS Standard becomes effective the IASB could withdraw this appendix without affecting the main body of the reduced disclosures IFRS Accounting Standard.

75 Concerning the proposed requirement on comparative information, stakeholders were supportive of the IASB's proposals.

76 The IASB discussed the effective date of, and transition to, the Accounting Standard. The IASB tentatively decided:

(a) to permit an eligible subsidiary to apply the Standard on 1 January 2027;

(b) to permit an eligible subsidiary to apply the Standard early and to require a subsidiary that elects to do so to disclose that fact; and

(c) to confirm the proposals (as set out in paragraphs 10–11 of the ED) about the comparative information that an eligible subsidiary would be required to provide when either electing to apply the Standard for the first time or electing not to apply the Standard in the current period.

77 The IASB also:

(a) confirmed that disclosure requirements issued in other IFRS Accounting Standards since the ED was developed remain applicable; and

(b) decided to specify the disclosures an eligible subsidiary is required to make if it applies the Standard early but does not apply the IFRS Accounting Standard *General Presentation and Disclosures* early.

EFRAG Secretariat analysis

78 The EFRAG Secretariat supports the IASB tentative decision to permit an eligible subsidiary to **apply the Standard on 1 January 2027**, with an earlier application permitted, which is aligned with the application date of the PFS Standard. This would also mean that when the reduced disclosures IFRS Accounting Standard becomes effective, it would already reflect the catch-up ED mentioned above.

79 The EFRAG Secretariat also agrees with the IASB proposals about the **comparative information** when an eligible subsidiary either elects to apply the Standard for the first time or elects not to apply the Standard in the current period.

80 In case an entity decides to early adopt the reduced disclosures IFRS Accounting Standard, the EFRAG Secretariat is concerned about the **interaction between the reduced disclosures IFRS Accounting Standard with other IFRS Accounting Standards that have been recently published** (e.g. lack of exchangeability) and the PFS Standard, as they are not reflected yet in the main body of the reduced disclosure IFRS Accounting Standard (temporary situation until catch-up ED is published).

81 In the EFRAG Secretariat's view, the IASB should provide application guidance to avoid confusion among the stakeholders, particularly on which disclosures to apply when an entity decides to early adopt the reduced disclosures IFRS Accounting Standard (i.e. on the interaction with the IFRS Accounting Standards mentioned in the paragraph above).

82 This application guidance should describe the disclosure requirements that should be applied in case of early adoption of other IFRS Accounting Standards together with early adoption of the reduced disclosures IFRS Standard and for how long (e.g. early adoption of IFRS 18 and IFRS 19).

83 In relation to **interaction with the PFS Standard**, the EFRAG Secretariat is concerned about having in an appendix current disclosure requirements of IAS 1 and in the body of the reduced disclosures IFRS Accounting Standard some of the references coming from the PFS Standard (including the relocation of some paragraphs from IAS 1 to IFRS 7 and IAS 8), which is deriving from the tentative decision to specify the disclosures an eligible subsidiary is required to make if it applies the Standard early but does not apply the IFRS Accounting Standard General Presentation and Disclosures early

84 Even if the effective dates of both Standards are the same, in case of early adoption of the reduced disclosures IFRS Accounting Standard, it could be counterintuitive for the entities to find some of the applicable requirements in the appendix (reference to IAS 1) and not in the main body of the Standard.

85 In addition, from an endorsement perspective, if the reduced disclosures IFRS Accounting Standard is endorsed before the PFS Standard, some of the text in the main body will relate to the Standard not yet endorsed (PFS) and, thus, will not correspond to the legal text applicable in the EU (IAS 1). The EFRAG Secretariat acknowledges that although this will be a temporary situation, eventuality of it, should, nevertheless, be considered. The EFRAG Secretariat would have to carefully consider the role of the "appendix" during the endorsement of the reduced disclosures IFRS Accounting Standard (to ensure that paragraphs deriving from IAS 1 would be the ones applicable until the effective date).

Questions for EFRAG FR TEG

86 Does EFRAG FR TEG agree with the IASB tentative decisions on transition and effective date of the reduced disclosures IFRS Accounting Standard?

87 Does EFRAG FR TEG agree with the IASB approach to the interaction with the PFS Standard?

88 Does EFRAG FR TEG agree with the EFRAG Secretariat analysis of the issues arising in case of early adoption of the reduced disclosures IFRS Accounting Standard?

