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This document is provided as a convenience to observers at IASB meetings, to assist them in following the Board's discussion. It does not represent an official position of the IASB. Board positions are set out in Standards.

These notes are based on the staff papers prepared for the IASB. Paragraph numbers correspond to paragraph numbers used in the IASB papers. However, because these notes are less detailed, some paragraph numbers are not used.

INFORMATION FOR OBSERVERS

Board Meeting: July 2008, London

Project: IFRS for Private Entities (formerly IFRS for SMEs)

Subject: Redeliberation – Issues relating to disclosure (including

Working Group recommendations) (Agenda Paper 8B)

For the July 2008 Board meeting, the private entity agenda papers are organised as follows:

- **Agenda Paper 8** Overview
- **Agenda Paper 8A** Issues relating to Exposure Draft (ED) sections 13-38
- **Agenda Paper 8B** Issues relating to disclosure, including Working Group (WG) recommendations

This agenda paper (Agenda Paper 8B) contains issues about disclosures that arose in comment letters on the ED and in field tests of the ED, and related staff recommendations. This agenda paper is based on the report of the views and recommendations of the WG members on disclosure issues. As preparation of the WG report began shortly after the WG meeting in April 2008, the WG recommendations do not reflect decisions made by the Board at the May and June 2008 Board meetings, for example regarding the change in the title of the standard.

The WG report begins on page 4 of this agenda paper. That report was prepared by marking up the Disclosure Checklist that was published as part of the ED, as follows:

a. The WG report includes five introductory paragraphs immediately before the markup of the Disclosure Checklist, to explain the WG's approach.

- b. The WG proposes some changes to the introductory paragraphs of the Disclosure Checklist specifically to add new paragraphs D2 and D4 and delete one of the existing paragraphs. Those proposed changes are shown in "track changes" format.
- c. The WG report adds two columns to the right of the checklist the first summarising views in the comment letters and field tests and the second stating WG members' views, recommendations, and reasons. Where the WG members' recommendation would involve a change to a disclosure proposed in the ED, the proposed change is reflected as an insertion or deletion in the main Disclosure Checklist column via track changes.

In preparing this agenda paper, the staff has made three kinds of additions to the WG report. All such staff additions are shown in grey shaded boxes, to distinguish them from WG comments and views. Those staff additions are the following:

- a. Staff recommendations and questions for the Board. The staff recommendations identify the paragraphs of the ED to which they relate. The questions are numbered sequentially. Where there is no WG or staff recommendation for a particular disclosure (most likely because no comment letters or field tests proposed changing that disclosure), no question has been raised to the Board. Board members are invited to comment on any disclosure requirements that are not covered by a staff recommendation. However, staff do not intend to highlight these at the meeting.
- b. **Staff views.** The staff agree with most of the WG recommendations regarding disclosure. In the small number of cases where the staff do not agree with the WG recommendations, staff have set out their view and reasoning beneath the relevant WG recommendation in a grey box titled "staff view".
- c. **Staff notes.** Staff have also added notes throughout the WG report titled "staff note" where staff consider supplementary information is helpful, for example, to draw attention to any Board decisions in May or June 2008 that affect a particular WG recommendation.

Not all of the disclosure issues identified by comment letters and field test reports are addressed in this agenda paper due to their vast number. When deciding which issues should be addressed by the Board and by WG members, staff have included any suggested change to the disclosures in the ED that was mentioned in more than a few comment letters or field test reports. Staff have also included issues that only came up in a small number of comment letters or field tests if the respondents' changes were well reasoned or if staff felt the issue should be discussed due to its nature.

Staff suggest that Board members view this document in Microsoft Word using "normal view" (called "draft view" in Word 2007) rather than "print layout" or "reading layout". With "normal/draft view" deletions appear as strike-though text rather than in tiny print in boxes in the right margin. Insertions are underlined.

WORKING GROUP REPORT

Disclosures Required by the IFRS for SMEs

Summary of Views of Members of the Working Group

- 1. The IASB's Working Group (WG) on the IFRS for Small and Medium-sized Entities (IFRS for SMEs) met in London on 10-11 April 2008. At that meeting the WG spent nearly all of the time discussing recognition, measurement, and financial statement presentation issues. A report of those discussions and the recommendations of Working Group members has been sent to the Board, as input to their redeliberations of the Exposure Draft that began at the May 2008 Board meeting. That report did not address disclosure issues.
- 2. At the WG meeting, WG members discussed general issues relating to disclosures, but time did not permit discussion of disclosures section by section in the ED. Overall, many WG members felt that further disclosure simplifications are needed beyond those proposed in the Exposure Draft, and that some additional disclosures are also appropriate. WG members agreed to complete the development of their disclosure recommendations to the Board after the 10-11 April 2008 meeting via correspondence, and to submit them in a separate report to the Board. That process has now been completed. The recommendations of WG members on disclosure issues are set out in this report.
- 3. This report is organised using the disclosure checklist that was part of the ED, with two columns added. The first added column summarises the main proposals made in the comment letters and field test reports for further disclosure simplifications and reductions. The second added column sets out the WG members' views, recommendations, and supporting reasons. Where comment letters or field test reports have made suggestions for additional disclosure requirements, these are inserted in the relevant place in the disclosure checklist in boxes labeled 'Additions proposed by comment letters and field tests'. Any WG comments relating to the proposed additions are added on the right of this box. Where views provided by comment letters/field tests and WG members (set out in the two right hand columns of the table below) refer to particular paragraphs, those references are to paragraphs in the ED and not in the marked-up checklist. To illustrate, WG members recommend deleting 11.48(a). This is 11.48(a) in the ED, not the new 11.48(a) after the proposed changes have been adjusted for in the left column of the table below.
- 4. The original checklist has been edited (using track changes) to reflect the WG members' recommendations on disclosures. To illustrate, WG members recommend deleting 3.4(d), and this is reflected by strike-through in the checklist below. However, the actual checklist itself has not been physically amended to reflect any consequential disclosure changes that would result from the changes to recognition and measurement that WG members have recommended in their earlier report to the Board. The areas where such consequential disclosure changes would be needed are identified in the "WG members' views and recommendations" column.
- 5. Where the report states "WG members recommended", this does not necessarily mean unanimous agreement but, rather, a substantial majority. Where the WG was significantly divided, the report indicates the differing views and arguments put forward. Where nothing is stated in the 'WG members' views and recommendations'

column, there was little, if any, disagreement with the proposed disclosure among WG members.

Disclosure checklist

This disclosure checklist has been derived from the disclosure requirements in the [draft] IFRS for SMEs.

- D1 This disclosure checklist summarises the disclosures that are required throughout the [draft] IFRS for SMEs. In most cases, the [draft] IFRS for SMEs does not specify whether the disclosure should be made in the notes or on the face of the financial statements. In several cases, however, disclosures are expressly required to be on face of financial statements; these are identified in this checklist.
- D2 The definition of materiality in paragraph 2.4 encompasses omission of immaterial disclosures. The disclosure requirements in the IFRS for SMEs apply only to material items and, therefore, if an item is immaterial no disclosure is prescribed.
- D3 This checklist deals with disclosures. While it does not deal with presentation format, often a required presentation is the equivalent of a disclosure requirement. To illustrate, Sections 3–6 of the [draft] IFRS for SMEs require the presentation of some specific line items on the face of the balance sheet, income statement, statement of changes in equity and cash flow statement. Those presentation requirements are essentially disclosure requirements and are included in this checklist.
- The application of the [draft] IFRS for SMEs, with additional disclosure when necessary, is presumed to result in financial statements that achieve a fair presentation of the financial position, financial performance and cash flows of SMEs. Such additional disclosures are necessary when compliance with the specific requirements in the [draft] standard is insufficient to enable users to understand the effect of particular transactions, other events and conditions on the entity's financial position and financial performance.
- D5 The disclosure requirements in the [draft] IFRS for SMEs should be regarded as minimum requirements. An entity must present additional line items, headings and subtotals on the face of the financial statements when such presentation is relevant to an understanding of the entity's financial position, performance, and changes in financial position. Similarly, an entity must include in the notes to financial statements information that is not presented on the face of the financial statements but is relevant to an understanding of them.
- Under the [draft] IFRS for SMEs, an entity is required or permitted to apply an International Financial Reporting Standard (IFRS) in the following cases:
 - (a) The entity elects to apply an accounting policy option that is included in the [draft] IFRS for SMEs by cross-reference to an IFRS. Examples include the direct method of preparing the cash flow statement; accounting for financial instruments under IAS 39 Financial Instruments: Recognition and Measurement rather than under the provisions of Section 11; the equity method of accounting for investments in associates and joint ventures; the

proportionate consolidation method of accounting for investments in joint ventures; the fair value through profit or loss model for investment property; the revaluation model for property, plant and equipment and for intangible assets; capitalisation of development costs; and capitalisation of borrowing costs.

- (b) The entity is required or permitted to apply an IFRS because the [draft] IFRS for SMEs does not address specific events, transactions or circumstances that are covered in IFRSs. That may be the case either because:
 - the [draft] IFRS for SMEs states that if an SME does encounter such events, transactions or circumstances it should apply the provisions of the relevant IFRS. Examples include calculation of the recoverable amount of goodwill; equity settled share based payment; financial reporting in a hyperinflationary economy; specialised industry accounting (extractive industries and agriculture); and interim reporting.
 - ii) paragraph 10.4 of the [draft] IFRS for SMEs permits the entity to apply the requirements and guidance in IFRSs and Interpretations of IFRSs dealing with similar and related issues.
- (c) The entity elects to follow IAS 39 rather than Section 11 in accounting for financial assets and financial liabilities. An entity that applies an IFRS in the foregoing circumstances is required to make the relevant disclosures as required by that IFRS. This disclosure checklist does not include those potential disclosures.

Question 1: Staff recommendation and question for the Board (paragraphs D1-D5)

Staff recommend that the Board adopt the WG recommendation to add two new paragraphs to the introduction to the disclosure checklist and delete the last paragraph as illustrated above. Staff also note that most of the deleted paragraph would be obsolete due to the Board's decision to make the IFRS for Private Entities fully standalone.

Does the Board agree with the staff recommendation?

Disclosure requirements in the [draft] IFRS for SMEs section by section

Section 1 Scope

No disclosures required by this section.

Section 2 Concepts and Pervasive Principles

No disclosures required by this section.

Section 3 Financial Statement Presentation

Compliance with the [draft] IFRS for SMEs

			Views in Comment Letters and Field Tests	WG members' views and recommendations
	3.2	An entity whose financial statements comply with the <i>IFRS for SMEs</i> shall make an explicit and unreserved statement of such compliance in the notes.		
	3.4	When an entity departs from a requirement of this [draft] standard in accordance with paragraph 3.3, it shall disclose:		
		(a) that management has concluded that the financial statements present fairly the entity's financial position, financial performance and cash flows;		
Ī		(b) that it has complied with the <i>IFRS</i> for <i>SMEs</i> , except that it has departed from a particular requirement to achieve a fair presentation; and		
		the nature of the departure, including the treatment that the IFRS for SMEs would require, the reason why that treatment would be so misleading in the circumstances that it would conflict with the objective of financial statements set out in Section 2, and the treatment adopted.: and	Delete 3.4(d) or add impracticability exemption.	WG members recommend deletion of 3.4(d) as measurement of the effect of the
		(d) for each period presented, the financial effect of the departure on each item in the financial statements that would have been reported in complying with the requirement.		departure is unduly onerous for SMEs.
	3.5	When an entity has departed from a requirement of this [draft] standard in a prior period, and that departure affects the amounts recognised in the financial statements for the current period, it shall make the disclosures set out in paragraph 3.4(c) and (d).		

3.6	In the extremely rare circumstances in which management concludes that compliance with a requirement in this [draft] Standard would be so misleading that it would conflict with the objective of financial statements of SMEs set out in Section 2, but the relevant regulatory framework prohibits departure from the requirement, the entity shall, to the maximum extent possible, reduce the				
	perceive disclosii (a)	the nature of the requirement in this [draft] standard, and the reason why management has concluded that complying with that requirement is so misleading in the circumstances that it conflicts with the objective of financial			
	(b)	statements set out in Section 2; and for each period presented, the adjustments to each item in the financial statements that management has concluded would be necessary to achieve a fair presentation.			
3.7	stateme disclose which it	n entity does not prepare financial ents on a going concern basis, it shall that fact, together with the basis on prepared the financial statements and the why the entity is not regarded as a going n.			
	Question 2: Staff recommendation and question for the Board (paragraphs 3.4 and 3.5) Staff recommend that the Board adopt the WG recommendation.				

Reclassifications

3.10	the fina reclassi reclassi	ne presentation or classification of items in ncial statements is changed, an entity shall fy comparative amounts unless the fication is impracticable. When comparative s are reclassified, an entity shall disclose:	
	(a) the nature of the reclassification;		
	(b)	the amount of each item or class of items that is reclassified; and	
	(c)	the reason for the reclassification.	

3.11	When it is impracticable to reclassify comparative amounts, an entity shall disclose.÷ (a) the reason for not reclassifying the amounts;and. (b) the nature of the adjustments that would have been made if the amounts had been reclassified.	Delete 3.11(b) or add impracticability exemption.	WG members recommend deletion of 3.11 (b) because measurement of the potential adjustments would be onerous for SMEs. In their earlier report to the Board, WG members recommended that an "undue cost or effort" principle be added to "impracticable" wherever the ED requires restatement, with appropriate disclosure.			
2.44	Claff acts		4.00.004.01			
3.11	Staff note At the May meeting the Board rejected adding an "undue cost or effort" principle to "impracticable" wherever restatement is required. The above WG suggestion appears wherever the ED requires restatement (together with an impracticability exemption) and also in a number of other places within the sections where the term impracticable or practicable is used.					
Questic	Question 3: Staff recommendation and question for the Board (paragraph 3.11)					
	Staff recommend that the Board adopt the WG recommendations with the exception of adding the "undue cost or effort" clause.					
Does th	Does the Board agree with the staff recommendation?					

Comparative information

3.12	Except when this [draft] standard permits or requires otherwise, an entity shall disclose comparative information in respect of the previous comparable period for all amounts reported in the financial statements (including the information on the face of the financial statements and in the notes). An entity shall include comparative information for narrative and descriptive information when it is relevant to an understanding of the	
	when it is relevant to an understanding of the current period's financial statements.	

Identification of the financial statements

3.20	Disclose	e:	WG members have
	(a)	the name of the reporting entity and any change in its name since the end of the preceding reporting period;	added disclosures from IAS 1.126 because the information is
	<u>(b)</u>	the domicile and legal form of the entity, its country of incorporation and the address of its registered office (or principal place of business, if different from the registered office):	regarded as useful for users of SME financial statements.
	<u>(c)</u>	a description of the nature of the entity's operations and its principal activities;	
	(<u>d</u> b)	whether the financial statements cover the individual entity or a group of entities;	
	(<u>e</u> e)	the date of the end of the reporting period and the period covered by the financial statements;	
	(<u>f</u> d)	the presentation currency, as defined in Section 31; and	
	(e g)	the level of rounding, if any, used in presenting amounts in the financial statements.	

Question 4: Staff recommendation and question for the Board (paragraph 3.20)

Staff recommend that the Board adopt the WG recommendation.

Does the Board agree with the staff recommendation?

