

© DRSC e.V	Zimmerstr. 30	10969 Berlin	Tel.: (030) 20 64 12 - 0	Fax: (030) 20 64 12 - 15
	Internet: www.drsc.de		E-Mail: info@drsc.de	

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 des FA wieder. Die Standpunkte des 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 SITZUNGSSUNTERLAGE

Sitzung:	73. IFRS-FA / 01.03.2019 / 09:00 – 10:00 Uhr
TOP:	05 – IFRS 17 Versicherungsverträge
Thema:	Aktueller Stand der Diskussion um potentielle Änderungen von IFRS 17
Unterlage:	73_05_IFRS-FA_IFRS17_CN

1 Sitzungsunterlagen für diesen TOP

- 1 Für diesen Tagesordnungspunkt (TOP) der Sitzung liegen folgende Unterlagen vor:

Nr.	Titel	Gegenstand
73_05	73_05_IFRS-FA_IFRS17_CN	Cover Note
73_05a	73_05a_IFRS-FA_IFRS17_Summary	Zusammenfassung der vom IASB diskutierten Themen sowie die jeweiligen Beschlüsse
73_05b	73_05b_IFRS-FA_IFRS17_AG1	Protokoll der DRSC-AG-Telko am 11.12.2018 (Unterlage nicht-öffentliche)
73_05c	73_05c_IFRS-FA_IFRS17_AG2	Protokoll der DRSC-AG-Telko am 17.01.2019 (Unterlage nicht-öffentliche)
73_05d	73_05d_IFRS-FA_IFRS17_AG3	Protokoll der DRSC-AG-Telko am 30.01.2019 (Unterlage nicht-öffentliche)

Stand der Informationen: 13.02.2019.

2 Ziel der Sitzung

- 2 Der IFRS-FA soll über die jüngsten Aktivitäten bzgl. IFRS 17 informiert werden. Zum einen hat der IASB im Dezember 2018, Januar 2019 und Februar 2019 potenzielle IFRS 17-Änderungen erörtert und entsprechende Beschlüsse gefasst. Zum anderen hat die DRSC-AG „Versicherungen“ die jeweiligen IASB-Sitzungsunterlagen in drei Sitzungen (11.12.2018, 17.1.2019, 30.1.2019) besprochen und gewürdiggt. Der IFRS-FA wird um Meinungsäußerungen zu diesen Entwicklungen gebeten.

3 Stand des Projekts

3.1 Bisherige Aktivitäten des IASB

Rückblick

- 3 Am 18.5.2017 wurde IFRS 17 sowie die dazugehörigen *Basis for Conclusions* und *Illustrative Examples* sowie weitere Begleitmaterialien vom IASB veröffentlicht. Der Standard ist erstmals für Berichtsperioden, die am oder nach dem 1.1.2021 beginnen, anzuwenden.
- 4 Im September 2017 hatte der IASB die *Transition Resource Group* (TRG) etabliert. Am 6.2.2018, 2.5.2018 und 26./27.9.2018 fanden TRG-Sitzungen mit inhaltlichen Diskussionen statt. Eine für den 4.12.2018 geplante TRG-Sitzung wurde wegen der jüngsten Aktivitäten des IASB verschoben und findet erst am 4.4.2019 statt.

Juni 2018

- 5 Der IASB hatte im Juni 2018 beschlossen, geringfügige Anpassungen an IFRS 17 im nächsten *Annual Improvements*-Zyklus vorzunehmen. Die Entscheidungen werden wie folgt zusammengefasst (Auszug IASB Update 6/2018):

Annual improvements (Agenda Paper 2A)

The IASB tentatively decided to propose the following minor amendments to IFRS 17 (and other Standards amended by IFRS 17) – all 14 IASB members agreed with each of the following decisions:

- to amend the terminology in IFRS 17.27 to include insurance acquisition cash flows relating to insurance contracts in the group yet to be issued.
- to amend the terminology in IFRS 17.28 to achieve the intended timing of recognition of contracts within a group.
- to remove requirements that could result in double-counting of the risk-adjustment for non-financial risk in the insurance contracts reconciliation disclosures and revenue analyses.
- to correct the terminology in the sensitivity analysis disclosures.
- to exclude business combinations under common control from the scope of the requirements for business combinations in IFRS 17.
- to amend IFRS 3 so that the amendment made by IFRS 17 on the classification of insurance contracts applies prospectively.
- to amend IFRS 7, IFRS 9 and IAS 32 to achieve the intended scopes of these financial instruments Standards and the scope of IFRS 17, particularly with respect to insurance contracts held.
- to add an explanation that, in Example 9 of the Illustrative Examples on IFRS 17, the time value of the guarantee changes over time.

