

## AGENDA PAPER

IFRS Foundation Trustees meeting – Due Process Oversight Committee

JAKARTA	25 MAY 2016	Agenda ref	3C
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## Insurance Contracts: due process 'lifecycle' review

#### Introduction

- 1. The purposes of this paper are to:
  - a. summarise the due process steps completed for the International Accounting Standards Board's ('the Board's') insurance contracts project; and
  - b. seek the confirmation of the Due Process Oversight Committee ('DPOC') that all necessary due process steps have been followed and that its review of due process on this project is now complete.
- 2. This project will result in a new Standard that will replace IFRS 4 *Insurance Contracts* (an overview of the forthcoming Standard is on the agenda for the Trustees' plenary session at the May 2016 meeting Agenda Paper, AP, 1D refers).

## The structure of the paper

- 3. The paper is structured as follows:
  - a. background (paragraphs 4-10);
  - b. latest developments (paragraphs 11-12);
  - c. due process summary (paragraph 13);
  - d. convergence considerations (paragraphs 14-16);
  - e. the controversial nature of the proposals (paragraphs 17-18);
  - f. feedback on deliberations (paragraphs 19-24);
  - g. effects analysis (paragraphs 25-26); and
  - h. a question to the DPOC (paragraph 27).

## Background

- 4. At its January 2016 meeting, the DPOC was updated on the progress made by the Board on its Insurance Contracts project. At that meeting, the DPOC's review focussed on two draft papers that the technical staff were proposing to present to the Board at its February 2016 meeting, as follows:
  - a. the first set out the criteria for re-exposure in the *Due Process Handbook*, together with the technical staff's assessment of where the current proposals for the forthcoming Standard stand against those criteria (presented to the DPOC in January as AP 3C(ii)<sup>1</sup>). The staff recommendation was that the tentative decisions reached on the changes were not of such a fundamental nature as to require re-exposure and those changes also responded to feedback the Board had received. In addition, the Board's on-going engagement with constituents had not revealed any new issues. The draft paper also assessed weighing the costs of re-exposing against the benefits. At its January meeting, the DPOC stressed the importance of the Board having a defensible and credible case for not re-exposing again and, in reviewing the position, acknowledged that a case had been made for not having another re-exposure;
  - b. the second paper reviewed all the due process steps taken in developing the new insurance contracts Standard (both mandatory and optional) and would contain a request to begin the balloting process for the new Insurance Contracts Standard (presented to the DPOC in January as AP 3C(iii)).
- 5. At the January meeting, the DPOC acknowledged that the drafting of the Standard would be challenging. The Committee emphasised the need for a careful and considered drafting process for the Standard, which would involve preparing drafts for editorial review with external parties as well as preparing an extensive effects analysis, as had been done for the *Leases* Standard (IFRS 16) published in January 2016.
- 6. The final version of the second paper referred to in paragraph 3 above was presented to the Board at its February meeting (AP 2F for that meeting). The paper was sent to DPOC members on 8 February<sup>2</sup>, but for ease of reference is reproduced as AP 3C(i) for this meeting. The paper summarises all the mandatory and optional due process steps that have been taken on the project, including the publication of three consultative documents:
  - (a) Discussion Paper ('DP') Preliminary Views on Insurance Contracts (May 2007);
  - (b) Exposure Draft ('ED') Insurance Contracts (July 2010); and

<sup>&</sup>lt;sup>1</sup> Available on the DPOC meetings section on the website at: <u>http://www.ifrs.org/Meetings/MeetingDocs/Other%20Meeting/2016/DPOC/January/AP3C-ii-DPOC\_ICReexposure.pdf.</u> <sup>2</sup> Under cover of Michelle Sansom's e-mail of that date, at: <u>http://www.ifrs.org/DPOC/Documentation-and-Correspondence/Documents/Insurance/20160208-MSmemotoDPOC.pdf.</u>

- (c) revised ED Insurance Contracts (June 2013).
- 7. The paper also summarises the extensive work the Board has undertaken on the project with consultative and other specialist advisory groups, public hearings and other outreach (including fieldwork and investor outreach).
- 8. At its February 2016 meeting, the Board agreed the following:

(1) **Re-exposure:** there is no need to re-expose the proposals in the new *Insurance Contracts* Standard;

(2) Due process: all due process requirements have been met;

(3) **Permission to ballot:** sufficient consultation and analysis has been undertaken for the balloting process for the new *Insurance Contracts* Standard to begin; and

(4) **Dissents:** no member of the Board has indicated that they propose to dissent from the publication of the new *Insurance Contracts* Standard.

- 9. Appendix A to this report summarises the background and history of the Insurance Contracts project.
- 10. Appendix B to this report summarises the discussions with the Trustees and the DPOC on this project since 2004, when Phase II of the project started (which was before the DPOC was established).

#### Latest developments

- 11. Since the Board's February meeting, the staff have been working on drafting the new Insurance Contracts Standard and analysing its effects. The staff are also in the process of developing plans for the external editorial review of the forthcoming Standard. As part of that external review, the staff plans to ask selected interested parties to:
  - a. review the wording of the new Standard to ensure that entities understand the requirements, and that the requirements can be operationalised. This review would focus in particular on those areas that have been amended since the 2013 ED; and
  - b. test the effects of particular aspects of the new Standard using case study analysis.
- 12. The remainder of this paper highlights some of the key considerations to bring to the DPOC's attention as part of its lifecycle review.

#### **Due Process summary**

13. As noted in paragraphs 4-6 above, at its January meeting, the DPOC reviewed a draft of the due process summary paper that was submitted to the Board in February. The final paper presented to the Board (attached for the DPOC as AP 3C(i)) is in substance unchanged from the draft seen by the DPOC. At the meeting in January, the DPOC

confirmed its view that all projects (including that on insurance contracts) were proceeding in a manner consistent with the requirements set out in the *Due Process Handbook*. At this meeting, the staff are seeking the DPOC's confirmation that this is the case for insurance contracts and we draw the Committee's attention in particular to the table at Appendix A of AP 3C(i), which sets out how the Board has complied with the due process steps required to finalise a Standard<sup>3</sup>.