Section 4 Balance Sheet

Information to be presented on the face of the balance sheet

	Views in Comment Letters and Field Tests	WG members' comments
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4.2	of the ba	nimum, an entity shall include, on the face alance sheet, line items that present the gamounts: cash and cash equivalents; trade and other receivables; financial assets (excluding amounts shown under (a), (b) and (h)); inventories; property, plant and equipment; intangible assets; biological assets; investments in associates accounted for using the equity method;		In their earlier report to the Board, WG members recommended changes in recognition and presentation requirements that would affect these disclosures if adopted. For example, if the WG recommendations for Sections 28 (income taxes) and 36 (discontinued operations) are		
	(x) (i)	investments in jointly controlled entities (unless accounted for by proportionate consolidation); the total of non-current assets classified as held for sale and assets included in disposal groups classified as held for sale in accordance with Section 36;		adopted, 4.2(i), (m), and (n) would be deleted.		
	(j)	trade and other payables;				
	(k)	financial liabilities (excluding amounts				
	40	shown under (j) and (o);				
	(l)	liabilities and assets for current tax;				
	(m)	deferred tax liabilities and deferred tax assets (these shall always be classified as non-current);				
	(n)	liabilities included in disposal groups classified as held for sale.				
	(o)	provisions;				
	(p)	minority interest, presented within equity separately from the parent shareholders' equity; and				
	(q)	equity attributable to shareholders of the parent.				
4.2	Staff not	<u> </u>				
	The ame	endment to 4.2(h) is necessary as a result of a ling for associates and jointly controlled entitie	allowing the cost and	fair value options for		
		Any other amendments to 4.2 would be a result of changes to other sections. Therefore, there is no staff recommendation here.				

Current/non-current distinction

4.5	An entity shall present current and non-current assets, and current and non-current liabilities, as separate classifications on the face of its balance sheet in accordance with paragraphs 4.6–4.9, except when a presentation based on liquidity provides information that is reliable and more relevant. When that exception applies, all assets and liabilities shall be presented in order of approximate liquidity.		
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Information to be presented either on the face of the balance sheet or in the notes

4.12	balanc subcla presen		the increased aggregation was simplify the not disclosure, wis significantly reducing the	WG members feel the increased aggregation will simplify the note disclosure, without
	(a)	classes of items of property, plant and equipment in classifications appropriate to the entityin accordance with Section 16;		significantly
	(b)	trade and other amounts-receivables showing separately amounts due from from trade customers, receivables from related parties, prepayments and from other amountsparties;		information presented.
	(c)	classes of inventories in classifications appropriate to the entityin accordance with Section 12, such as merchandise, production supplies, materials, work in progress and finished goods;		
I	(d)	provisions for employee benefits and other provisions; and		
	(e)	classes of equity, such as paid-in capital, share premium, retained earnings and items of income and expense that, as required by this [draft] standard, are recognised directly in equity.		

Question 5: Staff recommendation and question for the Board (paragraph 4.12)

Staff recommend that the Board adopt the WG recommendation.

4.13	following in the no (a)	g, either obtes: for each (i) (ii) (iii) (iv) (v) (vi)	re capital shall disclose the n the face of the balance sheet or class of share capital: the number of shares authorised; the number of shares issued and fully paid, and issued but not fully paid; par value per share, or that the shares have no par value; a reconciliation of the number of shares outstanding at the beginning and at the end of the period (see paragraph 21.12 for further guidance); the rights, preferences and restrictions attaching to that class including restrictions on the distribution of dividends and the repayment of capital; shares in the entity held by the entity or by its subsidiaries or associates; shares reserved for issue under options and contracts for the sale of shares, including the terms and amounts; and	Reduce disclosures in 4.13. Consider removing 4.13(a) (iv) as IFRS for SMEs is for entities without public accountability. 4.13(b) is contradictory to current regulations in Argentina and Costa Rica.	Some WG members would keep all of these disclosures since the information required should be easily available to SMEs and, in the majority of cases, is unlikely to vary from period to period. Some WG members feel that 4.13 (iii), (iv), (vi) and (vii) should be deleted.
	(b)	a descrip equity.	otion of each reserve within		
4.13		– uld keep a	all of the disclosures in 4.13 since the and is useful for financial statemer		d should be easily
4.14	An entity without share capital, such as a partnership or trust, shall disclose information equivalent to that required by paragraph 4.13(a), showing changes during the period in each category of equity, and the rights, preferences and restrictions attaching to each category of equity.				
21.12	Paragraph 4.13(a)(iv) requires an entity with share capital to disclose, either on the face of the balance sheet or in the notes, for each class of share capital, a reconciliation of the number of shares outstanding (or other measure of quantity) at the beginning and at the end of the period. In that reconciliation, the entity shall identify separately each significant type of change in the number of shares outstanding, including new issues; exercises of options, rights and warrants; conversions of convertible securities; treasury share transactions; business combinations; and bonus issues (share dividends) and share splits.				

Question 6: Staff recommendation and question for the Board (paragraphs 4.13 and 21.12)

Staff recommend no change to the disclosures in 4.13 but that 21.12 (and the reference to 21.12 in 4.13) should be deleted as recommended by WG members.

Does the Board agree with the staff recommendation?

Section 5 Income Statement

Information to be presented on the face of the income statement

				Views in Comment Letters and Field Tests	WG members' views and recommendations
	5.3	As a minimum, an entity shall incoff the income statement, line iter following amounts for the period	ms that present the		In their earlier report to the Board, WG members recommend that for
		 (a) revenue; (b) finance costs; (c) share of the profit or loss of investments in associates and joint ventures accounted for using the equity method; (d) tax expense; 			cost benefit
					period financial statements should not be restated to
					segregate discontinued
ĺ		(e) a single amount comprete the post-tax profit or los operations and (ii) the ploss recognised on the fair value less costs to disposal of the assets constituting the discont (see Section 36); and	ss of discontinued cost-tax gain or measurement to sell or on the or disposal group(s)		operations. Also in that report, WG members have recommended dropping the held for sale classification and therefore this would
		(f) profit or loss.			require the wording used in 5.3(e) to be
		Presentation of 5.3(e) for prior periods is encouraged but not required.			amended.
	5.3	Staff view Staff do not agree with the WG restatements to be able to make of change in the business will be tapresentation of comparative information of such an enormous change in as SMEs will rarely sell or disposinot normally be applicable. Staff ED from presenting prior period	omparisons between thing place. Staff wo rmation for 5.3(e) on the business. Such a se of a significant parf note that there is all	periods in this instance uld require (not only extrement in the income statement is not but of their business and ready an "impracticab"	ce since a major ncourage) ts to show the impact urdensome for SMEs therefore 5.3(e) will
	5.4	An entity shall disclose separate items on the face of the income allocations of profit or loss for the	statement as		
		(a) profit or loss attributable interest; and	e to minority		
		(b) profit or loss attributable of the parent.	e to equity holders		

5.4 Staff note

At the May meeting the Board decided that the final standard should incorporate the requirements of IAS 1 (revised 2007). The line items in 5.3 and 5.4 above will need to be amended to show which line items will appear in a statement of comprehensive income (or both a statement of comprehensive income and income statement if a two statement presentation is adopted). There will also be an impact on disclosures in other areas of Sections 3 to 7.

Question 7: Staff recommendation and question for the Board (paragraphs 5.3 and 5.4)

Staff recommend no change to the requirements in 5.3 and 5.4 except to incorporate the requirements of IAS 1 Presentation of Financial Statements (revised 2007)

Does the Board agree with the staff recommendation?

Information to be presented either on the face of the income statement or in the notes

5.7	An entity shall disclose separately the nature and amount of material components of income and expense. Such disclosures shall include: (a) write-downs of property, plant and equipment to fair value less costs to sell, and the reversal of such write-downs; (b) write-downs of inventories to net realisable value, and the reversal of such write-downs; (c) restructurings of the activities of an entity and reversals of any provisions for the costs of restructuring; (d) disposals of items of property, plant and equipment; (e) disposals of investments; (f) discontinued operations; (g) litigation settlements; and (h) the reversal of other provisions.	Revise or delete 5.7, a rather specific list. Also, 5.7(a)(b) (c)(f)&(h) are repeated by 26.25, 12.21, 20.14 and 36.2.	WG members recommend deletion of 5.7 as disclosure of these items is required elsewhere in the IFRS for SMEs.
5.9	An entity shall present an analysis of expenses using a classification based on either the nature of expenses or their function of expenses within the entity, whichever provides information that is reliable and more relevant.		

5.10	Entities classifying expenses by function shall disclose additional information on the nature of expenses, including depreciation and amortisation expense and employee benefits expense.	Delete 5.10 as it requires additional information to be compiled, which does not give a simplified application.	WG members recommend deletion of 5.10. Disclosure of depreciation and amortisation is required elsewhere in the ED. Although disclosure of the total employee benefits expense is not required elsewhere in the ED, it is only given as an example of one of the expenses that should be included in a "by nature" income statement. WG members feel this disclosure should either be required for all entities or not required at all (rather than having more onerous requirements for "by function" income statements).	
5.10	Staff note At the June meeting, the Board decided to drop the 5.10 disclosures.			
Question 8: Staff recommendation and question for the Board (paragraphs 5.7 and 5.10) Staff recommend that the Board adopt the WG recommendation to delete 5.7 (no need to redebate 5.10). Does the Board agree with the staff recommendation?				

Section 6 Statement of Changes in Equity and Statement of Income and Retained Earnings

Information to be presented on the face of the statement of changes in equity

- An entity shall present a statement of changes in equity showing on the face of the statement:

 (a) profit or loss for the period;
 - (b) each item of income and expense for the period that, as required by this [draft] standard, is recognised directly in equity, and the total of those items;
 - (c) total income and expense for the period (calculated as the sum of (a) and (b)), showing separately the total amounts attributable to equity holders of the parent and to minority interest; and
 - (d) for each component of equity, the effects of changes in accounting policies and corrections of errors recognised in accordance with Section 10.

WG members suggest adding the following wording above 6.2 in the disclosure checklist for clarity:

"If an entity is required to or elects to present a statement of changes in equity then it only needs to comply with paragraphs 6.2 and 6.3 in this section. If instead an entity presents a combined statement of income and retained earnings then it only needs to comply with paragraph 6.5 in this section."

Question 9: Staff recommendation and question for the Board (paragraph 6.2)

Staff recommend that the Board adopt the WG recommendation for clarity.

Does the Board agree with the staff recommendation?

Information to be presented either on the face of the statement of changes in equity or in the notes

6.3 An entity shall also present, either on the face of the statement of changes in equity or in the notes: (a) the amounts of investments by, and dividends and other distributions to, equity holders, showing separately issues of shares, treasury share transactions, and dividends and other distributions to equity holders: (b) the balance of retained earnings (ie accumulated profit or loss) at the beginning of the reporting period and at the end of the period, and the changes during the period; and a reconciliation of the carrying amount of (c) each class of contributed equity and each item of income and expense recognised directly in equity (see paragraph 6.2(b)) at the beginning and the end of the period, separately disclosing each change.

Information to be presented on the face of the statement of income and retained earnings

6.5	of incon	y shall present, on the face of the statement ne and retained earnings, the following addition to the information required by 5:	
	(a)	retained earnings at the beginning of the reporting period;	
	(b)	dividends declared and paid or payable during the period;	
	(c)	restatements of retained earnings for corrections of prior period errors;	
	(d)	restatements of retained earnings for changes in accounting policy; and	
	(e)	retained earnings at the end of the reporting period.	

Section 7 Cash Flow Statement

		Views in Comment Letters and Field Tests	WG members' views and recommendations
7.3	An entity shall present a cash flow statement that reports cash flows for a period classified by operating activities, investing activities and financing activities.		
7.7	An entity shall report cash flows from operating activities using either:		
	(a) the direct method, whereby major classes of gross cash receipts and gross cash payments are disclosed; or		
	(b) the indirect method, whereby profit or loss is adjusted for the effects of non-cash transactions, any deferrals or accruals of past or future operating cash receipts or payments, and items of income or expense associated with investing or financing cash flows.		

Reporting cash flows from investing and financing activities

7.10	An entity shall report separately major classes of gross cash receipts and gross cash payments arising from investing and financing activities. The aggregate cash flows arising from acquisitions and from disposals of subsidiaries or other business units shall be presented separately and classified as operating investing activities.		
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7.40	0. "			
7.10	Staff note			
	This is an editorial change therefore there is no staff recommendation here.			
Intere	Interest and dividends			
7.14	An entity shall disclose separately cash flows from interest and dividends received and paid.			
Incom	ne taxes			
7.17	An entity shall disclose separately cash flows arising from taxes on income and shall classify them as cash flows from operating activities unless they can be specifically identified with financing and investing activities. When tax cash flows are allocated over more than one class of activity, the entity shall disclose the total amount of taxes paid.			
Non-c	ash transactions			
7.18	An entity shall exclude from the cash flow statement investing and financing transactions that do not require the use of cash or cash equivalents. An entity shall disclose such transactions elsewhere in the financial statements in a way that provides all the relevant information about these investing and financing activities.			
Comp	onents of cash and cash equivalents			
7.20	An entity shall disclose the components of cash and cash equivalents and shall present a reconciliation of the amounts reported in the cash flow statement to the equivalent items reported in the balance sheet. However, an entity is not required to present this reconciliation if the amount of cash and cash equivalents reported in the cash flow statement is identical to the amount similarly described in the balance sheet.			
7.20	Staff note			
	This is an editorial change therefore there is no staff recommendation here.			
Other	disclosures			
7.21	An entity shall disclose, together with a commentary by management, the amount of significant cash and cash equivalent balances held by the entity that are not available for use by the entity. Cash and cash equivalents held by an entity may not be available for use by the entity because of, among other reasons, foreign exchange controls or legal restrictions.			

Section 8 Notes to the Financial Statements

		Views in Comment Letters and Field Tests	WG members' views and recommendations
8.2	The notes shall: (a) present information about the basis of preparation of the financial statements and the specific accounting policies used, in accordance with paragraphs 8.5 and 8.6; (b) disclose the information required by this [draft] standard that is not presented on the face of the financial statements; and (c) provide additional information that is not presented on the face of the financial statements but is relevant to an understanding of them.		WG members recommend adding ED paragraph 8.2 to the disclosure checklist to emphasise that additional disclosures are necessary if compliance with the specific disclosure requirements in the standard is insufficient to enable users to understand the effect of particular transactions, other events and conditions on the entity's financial position and financial performance.
Question 10: Staff recommendation and question for the Board (paragraph 8.2) Staff recommend that the Board adopt the WG recommendation.			
	e Board agree with the staff recommendation?		
8.3	An entity shall, as far as practicable, present the notes in a systematic manner. An entity shall cross-reference each item on the face of the financial statements to any related information in the notes.		

- 8.4 An entity normally presents the notes in the following order:
 - (a) a statement that the financial statements have been prepared in compliance with the *IFRS* for *SMEs* (see paragraph 3.2);
 - (b) a summary of significant accounting policies applied (see paragraph 8.5);
 - (c) supporting information for items presented on the face of the financial statements, in the order in which each statement and each line item is presented; and
 - (d) <u>any</u> other disclosures., including:
 - (i) contingent liabilities and contingent assets (see Section 20) and unrecognised contractual commitments:
 - (ii) non-financial disclosures
 - (iii) the amount of dividends proposed or declared before the financial statements were authorised for issue but not recognised as a distribution to equity holders during the period, and the related amount per share; and
 - (iv) the amount of any cumulative preference dividends not recognised.

WG members feel 8.4 (d)(i) to (iv) should be deleted as unnecessary for an SME and may be seen to require additional information from that required within specific sections.

