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Diese Sitzungsunterlage wird der Öffentlichkeit für die FA-Sitzung zur Verfügung gestellt, so dass dem Verlauf der Sitzung gefolgt werden kann. Die Unterlage gibt keine offiziellen Standpunkte der FA wieder. Die Standpunkte der FA werden in den Deutschen Rechnungslegungs Standards sowie in seinen Stellungnahmen (Comment Letters) ausgeführt.  
Diese Unterlage wurde von einem Mitarbeiter des DRSC für die FA-Sitzung erstellt.

## IFRS-FA – öffentliche Sitzungsunterlage

<b>Sitzung:</b>	<b>07. IFRS-FA / 27.07.2012 / 15:30 – 16:00 Uhr</b>
<b>TOP:</b>	<b>10 – Interpretationsentwürfe des IFRSIC</b>
<b>Thema:</b>	<b>DI/2012/2 - Put Options Written on Non-controlling Interests</b>
<b>Papier:</b>	<b>07_10b_IFRS-FA_NCIPuts_CL_EFRAG</b>

### Hintergrund

- 1 EFRAG hat am 6. Juli 2012 ihren Entwurf einer Stellungnahme zu DI/2012/2 *Put Options Written on Non-controlling Interests* veröffentlicht (siehe **07\_10d**).
- 2 Das DRSC äußert sich zu diesen Stellungnahmeentwürfen gewöhnlich nicht im Detail, sondern stellt EFRAG die eigene Stellungnahme zur Kenntnisnahme zur Verfügung, da in dieser Unterlage bereits die Auffassung des DRSC bzw. der entsprechenden Fachgremien des DRSC zum Ausdruck gebracht wird.
- 3 Etwas anderes gilt jedoch in den Fällen, in denen EFRAG in seinem Stellungnahmeentwurf direkte Fragen an die *Constituents* stellt, wie dies auch in dem DCL zu DI/2012/2 der Fall ist.
- 4 Vor diesem Hintergrund findet sich auf den Folgeseiten der Entwurf einer Stellungnahme des IFRS-FA in Bezug auf den DCL von EFRAG mit vorgeschlagenen Antworten zu diesen Fragen von EFRAG an die *Constituents*.

### Frage an den IFRS-FA

Stimmen Sie diesen vorgeschlagenen Antworten zu?



**DRAFT**

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EFRAG  
Françoise Flores  
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Berlin, 27 July 2012

B-1000 Brussels

Dear Françoise,

**IFRS Interpretations Committee DI/2012/2 Put Options Written on Non-controlling Interests**

On behalf of the Accounting Standards Committee of Germany (ASCG), I am writing to comment on EFRAG's draft comment letter on the IFRSIC's DI/2012/2 Put Options Written on Non-controlling Interests (herein referred to as 'DI'). We appreciate the opportunity to comment on EFRAG's draft comment letter.

For our arguments and further details, please see our comment letter to the IFRSIC attached to this letter.

For our answers to the questions raised to constituents in EFRAG's Draft Comment Letter, please refer to the appendix to this letter.

If you would like to discuss any aspect of this comment letter in more detail, please do not hesitate to contact me.

Yours sincerely,

Liesel Knorr  
President



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## Appendix

### Questions raised in EFRAG's DCL on DI/2012/2 to constituents

#### Question to EFRAG's constituents

- 16 Do you agree the Interpretations Committee should develop a broader interpretation that is consistent with IFRS 3, IFRS 10 / IAS 27, IAS 32 and IFRIC 17 (as recommended in paragraph 8 above)? Please explain why.
- 17 To what extent do you believe diversity in practice arises on initial recognition of NCI puts? If you are not aware of wider practice, please explain how your organisation accounts for the debit entry of a NCI put liability.

Ad 16 Our first preference would be to exclude written puts from the scope of IAS 32 (so that the requirements of IAS 39 and IFRS 9 for derivative contracts would apply). However, if our preferred solution cannot be implemented in the short term, we alternatively would support proceeding with the solution presented in the DI in order to at least address divergent interpretations existing in practice.

The proposal made by EFRAG, i.e. to develop a broader interpretation that is consistent with IFRS 3, IFRS 10 / IAS 27, IAS 32 and IFRIC 17, appears to be conceptually sound, but in our view would take too long to address the divergent interpretations existing in practice.

Ad 17 Although we inquired of listed companies in Germany of how they subsequently measure NCI puts, which confirmed that there is diversity in practice, we did not investigate the initial recognition as far as it relates to the debit entry of a NCI put liability.

As a standardsetter we do not account for such transactions.



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**Question to EFRAG's constituents**

- 51 How do you believe NCI puts should be accounted for? Please explain why
- 52 Do you believe that whether or not NCI has been derecognized should determine the accounting for NCI puts? Please explain why
- 53 Do you believe that the exercise price of NCI puts (e.g. fixed, fair value or formula-based) should determine the accounting for NCI puts. Please explain why.

Ad 51 As mentioned in our comment 'AD 16' above, we are of the opinion that NCI puts should be excluded from the scope of IAS 32 so that the requirements of IAS 39 and IFRS 9 for derivative contracts would apply.

Ad 52 Based on our preferred accounting for NCI puts (see comments 'Ad 16' and 'Ad 51' above), there would not be a debit entry to NCI or any other equity-category.

Ad 53 Since we prefer to treat NCI puts as derivative contracts (IAS 32.23 would not apply) the exercise price would determine the accounting for NCI puts since it has direct impact on the measurement of the derivative.