Annual improvement on coverage units (AP 2B)

The IASB tentatively decided to propose to clarify the definition of the coverage period for insurance contracts with direct participation features. The proposed amendment would clarify that the coverage period for such contracts includes periods in which the entity provides investment-related services. 13 of 14 IASB members agreed and one disagreed with this decision.

Next step

The IASB will propose these amendments in the next publication of annual improvements to IFRSs. The timing of the proposed annual improvements will depend on the identification of other matters for inclusion in the next publication. The IASB will continue its discussions on IFRS 17 at a future meeting.

Juli/September 2018

- 6 In den IASB-Sitzungen im Juli und September 2018 stand IFRS 17 nicht auf der Tagesordnung.

Oktober 2018

- 7 In der Oktober-Sitzung hat der IASB dann übergreifend erörtert, ob und unter welchen Bedingungen bzw. „Kriterien“ etwaige potenzielle IFRS 17-Änderungen determiniert werden können. Hierzu gab es einen vorläufigen Beschluss, der die Kriterien für die Auswahl von Themen für potenzielle IFRS 17-Änderungen definiert. Zugleich wurde eine Liste von 25 Themen vorgelegt, die der IASB als „*main concerns and implementation challenges*“ seitens der Stakeholder versteht und entsprechend diskutierte. Dazu wurden aber keine Beschlüsse gefasst. Die Ergebnisse dieser Sitzung werden wie folgt zusammengefasst (Auszug IASB Update 10/2018):

The Board met on 24 Oct 2018 to receive an update on work to support implementation of IFRS 17, including the meeting of the TRG held on 26–27 Sep 2018, and to consider criteria for evaluating possible amendments to IFRS 17.

Summary of the TRG meeting held on 26–27 Sep 2018 (Agenda Paper 2A, 2B)

The Board received an update on the third meeting of the Transition Resource Group. The Board was not asked to make any decisions.

Criteria for evaluating possible amendments to IFRS 17 (Agenda Paper 2C)

The Board noted that at a future meeting it would consider whether any of the concerns and implementation challenges discussed by the TRG and other stakeholders, including those relating to the costs and benefits of IFRS 17, indicate a need to amend the requirements of IFRS 17.

The Board tentatively decided, that when proposing any amendment to IFRS 17, in addition to demonstrating a need for the amendment, the staff must show that any proposal meets the **following criteria**:

- a. the amendments would not result in significant loss of useful information relative to that which would otherwise be provided by IFRS 17 for users of financial statements—any amendments would avoid:
 - i) reducing the relevance and faithful representation of information in the financial statements of entities applying IFRS 17;
 - ii) causing reduced comparability or introducing internal inconsistency in IFRS Standards, including within IFRS 17; or
 - iii) increasing complexity for users of financial statements, thus reducing understandability.
- b. the amendments would not unduly disrupt implementation already under way or risk undue delays in the effective date of this Standard, which is needed to address many inadequacies in the existing wide range of insurance accounting practices.

All 14 Board members agreed with this decision.

Concerns and implementation challenges (Agenda Paper 2D)

The Board discussed an overview of the main concerns and implementation challenges raised by stakeholders about requirements in IFRS 17. The Board was not asked to make any decisions.

Next steps

At a future meeting, the Board will consider whether any concerns and implementation challenges indicate a need for standard-setting to amend the requirements of IFRS 17 beyond the annual improvements the Board has already tentatively decided to propose. The Board will also consider implications for the effective date of IFRS 17.



November 2018

- 8 In der November-Sitzung hat der IASB die Verschiebung des Erstanwendungszeitpunkts von IFRS 17 erörtert und zugleich entschieden. Demzufolge ist IFRS 17 nunmehr ein Jahr später, nämlich ab 1.1.2022 verpflichtend anzuwenden (Auszug IASB Update 11/2018).

The Board met on 14 Nov 2018 to discuss the implications of exploring amendments to IFRS 17 on:

- a. the effective date of IFRS 17; and
- b. the expiry date of the temporary exemption from applying IFRS 9 *Financial Instruments* in IFRS 4 *Insurance Contracts*.