## Convergence

- 14. The forthcoming Insurance Contracts Standard is one that has been developed by the Board alone and is not converged with its equivalent in US GAAP. For a time the project was conducted on a joint basis with the US Financial Accounting Standards Board ('FASB'). In August 2007, the FASB issued an Invitation to Comment, *An FASB Agenda Proposal: Accounting for Insurance Contracts by Insurers and Policyholders*, which included the Board's May 2007 DP. The feedback to that Invitation to Comment led to the FASB's decision in October 2008 to participate in the project jointly with the Board. The Boards held more than 50 meetings to discuss various proposals to develop a common Standard for insurance contracts. While the Boards reached common decisions in many areas, they reached different conclusions in others.
- 15. The project continued to be taken forward on a joint basis until 2013. In light of the feedback received on its June 2013 proposed Accounting Standards Update *Insurance Contracts (Topic 834)*, the FASB decided to limit the scope to insurance entities as described in existing US GAAP. The FASB also decided that its project should focus on making targeted improvements to existing US GAAP. For short-duration contracts, the FASB decided to limit the targeted improvements to enhancing disclosures<sup>4</sup>.
- 16. The FASB issued Accounting Standards Update No. 2015-09, *Financial Services— Insurance (Topic 944): Disclosures about Short-Duration Contracts*, on 21 May 2015. The FASB is expected to issue a revised exposure draft of targeted improvements to the accounting for long-duration contracts during the third quarter of 2016.

## Controversy

17. The proposals on insurance contracts have always generated controversy and, among some stakeholders, continue to do so. The fact that the Board has gone through three formal rounds of public consultation (including 2 EDs), as well as two sets of public roundtable meetings and extensive outreach, is evidence of the importance it attaches to due process.

<sup>&</sup>lt;sup>3</sup> The DPOC is reminded that it reviewed the due process steps up to the issue of the 2013 ED at its meeting in April 2013. AP 3A(i) for that meeting refers, available at: <u>http://www.ifrs.org/MeetingS/MeetingDocs/Trustees/2013/April/AP3Ai\_DPOC\_Insurance.pdf</u>. At that meeting, the DPOC affirmed its view that the IASB had complied with all the required due process steps in developing the ED, as recorded in the report of the meeting at: <u>http://www.ifrs.org/DPOC/Documents/2013/DPOC-Report-April-2013.pdf</u>, paragraph 1.2 refers. <sup>4</sup> See the FASB's Insurance Project Update page at:

http://www.fasb.org/jsp/FASB/FASBContent\_C/ProjectUpdatePage&cid=1176164382639.

- 18. Underlying much of the detailed and extensive feedback the Board has received are two common concerns, namely:
  - a. concerns about the volatility arising from current value measurement of insurance contracts on profit or loss. In particular, some question whether all changes in current value measurement of the insurance contract should affect current period performance. The Board's model excludes from profit and loss some of the effect of changes in current value measurement, either by recognising some of those changes in other comprehensive income in the period, or by recognising those changes over the contract term; and
  - b. concerns about complexity of the proposals as a whole. The Board noted that the accounting model reflects the complexity inherent in insurance contracts, and that additional complexity also arises from decisions to address specific feedback from constituents in (a) above. Nonetheless, the Board has sought to reduce complexity where possible, using pragmatic exceptions and simplified approaches.

## Feedback on deliberations

- 19. The DPOC has previously emphasised the importance to the Board (a) of the need to avoid being left exposed to claims that it has not followed due process and (b) that it takes steps to ensure that it discloses publicly the rationale used to reach tentative decisions and conclusions, with special attention to issues that received substantial debate in the exposure process, including outside the comment letter consultation in response to the DP and the 2 EDs.
- 20. The DPOC spent some time examining this issue during 2014, following the comments made about the leases project by the Chairman of the UK Financial Reporting Council ('FRC'), Sir Win Bischoff, in his presentation to the Trustees at their meeting in July 2014. The FRC raised concerns that stakeholder views are not always given due weight and expressed a view that technical purism and an anti-avoidance/compliance-driven mindset prevails, citing the leases project to be an example of where this is the case. The FRC suggested that stakeholders need a better understanding of why their views and/or suggestions are not taken up by the IASB.
- 21. The DPOC followed this up at its meeting in October 2014 (AP 3C for that meeting refers<sup>5</sup>). The paper for that meeting outlined the measures taken by the Board to address the continuing concerns from some stakeholders about aspects of the leases project, including those raised by the FRC.

<sup>&</sup>lt;sup>5</sup> AP 3C for the DPOC October 2014 meeting can be accessed at: http://www.ifrs.org/Meetings/MeetingDocs/Trustees/2014/October/AP3C%20DPOC\_Leases.pdf.

- 22. In the light of the discussion at the October 2014 meeting<sup>6</sup>, the Board committed to review its public disclosure of the rationale used to reach tentative decisions and conclusions, with special attention to issues that received substantial debate in the exposure process. At its February 2015 meeting, the DPOC received a report (AP 2D for that meeting refers<sup>7</sup>) setting out planned improvements being employed by the Board to improve its public disclosure of the rationale used to reach its tentative decisions and conclusions.
- 23. In relation to the Insurance Contracts project, many of the planned improvements referred to above had already been put in place, including:
  - a. Updated summary of the effect of redeliberations on the 2013 ED a staff paper that indicated where and how the proposals in the 2013 ED would change as a result of the Board's tentative decisions to date (first version made available in April 2014, with subsequent regular updates, with the latest version available on the website that for February 2016, the last time the Board discussed the project<sup>8</sup>).
  - b. Project Update—Updated overview of the Insurance Contracts project an overview summarising the progress on the project, including tentative decisions to date (July 2014, again with subsequent regular updates, with the latest version available on the website that for February 2016<sup>9</sup>).
  - c. Feedback Statement—Summary of the feedback received and the Board's response

    an overview summarising the feedback received from respondents and the
    Board's responses, including tentative decisions to date (July 2014, with the latest version available on the website being a paper presented to the Board at its
    February 2016 meeting Comparison of the IASB's tentative decisions with the comment letter summary AP 2C for that meeting<sup>10</sup>).
- 24. These documents reveal the extent to which the Board has been keen to highlight publicly the rationale used to reach tentative decisions and conclusions.

## Effects analysis

25. As the DPOC is aware, the Board has to prepare an effects analysis to be approved by the Board and presented as part of, or with, the Basis for Conclusions that will be published with the Standard. An effects analysis was presented in the Basis of Conclusions of the

<sup>7</sup> AP 2D for the DPOC February 2015 meeting can be accessed at:

<sup>&</sup>lt;sup>6</sup> See Section 2 of the report of the October 2014 DPOC meeting at: <u>http://www.ifrs.org/DPOC/meetings/Documents/DPOC-report-October-2014.pdf</u>.

http://www.ifrs.org/DPOC/meetings/Documents/2015/AP2D%20DPOC\_ReportingProjects.pdf.