The reference to "unrecognised contractual commitments" in (d)(i) is unclear. There is no general requirement for disclosure of such commitments in the ED (nor in full IFRSs). The ED does require disclosure of some specific commitments (11.47(d), 14.17, 16.30(b), 17.33(e), and 32.10). The reference in (d)(i) is a sequencing requirement, not a disclosure requirement. This is also an issue in IAS 1(2007).

Some WG members support the addition of a general disclosure requirement for unrecognised contractual commitments. Other WG members feel that the specific requirements for commitments proposed in the ED (cited in the preceding paragraph) are sufficient as they assist SMEs in identifying such commitments and are consistent with full IFRSs, which doesn't have a general disclosure requirement.

8.4 Staff view

Staff feel that the specific requirements for commitments proposed in the ED are sufficient and therefore do not think a general requirement for unrecognised contractual commitments should be added.

Question 11: Staff recommendation and question for the Board (paragraph 8.4)

Staff recommend that the Board adopt the WG recommendation to amend 8.4 as shown (ie delete 8.4(i) to (iv)) and not to include a general disclosure requirement for unrecognised contractual commitments.

Does the Board agree with the staff recommendation?

Additions proposed by comment letters and field tests	WG members' views and recommendations
Requirements of IAS 1.126 should be added. IAS 1.126) An entity shall disclose the following, if not disclosed elsewhere in information published with the financial statements: (a) the domicile and legal form of the entity, its country of incorporation and the address of its registered office (or principal place of business, if different from the registered office); (b) a description of the nature of the entity's operations and its principal activities; and (c) the name of the parent and the ultimate parent of the group.	WG members recommend adding (a) and (b) to 3.20. (c) is required already by 33.4.

Staff note

This issue is dealt with for 3.20 above and therefore there is no staff recommendation here.

Disclosure of accounting policies

- An entity shall disclose in the summary of significant accounting policies:
 - (a) the measurement basis (or bases) used in preparing the financial statements;
 - (b) the accounting policy the entity has chosen whenever the entity has adopted an accounting policy for an event, a transaction, other event or condition for which this [draft] standard allows an accounting policy choice; and
 - (c) the other accounting policies used that are relevant to an understanding of the financial statements.

Several sections of the ED require disclosure of the specific accounting policy/policies used for that section. In general, these specific policy disclosure requirements are also in the related full IFRS. Many relate to the accounting policy option chosen when there is a choice.

Some WG members support deleting all of these explicit disclosures because they are covered by the general requirement in 8.5.

Other WG members are concerned that the principle in paragraph 8.5, by itself, is insufficient to help SMEs understand specifically what is required. In their view, putting the accounting policy disclosure requirement for a particular topic in the same place as the other disclosures relating to that topic makes clear what is required. They note that removing these disclosure requirements from the individual sections does not reduce an SME's required disclosures. It would only be a cosmetic change that makes the IFRS for SMEs less user friendly.

8.5 Staff view

Staff would keep the specific accounting policy disclosure requirements within the individual sections, rather than only having a general disclosure requirement, for the same reasons as provided above by those WG members who support specific requirements.

Question 12: Staff recommendation and question for the Board (paragraph 8.5)

Staff recommend that the Board adopt the Staff view set out directly above.

Does the Board agree with the staff recommendation?

Additions proposed by comment letters and field tests	WG members' views and recommendations
To the extent that a SME uses the optional fallback to any of the full IFRSs (by cross-reference), accounting policies must clearly state that fact.	WG members also feel this is adequately covered by paragraph 8.5. Additional disclosure is not needed.

Staff note

This issue is dealt with by 8.5 above and therefore there is no staff recommendation here. Staff note that the Board have decided all cross-references will be removed from the final standard.

Information about judgements

8.6	An entity shall disclose, in the summary of significant accounting policies or other notes, the judgements, apart from those involving estimations (see paragraph 8.7), that management has made in the process of applying the entity's accounting policies and that have the most significant effect on the amounts recognised in the financial statements.	Delete 8.6 or modify, for example by adding an impracticability exemption.	WG members regard these requirements from IAS 1 as appropriate for public capital markets but problematic for SMEs. SMEs are likely to have difficulty determining what to disclose, and quality is likely to vary from entity to entity. Some WG members are concerned that SMEs would simply use boilerplate language. This would reduce usefulness. This is one area where WG members feel relief should be provided.
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Question 13: Staff recommendation and question for the Board (paragraph 8.6)

Staff recommend that the Board adopt the WG recommendation.

Does the Board agree with the staff recommendation?

Information about key sources of estimation uncertainty

An entity shall disclose in the notes information about the key assumptions concerning the future, and other key sources of estimation uncertainty at the end of the reporting period, that have a significant risk of causing a material adjustment to the carrying amounts of assets and liabilities within the next financial year. In respect of those assets and liabilities, the notes shall include details of:

- (a) their nature; and
- (b) their carrying amount as at the end of the reporting period.

Delete 8.7 or modify, for example by adding an impracticability exemption.

WG members regard these requirements from IAS 1 as appropriate for public capital markets but problematic for SMEs. SMEs are likely to have difficulty determining what to disclose, and quality is likely to vary from entity to entity. Some WG members are concerned that SMEs would simply use boilerplate language. This would reduce usefulness. This is one area where WG members feel relief should be provided.

Question 14: Staff recommendation and question for the Board (paragraph 8.7)

Staff recommend that the Board adopt the WG recommendation.

Does the Board agree with the staff recommendation?

Information about externally imposed capital requirements

8.8 If an entity is subject to externally imposed capital requirements, it shall disclose the nature of those requirements and how they are managed, any non-compliance including whether the requirements have been complied with.

Delete or modify 8.8. Sufficient to only disclose existence of externally imposed capital requirements and if entity sees any risk of non-compliance or there have been any violations. WG members feel that a description of how capital requirements are managed is unnecessary for SMEs. This is a disclosure for entities that are in public capital markets.

Question 15: Staff recommendation and question for the Board (paragraph 8.8)

Staff recommend that the Board adopt the WG recommendation.

Section 9 Consolidated and Separate Financial Statements

Separate financial statements

		Views in Comment Letters and Field Tests	WG members' views and recommendations
9.19	When a parent, a venturer with an interest in a jointly controlled entity or an investor in an associate prepares separate financial statements, those separate financial statements shall disclose: (a) that the statements are separate financial statements; and and the reasons why those statements are prepared if not required by law; (b) a list of significant investments in subsidiaries, jointly controlled entities and associates, including the name, country of incorporation or residence, proportion of ownership interest and, if different, proportion of voting power held; and (be) a description of the methods used to		WG members feel that since IFRS for SMEs does not require presentation of separate financial statements, then there is no need to be overly prescriptive with the additional disclosures in IFRS for SMEs.
	account for the investments in subsidiaries, jointly controlled entities and associates listed under (b);		
	and shall identify the consolidated financial statements to which they relate.		

Question 16: Staff recommendation and question for the Board (paragraph 9.19)

Staff recommend that the Board adopt the WG recommendation.

Does the Board agree with the staff recommendation?

Combined financial statements

9.22	If an entity prepares combined financial statements and describes them as conforming to the <i>IFRS</i> for <i>SMEs</i> , those statements shall comply with all of the requirements of this [draft] standard. Intercompany transactions and balances shall be eliminated; profits or losses resulting from intercompany transactions that are recognised in assets such as inventory and fixed assets shall be eliminated; the financial statements of the entities included in the combined financial statements shall be prepared as of the same reporting date unless it is impracticable to do so; and uniform accounting policies shall be followed for like transactions and other events in similar circumstances. Disclosures shall include the fact that the financial statements are combined financial statements and the related party disclosures required by Section 33.		WG members generally recommended that the guidance for combined financial statements should be dropped However, if the Board retains the requirements for combined statements, WG members support this additional disclosure.
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Staff note

The Board have decided that the final standard should address combined financial statements and therefore there is no staff recommendation here.

Additions proposed by comment letters and field tests	WG members' views and recommendations
For combined financial statements, an SME should be required to disclose the reason why combined financial statements are prepared (like 9.19(a)), the basis for determining which entities are included in the combined financial statements and the basis of preparation of the combined financial statements.	If the Board retains the requirements for combined statements, WG members support this additional disclosure.

Question 17: Staff recommendation and question for the Board (paragraph 9.22)

Staff recommend that the Board adopt the WG recommendation to add this additional disclosure. Does the Board agree with the staff recommendation?

Section 10 Accounting Policies, Estimates and Errors

Disclosure of a change in accounting policy

		Views in Comment Letters and Field Tests	WG members' views and recommendations
10.11	When initial application of this [draft] standard, or an amendment to this [draft] standard, has an effect on the current period or any prior period or might have an effect on future periods, an entity shall disclose: (a) the nature of the change in accounting policy; (b) for the current period and each prior period presented, to the extent practicable, the amount of the adjustment for each financial statement line item affected shown separately; (i) for the current period; (ii) for each prior period presented; and (iii) in the aggregate for periods before those presented.; and (c) the amount of the adjustment relating to periods before those presented, to the extent practicable; and (cd) an explanation if it is not practicable to determine any of the amounts to be disclosed in (b) or (c) above.	and Field Tests	In their earlier report to the Board, WG members have recommended that an "undue cost or effort" principle be added to "practicable" wherever the ED requires restatement, with appropriate disclosure.
	Financial statements of subsequent periods need not repeat these disclosures.		

10.11	Staff view Staff feel that 10.11 should not relate to first time adoption. Therefore staff propose, as an editorial change, to move the requirements for such a disclosure on first time adoption of IFRS for SMEs to Section 38.			
10.12	an effect or might he shall discollate the shall di	oluntary change in accounting policy has on the current period or any prior period, have an effect on future periods, an entity ose: the nature of the change in accounting policy; the reasons why applying the new accounting policy provides reliable and more relevant information; to the extent practicable, the amount of the adjustment for each financial statement line item affected shown separately: (i) for the current period; (ii) for each prior period presented; and in the aggregate for periods before those presented; (d) the amount of the adjustment relating to periods before those presented, to the extent practicable; and an explanation if it is not practicable to determine the any of the amounts to be disclosed in (c) or (d) above. statements of subsequent periods need to these disclosures.		WG members have recommended that an "undue cost or effort" principle be added to "practicable" wherever the ED requires restatement, with appropriate disclosure.

Question 18: Staff recommendation and question for the Board (paragraphs 10.11 and 10.12)

Staff recommend that the Board adopt the WG recommendation, with the exception that 10.11 should not relate to first time adoption (the requirements for such disclosure on first time adoption of the Standard should be moved to Section 38).

Does the Board agree with the staff recommendation?

Disclosure of a change in estimate

10.16	An entity shall disclose the nature and amount of a change in an accounting estimate that has an effect in the current period or is expected to have an effect in future periods, except for the disclosure of the effect on future periods when it is impracticable to estimate that effect.	Delete 10.16.	WG members have recommended that an "undue cost or effort" principle be added to "practicable" wherever the ED requires restatement, with appropriate disclosure, and feels that there is no need to go further and delete 10.16.
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10.17	If the amount of the effect in future periods is not disclosed because estimating it is impracticable, an entity shall disclose that fact.	Delete 10.17.	WG members have recommended that an "undue cost or effort" principle be added to "practicable" wherever the ED requires restatement, with appropriate disclosure. If that is done, there is no need to go further and delete 10.17.
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Question 19: Staff recommendation and question for the Board (paragraphs 10.16 and 10.17)

Staff recommend no change to the requirements in 10.16 and 10.17 since at the May meeting the Board rejected adding an "undue cost or effort" principle to "impracticable" wherever restatement is required.

Does the Board agree with the staff recommendation?

Disclosure of prior period errors

10.23		An entity shall disclose the following about prior period errors: (a) the nature of the prior period error;		WG members have recommended that an "undue cost or effort" principle be added to "practicable" wherever the ED requires
	(b)	for each prior period presented, to the extent practicable, the amount of the correction for each financial statement line item affected;		
	(c) to the extent practicable, the amount of the correction at the beginning of the earliest prior period presented; and Don't require 10.23(d) if impracticable.	restatement, with appropriate disclosure.		
	<u>(d)</u>	an explanation if it is not practicable to determine the amounts to be disclosed in (b) or (c) above.		WG members feel some of the disclosure in 10.23(d) is unduly
	(d)	if retrospective restatement is impracticable for a particular prior period, the circumstances that led to the existence of that condition and a description of how and from when the error has been corrected.		prescriptive for SMEs.
	Financial statements of subsequent periods need not repeat these disclosures.			

Question 20: Staff recommendation and question for the Board (paragraph 10.23)

Staff recommend that the Board adopt the WG recommendation with the exception of adding the "undue cost or effort" clause.

Section 11 Financial Assets and Financial Liabilities

Additions proposed by comment letters and field tests	WG members' views and recommendations			
A principles-based approach to disclosing financial instruments would be simpler than the checklist-based approach in IFRS 7 [much of which is retained in paragraphs 11.40 to 11.52] and would give SMEs greater discretion to determine the level of disclosures appropriate to reflect the nature and extent of their exposure to financial risk and the way they manage that exposure.	WG members recommend that the IFRS for SMEs specify the required financial instruments disclosures, because most SMEs do not have the expertise to assess the disclosures that lenders and other users need. However, WG members recommend changes to 11.40 to 11.52 as noted below.			
Question 21: Staff recommendation and question for the Board (paragraphs 11.40 to 11.52)				

Question 21: Staff recommendation and question for the Board (paragraphs 11.40 to 11.52)

Staff recommend that the Board adopt the WG recommendation.

Does the Board agree with the staff recommendation?

Disclosure of accounting policies for financial instruments

		Views in Comment Letters and Field Tests	WG members' views and recommendations
11.40	In accordance with paragraph 8.5 of Section 8, an entity shall disclose, in the summary of significant accounting policies, the measurement basis (or bases) used for financial instruments and the other accounting policies used for financial instruments that are relevant to an understanding of the financial statements.		

Balance sheet – categories of financial assets and financial liabilities

11.41	An entity shall disclose the carrying amounts of each of the following categories of financial assets and financial liabilities at the reporting date, in total and by each significant type of financial asset or financial liability within each category, either on the face of the balance sheet or in the notes:	Delete or modify 11.41. This additional disaggregation has little informational value, but is very	WG members feel the additional disaggregation needed to break down amounts by "significant types"		
	(a)	financial assets measured at fair value through profit or loss (paragraph 11.8);	costly to produce.	has little additional informational value for users of SME	
	(b)	financial assets measured at amortised cost less impairment (paragraph 11.7(a));		financial statements, but could be very	
	(c)	equity instruments measured at cost (paragraph 11.7(c));		costly to produce.	
	(d)	loan commitments measured at cost less impairment (paragraph 11.7(b));			
	(e)	financial liabilities measured at fair value through profit or loss (paragraph 11.8); and			
	(f)	financial liabilities measured at amortised cost (paragraph 11.7(a)).			
11.41A	An entity shall disclose information that enables users of its financial statements to evaluate the significance of financial instruments for its financial position and performance. For example, for long term debt such information would include the terms and conditions of the debt instrument (such as interest rate, maturity, repayment schedule, and restrictions that the debt instrument imposes on the entity).			WG members suggest adding this new disclosure to the final standard based on IFRS 7.7.	
11.42	For all financial assets and financial liabilities measured at fair value, the entity shall disclose the basis for determining fair value, eg quoted market price in an active market or a valuation technique. When a valuation technique is used, the entity shall disclose the assumptions applied in determining fair values of each class of financial assets or financial liabilities. For example, if applicable, an entity discloses information about the assumptions relating to prepayment rates, rates of estimated credit losses, and interest rates or discount rates.				
11.43	availab	able measure of fair value is no longer ble for an equity instrument measured at fair hrough profit or loss, the entity shall disclose ct.			
Questio	Question 22: Staff recommendation and question for the Board (paragraphs 11.41 and 11.41A)				

Question 22: Staff recommendation and question for the Board (paragraphs 11.41 and 11.41A) Staff recommend that the Board adopt the WG recommendation.

