



Federation of European Accountants

Mr Roger Marshall  
Acting President of the EFRAG Board  
EFRAG  
Square de Meeûs 35  
B-1000 BRUXELLES  
Belgium

Sent by email:  
[Commentletters@efrag.org](mailto:Commentletters@efrag.org)

Brussels, 19 February 2016

**Subject: *Comment Letter issued by EFRAG on EFRAG's 2015 proactive agenda consultation***

Dear Mr Marshall,

The Federation of European Accountants ([www.fee.be](http://www.fee.be)) is pleased to provide you below with its comments on the EFRAG's Agenda Consultation.

Our views on the urgency and importance of the future projects for financial reporting are expressed in our letter to the IASB, regarding its own agenda consultation, published on 18 December 2015<sup>1</sup>. In our comments, in addition to the IASB's work on the *Conceptual Framework*, we stated our support for the IASB's research projects, as we believe that they are important to achieve an even more robust set of financial reporting standards. Furthermore we reiterated our support for the IASB's Disclosure initiative and for some key research projects that the Board has on its agenda. These are: *Financial Instruments with Characteristics of Equity, Goodwill and Impairment*, and *Business Combinations under Common Control*. Therefore we support EFRAG's proactive activities on these projects as listed in the appendix of the consultation paper, as they are important to provide European input into the IASB's thinking on these projects at an early stage.

At the moment we cannot express a view on new EFRAG's proactive projects mentioned in paragraphs 20-22 of the consultation paper, namely *Transactions with Government, Impact of re-measurement of liabilities and Impairment model for Equity Instruments*. In our view, in order for EFRAG's proactive work to be more influential towards the development of new standards, EFRAG's proactive agenda should be determined once the IASB agenda for the years to come is set. Based on this, we also recommend that EFRAG undertakes a review of its proactive agenda on a regular basis once the IASB completes the reviews of its agenda.

---

<sup>1</sup> [http://www.fee.be/index.php?option=com\\_content&view=article&id=1556&Itemid=106&lang=en](http://www.fee.be/index.php?option=com_content&view=article&id=1556&Itemid=106&lang=en)

We strongly believe that coordination and cooperation with the IASB is essential for EFRAG's proactive activities. Such coordination and cooperation should aim, at least, at the following objectives:

- a. Ensuring, where possible, consistency with the IASB's agenda and current projects, although recognising that EFRAG may also undertake proactive research on topics to influence the agenda of the IASB and
- b. Ensuring timeliness and alignment of the EFRAG's and IASB's timelines in order for any proactive work to have the desired impact in the standard setting process;
- c. Ensuring that adequate resources are devoted to key projects that are expected to have a significant impact.

As to the question whether it is important for EFRAG to remain an independent contributor to the IASB, we would answer affirmative. EFRAG should engage positively, constructively and in a coordinated manner with the IASB to influence future directions most effectively, but as the representative of the European interests, it should always maintain its independence.

Finally, we strongly support the efforts that EFRAG undertakes in ASAF as we believe that this is a relevant and useful forum to engage and coordinate with the IASB and other national standard setters.

We hope that our comments raised above are helpful to assess the current projects included in your agenda.

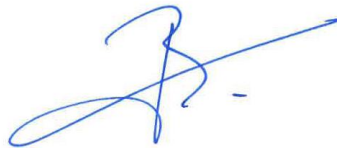
For further information on this letter, please contact Pantelis Pavlou, on +32 (0) 2 893 33 74 or via e-mail at [pantelis.pavlou@fee.be](mailto:pantelis.pavlou@fee.be).

On behalf of the Federation of European Accountants

Kind regards,



Petr Kriz  
President



Olivier Boutellis-Taft  
Chief Executive