



IFRS Technical Committee

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Jean-Paul Gauzès
EFRAG Board President
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Berlin, 11 January 2021

Dear Jean-Paul,

EFRAG's Draft Letter regarding Endorsement of the *Classification of Liabilities as Current or Non-current* and *Deferral of Effective Date* (Amendments to IAS 1)

On behalf of the Accounting Standards Committee of Germany (ASCG) I am writing to comment on EFRAG's Draft Letter to the European Commission Regarding Endorsement of the *Classification of Liabilities as Current or Non-current* and *Deferral of Effective Date* (Amendments to IAS 1).

We support EFRAG's assessment to recommend *Classification of Liabilities as Current or Non-current* and *Deferral of Effective Date* (Amendments to IAS 1) for endorsement.

Like EFRAG, we consider that the Amendments meet the qualitative characteristics of relevance, reliability, comparability and understandability required to support economic decisions and the assessment of stewardship, lead to prudent accounting, and that they are not contrary to the true and fair view principle. We also agree that the Amendments are conducive to the European public good.

We note, that the IFRS Interpretations Committee discussed in its December 2020 meeting how an entity applies the IAS 1 amendments to particular fact patterns. The IFRS IC concluded that the principles and requirements in IFRS Standards provide an adequate basis for the entity to determine how to classify the loan as current or non-current in the three fact patterns described in the tentative agenda decision.

Like the IFRS Interpretations Committee, we believe that paragraphs 72A and 75 of IAS 1 are clear as regards the classification of liabilities as current or non-current, when the liability is subject to a condition (such as covenants) and the borrower's compliance with the condition is tested at dates after the end of the reporting period. Although the application of the principles and requirements of the IAS 1 Amendment may lead to counter-intuitive results with regard to the classification of liabilities, we are of the opinion that paragraphs 72A and 75 of IAS 1 are clear. Therefore, we support EFRAG's assessment to recommend *Classification of Liabilities*

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as Current or Non-current and Deferral of Effective Date (Amendments to IAS 1) for endorsement.

If you would like to discuss our comments further, please do not hesitate to contact me (morich@drsc.de).

Yours sincerely,

Sven Morich

Executive Director



INVITATION TO COMMENT ON EFRAG'S ASSESSMENTS ON CLASSIFICATION OF LIABILITIES AS CURRENT OR NON-CURRENT

Once filled in, this form should be submitted by 11 January 2021 using the 'Comment publication link' available at the bottom of the respective news item. All open consultations can be found on EFRAG's web site: [Open consultations: express your views.](#)

EFRAG has been asked by the European Commission to provide it with advice and supporting material on Classification of Liabilities as Current or Non-current (the Amendments). In order to do so, EFRAG has been carrying out an assessment of the Amendments against the technical criteria for endorsement set out in Regulation (EC) No 1606/2002 and has also been assessing the costs and benefits that would arise from their implementation in the European Union (the EU) and European Economic Area.

A summary of the Amendments is set out in Appendix 1.1 of the accompanying *Draft Letter to the European Commission* regarding endorsement of the Amendments.

Before finalising its assessment, EFRAG would welcome your views on the issues set out below. Please note that all responses received will be placed on the public record, unless the respondent requests confidentiality. In the interests of transparency, EFRAG will wish to discuss the responses it receives in a public meeting, so it is preferable that all responses can be published.

EFRAG's initial assessments, summarised in this questionnaire, will be updated for comments received from constituents when EFRAG is in the process of finalising its *Letter to the European Commission* regarding endorsement of the Amendments.