Additions proposed by comment letters and field tests	WG members' views and recommendations
A movement chart of financial assets could be required by 11.41 to assess changes during period (for example, if changes in the balance sheets are due to purchases or fair value gains).	WG members do not recommend adding this reconciliation. It is not required by IFRS 7.

Question 23: Staff recommendation and question for the Board (paragraph 11.41)

Staff recommend that the Board adopt the WG recommendation not to add this reconciliation.

Does the Board agree with the staff recommendation?

Derecognition

11.44	another for dere the entit	tity has transferred financial assets to party in a transaction that does not qualify cognition (see paragraphs 11.24–11.26), ty shall disclose for each class of such I assets: the nature of the assets;	Delete 11.44	WG members would keep these disclosures as the information required must be known to the SME in order to account for the transaction correctly in accordance with 11.24 to 11.26.	
	(b)	the nature of the assets, the nature of the risks and rewards of ownership to which the entity remains exposed;			for the transaction correctly in accordance with
	(c)	the carrying amounts of the assets and of any associated liabilities that the entity continues to recognise.			

Question 24: Staff recommendation and question for the Board (paragraphs 11.44)
Staff recommend that the Board adopt the WG recommendation.

Does the Board agree with the staff recommendation?

Collateral

11.45		n entity has pledged financial assets as al for liabilities or contingent liabilities, it sclose:
	(a)	the carrying amount of the financial assets pledged as collateral; and
	(b)	the terms and conditions relating to its pledge.

Defaults and breaches on loans payable

	For loans payable recognised at the reporting date for which there is a breach of terms or default of principal, interest, sinking fund, or redemption	11.46 & 11.47.	WG members propose to not require disclosure
	terms that has not been remedied by the reporting	E.g., in 11.46(a)	of breaches and

	date, and (a) (b) (c)	details of that any breach or defaults during the period of principal, interest, sinking fund, or redemption terms of those loans payable; the carrying amount of the related loans payable in default at the reporting date; and whether the breach or default was remedied, or the terms of the loans payable were renegotiated, before the financial statements were authorised for issue.	only disclose the fact (default) and carrying amount of loans payable. If default was remedied, no disclosure under 11.46 & 11.47 should be required.	defaults that were remedied before the reporting date since this could lead to unnecessary disclosures that could be very sensitive for an SME.
11.47	agreemond paragraj informati breache acceleratemedie	g the period, there were breaches of loan ent terms other than those described in ph 11.46, an entity shall disclose the same tion as required by paragraph 11.46 if those as permitted the lender to demand ated repayment (unless the breaches were ad, or the terms of the loan were liated, on or before the reporting date).	SMEs should be able to give less detail under 11.47 (see comment for 11.46).	WG members recommend that 11.47 can be combined with 11.46 as illustrated.

<u>Question 25: Staff recommendation and question for the Board (paragraphs 11.46 and 11.47)</u>
Staff recommend that the Board adopt the WG recommendation.

Does the Board agree with the staff recommendation?

Income statement and equity – items of income, expense, gains or losses

11.48	the fina An ent	ty shall disclose the following on the face of nicial statements or in the notes: ity shall disclose the following items of the expense, gains or losses either on the face inancial statements or in the notes: net gains or net losses recognised on: (i) financial assets measured at fair value through profit or loss; (ii) financial liabilities measured at fair value through profit or loss; (iii) financial assets measured at fair value through profit or loss;	WG members recommend deletion of 11.48(a) because it is generally more relevant for financial institutions, which are outside the scope of the ED.
		(iv) financial liabilities measured at amortised cost;	
	(<u>a</u> b)	total interest income and total interest expense (calculated using the effective interest method) for financial assets or financial liabilities that are not at fair value through profit or loss; and	
	(e <u>p</u>)	the amount of any impairment loss for each class of financial asset.	

11.48 Staff view

Staff do not agree with the WG recommendation that 11.48 (a) should be deleted. Staff feel it provides useful information since it is important to see which part of an entity's performance for the period results from financial instruments. Staff note that although most financial assets/liabilities held by SMEs will be measured at amortised cost, there will still be a large number of non-listed entities that are not financial institutions that have significant financial assets/liabilities that are measured at fair value through profit or loss. Therefore, staff propose no change to 11.48 in the ED.

Question 26: Staff recommendation and question for the Board (paragraph 11.48)

Staff recommend that the Board adopt the staff view set out directly above.

Does the Board agree with the staff recommendation?

Hedge accounting

11.49	If an entity uses hedge accounting, aAn entityit shall disclose the following separately for each type of hedge described in paragraph 11.31: (a) a description of the hedge;			
	(b)	a description of the financial instruments designated as hedging instruments and their fair values at the reporting date; and		
	(c)	the nature of the risks being hedged, including a description of the hedged item.		
11.50	If an entity uses hedge accounting fFor a hedge of fixed interest rate risk or commodity price risk of a commodity held (paragraphs 11.33–11.36) it the entity shall disclose:		Delete 11.50	WG members would keep these disclosures since the amounts are
	(a)	the amount of the change in fair value of the hedging instrument recognised in profit or loss and		already known for purpose of measuring effectiveness.
	(b)	the amount of the change in fair value of the hedged item recognised in profit or loss.		CHOCHVOHESS.

11.51	If an entity uses hedge accounting f For a hedge of
	variable interest rate risk, foreign exchange risk,
	commodity price risk in a firm commitment or highly
	probable forecast transaction, or a net investment
	in a foreign operation (paragraphs 11.37–11.39)
	the entity it shall disclose:

- (a) the periods when the cash flows are expected to occur and when they are expected to affect profit or loss;
- (b) a description of any forecast transaction for which hedge accounting had previously been used, but which is no longer expected to occur;
- (c) the amount of the change in fair value of the hedging instrument that was recognised in equity during the period (paragraph 11.37);
- (d) the amount that was removed from equity and recognised in profit or loss for the period, showing the amount included in each line item in the income statement (paragraphs 11.38 and 11.39).

Delete 11.51. We view target users of SMEs to be more on the creditor side, so disclosures for financial liabilities and liquidity risks are appropriate. Disclosures of interest rate risk, foreign exchange risk and default risk for financial assets are less relevant in assessing short term cash flows, liquidity, and solvency.

WG members would keep these disclosures since the amounts are already known for purpose of measuring effectiveness.

Question 27: Staff recommendation and question for the Board (paragraphs 11.49-11.51)

Staff recommend that the Board adopt the WG recommendation.

Does the Board agree with the staff recommendation?

Risks relating to financial instruments measured at cost or amortised cost

Question 28: Staff recommendation and question for the Board (paragraph 11.52)

Staff recommend that the Board adopt the WG recommendation.

Section 12 Inventories

			Views in Comment Letters and Field Tests	WG members' views and recommendations
12.21	An entit (a) (b) (c) (d)	the accounting policies adopted in measuring inventories, including the cost formula used; the total carrying amount of inventories and the carrying amount in classifications appropriate to the entity; the amount of inventories recognised as an expense during the period ('cost of goods sold'); impairment losses recognised or reversed in profit or loss in accordance with Section 26the amount of any impairment of inventories recognised as an expense in the period in accordance with paragraph 12.18 and paragraphs 26.2–26.4; and the amount of any reversal of any impairment recognised in the period in accordance with paragraph 12.18 and paragraph 26.4, and a description of the circumstances or events that led to such reversal; and the carrying amount of inventories pledged as security for liabilities.	Delete 12.21(d) & (e) or add impracticability exemption. In 12.21(e), sufficient to include material amounts of reversals, or delete requirement to describe the circumstances that led to the reversal as it is burdensome and not justifiable by cost-benefits.	WG members feel this disclosure provides useful information so only propose a minor simplification. WG members propose the replacement of 12.21 (d) and (e) with a new 12.21 (d) to be consistent with the wording used in Section 16 paragraph 16.29(e)(iv).

Question 29: Staff recommendation and question for the Board (paragraph 12.21)

Staff recommend that the Board adopt the WG recommendation.

Section 13 Investments in Associates

		Views in Comment Letters and Field Tests	WG members' views and recommendations		
13.7	An investor in an associate shall disclose. (a)its accounting policy for investments in associates. (b)the fair value of investments in associates for which there are published price quotations; (c)summarised financial information of associates, including the aggregated amounts of assets, liabilities, revenues and profit or loss, along with the investor's percentage of ownership of the associates; and (d)the nature and extent of any significant restrictions (eg resulting from borrowing arrangements or regulatory requirements) on the ability of associates to transfer funds to the investor in the form of cash dividends, or repayment of loans or advances.	Simplify or delete 13.7(c). It is not required for joint ventures. Difficult to obtain information on a timely basis. Related party disclosures are sufficient. Rarely needed by users.	WG members propose deleting 13.7(b) because it would be extremely rare that this information is available, as well as rare that an SME would have significant influence over a listed entity. WG members propose deleting 13.7(c) as this disclosure would remove most of the benefit of allowing a cost model for investments. WG members believe that 13.7(d) is covered sufficiently by the related party disclosures in Section 33. WG members recommend that the IFRS for SMEs should directly address the equity method. This would involve added disclosures. The relevant IAS 28 disclosures would be tailored for SMEs.		
13.7	Staff note				
	At the May meeting the Board decided that in general all accounting policy options in full IFRSs should be available to private entities and the more complex options should be in a separate appendix, rather than available by cross-reference to full IFRSs. The last part of the WG recommendation above appears in all of the sections below where the ED allows more complex options via cross-reference.				
Questio	stion 30: Staff recommendation and question for the Board (paragraph 13.7)				
	Staff recommend that the Board adopt the WG recommendation. Does the Board agree with the staff recommendation?				

Section 14 Investments in Joint Ventures

		Views in Comment Letters and Field Tests	WG members' views and recommendations
14.16	An investor in a joint venture shall disclose the aggregate amount of the following contingent liabilities, unless the probability of loss is remote, separately from the amount of other contingent liabilities: (a) any contingent liabilities that the investor has incurred in relation to its interests in joint ventures and its share in each of the contingent liabilities that have been incurred jointly with other venturers; (b) its share of the contingent liabilities of the joint ventures themselves for which it is contingently liable; and (c) those contingent liabilities that arise because the investor is contingently liable for the liabilities of the other venturers of a joint venture.		WG members recommend deletion because these are covered by the disclosures in 20.15. WG members recommend that the IFRS for SMEs should directly address the equity method and proportionate consolidation. This would involve added disclosures. The relevant IAS 28 and IAS 31 disclosures would be tailored for SMEs.
14.17	An investor in a joint venture shall also disclose:		
	_(a) the aggregate amount of its commitments relating to joint ventures, including its share in the capital commitments that have been incurred jointly with other venturers, as well as its share of the capital commitments of the joint ventures themselves;		
	(b) a listing and description of interests in significant joint ventures and the proportion of ownership interest held in jointly controlled entities; and		
	(eb) the method it uses to recognise the accounting policy it uses for recognising its interests in jointly controlled entities.		

Question 31: Staff recommendation and question for the Board (paragraphs 14.16 and 14.17)
Staff recommend that the Board adopt the WG recommendation.

Section 15 Investment Property

Fair value model

		Views in Comment Letters and Field Tests	WG members' views and recommendations
15.5	An entity that elects to use the fair value model shall apply IAS 40 <i>Investment Property</i> (see especially paragraphs 33–55), and shall make the disclosures required by paragraphs 76–78 of that standard.		In their earlier report to the Board, WG members recommended that the IFRS for SMEs should directly address the fair value model for investment property. This would involve adding the relevant IAS 40 disclosures, suitably tailored for SMEs.

Cost model

	-	
15.6	An entity that elects to use the cost model shall account for all of its investment property as property, plant and equipment in accordance with the requirements for the cost model in Section 16. The entity shall make the disclosures required by that section. An entity that elects to use the cost model for its investment property is encouraged, but not required, to disclose the fair value of its investment property if that fair value can be measured reliably without undue cost or effort.	WG members believe that this information is useful because a key reason for holding investment property often is capital appreciation. However, WG members acknowledge that in some cases this information will not be available to SMEs.

Question 32: Staff recommendation and question for the Board (paragraph 15.6)

Staff recommend that the Board adopt the WG recommendation.

Additions proposed by comment letters and field tests views and recommendations

For entities with investment properties, the removal of the requirement to disclose fair value for investment properties held at cost is a serious omission as it assists users with their resource allocation decisions. It ignores the fact that a key reason for holding investment properties is their capital appreciation.

See recommended addition to paragraph 15.6.

Staff note

This issue is dealt with by 15.6 above and, therefore, there is no staff recommendation here.

Section 16 Property, Plant and Equipment

	Comment Letters	WG members' views and recommendations	
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plant an		sclose, for each class of property, ent that was deemed appropriate		WG members feel that the
(2)		<u>4.12(a)</u> :		reconciliation gives
(a)	determi			important information. However, some aggregation in
(b)	the dep	reciation methods used;		16.29(e) could
(c)	the usef	ful lives or the depreciation rates		simplify the disclosure, without significantly
(d)	accumu with acc	lated depreciation (aggregated cumulated impairment losses) at	Delete 16.29(e). See general comment on reconciliations	reducing the usefulness of the information presented.
(e)	the begi	inning and end of the period	below.	The reconciliation for the prior period should be dropped
	(i)	additions, including those through business combinations;		to avoid lengthy note disclosures that would repeat
	(ii)	disposals, including assets classified as held for sale or included in a disposal group		the prior year's disclosures. In their earlier
	_ (iii)	acquisitions through business combinations;		report to the Board, WG members recommended that
	(i <u>ii</u> ∀)	impairment losses recognised or reversed in profit or loss in accordance with Section 26;		the IFRS for SMEs should directly address the
	(<u>i</u> v)	depreciation;		revaluation model rather than allow it
	(vi)	the net exchange differences arising on the translation of the financial statements from the functional currency into a different presentation currency, including the translation of a foreign operation into the presentation currency of the reporting entity (see Section 30); and		by cross-reference. This would involve added disclosures. The relevant IAS 16 disclosures would be tailored for SMEs.
	(v ii)	other changes.		
This recoperiods.		n need not be presented for prior		
The enti	ty shall a	lso disclose:		WG members do
(a)	on title,	and property, plant and equipment		not believe that 16.30(c) is a disclosure that would normally be
(b)	for the a	acquisition of property, plant and		required by users of SME financial statements.
(c)	of the in comper of prope were im	scome statement, the amount of sation from third parties for items orty, plant and equipment that paired, lost or given up that is		
	(b) (c) (d) (e) This reception is reception in the entity of the entit	determinaccount (b) the depinaccount (c) the used; (d) the gross accumulation with accumulation the begins showing (i) (iii) (iii) (iiii) (iiiiv) (vii) This reconciliation periods. The entity shall a (a) the exist on title, pledged (b) the among for the accumulation of the incomperior of proper were important to the incomperior of	determining the gross carrying amountthe accounting policy used; (b) the depreciation methods used; (c) the useful lives or the depreciation rates used; (d) the gross carrying amount and the accumulated depreciation (aggregated with accumulated impairment losses) at the beginning and end of the period; and (e) a reconciliation of the carrying amount at the beginning and end of the period showing: (i) additions, including those through business combinations; (ii) disposals, including assets classified as held for sale or included in a disposal group classified as held for sale; (iii) acquisitions through business combinations; (iiii) impairment losses recognised or reversed in profit or loss in accordance with Section 26; (iv) depreciation; (vi) the net exchange differences arising on the translation of the financial statements from the functional currency into a different presentation currency, including the translation of a foreign operation into the presentation currency of the reporting entity (see Section 30); and (vii) other changes. This reconciliation need not be presented for prior periods. The entity shall also disclose: (a) the existence and amounts of restrictions on title, and property, plant and equipment pledged as security for liabilities; and (b) the amount of contractual commitments for the acquisition of property, plant and equipment; and	determining the gross carrying amountthe accounting policy used: (b) the depreciation methods used; (c) the useful lives or the depreciation rates used; (d) the gross carrying amount and the accumulated depreciation (aggregated with accumulated impairment losses) at the beginning and end of the period; and a reconciliation of the carrying amount at the beginning and end of the period showing: (i) additions, including those through business combinations; (ii) disposals, including assets classified as held for sale or included in a disposal group classified as held for sale; (iii) acquisitions through business combinatione; (iiii) impairment losses recognised or reversed in profit or loss in accordance with Section 26; (iv) depreciation; (vi) the net exchange differences arising on the translation of the financial statements from the functional currency into a different presentation currency, including the translation of a foreign operation into the presentation currency of the reporting entity (see Section 30); and (vii) other changes. This reconciliation need not be presented for prior periods. The entity shall also disclose: (a) the existence and amounts of restrictions on title, and property, plant and equipment pledged as security for liabilities; and (b) the amount of contractual commitments for the acquisition of property, plant and equipment; and (c) if it is not disclosed separately on the face of the income statement, the amount of compensation from third parties for items of property, plant and equipment that were impaired, lost or given up that is

16.31	An entity shall present property, plant and equipment that is held for sale separately from other assets on the face of the balance sheet. The entity shall present any liabilities related to property, plant and equipment that is held for sale separately from other liabilities on the face of the balance sheet.	WG members propose removing the held for sale category and hence deleting 16.31. WG members also note that 16.31 only covers property, plant and equipment held for sale. If this disclosure is to be retained, it should cover other assets as well (ie it should appear in other sections including Sections 12 and 17
		to be consistent).

