

# FEEDBACK STATEMENT

## RESEARCH AGENDA CONSULTATION

August 2018



## Introduction

EFRAG conducted its prior Agenda consultation in 2015 at the same time of the IASB Agenda consultation. Many active Research projects will be reaching their final stage in 2018. EFRAG is therefore looking to add new Research projects to its agenda.

EFRAG published the 2018 EFRAG Research Agenda Consultation (the Consultation) on 5 April and asked for feedback by 1 June 2018. The Consultation was seeking views on how to assess and improve the effectiveness of EFRAG's Research activities and new Research topics.

EFRAG is now issuing a feedback statement which describes the main comments received.

## Responses from constituents

EFRAG received 24 responses, the majority of which were from national standard setters, business associations and the auditing profession. The remaining respondents were private persons, academics and a user organisation EFFAS (European Federation of Financial Analysts). Appendix 1 includes the list of respondents.

## Purpose and use of this feedback statement

This feedback statement has been prepared as a formal record of the responses received. It summarises the messages received from constituents and notes any key themes identified.

In its Consultation, EFRAG tentatively proposed five Research Agenda topics around two main themes.

- (a) Addressing new developments
  - (i) Better information on intangible assets; and
  - (ii) Cryptocurrencies.
- (b) Enhancing current financial reporting
  - (i) Derecognition.
  - (ii) Transaction-related costs; and
  - (iii) Variable and contingent payments.



## Analysis of replies

### General remarks on EFRAG Research activities

Several respondents suggested that EFRAG promote the research topics relevant to Europe and ensure that the IASB develops its projects considering the preferred or acceptable solutions for European constituents. On the other hand, some respondents suggested that collaboration with non-European standard setters and organisations might also be fruitful.

Some respondents cited the importance for EFRAG to consider the need for each new project it planned to undertake, including specific requests from users of financial statements, to ensure that time and resources spent on projects offer meaningful and practical solutions to current problems.

Some respondents noted that given limited resources, EFRAG should carefully weigh-up its research agenda giving priorities to the most urgent projects for users and preparers.

#### **Q1.1 Do you have suggestions on how EFRAG could substantiate the influence of its Research activities in general, and individual projects in particular, on the IASB's work?**

The majority of constituents responded to this question and agreed that EFRAG influences the work of the IASB in various ways, such as:

- (a) High quality work and compelling arguments.
- (b) High quality comment letters and post implementation reviews; and
- (c) Participation in the round tables, outreach and other events.

Several respondents noted that the fact that topics and issues highlighted by EFRAG are considered and discussed by the IASB provides evidence of the influence of its research activities.

The majority of respondents mentioned the importance of the close collaboration with the IASB, national standard setters, user groups and academics where possible, to enhance its research objectives more effectively and efficiently and help avoid duplication of work by EFRAG on research performed by others.

Some respondents suggested that EFRAG aligns its research work to the IASB project pipeline, highlighting that the work carried out by EFRAG tends to be more useful and effective when individual projects are closely linked to the forthcoming or existing IASB research projects. However, others pointed out that the best way would be to address the topics that are not the IASB priority but are of significant practical relevance for preparers and users of financial statements.

#### **Q1.2 What is your assessment on the use of evidence by EFRAG in its recent Research? Do you have suggestions on how to improve it?**

More than half of constituents responded to this question. Overall respondents agreed with the increasing role of collecting evidence to assess the potential and expected consequences of future IFRS Standards and supported EFRAG's commitment to evidence-based quantitative and qualitative research.

Several respondents admitted that research activities are not free of challenges, such as isolating the effects of a particular accounting treatment from other contributing factors, gathering the reliable data and analysing large datasets. According to them a rigorous process should be in place to obtain good quality results.

Respondents generally encouraged EFRAG to engage with the academic community, which is increasingly using technology to analyse large amounts of data, to leverage their findings and create additional research insights; continuing to engage with users was also essential.

### **New Research topics**

Of the projects proposed in the Consultation document, respondents expressed the most support for *Better information on intangible assets*, *Crypto-currencies* and *Variable and Contingent Payments*.

There were suggestions for other topics, but none was proposed by a significant number of respondents. Some advised to undertake research on the future of corporate reporting (including technology) as well as non-financial information (NFI) including sustainability and how to integrate financial information and NFI for the benefit of users of financial statements.