Given plans to consider whether to explore amendments to IFRS 17, and given the criteria for assessing any such potential amendments, the **Board tentatively decided** that:

- a. the **mandatory effective date of IFRS 17 should be deferred by one year**, so that entities would be required to apply IFRS 17 for annual periods beginning on or after 1 January 2022. All 14 Board members agreed with this decision.
- b. consequently, the fixed **expiry date for the temporary exemption** in IFRS 4 from applying IFRS 9 **should be amended** so that all entities would be required to apply IFRS 9 for annual periods beginning on or after 1 January 2022. 13 of 14 Board members agreed ... with this decision.

Next steps

The Board will continue its discussions at its December 2018 meeting.

Dezember 2018 – Februar 2019

- 9 In den IASB-Sitzungen am 13.12.2018, am 23.1.2019 sowie am 7.2.2019 standen inhaltliche Themen auf der Tagesordnung. Von der Liste der o.g. 25 „*main concerns and implementation challenges*“, die der IASB im Oktober 2018 im Überblick besprochen hatte, wurden in den IASB-Sitzungen Dezember 2018 bis Februar 2019 immerhin 24 Themen erörtert. Zu allen Themen stand jeweils eine Empfehlung des IASB-Staff für oder gegen eine IFRS 17-Änderung zur Diskussion.
- 10 Der IASB hat zu allen diesen 24 Themen einen Beschluss gefasst, der übrigens in allen Fällen der Staff-Empfehlung entsprach.
- 11 Ergänzend ist darauf hinzuweisen, dass der IASB im Dezember 2018 nochmals die o.g. „kleineren“ Themen erörtert hat, zu denen bereits im Juni 2018 „geringfügige Änderungen an IFRS 17“ beschlossen wurden. Diese sollen nun – entgegen dem damaligen Beschluss – nicht im Rahmen des nächsten AIP-Zyklus (2018-2020), sondern im Zusammenhang mit den übrigen beschlossenen IFRS 17-Änderungen als Änderungsentwurf (Exposure Draft) publiziert werden.
- 12 Nachfolgend findet sich eine Zusammenfassung der IASB-Beschlüsse dieser drei Sitzungen (Auszüge aus den IASB Updates 12/2018, 1/2019 und 2/2019):

IASB Update 12/2018 – Agenda Papers 2

The Board tentatively decided to **amend the requirements in IFRS 17** so that the presentation of insurance contract assets and liabilities in the statement of financial position is determined using portfolios of insurance contracts rather than groups of insurance contracts. Thirteen of 14 Board members agreed and one disagreed with this decision.



The Board tentatively decided **not to amend** the requirements in IFRS 17 relating to following topics:

- the presentation and measurement of premiums receivable and claims payable. All 14 Board members agreed with this decision.
- the discount rates used to determine the adjustments to the contractual service margin. All 14 Board members agreed with this decision.
- the risk adjustment for non-financial risk in consolidated financial statements. Thirteen of 14 Board members agreed and one disagreed with this decision.
- the principle-based approach to determining the discount rates used to measure insurance contracts, or to limit the number of risk adjustment techniques an entity can use. All 14 Board members agreed with this decision.
- the option to present specified amounts of insurance finance income or expenses in profit or loss or other comprehensive income. Thirteen of 14 Board members agreed and one disagreed with this decision.
- the definition of an insurance contract with direct participation features. All 14 Board members agreed with this decision.
- non-transitional requirements relating to risk mitigation activities. All 14 Board members agreed with this decision.
- the classification, applying IFRS 17 and IFRS 3 *Business Combinations*, of contracts acquired in a business combination as insurance contracts. All 14 Board members agreed with this decision.
- the determination of the insured event for insurance contracts acquired in a business combination. Thirteen of 14 Board members agreed and one disagreed with this decision.
- future cash flows in the measurement of reinsurance contracts held. All 14 Board members agreed with this decision.
- the treatment of accounting estimates in interim financial statements. All 14 Board members agreed with this decision.

The Board will discuss the prohibition of retrospective application of the risk mitigation option at a future meeting. No decision was made in this meeting.

Next steps

At future Board meetings the Board will consider the remaining topics ... After the Board has considered all individual topics, the Board plans to consider the package of amendments as a whole, before concluding whether the benefits of making the amendments outweigh the costs.