Question 33: Staff recommendation and question for the Board (paragraphs 16.29-16.31)

Staff recommend that the Board adopt the WG recommendation.

Does the Board agree with the staff recommendation?

Section 17 Intangible Assets other than Goodwill

		Views in Comment Letters and Field Tests	WG members' views and recommendations
17.23	An entity that uses the revaluation model shall apply paragraphs 75–87 of IAS 38 Intangible Assets and shall make the disclosures required by paragraphs 124 and 125 of IAS 38.		In their earlier report to the Board, WG members recommended that the IFRS for SMEs should directly address revaluation of intangibles rather than allow it by cross-reference. This would involve adding the relevant IAS 38 disclosures, suitably tailored for SMEs WG members also recommended that the IFRS for SMEs should directly address the capitalisation model. This would involve added disclosures. The

			relevant IAS 38 disclosures would be tailored for SMEs.
17.32	An entity shall disclose the following for each class of intangible assets, distinguishing between internally generated intangible assets and other intangible assets: (a) whether the useful lives are indefinite or finite and, if finite, the useful lives or the amortisation rates used; (b) the amortisation methods used for intangible assets with finite useful lives; (c) the gross carrying amount and any accumulated amortisation (aggregated with accumulated impairment losses) at the beginning and end of the period; (d) the line item(s) of the income statement in which any amortisation of intangible assets is included; (ed) a reconciliation of the carrying amount at the beginning and end of the period showing separately additions, disposals, amortisations, impairment losses, and other changes. This reconciliation need not be presented for comparative prior periods.	Delete 17.32(e). See general comment on reconciliations below	WG members feel that allowing the aggregation of internally generated intangible assets and other intangible assets could simplify the disclosure, without significantly reducing the usefulness of the information presented. The reconciliation for the prior period should be dropped to avoid lengthy note disclosures that would repeat a prior year's disclosures. WG members would drop 17.32(d) to be consistent with the fact it's not required in Section 16. If the Board adopts the WG members' recommendation to amortise all intangibles, then references to finite lives in 17.32(a) and (b) would change and references to indefinite life would be removed.
17.33	An entity shall also disclose: (a) for an intangible asset assessed as having an indefinite useful life, the carrying amount of that asset and the reasons supporting the assessment of an indefinite useful life. In giving these reasons, the entity shall describe the factor(s) that played a significant role in determining that the asset has an indefinite useful life. (b) a description, the carrying amount and remaining amortisation period of any individual intangible asset that is material	Delete 17.33, in particular 17.33(c) which is unnecessary on top of 23.5.	WG members believe the disclosures in Section 23 (government grants) adequately cover 17.33(c). WG members recommend that all intangibles are amortised. Hence 17.33(a) should be deleted.

		(<u>a</u> d)	to the entity's financial statements. for intangible assets acquired by way of a government grant and initially recognised at fair value (see paragraph 17.10): (i) the fair value initially recognised for these assets; (ii) their carrying amount; and (iii) whether they are measured after recognition using the cost model or the revaluation model. the existence and carrying amounts of intangible assets whose title is restricted		not think 17.33(b) is necessary for SMEs.		
I		(<u>b</u> e)	and the carrying amounts of intangible assets pledged as security for liabilities. the amount of contractual commitments for the acquisition of intangible assets.				
	17.34	research separate asset an	y shall disclose the aggregate amount of and development expenditure, showing by the amount capitalised as an intangible and the amount recognised as an expense me period.				
ĺ	Questio	n 34: Sta	aff recommendation and question for the E	Board (paragraphs 1	7.32-17.34 <u>)</u>		
	Staff red	taff recommend that the Board adopt the WG recommendation.					
	Does the	Does the Board agree with the staff recommendation?					

Section 18 Business Combinations and Goodwill

For business combinations effected during the reporting period

	Views in Comment Letters and Field Tests	WG members' views and recommendations	
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18.23 For each <u>material</u> business combination that was effected during the period (or group of individually immaterial business combinations), the acquirer shall disclose the following:

- the names and descriptions of the combining entities or businesses.
- (b) the acquisition date.
- (c) the percentage of voting equity instruments acquired.
- (d) the cost of the combination and a description of the components of that cost (such as cash, equity instruments, and debt instruments.), including any costs directly attributable to the combination.

 When equity instruments are issued or issuable as part of the cost, the following shall also be disclosed:
- (i) the number of equity instruments issued or issuable; and
- (ii) the fair value of those instruments and the basis for determining that fair value.
- _(e) details of any operations the entity has decided to dispose of as a result of the combination.
- (ef) the amounts recognised at the acquisition date for each class of the acquiree's assets, liabilities and contingent liabilities, including goodwill.
- (gf) the amount of any excess recognised in profit or loss in accordance with paragraph 18.22, and the line item in the income statement in which the excess is recognised.
- (h) a description of the factors that contributed to a cost that results in the recognition of goodwill—a description of each intangible asset that was not recognised separately from goodwill and an explanation of why the intangible asset's fair value could not be measured reliably—or a description of the nature of any excess recognised in profit or loss in accordance with paragraph 18.22.
- (i) the amount of the acquiree's profit or loss since the acquisition date included in the acquirer's profit or loss for the period, unless disclosure would be impracticable. If such disclosure would be impracticable, that fact shall be disclosed, together with an explanation of why this is the case.

Delete 18.23 as sensitive and burdensome, except 18.23(a), (b) & maybe (c). 18.23(h)&(i) give the most problems.

SMEs have fewer such transactions so disclosures are less aggregated and so the degree of detail is relatively higher. Information is unlikely to be relevant for users.

Regarding 18.23(d), SMEs often do not use due diligences so cannot allocate the components of the costs.

If keep 18.23(i), only require a general description of how acquiree contributed to profit or loss since acquisition. WG members suggest deleting 18.23(e), (h) and (i) and simplifying 18.23(d) as they are unduly complex and onerous for SMEs without providing significant additional benefits in an SME context.

Question 35: Staff recommendation and question for the Board (paragraph 18.23)

Staff recommend that the Board adopt the WG recommendation.

For business combinations effected after the end of the reporting period but before the financial statements are authorised for issue

18.24	For each business combination effected after the end of the reporting period but before the financial statements are authorised for issue, the acquirer shall make the disclosures required by paragraph 18.23 unless such disclosure would be impracticable. If disclosure of any of that information would be impracticable, that fact shall be disclosed, together with an explanation of why this is the case.	Revise or delete 18.24 as too burdensome. Only require the fact a business combination was carried out. SMEs should not be required to disclose the info for each business combination after reporting period, but, if applicable, on all business combinations combined.	WG members feel this disclosure is adequately covered by paragraph 32.10(a)
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Question 36: Staff recommendation and question for the Board (paragraph 18.24)

Staff recommend that the Board adopt the WG recommendation.

Does the Board agree with the staff recommendation?

For all business combinations

An acquirer shall disclose a reconciliation of the carrying amount of goodwill at the beginning and end of the reporting period, showing separately changes arising from new business combinations, impairment losses, disposals of previously acquired businesses, and other changes. An acquirer shall also disclose the gross amount and accumulated impairment losses at the end of the period. This reconciliation need not be presented for prior periods.			The reconciliation for the prior period should be dropped to avoid lengthy note disclosures that would repeat a prior year's disclosures.	
Question 37: Staff recommendation and question for the Board (paragraph 18.25) Staff recommend that the Board adopt the WG recommendation.				
Does the Board agree with the staff recommendation?				

Section 19 Leases

Financial statements of lessees – finance leases

	Views in Comment Letters and Field Tests	WG members' views and recommendations
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19.12	Lessees shall make the following disclosures for finance leases: (a) for each class of asset, the net carrying amount at the end of the reporting period. (b) the total of future minimum lease payments at the end of the reporting period, for each of the following periods: (i) not later than one year each future year: (ii) later than one year and not later than five years; (iii) later than five years. (c) contingent rents recognised as an expense. (d) the total of future minimum sublease payments expected to be received under non-cancellable subleases at the end of the reporting period. (ec) a general description of the lessee's significant leasing arrangements including, for example, , but not limited to, information about the following: (ii) the basis on which contingent rent; payable is determined; (iii) the existence and terms of renewal or purchase options and escalation clauses; subleases; and rand (iii) restrictions imposed by lease arrangements, such as those concerning dividends, additional debt and further leasing.	19.12(b) is more onerous than IAS 17. Sufficient to distinguish between MLPs within 12 months and after 12 months. Or breakdown future MLPs by "less than 1 year" & "over 5 years" like IAS 17. Revise or delete 19.12(c),(d)&(e). May involve long explanations if SME has a small number of high volume contracts with different conditions.	WG members do not feel that the requirement in 19.12(a) regarding disclosing minimum lease payments per year is unduly onerous. However, it is more detailed than under full IFRSs. WG members suggest using IAS 17 requirements. WG members suggest deleting 19.12(c), (d) and simplifying (e) since they are unduly detailed for SMEs. Adding the term "significant" (as used in IAS 17.35(d)) would provide relief for entities which have a number of insignificant leases.

Question 38: Staff recommendation and question for the Board (paragraph 19.12)

Staff recommend that the Board adopt the WG recommendation.

Financial statements of lessees – operating leases

19.14	Lessees shall make the following disclosures for operating leases: (a) the total of future minimum lease payments under non-cancellable operating leases for each of the following periods: (i) not later than one year; (ii) later than one year and not later than five years; (iii) later than five years. -each future year.	Same comment for 19.14(a) as 19.12(b) above. Revise or delete 19.14(c)&(d). Same comment as for 19.12(c), (d)&(e) above.	WG members do not feel that the requirement in 19.14(a) regarding disclosing minimum lease payments per year is unduly onerous. However, it is more detailed than under full IFRSs. WG members suggest using IAS 17
	(b) the total of future minimum sublease payments expected to be received under non-cancellable subleases at the end of the reporting period. (be) lease and sublease payments recognised as an expense, with separate amounts for minimum lease payments, contingent rents, and sublease payments. (cd) a general description of the lessee's significant leasing arrangements including for example, information about contingent rent; renewal or purchase options and escalation clauses; subleases; and restrictions imposed by lease arrangements.a general description of the lessee's significant leasing arrangements including, but not limited to, the following: (i) the basis on which contingent rent payable is determined; (ii) the existence and terms of renewal or purchase options and escalation clauses; and (iii) restrictions imposed by lease arrangements, such as those concerning dividends, additional debt and further leasing.		requirements. WG members suggest deleting 19.14(b), and simplifying (c) and (d) since they are unduly detailed for SMEs. Adding the term "significant" (as used in IAS 17.35(d)) would provide relief for entities which have a number of insignificant leases.

Question 39: Staff recommendation and question for the Board (paragraph 19.14)

Staff recommend that the Board adopt the WG recommendation.

Financial statements of lessors: finance leases

19.15	A lessor in a finance lease shall apply paragraphs 36–46 of IAS 17 Leases and shall make the disclosures required by paragraph 47 of IAS 17.	Provide disclosure relief for lessors applying IAS 17 via 19.15. This is a much broader issue than just leases and is identified as a 'general' disclosure comment below. Currently, when SME elects or is required to look to a full IFRS, it is required also to make the disclosures in that full IFRS.	In their earlier report to the Board, WG members recommended that the IFRS for SMEs should directly address lessor accounting for finance leases. This would involve adding the relevant IAS 17 disclosures, suitably tailored for SMEs.
19.15	At the May meeting the Board decided that the IFRS for SMEs should be stand-alone should address directly the following topics, which the ED addresses by cross-referent IFRS: lessor accounting for finance leases, share-based payment, fair value of agricular assets, and hyperinflation. The WG recommendation above appears in all of the section where the WG feel the standard should address directly the topics omitted from the E		

Financial statements of lessors: operating leases

19.23	leases: (a)	the future minimum lease payments under non-cancellable operating leases in the aggregate and for each of the following periods: (i) not later than one year; (ii) later than one year and not later than five years; (iii) later than five years. future year(b) total contingent rents recognised as income. a general description of the lessor's significant leasing arrangements including, for example, information about contingent rent; renewal or purchase options and escalation clauses; subleases; and restrictions imposed by lease arrangements.	Same comment for 19.23(a) as 19.12(b) above. Same comment for 19.23(b)&(c). as for 19.12(c), (d)&(e) above.	WG members do not feel that the requirement in 19.23(a) regarding disclosing minimum lease payments per year is unduly onerous. However, it is more detailed than under full IFRSs. WG members suggest using IAS 17 requirements. WG members suggest providing guidance (as illustrated on the left) in 19.23(c) as SMEs may need direction. Adding the term "significant" (as used in IAS 17.35(d)) would provide relief for entities that have a number of insignificant leases.
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Question 40: Staff recommendation and question for the Board (paragraph 19.23)

Staff recommend that the Board adopt the WG recommendation.

Does the Board agree with the staff recommendation?

Sale and leaseback transactions

Disclosure requirements for lessees and lessors apply equally to sale and leaseback transactions. The required description of significant leasing arrangements includes description of unique or unusual provisions of the agreement or terms of the sale and leaseback transactions.	WG members suggest adding "significant" to simplify requirements if the entity has a number of insignificant leases.
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Question 41: Staff recommendation and question for the Board (paragraph 19.27)

Staff recommend that the Board adopt the WG recommendation.