**Q2.1 For each of the projects listed above, you are kindly required to provide your recommendation based on the following criteria:**

- (a) Is the project topic an important or urgent matter to European constituents?**
- (b) Is the project likely to reach a useful conclusion in a reasonable time?**
- (c) How would an EFRAG Research project interact with projects from other organisations, including (but not limited to) the IASB?**

The relative rating by respondents of the 5 potential research projects proposed by EFRAG is presented below:

#### *Better information on intangible assets*

Out of 21 responses received, 13 respondents rated it as a high; 4 – as medium and 4 – as low priority project.

The proponents of this project mentioned that:

- (a) The topic is highly relevant for European constituents and progress can be made within a reasonable timeframe;
- (b) Changes in the business landscape resulting from new technologies, digitalisation and software solutions, mean that internally generated intangible assets play an increasingly important role for the performance of an entity while not adequately reflected in the financial statements;
- (c) It would be worthwhile to examine further the conceptual basis for the discrepancies between the accounting treatment for acquired and internally generated intangibles. This is a significant investor concern as it distorts key ratios and could lead to the misallocation of capital;
- (d) Information on intangible assets is of significant practical relevance for preparers and users of financial statements and in particular for the service sector for which the drivers of value are not presently reflected on the balance sheet;
- (e) The work should only be carried out on improved disclosure because various standard setters have over the years' explored recognition and measurement and have up to now not found an acceptable solution. In line with EFRAG's view in the Consultation document, respondents generally agreed that the objective of this project was not to align the carrying amount of equity to market prices as this is not the role of financial statements.

The opponents of this project stressed that:

- (a) This matter is of limited importance to constituents as there are limited possibilities for reaching a useful conclusion that might impact financial reporting, whether recognition, measurement or disclosure. In their view, this topic would be better dealt with through the other reporting initiatives already in process.
- (b) This area has already been subject to considerable research.

### *Crypto-currencies*

Out of 21 responses received, 10 respondents rated it as high; 6 – as medium and 5 – as low priority project.

The proponents of this project stated that:

- (a) The current IFRS literature does not provide adequate guidance on issues that prevail from the accounting treatment of cryptocurrencies, with some respondents (including one from a European banking federation) citing an increasingly urgent need for accounting guidance on digital currencies.
- (b) With the rapid rise of cryptocurrencies this issue is urgent and highly relevant from a global point of view with a stronger presence in the economic practice. Addressing this topic together with Initial Coin Offerings (ICO's) will enhance the quality of financial reporting.
- (c) Research is needed to define what crypto-assets may represent, which wider asset categories they may belong to, and how these assets should be accounted for.
- (d) Some respondents stated that any research activity on this topic should be coordinated with the IASB to avoid duplication of efforts and suggested EFRAG to interact with the IASB at an early stage.

The opponents of this project stressed that cryptocurrencies are only relevant to a small group of constituents in certain industries. Moreover, many other organisations are focusing on the topic.

### *Derecognition*

Out of 19 responses received, 2 respondents rated it as high; 5 – as medium and 12 – as low priority project.

The proponents of this project found it important, particularly provided that recognition criteria are much more thoroughly discussed than derecognition and given many structuring opportunities in practice.

However, the majority of respondents considered this project of less importance stating that:

- (a) Although there are inconsistencies in the accounting requirements, the magnitude of issues arising from such discrepancies is not clear and should therefore be assessed prior to undertaking a project.
- (b) This issue is mostly relevant in the context of financial instruments and IFRS 9 *Financial Instruments* already contains enough guidance on derecognition criteria.
- (c) This topic was not timely given that the IASB has just issued a revised *Conceptual Framework for Financial Reporting* and that it might take too long before it could influence IASB.

### *Transaction-related costs*

Out of 20 responses received, 3 respondents rated it as high; 8 – as medium and 9 – as low priority project. Those in favour noted that:

- (a) Acquisition costs are an important issue for most preparers of IFRS financial statements, are highly relevant to the majority of EFRAG’s constituents, run through a large part of IFRS Standards and should therefore be pursued.
- (b) One user organisation (EFFAS) mentioned the importance of transaction-related costs and the impact on the profit or loss arising from business combination transactions.
- (c) It would be beneficial to consider the conceptual basis for historical cost accounting holistically as an initial step, before narrowing the research to focus on specific issues such as transaction-related costs.