IASB Update 1/2019

The Board met on 23 Jan 2019 to consider possible amendments to IFRS 17 relating to following topics:

Insurance Acquisition Cash Flows for Renewals outside the Contract Boundary (AP 2A)

The Board tentatively decided to **amend IFRS 17** to require an entity to:

- a. allocate to any expected contract renewals their related part of the insurance acquisition cash flows directly attributable to newly issued contracts.
- b. recognise the insurance acquisition cash flows allocated to expected contract renewals as assets applying paragraph 27 of IFRS 17 until the renewed contracts are recognised.
- c. assess the recoverability of any asset recognised applying paragraph 27 of IFRS 17 each period before the related contracts are recognised. The recoverability assessment would be based on the expected fulfilment cash flows of the related group of contracts.
- d. recognise a loss in profit or loss for any unrecoverable carrying amounts of the asset recognised by applying paragraph 27 of IFRS 17.
- e. recognise in profit or loss the reversal of some or all of any such loss previously recognised when the impairment conditions no longer exist or have improved.

Thirteen of 14 Board members agreed and one disagreed with this decision.

Reinsurance Contracts Held (AP 2B-2D)

The Board tentatively decided to **amend IFRS 17** to:

- a. expand the scope of the exception in IFRS 17.66(c)(ii) to require an entity to recognise a gain in profit or loss when the entity recognises losses on onerous underlying insurance contracts, to the



- extent that a reinsurance contract held covers the losses of each contract on a proportionate basis; and
- require an entity to apply the expanded exception when the entity measures contracts applying the premium allocation approach (PAA).

All Board members agreed with this decision.

The Board also tentatively decided to amend IFRS 17 to expand the scope of the risk mitigation exception for insurance contracts with direct participation features in paragraph B115 of IFRS 17 so that the exception applies when an entity uses a derivative or a reinsurance contract held to mitigate financial risk, to the extent that the entity meets the conditions in paragraph B116 of IFRS 17. All Board members agreed with this decision.

Recognition of the Contractual Service Margin in Profit or Loss in the General Model (AP 2E)

The Board tentatively decided:

- to **amend IFRS 17** so that in the general model the contractual service margin is recognised in profit or loss on the basis of coverage units that are determined by considering both insurance coverage and investment return service, if any;
- to **amend IFRS 17** to establish that an investment return service exists only when an insurance contract includes an investment component;
- to **amend IFRS 17** to require an entity to use judgement applied consistently in deciding whether an investment return service exists when determining coverage units, and not provide an objective or criteria for that determination. However, the Board instructed the staff to consider including in the Basis for Conclusions some of the analysis in the Board paper, to indicate what such judgements might involve;
- to **amend IFRS 17** to establish that the period of investment return services should be regarded as ending when the entity has made all investment component payments to the policyholder of the contract and should not include any period of payments to future policyholders;
- to **amend IFRS 17** to require assessments of the relative weighting of the benefits provided by insurance coverage and investment return services and their pattern of delivery to be made on a systematic and rational basis;
- to **confirm** that, applying **IFRS 17**, cash flows relating to fulfilling the investment return service are included in the measurement of the insurance contract;
- not to change** the requirements of IFRS 17 relating to changes in fulfilment cash flows that adjust the contractual service margin in the general model; and
- to **amend IFRS 17** to establish that the one-year eligibility criterion for the PAA should be assessed by considering insurance coverage and an investment return service, if any.

Thirteen of 14 Board members agreed and one disagreed with these decisions.

Next steps

At future meetings the Board will consider the topics ... that have not yet been discussed. After the Board has considered each topic individually, the Board plans to consider the package of amendments at a future meeting. At that meeting the Board will consider whether:

- any amendments to the disclosure requirements are required as a result of the amendments tentatively decided by the Board;
- on the whole, the benefits of the amendments outweigh the costs; and
- on the whole, the amendments do not unduly disrupt implementation.

IASB Update 2/2019 – Agenda Papers 2

The Board met on 7 Feb 2019 to consider possible amendments to IFRS 17 relating to following topics.

Loans that transfer significant insurance risk (AP 2A)

The Board tentatively decided to **amend the scope of IFRS 17** and IFRS 9 for insurance contracts that provide insurance coverage only for the settlement of the policyholder's obligation created by the contract. These amendments would enable entities issuing such contracts to account for those contracts applying either IFRS 17 or IFRS 9. The choice would be made portfolio by portfolio, using the IFRS 17 definition of a portfolio. Thirteen of 14 Board members agreed and one disagreed with this decision.



Transition—Optionality and comparative information (AP 2B)

The Board tentatively decided to:

- a. **retain** the IFRS 17 transition requirements without making amendments that would reduce the optionality included in those requirements; and
- b. **retain** the IFRS 17 requirement to present restated comparative information for the annual reporting period immediately preceding the date of initial application of IFRS 17.