Does the Board agree with the staff recommendation?

Section 20 Provisions and Contingencies

Disclosures about provisions

	Views in Comment Letters and Field Tests	WG members' views and recommendations
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	20.14	For eacl	n class of provision, an entity shall disclose:		WG members feel
		(a)	the carrying amount at the beginning and end of the period.		that 20.14(e), (g) and (h) are unnecessary for
		(b)	additions during al provisions made in the period, including adjustments that result from changes in measuring the discounted amount increases to existing provisions.		SMEs. 20.14(e) would require an onerous calculation and it is unlikely the resulting
		(c)	amounts used (ie incurred and charged against the provision during the period.	Delete 20.14(e) (f),(g)&(h).	information would be useful to users of SME financial
		(d)	unused amounts reversed during the period.		statements.
		_ (e)	the increase during the period in the discounted amount arising from the passage of time and the effect of any change in the discount rate.		
		(<u>fe</u>)	a brief description of the nature of the obligation and the expected <u>amount and</u> timing of any resulting <u>paymentsoutflows</u> of economic benefits.		
		(g)	an indication of the uncertainties about the amount or timing of those outflows.		
		(h)	the amount of any expected reimbursement, stating the amount of any asset that has been recognised for that expected reimbursement.		
L		Compar	ative information is not required.		

Question 42: Staff recommendation and question for the Board (paragraph 20.14)

Staff recommend that the Board adopt the WG recommendation.

Does the Board agree with the staff recommendation?

Disclosures about contingent liabilities

	20.15	remote, continge a brief d	he possibility of any outflow in settlement is an entity shall disclose for each class of ent liability at the end of the reporting period escription of the nature of the contingent and, when practicable:		WG members recommend that an "undue cost or effort" principle be added to
		(a)	an estimate of its financial effect, measured in accordance with paragraphs 20.86–20.119.	Delete 20.15(b) &(c).	"practicable" throughout, with appropriate disclosure, and feel
I		(b)	an indication of the uncertainties relating to the amount or timing of any outflow.		this is appropriate here for SMEs for cost-benefit
		(c) the possibility of any reimbursement. If it is impracticable to make one or more of these disclosures, that fact shall be stated.		reasons.	

Question 43: Staff recommendation and question for the Board (paragraph 20.14)

Staff recommend that the Board adopt the WG recommendation (note this is not the same as proposing an "undue cost or effort" principle for a restatement which has already been rejected by the Board).

Does the Board agree with the staff recommendation?

Disclosures about contingent assets

20.16	If an inflow of economic benefits is probable (more likely than not) but not virtually certain, an entity shall disclose a description of the nature of the contingent assets at the end of the reporting period, and, when practicable, an estimate of their financial effect, measured using the principles set out in paragraphs 20.8–20.11. If it is impracticable to make this disclosure, that fact shall be stated.	Delete 20.16. Disclosure should not be given as a user would make decisions based on unrealised gains.	WG members recommend that an "undue cost or effort" principle be added to "practicable" throughout and feel this is appropriate here for SMEs for cost-benefit reasons.
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Question 44: Staff recommendation and question for the Board (paragraph 20.14)

Staff recommend that the Board adopt the WG recommendation (note this is not the same as proposing an "undue cost or effort" principle for a restatement).

Does the Board agree with the staff recommendation?

Prejudicial disclosures

20.17	In extremely rare cases, disclosure of some or all of the information required by paragraphs 20.14–20.16 can be expected to prejudice seriously the position of the entity in a dispute with other parties on the subject matter of the provision, contingent liability or contingent asset. In such cases, an entity need not disclose the information, but shall disclose the general nature of the dispute, together with the fact that, and reason why, the information has not been disclosed.		
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Section 21 Equity

No disclosures required by this section (but see paragraph 4.13).

Section 22 Revenue

		Views in Comment Letters and Field Tests	WG members' views and recommendations
22.28	An entity shall disclose:		WG members

(a)	the accounting policies adopted for the recognition of revenue, including the methods adopted to determine the stage of completion of transactions involving the rendering of services.	22.28(b)&(c) should	recommend adding 'significant' to be consistent with the same requirement in IAS 18.35(b).
(b)	the amount of each materialsignificant category of revenue recognised during the period, including revenue arising from: (i) the sale of goods; (ii) the rendering of services; (iii) interest; (iv) royalties; (v) dividends; (vi) government grants; and (vii) any other significant types of revenue. the amount of revenue arising from exchanges of goods or services included in each category of revenue.	refer to "significant" categories of revenue to decrease the burden. Alternatively delete 22.28(c).	Otherwise it might appear that a more onerous requirement is being imposed on SMEs.

Question 45: Staff recommendation and question for the Board (paragraph 22.28)

Staff recommend that the Board adopt the WG recommendation.

Does the Board agree with the staff recommendation?

Additions proposed by comment letters and field tests	WG members' views and recommendations		
Disclose separately amounts in revenue as principal and as agent.	WG members disagree with adding this as may cause a lot of work for SMEs without adding significant benefits.		
Question 46: Staff recommendation and question for the Board Staff recommend that the Board adopt the WG recommendation not to add this disclosure. Does the Board agree with the staff recommendation?			

Disclosures relating to revenue from construction contracts

22.29	An entit	y shall disclose:	Reduce 22.29 –	
	(a)	the amount of contract revenue recognised as revenue in the period;	22.31. Substantial info is required for construction	
	(b)	the methods used to determine the contract revenue recognised in the period; and	contracts. Hence the project process, overall order conditions and	
	(c)	the methods used to determine the stage of completion of contracts in progress.	complete cost structure is	

		apparent. This is unwelcome and anti-competitive for SMEs.	
22.30	An entity shall disclose each of the following for contracts in progress at the balance sheet date: (a) the aggregate amount of costs incurred and recognised profits (less recognised losses) to date; (b) the amount of advances received; and (c) the amount of retentions (progress billings that are not paid until the satisfaction of conditions specified in the contract for the payment of such amounts or until defects have been rectified).	Delete 22.30	WG members suggest deleting this as feel this is onerous for SMEs and is not a requirement for other sales of goods.
22.31	An entity shall present: (a) the gross amount due from customers for contract work as an asset; and (b) the gross amount due to customers for contract work as a liability.	Reduce 22.31. See comment to 22.29.	WG members do not think this disclosure is onerous, as the data should be easily available.

Question 47: Staff recommendation and question for the Board (paragraph 22.29-31)

Staff recommend that the Board adopt the WG recommendation.

Does the Board agree with the staff recommendation?

Section 23 Government Grants

		Views in Comment Letters and Field Tests	WG members' views and recommendations
23. <u>6</u> 5	y shall disclose the following regardless of hoice it has made under paragraph 23.3: the accounting policy adopted for government grants, including an explanation of how the grant is presented in the financial statements; the nature and amounts of government grants recognised in the financial statements; unfulfilled conditions and other contingencies attaching to government grants that have not been recognised in income; and an indication of other forms of government assistance from which the entity has directly benefited.		In their earlier report to the Board, WG members recommended that the IFRS for SMEs should directly address the grant models available by cross-reference to IAS 20. This would involve added disclosures. The relevant IAS 20 disclosures would be tailored for SMEs.

Section 24 Borrowing Costs

		Views in Comment Letters and Field Tests	WG members' views and recommendations
24.5	An entity shall disclose the accounting policy adopted for borrowing costs. If the capitalisation model is adopted as provided in paragraph 24.4, the entity shall include the relevant disclosures required by IAS 23 <i>Borrowing Costs</i> .		In their earlier report to the Board, WG members recommended that the IFRS for SMEs should directly address the capitalisation model. This would involve added disclosures. The relevant IAS 23 disclosures would be tailored for SMEs.

Section 25 Share-based Payment

		Views in Comment Letters and Field Tests	WG members' views and recommendations
25.8	An entity shall disclose a description of each type of share-based payment arrangement that existed at any time during the period, including the general terms and conditions of each arrangement, such as vesting requirements, the maximum term of options granted, and the method of settlement (eg whether in cash or equity). An entity with substantially similar types of share-based payment arrangements may aggregate this information.	Delete 25.8 or consider limiting to arrangements that exist at the end of the period for costbenefits. In the later case, any short term arrangements (begin & end in period) should be reported.	WG members do not feel that this information is onerous as it is descriptive, and few SMEs are likely to have more than one such arrangement. Also it is unlikely to change very much from period to period.
25.9	An entity shall disclose the following information about the effect of share-based payment transactions on the entity's profit or loss for the period and on its financial position, including at least the following: (a) the total expense recognised in profit or loss for the period arising from share-based payment transactions in which the		In their earlier report to the Board, WG members recommended that the IFRS for SMEs should directly address the accounting for SBP. This would
	goods or services received did not qualify for recognition as assets and hence were recognised immediately as an expense, including separate disclosure of that portion of the total expense that arises from transactions accounted for as equity-settled share-based payment transactions.		involve added disclosures. The relevant IFRS 2 disclosures would be tailored for SMEs. If the accounting
	(b) and the total carrying amount of with respect to liabilities arising from share-based payment transactions at the end of the reporting period.: (i) the total carrying amount at the end of the period; and (ii) the total intrinsic value at the end		requirements in section 25 are not changed, WG members recommend modifying 25.9 as illustrated on the left.
	of the period of liabilities for which the counterparty's right to cash or other assets had vested by the end of the period (eg vested share appreciation rights).		WG members have proposed simplifications to the wording of the disclosures without affecting the disclosure requirements significantly.

Question 48: Staff recommendation and question for the Board (paragraphs 25.8 and 25.9) Staff recommend that the Board adopt the WG recommendation.

Section 26 Impairment of Non-financial Assets

		Views in Comment Letters and Field Tests	WG members' views and recommendations
26.25	An entity shall disclose the following for each categoryclass of assets indicated in paragraph 26.25A:		
	(a) the amount of impairment losses recognised in profit or loss during the period and the line item(s) of the income statement in which those impairment losses are included.		
	(b) the amount of reversals of impairment losses recognised in profit or loss during the period and the line item(s) of the income statement in which those impairment losses are reversed.		
	(c) the amount of impairment losses on revalued assets recognised directly in equity during the period.		
	(d) the amount of reversals of impairment losses on revalued assets recognised directly in equity during the period.		
26.25A	An entity shall disclose the information required by paragraph 26.25 for each of the following categories of asset: (a) inventories (b) property, plant and equipment (including investment property accounted for by the cost method) (c) goodwill (d) intangible assets other than goodwill (d) investments in associates (e) investments in joint ventures 26.25(b) will not apply to goodwill since goodwill cannot be reversed. 26.25(c) and (d) will only apply if items of property plant and equipment or intangibles are accounted for using the revaluation models under Section 16 or 17.		WG members feel that the guidance in 26.25A would be helpful for SMEs (particularly as sections 13 and 14 do not refer specifically to impairment in the disclosure requirements). This would also provide some aggregation from full IFRSs without significantly reducing the usefulness of the information presented.
26.26	An entity shall disclose the following information for the aggregate impairment losses and the aggregate reversals of impairment losses recognised during the period for which no separate information is disclosed: (a) the main classes of assets affected by impairment losses and the main classes of assets affected by reversals of impairment losses. (b) the main events and conditions that led to the recognition of these impairment losses		WG members feel this disclosure is unnecessarily onerous for SMEs. They believe that 26.25(a) combined with new paragraph 26.25A is adequate in an SME context.

and reversals of impairment losses.

Question 49: Staff recommendation and question for the Board (paragraphs 26.25-26.26)

Staff recommend that the Board adopt the WG recommendation.

Does the Board agree with the staff recommendation?

Additions proposed by comment letters and field tests	WG members' views and recommendations
Accumulated impairment losses should be disclosed separately from accumulated depreciation in the notes since it provides relevant information for trend analysis purposes.	WG members do not believe this disclosure would provide meaningful information for users of financial statements and therefore do not recommend this proposed addition is considered.

Question 50: Staff recommendation and question for the Board

Staff recommend that the Board adopt the WG recommendation not to add this disclosure requirement.

Does the Board agree with the staff recommendation?

Section 27 Employee Benefits

Disclosures about short-term employee benefits

		Views in Comment Letters and Field Tests	WG members' views and recommendations
27.36	Section 27 does not require specific disclosures about short-term employee benefits.		

Additions proposed by comment letters and field tests	WG members' views and recommendations
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- 27.36 should require specific information to be disclosed on shortterm employee benefits (salaries, social security etc) which are the most important employee benefits for SMEs. Some requirements (e.g. breakdown of employee expense) should be given.
- Disclose employee figures to allow ratios, eg personnel cost/productivity per employee, to be calculated and to help to analyse employee expenses or defined benefit obligations.

WG members do not recommend disclosures for short-term employee benefits as these are not required by IAS 19.

Question 51: Staff recommendation and question for the Board (paragraph 27.36)

Staff recommend that the Board adopt the WG recommendation not to add these disclosure requirements.

Does the Board agree with the staff recommendation?

Disclosures about defined contribution plans

27.3	37	An entity shall disclose the total cost of defined contribution plans for the period and their amounts (a) recognised in profit or loss as an expense and (b) included in the cost of an asset.	Delete 27.37 as exceeds full IFRS disclosure requirements.	WG members do not think this disclosure is onerous, or that it really goes beyond what is intended under full IFRSs.
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Question 52: Staff recommendation and question for the Board (paragraph 27.37)

Staff recommend that the Board adopt the WG recommendation.

Disclosures about defined benefit plans	Disclosures	about	defined	benefit	plans
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27.38 An entity shall disclose the following information about defined benefit plans:

- a general description of the type of plan, including funding policy.
- (b) the entity's accounting policy for recognising actuarial gains and losses and the amount of actuarial gains and losses recognised during the period.
- a reconciliation of opening and closing balances of the defined benefit liability showing separately benefits paid and all other changes.
- (d) an analysis of the defined benefit liability into amounts arising from plans that are wholly unfunded and amounts arising from plans that are wholly or partly funded.
- (ed) a reconciliation of the opening and closing balances of the fair value of plan assets and of the opening and closing balances of any reimbursement right recognised as an asset, showing separately, if applicable:
 - (i) contributions by the employer;
 - (ii) contributions by plan participants;
 - (iii) benefits paid; and
 - (iii+) other changes in plan assets.
- (fe) the total cost relating to defined benefit plans for the period and their amounts (a) recognised in profit or loss as an expense and (b) included in the cost of an asset. recognised in profit or loss as an expense for the period, and the line item(s) in which they are included.
- (g) the total cost relating to defined benefit plans during the period that was:
- (i) included in the cost of producing inventories in accordance with Section 12; or
- (ii) included in the cost of property, plant and equipment in accordance with Section 16.
- (Hf) for each major category of plan assets, which shall include, but is not limited to, equity instruments, debt instruments, property, and all other assets, the percentage or amount that each major category constitutes of the fair value of the total plan assets at the reporting date.
- (gi) the amounts included in the fair value of plan assets for:
 - (i) each category of the entity's own financial instruments; and
 - (ii) any property occupied by, or other assets used by, the entity.
- (hj) the actual return on plan assets.
- (kij) the principal actuarial assumptions used, including, when applicable:
 - (i) the discount rates;
 - (ii) the expected rates of return on any plan assets for the periods presented in the financial statements:

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iii) the expected rates of salary increases; and

(iv) medical cost trend rates.

Reduce 27.38. Only need 27.38 (a),(c)&(k).

27.38(f)&(g) exceed requirements of IAS 19 and are not necessary.

Disclosure of accounting policy for actuarial gains & losses is redundant, as no option is allowed (27.38(b)).