Your details

1 Please provide the following details:

- (a) Your name or, if you are responding on behalf of an organisation or company, its name:

Accounting Standards Committee of Germany (ASCG)

- (b) Are you a:

Preparer User Other (please specify)

National Standard Setter

- (c) Please provide a short description of your activity:

- (d) Country where you are located:

Germany

- (e) Contact details, including e-mail address:

info@drsc.de

EFRAG's initial assessment with respect to the technical criteria for endorsement

2 EFRAG's initial assessment of the Amendments is that they meet the technical criteria for endorsement. In other words, the Amendments are not contrary to the principle of true and fair view and meet the criteria of understandability, relevance, reliability, comparability and lead to prudent accounting. EFRAG's reasoning is set out in Appendix 2.1 of the accompanying *Draft Letter to the European Commission* regarding endorsement of the Amendments.

(a) Do you agree with this assessment?

Yes No

If you do not agree, please provide your arguments and what you believe the implications of this could be for EFRAG's endorsement advice.

(b) Are there any issues that are not mentioned in Appendix 2.1 of the accompanying *Draft Letter to the European Commission* regarding endorsement of the Amendments that you believe EFRAG should take into account in its technical evaluation of the Amendments? If there are, what are those issues and why do you believe they are relevant to the evaluation?

The European public good

3 In its assessment of the impact of the Amendments on the European public good, EFRAG has considered a number of issues that are addressed in Appendix 3.1 of the accompanying *Draft Letter to the European Commission* regarding endorsement of the Amendments.

Improvement in financial reporting

4 EFRAG has identified that in assessing whether the endorsement of the Amendments is conducive to the European public good it should consider whether the Amendments are an improvement over current requirements across the areas which have been subject to changes (see paragraphs 3 to 4 of Appendix 3.1 of the accompanying *Draft Letter to the European Commission*). To summarise, EFRAG's initial assessment is that the Amendments are likely to improve the quality of financial reporting.

Do you agree with the assessment?

Yes No

If you do not agree, please provide your arguments and indicate how this could affect EFRAG's endorsement advice.

*Classification of Liabilities as Current or Non-current
Invitation to Comment on EFRAG's Initial Assessments*

Costs and benefits

- 5 EFRAG is also assessing the costs that are likely to arise for preparers and for users on implementation of the Amendments in the EU, both in year one and in subsequent years. Some initial work has been carried out, and the responses to this invitation to comment will be used to complete the assessment.

The results of the initial assessment of costs are set out in paragraphs 6 to 11 of Appendix 3.1 of the accompanying *Draft Letter to the European Commission* regarding endorsement of the Amendments. To summarise, EFRAG's initial assessment is that the Amendments will not result in increased costs and that it is likely to be cost neutral.

Do you agree with this assessment?

Yes No

If you do not, please explain why you do not and (if possible) explain broadly what you believe the costs involved will be?

As a National Standard-Setter we are not in a position to comment on this issue.

- 6 In addition, EFRAG is assessing the benefits that are likely to be derived from the Amendments. The results of the initial assessment of benefits are set out in paragraphs 12 to 13 of Appendix 3.1 of the accompanying *Draft Letter to the European Commission* regarding endorsement of the Amendments. To summarise, EFRAG's initial assessment is that users are likely to benefit from the Amendments as the information resulting from it will remove inconsistency and increase comparability between entities and therefore enhance their analysis.

Do you agree with this assessment?

Yes No

If you do not agree with this assessment, please provide your arguments and indicate how this could affect EFRAG's endorsement advice.

- 7 EFRAG's initial assessment is that the benefits to be derived from implementing the Amendments in the EU, as described in paragraph 6 above, are likely to outweigh the costs involved, as described in paragraph 5 above.

Do you agree with this assessment?

Yes No

If you do not agree with this assessment, please provide your arguments and indicate how this could affect EFRAG's endorsement advice.

Overall assessment with respect to the European public good

- 8 EFRAG has initially concluded that endorsement of the Amendments would be conducive to the European public good (see paragraphs 15 to 18 of Appendix 3.1 of the accompanying *Draft Letter to the European Commission*).

Do you agree with this conclusion?

*Classification of Liabilities as Current or Non-current
Invitation to Comment on EFRAG's Initial Assessments*

Yes No

If you do not agree, please explain your reasons.