<sup>&</sup>lt;sup>8</sup> Available at: <u>http://www.ifrs.org/Current-Projects/IASB-Projects/Insurance-Contracts/Documents/2016/290116-Effect-of-redeliberations-on-the-ED.pdf</u>.

<sup>9</sup> Available at: <u>http://www.ifrs.org/Current-Projects/IASB-Projects/Insurance-Contracts/Documents/2016/project-overview-Feb-2016.pdf</u>.

<sup>&</sup>lt;sup>10</sup> Available at: <u>http://www.ifrs.org/Current-Projects/IASB-Projects/Insurance-Contracts/Documents/2016/2C-comparison-with-CLetter-summary.pdf</u>.

2013 ED<sup>11</sup>. As reported to the DPOC in January, a comprehensive effects analysis will be prepared to accompany the new Standard.

26. The IASB anticipates publishing the effects analysis as a separate document (rather than as part of the Basis for Conclusions) at the same time as publishing the new Standard. The IASB will approve the effects analysis as part of the balloting process for the new Standard. When preparing the effects analysis, the Board will also take into account the recommendations made by the Effects Analysis Consultative Group in its November 2014 report.

## Question for the DPOC

27. Is the DPOC content to confirm that all necessary due process steps have been followed and that its review of due project on this project is now complete?

<sup>&</sup>lt;sup>11</sup> As set out in paragraphs EA1-EA27 of the Basis of Conclusions, available at: <u>http://www.ifrs.org/Current-Projects/IASB-</u> <u>Projects/Insurance-Contracts/Exposure-Draft-June-2013/Documents/ED-Insurance-Contracts-Basis-for-Conclusions-June-2013.pdf</u>.

## Appendix A

# INSURANCE CONTRACTS: BACKGROUND TO THE INSURANCE CONTRACTS PROJECT

A draft version of this paper was presented to the DPOC at its January 2016 meeting, as Agenda Paper (AP) 3C(i). The paper was subsequently presented to the Board at its February 2016 meeting, as AP 2A for that meeting.

#### Purpose of this paper

- A1 This paper summarises the history of the International Accounting Standards Board's ('the Board's') project to develop an insurance contracts Standard, as follows:
  - (a) The reasons for undertaking the project (in paragraphs A3-A6).
  - (b) The history of the project (in paragraphs A7-A22), in the following stages:
    - (i) work of the International Accounting Standards Committee ('IASC');
    - (ii) Phase I of the Board's project on insurance contracts; and
    - (iii) Phase II of the Board's project on insurance contracts, including the redeliberations on the 2013 Exposure Draft *Insurance Contracts* ('the 2013 ED').
- A2 This paper provides background information to assist the Board in deciding on the questions in Agenda Paper 2F *Due process summary and permission to begin the balloting process for the insurance contracts Standard* for this meeting. Consequently, this paper does not offer any staff recommendations.

#### Reasons for undertaking the project

A3 An entity that issues insurance contracts writes contracts today that are subject to uncertain outcomes and for which the entity may not know the profit for many years. This is almost unique and the difficulties associated with measuring such contracts inevitably results in complex accounting that depends heavily on assumptions. In addition, many insurance products are often deliberately complex either for tax, regulatory or competition purposes. While accounting standards can exacerbate the complexity, no accounting standard will remove this basic and key complexity, or the need to rely on assumptions about the future.

- A4 At the most basic level, an entity that issues insurance contracts receives cash in the form of premiums, invests that cash into assets (generally financial assets) and promises to pay cash to the policyholder if the insured event happens, sometimes many years in the future. However, some insurance contracts are not basic, and create complex interdependencies between rights and obligations that make them difficult to account for using existing standards. There are difficulties of applying generally applicable standards, including the following:
  - (a) Interdependencies between rights and obligations can make it difficult to identify the various performance obligations provided by the contract or to allocate the consideration paid by policyholders to those individual performance obligations.
  - (b) Uncertainty of outcomes can make it difficult to make estimates. In particular, options and guarantees embedded in insurance contracts can exacerbate the uncertainty of outcomes. Thus, there can be significant changes in the estimate of cash flows that would be needed to fulfil the contracts.
  - (c) Long durations can mean that estimates made at the inception of a contract may not provide useful information throughout the life of the contract. Furthermore, there is little ability to assess whether estimates made at inception were reasonable or accurate.
- A5 At present, the IFRS Standards have no complete Standard that deals with the accounting for insurance contracts. IFRS 4 *Insurance Contracts* (IFRS 4) was issued in 2004 as an interim Standard and completed only the first phase of the Board's project on insurance contracts. As an interim Standard, IFRS 4 made limited changes to previous practices, permits a wide range of practices and includes a 'temporary exemption' that states explicitly that an insurer does not need to ensure that its accounting policies are relevant to the economic decision-making needs of users or are reliable. Many of the problems associated with financial reporting for insurance contracts have continued in the meantime and there continue to be substantial differences between different companies in accounting for insurance contracts. The diversity in the current application of the IFRS Standards for insurance contracts today means that until a Standard on insurance contracts is finalised, the IFRS Standards could be regarded as incomplete.

A6 Accordingly, the Board has been consistently told that there is an urgent need to finalise a Standard on insurance contracts. Most recently, users of financial statements participating in the Board's outreach on the different effective dates of IFRS 9 *Financial Instruments* and the new insurance contracts Standard urged the Board to complete the Standard on insurance contracts as quickly as possible.<sup>12</sup> There has also been a statement issued by the Financial Stability Board ('FSB') Plenary at its meeting in September 2015, which noted the high priority of the insurance contracts project<sup>13</sup>.

## History of the project

- A7 Work on the Board's insurance contracts project began in 1997. The following paragraphs summarise:
  - (a) the work of the IASC (in paragraphs A8-A12);
  - (b) Phase I of the Board's project on insurance contracts (in paragraph A13); and
  - (c) Phase II of the Board's project on insurance contracts, including the redeliberations on the 2013 ED (in paragraphs A14-A22).