WG members recommend keeping 27.38(b) on the assumption that SMEs will have the same options for actuarial gains and losses as are in IAS 19 (recommended in the earlier report to the Board).

WG members feel reconciliations for prior periods add unnecessary length to the notes to the financial statements and would be available from prior year financial statements anyway.

WG members believe that 27.38 (h) is important for assessing the risks of a plan.

WG members would retain 27.38 (j) and (k) because they are important disclosures for employees as users of the SME's financial statements. Question 53: Staff recommendation and question for the Board (paragraph 27.38)

Staff recommend that the Board adopt the WG recommendation.

Does the Board agree with the staff recommendation?

Disclosures about other long-term benefits

For each category of other long-term benefits that an entity provides to its employees, the entity shall disclose the nature of the benefit, the amount of its obligation and the **funding** status at the balance sheet date, and the amount of any actuarial gains and losses arising in the current period and its accounting policy for such actuarial gains and losses.

Disclosure of accounting policy for actuarial gains & losses is redundant. WG members recommend deleting the disclosure of the policy for actuarial gains and losses if SMEs only have one option.

WG members recommend adding the definition of funding from full IFRS Glossary into SME Glossary.

Question 54: Staff recommendation and question for the Board (paragraph 27.39)

Staff recommend that the Board adopt the WG recommendation.

Does the Board agree with the staff recommendation?

Disclosures about termination benefits

27.40	For each category of termination benefits that an
	entity provides to its employees, the entity shall
	entity provides to its employees, the entity shall disclose the nature of the benefit, its accounting
	policy, and the amount of its obligation and the
	funding status at the balance sheet date.

Delete 27.40 as more onerous than full IFRSs. WG members do not think this disclosure is onerous or that it really goes beyond what would be required under IAS 1.

WG members recommend adding the definition of funding from full IFRS Glossary into SME Glossary.

Question 55: Staff recommendation and question for the Board (paragraph 27.40)

Staff recommend that the Board adopt the WG recommendation.

27.41	When there is uncertainty about the number of employees who will accept an offer of termination benefits, a contingent liability exists. Section 20 requires an entity to disclose information about its	Delete 27.41	WG members do not think this disclosure is onerous.
	contingent liability unless the possibility of an outflow in settlement is remote.		WG members recommend retaining this. It is required in full IFRSs and could affect short-term cash flows. A specific requirement is appropriate here as employee benefit obligations are excluded from the scope of Section 20.

Question 56: Staff recommendation and question for the Board (paragraph 27.41)

Staff recommend that the Board adopt the WG recommendation.

Does the Board agree with the staff recommendation?

Section 28 Income Taxes

			Views in Comment Letters and Field Tests	WG members' views and recommendations
28.28	compon	y shall disclose separately the major lents of tax expense (income). Such lents of tax expense (income) may include:		Disclosure of amounts of deferred tax
	(a)	current tax expense (income).		included in tax expense may be
	(b)	any adjustments recognised in the period for current tax of prior periods.		affected by the Board's decision on
	(c)	the amount of deferred tax expense (income) relating to the origination and reversal of temporary differences.		accounting for income taxes.
	(d)	the amount of deferred tax expense (income) relating to changes in tax rates or the imposition of new taxes.		
	(e)	the amount of the benefit arising from a previously unrecognised tax loss, tax credit or temporary difference of a prior period that is used to reduce current tax expense.		
	(f)	deferred tax expense (or income) arising from the impairment, or reversal of a previous impairment, of a deferred tax asset (see paragraph 28.26).		

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28.29	An entity shall disclose the following separately: (a) the aggregate current and deferred tax relating to items that are recognised directly in equity. (b) an explanation of the significant differences in amounts reported in the income statement and amounts reported to tax authorities. numerical reconciliation between tax expense (income) as recognised and tax expense (income) that would be expected by multiplying profit by the applicable tax rate(s), with each significant difference disclosed separately. (c) an explanation of changes in the applicable tax rate(s) compared with the previous reporting period. (d) the amount (and expiry date, if any) of	Delete 28.29(b)-(f), except aggregated amount, as too burdensome. 28.29(b) is cost intensive and does not significantly add to forward looking analysis of future tax burden. Consider an "explanatory reconciliation". Permit SMEs to explain relationship between tax expense (income) and profit in	Disclosures in 28.29(a) and (e) relating to deferred tax may be affected by the Board's decision on accounting for income taxes. WG members feel that allowing an explanation in 28.29(b) rather than a numerical reconciliation would provide relief for SMEs and respond to some of the concerns in		
	temporary differences, unused tax losses, and unused tax credits for which no deferred tax asset is recognised. (e) the aggregate amount of temporary differences associated with investments in foreign subsidiaries, branches and associates and joint ventures, for which deferred tax liabilities have not been recognised (see paragraph 28.18(b)). (f) the aggregate amount of temporary differences associated with the initial recognition of goodwill for which deferred tax liabilities have not been recognised (see paragraph 28.18(c))	28.29(b) using gross amounts of relevant items of income or expense, rather than their related tax effects. Users better understand a reconciliation using gross amounts.	concerns in comment letters and field tests without significantly reducing the usefulness of the information presented. WG members believe that 28.29(e) and (f) are of limited use to users of SME financial statements, are burdensome to prepare, and should not be required for SMEs.		
	In the circumstances described in paragraph 28.25, an entity shall explaindisclose the nature of the potential income tax consequences that would result from the payment of dividends to its shareholders. In addition, the entity shall disclose the amounts of the potential income tax consequences, if practicably determinable, and whether there are any potential income tax consequences not practicably determinable. In 57: Staff recommendation and question for the commend that the Board adopt the WG recommendation.		WG members feel the second sentence is difficult to understand and disclosure of potential tax consequences is too onerous for SMEs.		
Does ti	Does the Board agree with the staff recommendation?				

Section 29 Financial Reporting in Hyperinflationary Economies

	Views in Comment Letters and Field Tests	WG members' views and recommendations
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An entity whose functional currency is the currency of a hyperinflationary economy shall apply IAS 29 Financial Reporting in Hyperinflationary Economies in preparing and presenting its financial statements in accordance with this [draft] standard.	In their earlier report to the Board, WG members recommended that the IFRS for SMEs address hyperinflation. This would involve added disclosures. The relevant IAS 29 disclosures would be tailored for SMEs.
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Section 30 Foreign Currency Translation

		Views in Comment Letters and Field Tests	WG members' views and recommendations
30.25	In paragraphs 30.27 and 30.29, references to 'functional currency' apply, in the case of a group, to the functional currency of the parent.		
30.26	An entity shall disclose: (a) the amount of exchange differences recognised in profit or loss during the period except for those arising on financial instruments measured at fair value through profit or loss in accordance with Section 11. (b) net exchange differences classified in a separate component of equity during the period, and a reconciliation of the amount of such exchange differences at the beginning and end of the period.		WG members would leave cumulative exchange differences in equity on disposal of a foreign operation, to avoid the administrative burden of tracking historical exchange rates. Following on from this, WG members would also provide relief from tracking and reconciling opening and closing balances for exchange differences.
30.27	An entity shall disclose the currency in which the financial statements are presented. When the presentation currency is different from the functional currency, an entity shall state that fact and shall disclose the functional currency and the reason for using a different presentation currency.		
30.28	When there is a change in the functional currency of either the reporting entity or a significant foreign operation, the entity shall disclose that fact and the reason for the change in functional currency.		
30.29	When an entity displays its financial statements or other financial information in a currency that is		WG members suggest deleting

different from either its functional currency or its presentation currency (for example, a 'convenience translation' of all amounts at closing rate), it shall: (a) clearly identify the information as supplementary information to distinguish it from the information that complies with this [draft] standard; (b) disclose the currency in which the supplementary information is displayed; and (c) disclose the entity's functional currency and the method of translation used to	30.29 so as not to encourage SMEs to do convenience translations. The IFRS for SMEs already provides guidance on a presentation currency that differs from the functional currency.
determine the supplementary information.	

Question 58: Staff recommendation and question for the Board (paragraphs 30.26 and 30.29)

Staff recommend that the Board adopt the WG recommendation.

Does the Board agree with the staff recommendation?

Section 31 Segment Reporting

		Views in Comment Letters and Field Tests	WG members' views and recommendations
31.1	An entity using this [draft] standard is not required to present information about operating segments. An entity that chooses to disclose segment information in financial statements described as conforming to the <i>IFRS for SMEs</i> shall comply fully with the requirements of IFRS 8 <i>Operating Segments</i> . If an entity discloses information about segments that does not comply with IFRS 8, it shall not describe the information as segment information.		In their earlier report to the Board, WG members recommended allowing entities to disclose voluntary segment information without having to apply the full IFRS 8. If that is done, the IFRS for SMEs should require disclosure of the basis for preparing the information disclosed.
31.1	Staff note		
	At the May meeting the Board decided the standard would not address the following topics: segment information, earnings per share and interim reporting and if an entity presented such information it would be required to explain the basis of preparing the data. The WG recommendation above also appears in sections 34 (EPS) and 37 (Interim financial reporting). Since the Board has already made this decision, there is no need for a staff recommendation here or in sections 34 and 37.		

Additions proposed by comment letters and field tests	G members' ews and commendations	
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Clear disclosure of the basis of preparation of any voluntary disclosures is required so readers can make an assessment of its reliability and comparability.

WG members recommend adding this disclosure in sections 31, 34, and 37.

Section 32 Events after the End of the Reporting Period

Date of authorisation for issue

		Views in Comment Letters and Field Tests	WG members' views and recommendations
32.8	An entity shall disclose the date when the financial statements were authorised for issue and who gave that authorisation. If the entity's owners or others have the power to amend the financial statements after issue, the entity shall disclose that fact.		

Non-adjusting events after the end of the reporting period

32.9	materia	y shall disclose the following for each category of non-adjusting event after the he reporting period: the nature of the event; and an estimate of its financial effect, or a statement that such an estimate cannot be made.	Simplify 32.9 by requiring disclosure only for each 'material' category of non-adjusting event (like IAS 10.21).	WG members support adding 'material' to 32.9 to be consistent with IAS 10.21 and avoid the perception that IFRS for SMEs is being more onerous than full IFRSs.
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32.10	The following are examples of non-adjusting events after the end of the reporting period that would generally result in disclosure:	definitional guidance and so
	(a) a major business combination (Section 18 requires specific disclosures in such cases) or disposing of a major subsidiary.	WG members don't think that it belongs in the disclosure checklist. WG
	(b) announcing a plan to discontinue an operation.	members therefore propose it is
	(c) major purchases of assets, classification of assets as held for sale in accordance with Section 16, other disposals of assets, or expropriation of major assets by government.	deleted here.
	(d) the destruction of a major production plant by a fire.	
	(e) announcing, or commencing the implementation of, a major restructuring (see Section 20).	
	(f) major ordinary share transactions and potential ordinary share transactions.	
	(g) abnormally large changes in asset prices or foreign exchange rates.	
	(h) changes in tax rates or tax laws enacted or announced that have a significant effect on current and deferred tax assets and liabilities (see Section 28).	
	(i) entering into significant commitments or contingent liabilities, for example, by issuing significant guarantees.	
	(j) commencing major litigation arising solely out of events that occurred after the end of the reporting period.	

Question 59: Staff recommendation and question for the Board (paragraphs 32.9 and 32.10)

Staff recommend that the Board adopt the WG recommendation.

Section 33 Related Party Disclosures

Disclosure of relationships

		Views in Comment Letters and Field Tests	WG members' views and recommendations
33.4	Relationships between parents and subsidiaries shall be disclosed irrespective of whether there have been transactions between those related parties. An entity shall disclose the name of the entity's parent and, if different, the ultimate controlling party. If neither the entity's parent nor the ultimate controlling party produces financial statements available for public use, the name of the next most senior parent that does so (if any) shall also be disclosed.	Delete 33.4	WG members feel 33.4 should be retained in full. Disclosures of relationships are especially relevant in an SME context.

Question 60: Staff recommendation and question for the Board (paragraph 33.4)

Staff recommend that the Board adopt the WG recommendation.

Does the Board agree with the staff recommendation?

Disclosure of key management personnel compensation

33.5	Key management personnel are those persons having authority and responsibility for planning, directing and controlling the activities of the entity, directly or indirectly, including any director (whether executive or otherwise) of that entity. Compensation includes all employee benefits (as defined in Section 27) including those in the form of share-based payment (see Section 25). Employee benefits include all forms of consideration paid, payable or provided by the entity, or on behalf of the entity (for example, by its parent or by a shareholder), in exchange for services rendered to the entity. It also includes such consideration paid on behalf of a parent of the entity in respect of the entity.	Delete or modify 33.5. If disclosure of key management personnel compensation results in providing individual compensation of 1 or 2 key managers, this information should not be required because it can be sensitive for SMEs.	33.5 provides definitional guidance and so WG members don't think that it belongs in the disclosure checklist. WG members therefore propose it is deleted here.
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33.6 Staff view

Staff feel that removal of the requirement to provide a breakdown of the key management compensation would not result in a significant loss of information for users of SME financial statements. Staff are not concerned that disclosure of the total compensation would be sensitive for an entity with only one or two key management personnel since 33.6 does not require disclosure by name, nor does it require disclosure of the number of members of the key management personnel making up the figure.

Question 61: Staff recommendation and question for the Board (paragraphs 33.5 and 33.6)

Staff recommend that the Board adopt the WG recommendation to amend 33.5 and 33.6 as shown, ie only require disclosure of key management personnel compensation in total.

Disclosure of related party transactions

33.7	A related party transaction is a transfer of resources, services or obligations between related parties, regardless of whether a price is charged. Examples of related party transactions that are common to SMEs include, but are not limited to: (a) transactions between an entity and its principal owner(s). (b) transactions between an entity and another entity where both entities are under the common control of a single entity or individual. (c) transactions in which an entity or individual that controls the reporting entity incurs expenses directly that otherwise would have been borne by the reporting entity.	Reduce or delete 33.7 – 33.10. May reveal sensitive information and cause competitive harm. Question the relevance of related party disclosures in a non-listed environment. Disclosure requirements in 33.7 – 10 are difficult to understand.	33.7 provides definitional guidance and so WG members don't think that it belongs in the disclosure checklist. WG members therefore propose it is deleted here.
33.8	If there have been transactions between related parties, an entity shall disclose the nature of the related party relationship as well as information about the transactions and outstanding balances necessary for an understanding of the potential effect of the relationship on the financial statements. These disclosure requirements are in addition to the requirements in paragraph 33.6 to disclose key management personnel compensation. At a minimum, disclosures shall include: (a) the amount of the transactions. (b) the amount of outstanding balances and: (i) their terms and conditions, including whether they are secured, and the nature of the consideration to be provided in settlement; and (ii) details of any guarantees given or received. (c) provisions for uncollectible receivables related to the amount of outstanding balances. (d) the expense recognised during the period in respect of bad or doubtful debts due from related parties. Such transactions could include purchases, sales, or transfers of goods or services; leases; guarantees; and settlements by the entity on behalf of the related party or vice versa.	Delete or modify 33.8 (see comment for 33.7 above). Only need a general description of the nature of related party transactions – it's not necessary to go into further detail. Related party disclosures are lengthy and onerous. Mandating detailed disclosures for such items could be a matter for local legislation instead.	WG members feel the narrative regarding the terms and conditions of the balances could be dropped as long as the amounts are disclosed.
33.9	An entity shall make the disclosures required by paragraph 33.8 separately for each of the following categories: (a) the parent. (b) entities with joint control or significant influence over the entity.	Delete or modify 33.9 (see comments for 33.7 and 33.8 above).	WG members feel that related party information could be aggregated into fewer categories without significantly reducing the

	(c) subsidiaries. (d) associates. (e) joint ventures in which the entity is a venturer. (f) key management personnel of the entity or its parent (in the aggregate). (g) other related parties.	usefulness of the information presented.		
33.9	Staff view			
	taff do not agree with the WG recommendation to delete 33.9 as feel guidance is necessary n how to determine the categories of related party for which the disclosures in 33.8 are equired. Instead staff propose rewriting 33.9 as follows:			
	33.9) An entity shall make the disclosures required by paragraph 33.8 separately for each of the following categories:			
	(a) entities with control, joint control or significa-	ant influence over the entity.		
	(b) entities over which the entity has control, jo	oint control or significant influence.		
	(c) key management personnel of the entity or	its parent (in the aggregate).		
	(d) other related parties.			