All 14 Board members agreed with these decisions.

Transition—Risk mitigation option and amounts accumulated in OCI on transition (AP 2C)

The Board tentatively decided to **retain** the transition requirement in IFRS 17 that prohibits retrospective application of the risk mitigation option. Thirteen of 14 Board members agreed and one disagreed with this decision. The Board asked the staff to continue to explore alternative proposals that would address stakeholders' concerns about the results of not applying the option retrospectively. The Board also tentatively decided to retain the transition requirements in IFRS 17 relating to the cumulative amounts included in other comprehensive income. All 14 Board members agreed with this decision.

Transition—Modified retrospective approach (AP 2D)

The Board tentatively decided to:

- a. **retain** the transition requirements in of the modified retrospective approach set out in IFRS 17 that: (i) prohibit an entity from using a specified modification to the extent that the entity has reasonable and supportable information to apply the related IFRS 17 requirement retrospectively; and (ii) permit an entity to use a specified modification only when the entity has reasonable and supportable information to apply that modification.
- b. **retain** the transition requirements in IFRS 17 for the modified retrospective approach, without an amendment that would permit an entity to develop its own modifications that it regards as consistent with the objective of the modified retrospective approach. However, the Board noted the importance of the clarification in the paper that the existence of specified modifications does not preclude the normal use of estimation techniques.
- c. **amend the transition requirements in IFRS 17 for liabilities** that relate to the settlement of claims incurred before an insurance contract was acquired as follows: (i) to add a specified modification to the modified retrospective approach so that an entity classifies such liabilities as a *liability for incurred claims*. Consistent with the other specified modifications, an entity would be permitted to use this specified modification only to the extent that it does not have reasonable and supportable information to apply a retrospective approach. (ii) to permit an entity applying the fair value approach to choose to classify such liabilities as a liability for incurred claims.
- d. **retain** without amendment the specified modification in the modified retrospective approach relating to the use of cash flows that are known to have occurred, instead of estimating retrospectively cash flows that were expected to occur.
- e. **retain** the modified retrospective approach for insurance contracts with direct participation features, without an amendment that would permit an entity to apply to such contracts the specified modifications permitted for insurance contracts without direct participation features.

All 14 Board members agreed with this decision.

Next step

The Board will continue its discussions on possible amendments to IFRS 17 at future meetings.

März 2019

- 13 Für die nächste IASB-Sitzung am 11.3.2019 ist geplant, lediglich zwei inhaltliche Themen zu erörtern – es handelt sich um das einzige, bisher noch nicht diskutierte Thema dieser Liste der 25 Themen, sowie um ergänzende Details eines bereits zuvor diskutierten Themas dieser Liste. Zudem ist zu erwarten, dass der IASB in seiner März- oder April-Sitzung die Gesamtheit seiner Beschlüsse würdigt und den selbst aufgestellten Kriterien prüfend unterzieht.

3.2 Indossierung

- 14 Der EFRAG-Beschluss, angesichts der IASB-Erörterungen und -Beschlüsse bzgl. IFRS 17-Änderungen das Indossierungsverfahren vorerst auszusetzen, ist unverändert. Daher sind in den vergangenen Monaten keine konkreten Aktivitäten in Bezug auf die Indossierung erfolgt.

3.3 DRSC-AG

- 15 Auf Wunsch des IFRS-FA hatte die DRSC-AG „Versicherungen“ für 2018 drei Sitzungen und vier Telefonkonferenzen abgehalten, um (a) die Themen und Diskussionsergebnisse der TRG jeweils vorzubesprechen und anschließend auszuwerten, (b) von AG-Mitgliedern aufgebrachte Implementierungsfragen zu erörtern (im Sinne eines Anwenderforums, aber auch mit dem potenziellen Ziel einer Einreichung bei der TRG) und (c) das Indossierungsverfahren zu begleiten.
- 16 Angesichts der im Sommer 2018 vom IASB angekündigten Befassung mit Themen, für die potenzielle IFRS 17-Änderungen diskutiert bzw. erwogen werden sollen, hatte die DRSC-AG auf ergänzenden Wunsch des IFRS-FA die inhaltlichen Themen aller IASB-Sitzungen seit Dezember 2018 diskutiert und gewürdigt. Dazu wurden im Dezember 2018 und Januar 2019 drei Telefonkonferenzen durchgeführt, in denen jeweils die IASB-Sitzungsunterlagen und damit die Beschlussempfehlungen **vorbesprochen**. Die Meinungen und Erkenntnisse der DRSC-AG sind jeweils in den AG-Sitzungsprotokollen festgehalten (**nicht-öffentliche Unterlagen 73_05b bis d**).
- 17 Die DRSC-AG wird eine weitere Telko am 6.3.2019 durchführen, um die IASB-Sitzungsunterlagen für die IASB-März-Sitzung zu besprechen. Ferner ist geplant, eine Telko abzuhalten, um die Themen der TRG-Sitzung vom 4.4.2019 vorzubesprechen.