## Work of the IASC

- A8 In 1997, the IASC set up a Steering Committee to carry out the initial work on an insurance contracts project. The Steering Committee published an Issues Paper in 1999. The first volume of the Issues Paper analysed the characteristics of different forms of insurance contract and considered the significant accounting issues. The second volume contained 82 illustrative examples, summarised relevant national standards and requirements in 17 countries and summarised the main features of the principal contracts found in eight countries.
- A9 The Issues Paper attracted 138 responses. The Steering Committee held two meetings of three days each to discuss the comment letters and two further meetings, totalling seven days, to develop a Draft Statement of Principles ('DSOP'). The Issues Paper indicated the former IASC Steering Committee's intention to publish the DSOP for formal comment. However, when the International Accounting Standards Board was formed in 2001, the

<sup>&</sup>lt;sup>12</sup> Agenda Paper 14A for the September 2015 Board meeting

http://www.ifrs.org/Meetings/MeetingDocs/IASB/2015/September/AP14AIFRS%209%20and%20IFRS%204.pdf

<sup>&</sup>lt;sup>3</sup> See press release at <u>http://www.fsb.org/2015/09/meeting-of-the-financial-stability-board-in-london-on-25-september/</u>

Steering Committee instead used the draft DSOP as an internal report to the newly constituted Board. The role of the Steering Committee finished at that point.

- A10 In November 2001, the Board began discussing the project, using the DSOP as the initial basis for the discussions. Although the Board decided not to invite formal comments at that stage on a document that the Board had not yet discussed, it took the unusual step of making the DSOP available on its website. Doing so helped to stimulate an active debate, within both the insurance industry and the actuarial community.
- A11 Between October 2001 and June 2002, IASB staff and Board members conducted field visits to nineteen insurance companies from nine countries. The purpose of these visits was to assess the practical implications of implementing the model proposed in the DSOP.
- A12 The Board split this project into two phases in May 2002, in order to improve disclosures, and some recognition and measurement practices for insurance contracts in time for the adoption of the IFRS Standards by listed companies throughout Europe and elsewhere in 2005.

## Phase I of the Board's project on insurance contracts

- A13 The Board completed Phase I in 2004 by issuing IFRS 4, which:
  - (a) made limited improvements to accounting practices for insurance contracts;
  - (b) permitted a wide variety of accounting practices for insurance contracts to continue, thus avoiding major changes that Phase II might reverse; and
  - (c) required an insurer to disclose information about insurance contracts.

#### Phase II of the Board's project on insurance contracts

A14 The Insurance Working Group was constituted to assist the Board to analyse the accounting issues relating to insurance contracts when the Board recommenced work on Phase II. The Insurance Working Group brought together a wide range of interests and includes senior financial executives who are involved in financial reporting.

#### The 2007 Discussion Paper

A15 In mid-2004 the Board started work on Phase II and in September of that year, the Board created a working group to advise it on its project. The Board deliberated staff proposals on substantive issues until February 2007 and in May 2007, the Board published a discussion paper *Preliminary Views on Insurance Contracts* ('the 2007 DP'), setting out its preliminary views on the main components of an accounting model for an insurer's rights and obligations (ie assets and liabilities) arising from an insurance contract. The staff decided not to hold public round-table meetings after the publication of the 2007 DP, noting that the members of its Insurance Working Group would supply input from a wide range of perspectives. The Board received 162 comment letters in response to the 2007 DP.

#### The 2010 Exposure Draft

A16 The Board began its review of the responses to the 2007 DP in February 2008. The Board undertook initial field testing between September and December 2009 to determine how the proposals could be applied consistently in practice. The deliberations on the responses to the 2007 ED led to the 2010 Exposure Draft *Insurance Contracts* ('the 2010 ED') which was published in July of that year. The 2010 ED had a comment period ending on 30 November 2010 and the Board received 250 comment letters in response.

#### The 2013 Exposure Draft

A17 The Board undertook a second round of field testing between September 2010 and January 2011 to test the proposals made in the 2010 ED. After the comment period ended in November 2010, the Board redeliberated the proposals in the 2010 ED between December 2010 and February 2013, during which time there was extensive consultation with the Insurance Working Group. As a result, the Board modified its 2010 proposals in response to the issues identified in consultations on the 2010 ED. In seeking to address these issues, the Board acknowledged that the modified proposals were more complex than those in the 2010 ED. A18 In September 2012, the Board decided to re-expose its proposals, and the 2013 ED was published in June 2013. However, the Board was mindful that, while the changes it had made to the 2010 ED could be regarded as significant, the core principles and many aspects of the 2010 proposals had not changed. Accordingly, while the 2013 ED contained a complete draft of the proposed Standard on insurance contracts to provide interested parties with context, the Board only sought input on five targeted areas. In light of the increased complexity of the proposals, the Board also sought views on whether the costs of the revised information would be justified by the benefits of the information provided overall. In publishing the 2013 ED, the Board stated its intention not to revisit issues that it had previously rejected or reconsider consequences it had previously considered. The comment period ended on 25 October 2013 and the Board received 194 comment letters in response to the 2013 ED.

#### Redeliberations on the 2013 Exposure Draft

- A19 The Board undertook extensive outreach and detailed field testing of the operationality of the proposals set out in the 2013 ED and began considering the feedback from its 2013 ED in March 2014.
- A20 Although the majority of respondents to the 2013 ED welcomed the progression the Board had made from the 2010 ED and indicated broad support for the principle of current value measurement of insurance contracts, there were also significant areas of disagreement. The following key concerns were raised:
  - (a) Complexity. Most constituents expressed concern about the complexity of some specific proposals or of the proposals as a whole. These concerns were strongest where the proposals differed more significantly from existing practices, either for financial reporting, regulatory reporting or supplementary reporting.
  - (b) The treatment of contracts with participation features, which was the most difficult and contentious of the specific aspects on which the Board had sought feedback. Underlying those concerns were issues related to:
    - (i) the extent of accounting mismatches that would result from application of the proposed Standard; and

- (ii) an underlying diversity of views about what constitutes service from an insurance contract.
- A21 As a consequence of the complexity of the issues relating to contracts with participating features, the Board has decided to extend its original timetable to allow it to consider the issues in detail. The Board has spent the majority of the redeliberations since March 2014 on the treatment of contracts with participation features. As many of the issues are interrelated, the staff have approached these deliberations by asking the Board for indicative leanings, instead of tentative decisions. This approach, and the extended timetable, has helped the Board and the staff to obtain feedback on the direction of the model as it was developed. Accordingly, the Board has maintained extensive dialogue with all interested parties and continues to consult its advisory bodies. In particular:
  - (a) the Board has engaged extensively with preparers and other interested parties, in particular in Europe, Canada, USA, Hong Kong, Korea and Japan; and
  - (b) the Board has sought advice from the Accounting Standards Advisory Forum ('ASAF') at its March, June and September 2014 meetings and its March 2015 and July 2015 meetings.
- A22 In January 2016, the Board completed the planned technical decisions needed for the insurance contracts Standard. At its February 2016 meeting, the staff asked for, and received, the Board's confirmation that the necessary due process steps have been undertaken and its agreement to begin the balloting process for the issuance of the insurance contracts Standard (AP 2F for that meeting refers).

