



EFFAS THE EUROPEAN FEDERATION OF FINANCIAL ANALYSTS SOCIETIES

IASB – International Accounting Standards Board
IFRS – International Financial Reporting Standard

Mainzer Landstrasse 47a
DE – 60329 Frankfurt am Main

Contact: Claudia Stinnes
Direct number: +49 69 26 4848 300
Fax number: +49 69 26 4848 335
E-mail: Claudia.Stinnes@effas.com
Internet: www.effas.com

18 February 2013

Annual Improvements to IFRSs 2011-2013 Cycle *(Deadline for Comments – 18 February 2013)*

Comments by the European Federation of Financial Analysts Societies (EFFAS) Financial Accounting Commission – FAC

Dear Madam, dear Sir,

The European Federation of Financial Analysts Societies is the European umbrella organization of national analysts' societies. It comprises 27 members representing more than 16,000 professionals in the areas of equity and bond research, asset management as well as investment advice. The EFFAS Commission on Financial Accounting represents the views of investment professionals in the field of accounting.

The Financial Accounting Commission is pleased to share with you the views of European users of financial statements regarding *Annual Improvements*. We believe that a clear definition and plain wording always contribute to a better understanding in the implementation of IFRSs. Thus, the Commission would like to express its appreciation for this undertaking.

Regarding IFRS 1, we agree that first time adopter's should apply a single version of each IFRS. As stated in the proposal, this will enhance comparability while facilitating financial reporting presentation on the same time-basis. Using January 1st -2014 as the effective date seems very reasonable.

Regarding IFRS 3, we welcome the Board's undertaking to clarify the meaning of joint ventures by providing a better definition of the scope of the standard and attempting to introduce more simplicity.

Regarding IFRS 13, the Commission has no further comments.

Regarding IAS 40, the Commission supports the view that the definition of investment property under IFRS 3 and IAS 40 are not mutually exclusive. The statement that judgment is needed to define whether the transaction is solely for the acquisition of an investment property or the acquisition of a group of assets in the scope of IFRS 3 is needed to clarify the interrelationship of the two standards.

Regarding the effective date, as noted previously, it seems reasonable to consider January 1st-2014 as the date for adoption.

If you have any question and/or would like us to comment further on specific points, the EFFAS FAC commission will be more than willing to do so.

Best regards,

Javier de Frutos
Chair, EFFAS Commission on
Financial Accounting

EFFAS Financial Accounting Commission

EFFAS was established in 1962 as an association for nationally-based investment professionals in Europe. Headquartered in Frankfurt am Main, EFFAS comprises 27 member organisations representing more than 16,000 investment professionals. The Commission on Financial Accounting is a standing commission of EFFAS aiming at proposing and commenting on financial issues from an analyst standpoint. FAC members are Javier de Frutos (Chairman, Spain), Jacques de Greling (Vice Chairman - SFAF, France), Friedrich Spandl (OEVFA, Austria), Henning Strom (NFF, Norway), Ivano Mattei (AIAF, Italy), Taras Koval (USFA, Ukraine), Jérôme Vial (SFAA, Switzerland) and Rolf Rundfelt (SFF, Sweden).