The opponents of this project found it too narrow and did not consider the topic as a priority.

### *Variable and contingent payments*

Out of 22 responses received, 7 respondents rated it as high; 8 – as medium and 7 – as low priority project. There were the following comments:

- (a) Significant diversity in practice exists making this topic, which covers many IFRS Standards, highly relevant to the majority of EFRAG’s constituents.
- (b) One respondent said that it would be useful to broaden the scope and also look into the treatment of rights associated with contingent payments covering various types of acquisitions.
- (c) Another respondent suggested to wait for the IASB decision on the scope of its own project on this subject.
- (d) Several constituents found this topic less interesting and more of a secondary importance which should only be considered if resources permit.

**Q2.2 Are there other topics that you advise EFRAG to add to its Research agenda? If so, please provide a description of the topic and what the objective of an EFRAG Research project should be.**

Three-quarters of respondents answered this question proposing various projects for the attention of EFRAG.

Several respondents suggested that EFRAG start its own project on *equity-liability distinction* in parallel with *Financial Instruments with Characteristics of Equity (FICE)* project of the IASB.

Some respondents suggested that EFRAG address the *equity method* of accounting for associates and joint ventures.

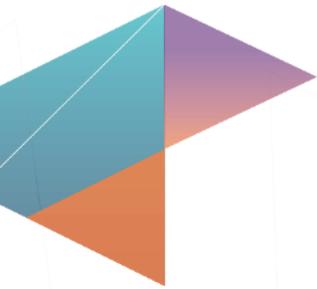
Other respondents suggested that EFRAG perform work on *Non-financial information (NFI) and sustainability reporting and its integration with financial information (FI)* once EFRAG is able to do so under its mandate. One respondent specifically recommended EFRAG to closely monitor, and engage with, the IASB’s project on the *Management Commentary Practice Statement*, as this will be one of the focal points for the global discussion on corporate reporting.

Several respondents proposed to cover the topic of *discount rates* used by different IFRS Standards. They suggested to look at the differences in discount rates used for example for impairment test, pension plans and other provisions and the effects of those differences.

Some constituents suggested a topic *Impact of the standard setting on the business model* which would cover the impact of new standards such as IFRS 16 *Leases*, IFRS 15 *Revenue from Contracts with Customers*, IFRS 9 and IFRS 3 *Business Combinations*.

One constituent noted that IFRS 15 provides guidance on revenue recognition for the seller but not on cost recognition and suggested to undertake a project on recognition of cost from the customers' perspective.

One constituent suggested a research topic on the implications of reporting in a circular economic environment noting that currently there is little, if any accounting guidance available.



## APPENDIX I – List of respondents

<b>Respondent</b>	<b>Country</b>	<b>Type</b>
Ivan Grixti	Malta	Private individual
Bruno Ricci	Italy	Private individual
Simon Gleadhill	UK	Private individual
Srivatsan Lakshminaryan	UK	Private individual
HELP University	Malaysia	Academic
Alf Gohdes	Germany	Private individual
FRC - Financial Reporting Council	UK	National Standard Setter
EFAA - European Federation of Accountants and Auditors for SMEs	International	Auditing
PASC - Polish Accounting Standards Committee	Poland	National Standard Setter
Meletre Oy	Finland	Auditing
AFRAC - Austrian Financial Reporting and Auditing Committee	Austria	Auditing
EFFAS - European Federation of Financial Analysts Societies	International	Professional Organisation of Users
VMEBF - Vereinigung zur Mitwirkung an der Entwicklung des Bilanzrechts für Familiengesellschaften	Germany	Business Association
DASC - Danish Accounting Standards Committee	Denmark	National Standard Setter
Tweeus	Netherlands	Consulting
NASB - Norwegian Accounting Standards	Norway	National Standard Setter
AFME - Association for Financial Markets in Europe	International	Business Association
ICAEW - Institute of Chartered Accountants in England and Wales	UK	Auditing
ANC - Autorité des Normes Comptables	France	National Standard Setter
BusinessEurope	International	Business Association
OIC – Organismo Italiano di Contabilita	Italy	National Standard Setter
Mazars	France	Auditing
Accountancy Europe	International	Business Association
FBF - French Banking Federation	France	Business Association