## Appendix B

# INSURANCE DUE PROCESS LIFE-CYCLE REVIEW: REPORTING TO THE TRUSTEES AND THE DUE PROCESS OVERSIGHT COMMITTEE (DPOC)

Date	Trustees/DPOC	Paper
2004		
Jun	Trustees	<i>Chairman's Report to the Trustees</i> (Agenda Paper, AP 2). Paper noted the completion of Phase I in March 2004 with the publication of IFRS 4 <i>Insurance Contracts.</i> AP stated that Phase II had been largely dormant since January 2003, but referred to the work underway to establish an Insurance Working Group (IWG).
Oct	Trustees	<i>Report by the Chairman of the IASB</i> (AP 3A) Referred to establishment of the IWG, which had met for the first time in September 2004.
2005		
Mar	Trustees	(Draft) Report of the Chairman of the IASB (AP 2A - Paper served as both an AP for Trustees and a draft for the Foundation's Annual Report 2004). Reported progress on the IWG and said that the initial output for Phase II would be a Discussion Paper (DP), which "cannot be expected before the end of 2005, and quite possibly later".
Jun	Trustees	<i>Chairman's Report</i> (AP 2B). Reported further progress on the IWG and that the Board had reviewed a project plan in January 2005.
2006		
Apr	Trustees	( <i>Draft</i> ) <i>Report of IASB Chairman</i> (AP 5) Update on meetings of the IWG. Stated that the Board hoped to publish an initial DP towards the end of 2006.
Jun	Trustees	<i>IASB Chairman's Report</i> (AP 3A). As April 2006, but with update on the work of the IWG.
Oct	Trustees	<i>IASB Due Process Summaries</i> (AP 4B). Update on the project, noting that the Board was working towards a DP, estimated to be published Q1 2007.
2007		
Jan	Trustees	IASB Due Process Summaries (accompanying the IASB Chairman's Report at AP3) included a section summarising progress to date on the insurance contracts project. The Trustees also received a separate presentation The IASB's project on Insurance Contracts (AP 3F).
Apr	Trustees	<i>Report of the Chairman of the IASB (AP 4A).</i> Brief reference to the progress on the project.
Jul	Trustees	Chairman's Report to Trustees June 2017 (AP 2) noted that the DP Preliminary Views on Insurance Contracts had been published in early May 2007, with a deadline for comments on 16 November 2007.
Oct	Trustees	The IASB Work Plan – convergence with US GAAP (AP 6A, Appendix A) reported that the DP was still out for comment. It also referred to the fact that the US Financial Accounting Standards Board (FASB) had issued an invitation to comment containing the Board's DP, with an introduction asking for comments on whether the FASB should add this project to its own agenda.
2008		
Mar	Trustees	Report of the Chairman of the IASB (draft of Chairman's report for the Annual Report (AP 4). Reported that 150 responses had been received to the 2007 DP. Board's redeliberations began in February 2008. The Board

Date	Trustees/DPOC	Paper
		was working towards an Exposure Draft (ED) with assistance from its IWG.
Jul	Trustees	The IASB's work plan – October 2008 (AP 5B). Reiterated the main
		background as set out at the March meeting. DP addressed accounting by
		insurers for insurance contracts; project would also deal with accounting
		by policyholders for insurance contracts. Policyholder accounting
		expected to involve ED but no DP.
2009		
Jan	Trustees	IASB Work Plan Overview (AP 5A). Confirmed that in October 2008 the
		FASB had decided to join the joint project on insurance contracts.
Jan	DPOC	Reporting on the Working Groups' Effectiveness; Survey and Interviews
		(AP 6A). The Committee heard a report on the IWG. Felt that the group
		was effective and well structured. However, there was a need for more
		users in the group. Non-attendance had become a problem.
Apr	Trustees with	Draft Report of the IASB Chairman – 2008 Annual Report (AP MB 2D). A
	Monitoring Board	general overview was provided, reflecting previous comments. ED
		forecast for second half of 2009.
Jul	Trustees	<i>Chairman's report</i> (AP 5A). General update reiterating timeframe given at
		April meeting.
Jul	DPOC	Update on the Working Group review (AP 6E) - the DPOC made a number
		of recommendations following the working group review, which the
		Board was implementing. Letters had been sent to members of the IWG
		who participated in the review, in order to bring them up-to-date and
		confirm the following main recommendations: 1) Improved use of
		meetings including better use of electronic communication; 2) Enhanced
Oct	Tructooc	feedback; 3) Clarified objectives; and 4) Enhancements on composition.
Oct	Trustees	Chairman's report (AP 4B(i)). Work was being undertaken to publish joint
		ED with FASB, forecast for the year end. Agreeing on a measurement basis had proven particularly difficult.
2010		
Jan	Trustees	Report of the IASB Chairman (AP 4A). General update, ED due to be
		published first half of 2010.
		FASB and IASB Reaffirm Commitment to Memorandum of Understanding:
		A Joint Statement of the FASB and IASB, November 5, 2009 (AP 4A,
		Attachment 1). General background, plus confirmation that that the
		Boards had begun discussing the project together and were aiming to
		publish ED in Q2 2010 with a view to finalising joint standard by mid-
		2011.
Mar	Trustees	IASB and FASB Commitment to Memorandum of Understanding, Quarterly
		Progress Report: March 31, 2010 (AP 2B). Reiteration of the position as
		reported at the meeting in January.
Apr	Trustees with	The Technical Agenda (AP 4B(i)). AP reported that the objective of the
	Monitoring Board	current project was to develop a common, high-quality standard that
		would address recognition, measurement, presentation, and disclosure
		requirements for insurance contracts. The Boards were currently working
		towards an ED in first half of 2010.
Jul	Trustees	Progress Report on Commitment to Convergence of Accounting Standards
		and a Single Set of High Quality Global Accounting Standards: 24 June
		2010 (AP 5). Background summary provided. Noted that joint discussions
		had resulted in differing conclusions on several important technical
		issues. To this end the Board planned to publish ED in Q3 2010, and FASB