4 Übersicht über die vom IASB diskutierten Themen und jeweiligen Beschlüsse

#	Thema	IASB-Sitzung / Agenda Paper	IASB-Beschluss	AG-Votum
1	Scope: Loans and other forms of credit	2/2019 (AP2A)	Änderung nun Wahlrecht IFRS 9 / IFRS 17 für Gesamtvertrag	Zustimmung
2	Level of aggregation of insurance contracts	vsl. 3/2019	???	???
3	Acquisition cash flows for renewals outside the contract boundary	1/2019 (AP2A)	Änderung Provision nun teils künftigen VV zurechenbar	Zustimmung
4	Use of locked-in discount rates to adjust the CSM	12/2018 (AP2B)	unverändert	Akzeptanz (da schwer lösbar)
5	Subjectivity: Discount rates and risk adjustment	12/2018 (AP2B)	unverändert	Zustimmung
6	Risk adjustment in a group of entities	12/2018 (AP2B)	unverändert	Zustimmung
7	CSM: coverage units in the general model	1/2019 (AP2E)	Änderung Deckungseinheiten auch für „Rendite-Service“	bedingte Zustimmung
8	CSM: limited applicability of risk mitigation exemption	12/2018 (AP2C) 1/2019 (AP2D)	Beschluss vertagt Änderung Exemption auch für RückVV	Zustimmung
		2/2019 (AP2C) vsl. 3/2019	unverändert Verbot retrosp. Anwendung weitere Details ???	Kritik (retrospektive Anwendung ohne Willkür möglich) ???
9	PAA: premiums received	12/2018 (AP2A)	Änderung Aggregation auf Portfolioebene	Zustimmung
10	Business combinations: classification of contracts	12/2018 (AP2D)	unverändert	Kritik (IFRS 3 inkonsistent zu IFRS 17)
11	Business combinations: contracts acquired during settlement period	12/2018 (AP2D)	unverändert	Kritik (führt zu Inkonsistenzen)
12	Reinsurance contracts held: initial recognition when underlying insurance contracts are onerous	1/2019 (AP2B-C)	Änderung Sofortgewinne für RückVV zulässig	Zustimmung
13	Reinsurance contracts held: ineligibility for the VFA	1/2019 (AP2D)	unverändert	Zustimmung wegen Änderung zu 8
14	Reinsurance contracts held: expected cash flows from underlying contracts not yet issued	12/2018 (AP2E)	unverändert	Kritik (keine ganzheitliche Analyse aller RückVV-Fragen)

15	Separate presentation of groups of assets and groups of liabilities	12/2018 (AP2A)	unverändert	Kritik (Widerspruch zur Nettoausweispflicht, siehe 16)
16	Presentation in statement of financial position: premiums receivable	12/2018 (AP2A)	unverändert	Kritik (Verbot des Separatausweises ökonomisch falsch)
17	Presentation: OCI option for insurance finance income or expenses	12/2018 (AP2B)	unverändert	Zustimmung
18	Insurance contracts with direct participation features	12/2018 (AP2C)	unverändert	Akzeptanz (da schwer lösbar)
19	Interim financial statements: treatment of accounting estimates	12/2018 (AP2F)	unverändert	Zustimmung
20	Date of initial application	11/2018	Änderung Stichtag 1.1.2022	Zustimmung
21	Transition: comparative information	2/2019 (AP2B)	unverändert	Kritik (Erleichterung wäre erheblich)
22	Temporary exemption from applying IFRS 9	11/2018	Änderung verlängert bis 2022	Zustimmung
23	Transition: Optionality	2/2019 (AP2B)	unverändert	Zustimmung
24	Transition: Modified retrospective approach / further modifications	2/2019 (AP2D)	unverändert, außer Wahlrecht , erworbene Verpflichtungen als LIC darzustellen	Kritik (Praxiserleichterungen dringend nötig)
25	Transition: Fair value approach / OCI on related assets	2/2019 (AP2C)	unverändert	Zustimmung