Due process

IASB discussions and tentative decisions

89 The IASB staff analysed the re-exposure criteria in the Due Process Handbook, summarised the due process steps undertaken during the entire project (including mandatory and optional activities) and concluded that re-exposure is not needed, since there were no fundamental changes to the main proposals in the ED. The IASB Staff asked the IASB's permission to begin the process for balloting the reduced disclosures IFRS Accounting Standard and asked if any IASB member plans to dissent from the proposals in the reduced disclosures IFRS Accounting Standard.

90 The IASB confirmed it was satisfied that applicable due process requirements have been complied with and sufficient consultation and analysis were undertaken to begin the process for balloting the Standard. No IASB member indicated an intent to dissent from issuing the Standard.

91 The IASB expects to publish the reduced disclosures IFRS Accounting Standard in the first half of 2024.

EFRAG Secretariat analysis

92 The EFRAG Secretariat agrees that no significant changes were made to the main proposals in the ED. The IASB has given the opportunity to stakeholders to provide their input on various topics and has considered diverse viewpoints in the revisions of the proposals in the ED. However, the EFRAG Secretariat will continue to monitor whether some remaining issues highlighted in EFRAG's final comment letter will be addressed during the drafting process.

93 The EFRAG Secretariat considers that the IASB complied with the due process requirements and agrees with the IASB's decision to commence the balloting process of the Standard.

Approach to maintenance

IASB discussions and tentative decisions

94 In September 2023, the IASB staff proposed the following approach to maintenance of the forthcoming Standard *Subsidiaries without Public Accountability: Disclosures ('the subsidiaries Standard'):* potential amendments to the disclosure requirements in the subsidiaries Standard will be considered when they arise as a result of changes to disclosure requirements in a proposed new or amended IFRS Accounting Standard. They will be considered individually based on the principles for reducing disclosures, and holistically to ensure that the effect of making the amendments would be proportionate and would preserve the goal of maintaining the usefulness of financial statements of eligible subsidiaries with reduced disclosure requirements.

95 In more details, when the IASB issues a new or amended IFRS Accounting Standard that includes new or amended disclosure requirements:

(a) New or amended requirements that exist in the subsidiaries Standard: The requirements are assessed using the principles for reducing disclosures requirements;

(b) Deletion of existing requirements: The requirements are also deleted from the subsidiaries Standard;

(c) Amended requirements that do not exist in the subsidiaries Standard: The requirements are assessed against the principles and the discussion includes reference to the IASB's relevant previous discussions and decisions of not including them in the subsidiaries Standard.

96 The IASB may also assess whether there is any new information since the subsidiaries Standard was issued or last updated (e.g. post-implementation review), which may result in the deletion or inclusion of related disclosure requirements.

97 As an additional step, the IASB would assess the overall position of the proposed new disclosure requirements, including:

(a) Usefulness for users of financial statements; and

(b) Cost-benefits analysis of applying the requirements for eligible subsidiaries.

98 The IASB applied the above maintenance approach to the *Business Combinations—Disclosures, Goodwill and Impairment* project.

99 The IASB tentatively decided to propose amending the reduced disclosures IFRS Accounting Standard to require an eligible subsidiary to disclose:

(a) the strategic rationale for undertaking a business combination; and

(b) whether the discount rate used in calculating value in use is pre-tax or post-tax.

100 The IASB also tentatively decided:

(a) to ensure the wording of the disclosure requirement in the reduced disclosures IFRS Accounting Standard in relation to paragraph B64(i) of IFRS 3 aligns with the proposals made by the IASB in the project on *Business Combinations—Disclosures, Goodwill and Impairment*; and

(b) to propose amending the reduced disclosures IFRS Accounting Standard to require an eligible subsidiary to disclose information about the contribution of the acquired business.

EFRAG Secretariat analysis

101 The EFRAG Secretariat generally agrees with the proposed approach to maintenance of the reduced disclosures IFRS Accounting Standard on an individual continuous basis. However, it should be made clear starting from which proposed new or amended IFRS Accounting Standard this process is going to be applied. The IASB should clearly distinguish which new or amended IFRS Accounting Standards will be captured by the catch-up ED and to which a particular process is applied (first applying full and after – reduced disclosures) and starting from which IFRS Accounting Standard the normal maintenance process, described here, will be applied. This would avoid confusion from stakeholders.

102 The EFRAG Secretariat notes that the amendments resulting from the *Business Combinations—Disclosures, Goodwill and Impairment* project are currently made to the non-existing (yet) reduced disclosure Standard which makes them difficult to fit within EFRAG's current approval process.

Questions for EFRAG FR TEG

103 Does EFRAG FR TEG have any comments on the approach to maintenance proposed by the IASB?

104 Do EFRAG FR TEG members agree with the EFRAG Secretariat analysis?