Date	Trustees/DPOC	Paper
		would decide best means of obtaining stakeholder input on the Board's
		proposal.
Oct	Trustees	<i>Report of the IASB Chairman</i> (AP 7A). ED published July 2010. The FASB
		had not published a DP but instead published the Board's ED as a
		discussion document in September. IWG meeting scheduled for
		November with round tables to begin in December. Project completion
		expected in June 2011.
2011		
Feb	Trustees	Chairman's Quarterly Review (AP 8A) reported progress on the project. In
		response to the ED the Board had received 247 comment letters, and in
		response to its discussion document the FASB had received 74 responses.
		Outreach and comments indicated general support for the proposal to
		measure an insurance contract directly using current, discounted
		estimates of future cash flows arising from the contract, revised at each reporting date (the 'building block' approach). However, there were
		strong jurisdictional differences, for example respondents from Canada
		and Australia felt that the model proposed in the ED would not be as
		strong as their existing models. Many users were concerned that the
		proposed model was highly dependent on estimates and was therefore
		volatile and would lead to a lack of comparability.
Mar	DPOC	Update on Enhanced Engagement (AP 6C(i)) reported progress on the
		project. Report referred to the need to ensure that requirements for
		insurance and those for financial Instruments in IFRS 9 worked together.
Mar	Trustees	IASB Chairman's Report (AP 7): as for DPOC report referred to above.
		The Conclusions of the March 2011 Trustees' meeting, London referred to
		the fact that the Board Chairman reported progress on the insurance
		contracts project.
Mar	Trustees with	IASB Chairman's Update (March 2011 (AP MB2A): as above.
	Monitoring Board	
Jun	DPOC	General Update (AP 2). Report noted that the Insurance Contracts project
		was not as well advanced as others, decision about next due process
		document to be made Q4.
		The Summary of the Conclusions of the meeting of the DPOC recorded
		that the Committee had reviewed the Board's compliance with its due
1.1	Tauata a suith	process on the insurance contracts project.
Jul	Trustees with Monitoring Board	Report by David Tweedie, Immediate IASB Past Chairman - Quarterly
	WOILDING BOARD	<i>Review</i> (AP MB2, Attachment 3) reported the progress on the project,
Jul	Trustees	noting the challenges in taking it forward. Report by David Tweedie, immediate IASB Past Chairman: Quarterly
Jui	Trustees	Review (AP 8): as above.
Jul	DPOC	General Update (AP 2F): as above.
Oct	Trustees	Report of the IASB Chair (AP 2), also The Technical Agenda (AP 2,
000	in usices	Appendix B): update on the current position of the Insurance Contracts
		project. Noted that the next due process documents were now not due
		until 2012.
		The Summary of the conclusions of the IFRS Foundation Trustees' meeting
		referred to the fact that the Board Chairman reported progress on the
		insurance contracts project.
Oct	DPOC	Due Process Update (AP 3F): as above for Trustees.
2012		

Date	Trustees/DPOC	Paper
Jan	Trustees	Report of the IASB Chair (AP 2). Reiterated that due process documents
		not now expected until at least first half of 2012.
		The Technical Agenda (AP 2, Appendix B): summary of background to the
		project and progress.
		The Summary of the conclusions of the IFRS Foundation Trustees' meeting
		referred to the fact that the Board Chairman reported progress on the
		insurance contracts project, noting the difficulty of the Board and FASB
		seeking to achieve convergence.
Jan	DPOC	Due Process Update (AP 3C). Referred to a due process concern that had
		been raised in December 2011 by the HUB Group – consisting mainly of
		representatives of insurance companies. In essence the letter requested
		that the Boards withdrew staff papers related to discounting of short-
		duration contracts.
		Correspondence with the Hub Global Insurance Group: Accounting for
		short duration insurance contracts (AP 3C, Appendix 1). This set out the e-
		mail submitted by the HUB Group and the response from the Chairman of
		the Board. The Chairman had concluded that he believed that the Board's
		deliberations on short duration contract had been 'extensive, transparent
		and considered' and that it had 'received enough information to reach an
		informed conclusion on the issue. Of course, we will always consider any
		new information that arises'.
Apr	Trustees	Report of the IASB Chair (AP2) and The Technical Agenda (AP 2B). General
, .p.		update on the project. Noted that it had not yet been formally decided if
		the Board would publish an ED or a review draft.
		The Summary of the conclusions of the IFRS Foundation Trustees' meeting
		referred to the fact that the Board Chairman reported progress on the
		insurance contracts project.
Apr	DPOC	Due Process update (AP 3G). As above. Noted that the project continued
I.		to be controversial, with on-going concerns about volatility.
Jul	Trustees with	Report of the IASB Chairman (AP MB3): report on progress on the project
	Monitoring Board	by the Board and FASB. As April, noted that the Board had still to
	Ū	determine whether it should publish another ED or proceed to a final
		Standard.
Jul	Trustees	Report of the IASB Chair (AP 2) and The Technical Agenda (AP 2B): as
		above.
Jul	DPOC	Update on technical activities (AP 4D). As above, noting as well that
		additional input was expected from the IWG meeting held at the end of
		June 2012.
Oct	DPOC (e-mail)	E-mail to DPOC 1 October covering copies of papers to the Board at its
	· · · · ·	September 2012 meeting on whether or not to re-expose the proposals
		on the project and a due process summary.
Oct	Trustees	Report of the IASB Chair (AP2) and The Technical Agenda (AP 2B). Report
		noted that the Board and FASB had reached different decisions on
		important aspects, and this had been complicated by the very different
		starting points on insurance accounting. In September 2012 the Board
		had decided to re-expose its Insurance proposals, seeking feedback on a
		limited range of questions. This was planned for the first half of 2013.
		The FASB would also develop an ED. It was noted that the Board and FASB
		had worked to minimise their differences.
Oct	DPOC	Update on technical activities (AP 3B): as above.
5	5.00	oparte on technical activities (AF 50), as above.