Question 62: Staff recommendation and question for the Board (paragraphs 33.7-33.9)

Staff recommend that the Board adopt the WG recommendation to amend 33.7 and 33.8, however adopt the staff view to amend 33.9.

33.10	The following are examples of transactions that are disclosed if they are with a related party. (a) purchases or sales of goods (finished or unfinished). (b) purchases or sales of property and other assets. (c) rendering or receiving of services. (d) leases. (e) transfers of research and development. (f) transfers under licence agreements. (g) transfers under finance arrangements (including loans and equity contributions in cash or in kind). (h) provision of guarantees or collateral. (i) settlement of liabilities on behalf of the entity or by the entity on behalf of another party. (j) participation by a parent or subsidiary in a defined benefit plan that shares risks	Delete or modify 33.10 (see comments for 33.7 and 33.8 above).	Not a disclosure requirement. Delete from disclosure checklist.
	defined benefit plan that shares risks between group entities.		
33.11	An entity shall not state that related party transactions were made on terms equivalent to those that prevail in arm's length transactions unless such terms can be substantiated.		
33.12	An entity may disclose items of a similar nature in the aggregate except when separate disclosure is necessary for an understanding of the effects of related party transactions on the financial statements of the entity.		
Staff not	<u>e</u>		

Additions proposed by comment letters and field tests	WG members' views and recommendations
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This is an editorial issue and therefore there is no staff recommendation here.

SMEs are often heavily reliant on one or a few major customers or otherwise have significant economic dependencies. Knowledge of the nature of those dependences is essential for assessing the SME's future cash flows and financial position. The IFRS for SMEs should require disclosure of reliance on major customers and other economic dependencies.

WG members acknowledge that this information may be particularly relevant where an SME relies on a limited number of customers or suppliers. However, WG members feel this information should not be required as it could be sensitive and anti-competitive, and also is not required under full IFRSs. (Note, some disclosure is required under IFRS 8 for publicly traded entities regarding the extent of reliance on major customers.)

Question 63: Staff recommendation and question for the Board

Staff recommend that the Board adopt the WG recommendation not to add this disclosure requirement.

Does the Board agree with the staff recommendation?

Section 34 Earnings per Share

		Views in Comment Letters and Field Tests	WG members' views and recommendations
34.1	An entity using this [draft] standard is not required to present amounts of earnings per share. However, if the entity discloses earnings per share, it shall calculate and disclose earnings per share in accordance with IAS 33 Earnings per Share.		In their earlier report to the Board, WG members recommended allowing entities to disclose voluntary EPS information without having to apply the full IAS 33. If that is done, the IFRS for SMEs should require disclosure of the basis for preparing the information.

Additions proposed by comment letters and field tests	WG members' views and recommendations
Clear disclosure of the basis of preparation of any voluntary disclosures is required so readers can make an assessment of its reliability and comparability.	WG members recommend adding this disclosure in sections 31, 34, and 37.

Section 35 Specialised Industries

Agriculture

Views in WG members'

					Comment Letters and Field Tests	views and recommendations
3	35.1	An entity using this [draft] standard that is engaged in agricultural activity shall determine, for each of its biological assets, whether the fair value of that biological asset is readily determinable without undue cost and effort: (a) The entity shall apply the fair value model in paragraphs 10–29 of IAS 41 Agriculture to account for those biological assets whose fair value is readily determinable without undue cost or effort, and the entity			WG members propose deleting 35.1(b)(iii) as it removes most of the benefit of allowing an undue cost or effort exemption from measurement at FV for biological assets.	
		(b)	by IAS 4	ke all related disclosures required 11. ty shall measure at cost less any	Delete 35.1(b)	In their earlier report to the Board,
			accumul accumul biologica readily d or effort.	ated depreciation and any ated impairment losses those al assets whose fair value is not leterminable without undue cost. The entity shall disclose, for such al assets:	(ii)&(iii). Disclosure in 35.1(b)(iii) defeats the purpose of allowing the cost method so should be deleted.	WG members recommended that the IFRS for SMEs address fair valuation of agricultural assets, rather than addressing it by cross-reference.
			(i)	a description of the biological assets;		
			(ii)	an explanation of why fair value cannot be measured reliably;		This may involve added or modified disclosures.
			(iii)	if possible, the range of estimates within which fair value is highly likely to lie;		a.cccca.cc.
			(<u>iii</u> i∀)	the depreciation method used;		
-			(<u>i</u> v)	the useful lives or the depreciation rates used; and		
			(v i)	the gross carrying amount and the accumulated depreciation (aggregated with accumulated impairment losses) at the beginning and end of the period.		

Question 64: Staff recommendation and question for the Board (paragraph 35.1)

Staff recommend that the Board adopt the WG recommendation.

Section 36 Discontinued Operations and Assets Held for Sale

Presentation and disclosure

		Views in Comment Letters and Field Tests	WG members' views and recommendations
36.2	An entity shall disclose: (a) a single amount on the face of the income statement comprising the total of: (i) the post-tax profit or loss of discontinued operations; and (ii) the post-tax gain or loss recognised on the measurement to fair value less costs to sell or on the disposal of the assets or group(s) of assets and liabilities constituting the discontinued operation. (b) an analysis of the single amount that is required by in-5.3(ea) into: (i) the revenue, expenses, pre-tax profit or loss and income tax expense of discontinued operations; (ii) the gain or loss recognised on the measurement to fair value less costs to sell or on the disposal of the assets or group(s) of assets constituting the discontinued operation and the related income tax expense. The analysis may be presented in the notes or on the face of the income statement. If it is presented on the face of the income statement it shall be presented in a section identified as relating to discontinued operations, ie separately from continuing operations. (c) the net cash flows attributable to the operating, investing and financing activities of discontinued operations. These disclosures may be presented either in the notes or on the face of the financial statements.	Covered in Agenda paper 1 – 3.	WG members propose deleting 36.2(a) and (c) and moving 36.2(b)(i) and (ii) into Section 5. Paragraph 36.2(a) is already required by paragraph 5.3(e) and hence is redundant. WG members note that if all their suggestions for Section 36 are adopted, this section could be removed altogether.
36.3	Unless impracticable, an entity shall restate the disclosures in the preceding paragraph for prior periods presented in the financial statements so that the disclosures relate to all operations that have been discontinued by the end of the reporting period for the latest period presented.		WG members recommend that prior period financial statements not be restated to segregate discontinued operations for costbenefit reasons.

36.3	Staff view			
	As noted in section 5 under paragraph 5.3(e), staff do not agree with the WG recommendation for 36.3. Staff feel that restatement of prior period information to segregate discontinued operations should be required since the need to restate would be extremely rare and also it provides useful information to financial statement users.			
36.4	If an entity ceases to classify a component of an entity as held for sale, the entity shall reclassify the results of operations of the component previously presented in discontinued operations and shall include them in income from continuing operations for all periods presented. The amounts for prior periods shall be described as having been restated.		WG members suggest eliminating the held for sale classification.	

Question 65: Staff recommendation and question for the Board (paragraphs 36.2-36.4)

Staff recommend that the Board adopt the WG recommendation to amend 36.2 and 36.4, and adopt the staff view to leave 36.3 unchanged.

Does the Board agree with the staff recommendation?

Non-current assets held for sale

36.8	An entity shall disclose the following information in the period in which property, plant and equipment has been either classified as held for sale or sold: (a) a description of the asset or disposal group; (b) a description of the facts and circumstances of the sale, or leading to the expected disposal, and the expected manner and timing of that disposal; and (c) the gain or loss recognised, if not separately presented on the face of the income statement.		WG members feel there is no need for a held for sale classification. Instead, the impairment requirements in the individual sections of the IFRS for SMEs cover this together with the disclosures that those sections require.			
36.8	Staff view					
	Staff agree with the WG recommendation that the held for sale classification should be removed. However, staff propose adding the following disclosure requirement (which goes beyond the requirements of Section 32 <i>Events after the End of the Reporting Period)</i> as it will provide useful information for users of financial statements.					
	If, at the reporting date, an entity has a binding sale agreement or a formal plan for a major disposal of assets, or a group of assets and liabilities, within 12 months, the entity shall disclose the following information in the notes:					
	(a) a description of the asset(s) or the group of	assets and liabilities;				
	(b) a description of the facts and circumstances of the sale or plan; and					
	(c) the carrying amount of the assets or, if the disposal involves a group of assets and liabilities, the carrying amounts of those assets and liabilities.					
Questio	Question 66: Staff recommendation and question for the Board (paragraph 36.8)					

Staff recommend that the Board adopt the staff view set out directly above.

Section 37 Interim Financial Reporting

		Views in Comment Letters and Field Tests	WG members' views and recommendations
37.1	An entity that issues an interim financial report that is described as complying with this [draft] standard shall apply either IAS 34 Interim Financial Reporting or all of the requirements of this [draft] standard, except as provided in paragraph 37.2.		In their earlier report to the Board, WG members recommended allowing entities to disclose voluntary interim period information without having to apply the full IAS 34. If that is done, the IFRS for SMEs should require disclosure of the basis for preparing the information.

Additions proposed by comment letters and field tests	WG members' views and recommendations
Clear disclosure of the basis of preparation of any voluntary disclosures is required so readers can make an assessment of its reliability and comparability.	WG members recommend adding this disclosure in sections 31, 34, and 37.

Section 38 Transition to the IFRS for SMEs

Explanation of transition to the *IFRS for SMEs*

		Views in Comment Letters and Field Tests	WG members' views and recommendations
38.10	An entity shall explain how the transition from its previous GAAP to this [draft] standard affected its reported financial position, financial performance and cash flows.		

Reconciliations

38.11	To comply with paragraph 38.10, an entity's first financial statements prepared using this [draft] standard shall include: (a) reconciliations of its equity reported under previous GAAP to its equity under the [draft] standard for both of the following dates: (i) the date of transition to this [draft] standard; and (ii) the end of the latest period presented in the entity's most recent annual financial statements under previous GAAP; and (b) a reconciliation of the profit or loss reported under previous GAAP for the latest period in the entity's most recent annual financial statements to its profit or loss under this [draft] standard for the same period.		WG members favour retaining this reconciliation. It is a one-time disclosure that WG members believe is vital for users to understand the effect of switching from local GAAP to the IFRS for SMEs.		
38.12	If an entity becomes aware of errors made under previous GAAP, the reconciliations required by paragraph 39.11(a) and (b), to the extent practicable, shall distinguish the correction of those errors from changes in accounting policies. If an entity did not present financial statements for previous periods, it shall disclose that fact in its first financial statements that conform to this [draft] standard.		WG members recommend that an "undue cost or effort" principle be added to "practicable" regarding restatements for prior period errors. WG members believe this should also apply here.		
	Question 67: Staff recommendation and question for the Board (paragraph 38.11 and 38.12) Staff recommend that the Board adopt the WG recommendation with the exception of adding the				

Staff recommend that the Board adopt the WG recommendation with the exception of adding the "undue cost or effort" clause.

Does the Board agree with the staff recommendation?

Miscellaneous

Eliminations/simplifications proposed by comment letters and field tests	WG members' views and recommendations
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- Do not require disclosure of reconciliations of opening and closing In several cases in their comments on balances, e.g. 16.29(e) [each class of PP&E], 17.32(e) [each class of the relevant intangible], 20.14 [each class of provision] and 27.38(c)-(e) [defined sections above, benefit liability and fair value of plan assets] or only require WG members recommend greater reconciliations for the current period (from start to end of current aggregation in the year). We question information usefulness of these reconciliations, current year particularly when there is either no movement or only one movement reconciliation and in the balance for the year. Not very relevant to users. recommend not requiring the reconciliation for prior periods. WG members - Reduce disclosures for options available by cross-references to full agree in principle IFRSs. SMEs should not be penalised for choosing the more complex with this proposal. treatment. For example, reduce the disclosures required by IFRS 7 in event SME chooses to apply IAS 39. - Requirements to disclose all of the assumptions and similar WG members have proposed some information in connection with valuation of financial instruments, simplifications in share based payments, pension liabilities and revalued assets should the relevant be reconsidered and simplified. sections. WG members do - To the extent that disclosures are included in group financial not support this statements, the subsidiaries of that group, when preparing individual recommendation financial statements, should be exempted from providing full because the disclosures in certain areas, for example share-based payments, cash individual financial statements are flow statements, events after the balance sheet date, segment often relied on reporting, employee benefits, related parties, investments in associates separately from the and financial instruments. group statements. The definition of - IFRS for SMEs should state that non-material items do not require materiality in 2.4 disclosure. encompasses omission of immaterial disclosures. WG members recommend that the introduction to the disclosure checklist in the implementation guidance should make this clear (see new paragraph D2 at

the start of the checklist above). The training materials being developed by IASCF could also explain this point.

Question 68: Staff recommendation and question for the Board

Staff recommend that the Board adopt the WG recommendations above. Staff believe the WG have addressed the above issues appropriately throughout the checklist. Therefore staff recommend no further changes.

Restructuring proposed by comment letters and field tests	WG members' views and recommendations
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- Rather than giving SMEs detailed disclosure requirements, they should instead follow a skeleton outline of necessary requirements for note disclosures. For example, notes to SME financial statements should be limited to:
- description of the major accounting policies
- impact of all changes in accounting policies and prior error corrections on opening balance of equity for the current period (plus restatement of the prior period)
- details of assets and liabilities by category or origin (excluding: provisions), where relevant (our proposals lead to separate disclosure on the face of the balance sheet of assets carried at revalued amount (easily disposable) from assets carried at cost);
- reconciliations between opening and closing balances for assets subject to depreciation and impairment and provisions. These reconciliations should be based on a standard reconciliation
- a specific reconciliation between the opening and closing balance of net pension liabilities
- details of maturity and interest rates for all financial debt (including finance lease related debt and minimum payments for operating leases);
- summarised information related to ownerships in associates and joint ventures (interest share, joint control or significant influence, total revenue, net income and equity for each entity)
- description and main information related to significant transactions and events of reporting period (business combinations, disposals etc.);
- off balance sheet items such as commitments, pledges and collaterals
- contingencies;
- hedging strategies and related amounts in the balance sheet;
 and
- income tax: basic tax and effective tax rates.

believe that SMEs would benefit from explicit disclosure requirements rather than a conceptual disclosure framework, which would be impractical for an SME to apply. In making the substantial disclosure reductions reflected in the ED, the Board has relied on criteria that it explained in paragraph BC120. The WG has proposed substantial further reductions based on criteria similar to those outlined to the left and also cost-benefits.

WG members

Question 69: Staff recommendation and question for the Board

Staff recommend that the Board adopt the WG recommendation.