Date	Trustees/DPOC	Paper
		The <i>Report of the DPOC meeting</i> referred to the Committee considering the Board's decision on balance to re-expose the insurance contracts proposals, with questions targeted on the areas of significant change, although the ED would set out the whole draft Standard.
2013		
Jan	Trustees	<i>Technical Projects: Update</i> (AP 2B). Progress update noting that the ED referred to above was planned for issue in the first half of 2013. The <i>Summary of the conclusions of the IFRS Foundation Trustees' meeting</i> referred to the proposal to issue an ED to seek views on five key matters on the project.
Jan	DPOC	Update on Technical Activities (AP 3C(i)): as above.
Apr	Trustees with Monitoring Board	Report of the IASB Chairman (AP MB2): update on progress, with same proposed timescale for the issue of the ED as mentioned in January 2013. Due Process Oversight Activities (AP MB6). Report noted that DPOC had reviewed the progress on this project at its October 2012 meeting, noting then that the Board had decided to re-expose its proposals, with questions targeted on the areas of significant change, and the DPOC noted, with approval, the fuller discussion on re-exposure that had taken place.
Apr	Trustees	Report of the IASB Chair (AP 2) and Technical Projects – Update (AP 2A): as above. The Summary of the conclusions of the IFRS Foundation Trustees' meeting again referred to the proposal to issue an ED to seek views on five key matters on the project.
Apr	DPOC	Technical Projects – Update (AP 3): progress report as above. Permission to ballot a targeted re-exposure draft on accounting for insurance contracts (AP 3A(i)): reproduced the paper presented to the Board in February 2013 regarding the completion of the due process steps for the Insurance Contracts project prior to the publication of the ED. The Report of the DPOC meeting referred to the Committee focusing in particular on the insurance contracts project and the Board's decision on balance to re-exposure the proposals. The DPOC considered the paper to the Board on due process compliance on the project that had been considered at its February 2013 meeting. The DPOC affirmed its view that the Board had complied with all the required due process steps in developing the forthcoming ED.
Jul	Trustees	Report of the IASB Chair (AP 2): referred to publication of ED in June 2013. The Summary of the conclusions of the IFRS Foundation Trustees' meeting referred to the issue of the ED in June 2013 to seek views on five key matters on the project.
lut	DPOC	Technical Projects – update (AP 3B): as above, noting also that the FASB had issued an ED in June 2013. Both EDs had a 120 day comment period with comments due in late October 2013. The Boards planned to discuss the feedback on their EDs at a joint meeting and would then consider the extent to which aspects of those proposals should be jointly redeliberated. The <i>Report of the DPOC meeting</i> referred to the issue of the ED in June 2013 to seek views on five key matters on the project.
Oct	Trustees	Report of the IASB Chair (AP 2): referred to the fact that completing the

Date	Trustees/DPOC	Paper
		Insurance Contracts project would be challenging. The Summary of the conclusions of the IFRS Foundation Trustees' meeting referred to the comment period on the ED coming to an end. There had been a lot off outreach on the proposals, but the views of the industry remained diverse.
Oct	DPOC	Technical Projects – update (AP 3B): report noted that the comment period for the ED ended on 25 October 2013. During the comment period extensive outreach had been undertaken across a broad range of jurisdictions. The Report of the DPOC meeting noted that the Committee had been updated on views received on the ED. The DPOC was informed that a number of major insurance companies had carried out extensive fieldwork on the proposals, which had revealed some significant concerns with regards to volatility and accounting mismatches. The DPOC expressed a view that comments raised such as these needed to receive due consideration.
2014		
Jan	Trustees with Monitoring Board	Report of the IASB Chairman (AP MB3): progress report noted that, in early 2014, the Board would carefully consider how to finalise this Standard in the light of the comments received on the June 2013 ED. The Summary of the conclusions of the IFRS Foundation Trustees' meeting noted that the Trustees had been updated on the project and informed that, while there was a clear need for an Standard on insurance contracts to bring more uniformity around the world and to improve transparency, finalising the Standard would be challenging, given the range of business models currently in place.
Jan	DPOC	<i>Technical Projects—update</i> (AP 3B): progress report noted that 194 comment letters had been received on the 2013 ED, plus extensive outreach had been undertaken across a broad range of jurisdictions. In addition, the Board undertook detailed field work with preparers to test the operationality of the proposals in the ED. <i>Reporting of Outreach and Fieldwork and Correspondence: update</i> (AP 3F) and <i>Insurance contracts: feedback from users of financial statements</i> (AP 3F(i)). Papers referred to a paper summarising the feedback from the Board's outreach with users of financial statements that was presented to its January 2014 meeting, as an example of improvements to the transparency of reporting the Board's activities on outreach and fieldwork. The <i>Report of the DPOC meeting</i> noted that the Committee had been updated on the feedback to the ED.
Apr	Trustees	<i>Report of the IASB Chairman</i> (AP 2): referred to the progress by the Board in redeliberating the proposals in the 2013 ED.
Apr	DPOC	<i>Technical Activities</i> — <i>Update</i> (AP 3B): as above, but in greater detail. Also noted that, in February 2014, the FASB had decided that it would make limited improvements to its existing Standards on insurance contracts rather than continue to develop the model it proposed in its ED. The FASB's revised project would also now be limited to insurance entities as described in existing US GAAP. The <i>Report of the DPOC meeting</i> noted that the Committee had been further updated on the project, including on the FASB's decision as

Date	Trustees/DPOC	Paper
		referred to above.
lut	Trustees	Report of the IASB Chairman (AP 2): progress report, noting that it was currently anticipated that the Board would continue to redeliberate the proposals in the 2013 ED during 2014. The Summary of the conclusions of the IFRS Foundation Trustees' meeting referred to the redeliberations on the 2013 ED proposals and the fact that the most difficult and contentious outstanding issue was the accounting for contracts with participating features.
Jul	DPOC	<i>Technical Activities – Update</i> (AP 3B): as above, but in greater detail. Noted that the Board planned to issue the Standard on Insurance Contracts in 2015. The Board had substantially completed its deliberations on most of the proposals in the 2013 ED. However, the Board was currently considering the most difficult and contentious of the issues on which it sought input, ie those relating to the accounting for contracts with participating features.
Oct	Trustees	Report of the IASB Chairman (AP2): referred again to plan to issue the Standard in 2015, but noted that the Board was still deliberating some difficult and contentious issues. The Summary of the conclusions of the IFRS Foundation Trustees' meeting referred again to the redeliberations on the 2013 ED proposals and the difficulties in seeking to achieve a balance between completing the project and the need to maintain the quality of the Board's decision- making process in dealing with such a challenging issue as the accounting for contracts with participating features.
Oct	DPOC	Technical Activities—Update (AP 3B): progress report provided, noting that during redeliberations, the Board had maintained extensive dialogue with all interested parties and continued to consult its advisory bodies. It had also provided regular updates of project progress on the project page. The Board had also sought advice from the Accounting Standards Advisory Forum (ASAF) at its March, June and September 2014 meetings. The Report of the DPOC meeting noted that the Committee questioned the Board representatives on the diverse views of constituents on the proposals and how the concerns were being considered and reported on by the Board.
2015		
Feb	Trustees with Monitoring Board	Report of the IASB Chairman (AP MB2): noted the progress on the project and referred to the consideration of the accounting model for contracts with participating features as one of the most difficult and contentious of the specific aspects on which the Board had sought feedback.in the 2013 ED. Report noted that a Standard was not expected to be issued before the end of 2015.
Feb	Trustees	The Summary of the conclusions of the IFRS Foundation Trustees' meeting referred to the on-going challenges of the accounting for contracts with participating features, which emphasising the Board's on-going extensive dialogue with all interested parties.
Feb	DPOC	Technical Activities—Update (AP 3B): as above. The Report of the DPOC meeting noted that the Committee was updated on progress. It noted that the DPOC raised the issue of the timing of the finalisation of the Standard on insurance contracts and the effective date of IFRS 9, as it was now clear that the effective date of IFRS 9 would

Date	Trustees/DPOC	Paper
		precede that of the Standard on insurance contracts. The DPOC was
		informed that the Board was considering the issue.
Apr	Trustees	Report of the IASB Chairman (AP 2). Noted that the Board IASB continued
		to consider the accounting model for contracts with participating
		features. The report also noted that noted that entities that issued
		insurance contracts would be significantly affected by both the new
		insurance contracts Standard and IFRS 9, and that the two Standards
		would have different effective dates. The Board was considering ways to
		alleviate the costs that would arise for entities that would be required to
		implement two significant changes in accounting within a short period of time.
Apr	DPOC	Technical Activities: update (AP 3B): as above.
Jun	Trustees	Report of the IASB Chairman (AP 2). As February 2015 report. Report also
Juli	Trustees	referred to the European Financial Reporting Advisory Group's (EFRAG's)
		Draft Endorsement Advice on IFRS 9 that both recommended IFRS 9 for
		endorsement without further delay and indicated EFRAG's preliminary
		view that the European Commission (EC) should ask the Board to defer
		the effective date of IFRS for insurance businesses.
		The Summary of the conclusions of the IFRS Foundation Trustees' meeting
		referred to the on-going redeliberations and engagement with interested
		parties, as well as flagging up the implications of the relationship between
		the new Insurance Contracts Standard and IFRS 9.
Jun	DPOC	<i>Technical Activities—Update</i> (AP 3B): as above, but in greater detail.
		The <i>Report of the DPOC meeting</i> noted that the Committee was updated
		on progress and again considered the interaction between the new
		insurance contracts Standard and IFRS 9 and the fact that entities that issued insurance contracts would be significantly affected by both
		Standards.
Sep	DPOC (e-mail)	E-mail to DPOC 16 September covering a copy of a paper to the Board for
CCP		its September 2015 meeting with a staff recommendation for a proposal
		to amend IFRS 4 to address the possible accounting consequences of the
		application of IFRS 9 prior to the application of the new insurance
		contracts Standard.
Oct	Trustees	Report of the IASB Chairman (AP 2). Progress report noted that the Board
		was planning to complete redeliberations by the end of 2015. Also
		referred to the Board's consideration of the need for further transition
		relief on initial application of the new Insurance Contracts Standard, and
		the planned ED outlining proposals to amend IFRS 4 on both the so-called
		'overlay' and 'deferral' approaches.
		The Summary of the conclusions of the IFRS Foundation Trustees' meeting
Oct	DPOC	referred to the progress on the project, including on the planned ED. <i>Technical Activities: Key Issues and Update</i> (AP 3B): progress report on
		main Insurance Contracts project, as above.
		Different Effective Dates of IFRS 9 Financial Instruments and the new
		Insurance Contracts Standard (AP 3C): paper outlined the progress of the
		planned ED referred to in the Trustees' paper above and seeking the
		DPOC's approved to a shortened comment period for the ED.
		The <i>Report of the DPOC meeting</i> noted that the Committee discussed the
		forthcoming ED. The <i>Report</i> noted that The DPOC was aware that the
		insurance contracts project had been in progress for many years, but took

Date	Trustees/DPOC	Paper
2016		note of the staff's reasoning of the urgency of the issues to be raised in the ED, mainly the fact that with the effective date of IFRS 9 having been set for 2018, entities needed clarity as soon as practicable for their implementation plans. Given this, together with the fact that the proposals would affect a limited range of entities, the DPOC was content to approve a shortened comment period of 60 days.
Jan	Trustees	Report of the IASB Chairman (AP 2). Progress report noting that the ED
5011		referred to above had been published in December 2015. The Summary of the conclusions of the IFRS Foundation Trustees' meeting referred to the fact that, at its January 2016 meeting, the Board completed its planned technical decisions on the project. For its February meeting, the technical staff planned to ask the Board to confirm that it did not need to re-expose the proposed new Standard and – subject to that confirmation – to review the due process steps taken in developing the proposed Standard and to ask the Board for its permission to start the balloting process. The Summary also reported the update provided to the Trustees on the ED addressing the relationship between IFRS 4 and IFRS 9 and their different effective dates.
Jan	DPOC	Insurance Contracts Project: Update (AP 3C): progress report on redeliberations. The DPOC was also presented with a number of draft papers that the technical staff planned to take to the Board at its February 2016 meeting, in particular: a paper setting out the criteria for re-exposure in the <i>Due Process Handbook</i> and the staff's recommendation that re-exposure was not needed; and a paper reviewing all the due process steps that had taken place in developing the proposed new Standard and a request to the Board to give its permission to start the balloting process. The <i>Report of the DPOC meeting</i> noted that the Committee appreciated the opportunity for the DPOC to review the papers and to provide its comments before the papers went to the Board. Given the high profile of the project and controversial nature of at least some of the proposals, the DPOC stressed the importance of the Board having a defensible and credible case for not re-exposing again. In reviewing the position, the DPOC acknowledged that a case had been made for not having another re-exposure. The DPOC acknowledged that the drafting of the Standard would be challenging. The Committee emphasised the need for careful and considered drafting process for the Standard, which would involve preparing drafts for editorial review with external parties as well as preparing an extensive effects analysis, as had been done for the Leases Standard.
Feb	DPOC (e-mail)	E-mail to DPOC 8 February covering the two main papers seen by the Committee in draft at its January 2016 meeting, which were to be included in the papers for the Board at its meeting in February 2016.