



Disclaimer

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Project	Second Comprehensive Review of the IFRS for SMEs Standard					
Paper topic	Online survey feedback s	ummary				
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Purpose of this paper

- The International Accounting Standards Board (Board) published a Request for Information on the comprehensive review of the IFRS for SMEs Standard in January 2020.
- The Request for Information (RFI) was open for comments for 270 days.
- The online survey replicated the questions of the Request for Information.
- The purpose of this paper is to summarise the results of the online survey on the comprehensive review of the IFRS for SMEs Standard to help the SME Implementation Group (SMEIG) to develop recommendations that will enable the Board to decide the project's direction.

Overview of online survey

28 January 2020 Request Online survey published Online survey published Online survey published



 Provide an opportunity to stakeholders who do not have the capacity to submit a comment letter

- **Questions on...**
- A strategic and general framework for the review
- aligning sections of the *IFRS for SMEs* Standard with IFRS Standards
- new topics and other matters related to the IFRS for SMEs Standard

Type of respondent and overall summary

Summary of the online survey:

Part A—Strategic and general questions

Part B—Aligning sections of the IFRS for SMEs Standard with IFRS Standards

Part C—New topics and other matters related to the IFRS for SMEs Standard

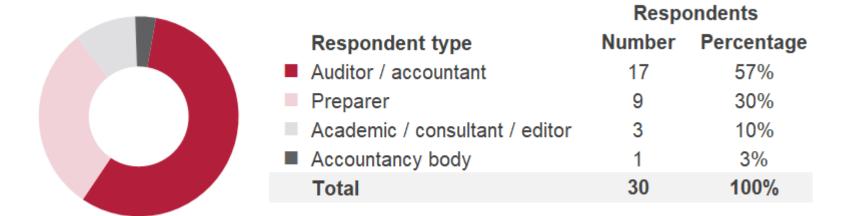
Appendix—List of amendments to IFRS Standards and IFRIC Interpretations

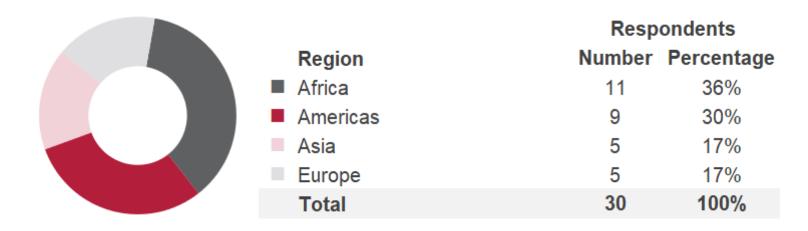




Respondents to the online survey

- 30 online surveys were completed; 21 from individuals and 9 from organisations
- The analysis only includes completed responses
- Respondents are from 24 jurisdictions





Overall summary

- Stakeholders generally agreed that the *IFRS for SMEs* Standard continuing to be based on full IFRS Standards (aligned with full IFRS Standards)
- Many stakeholders recommended the Board consider simplifying the requirements of full IFRS Standards, because preparers of the SME financial statements have a smaller resource pool than entities applying full IFRS Standards









G1—Alignment approach

Alignment is continuing to develop the *IFRS for SMEs* Standard based on the principles and requirements of IFRS Standards

G1A. Should the *IFRS for SMEs* Standard be aligned with full IFRS Standards?

Yes		No	
Respondent	%	Respondent	%
21	70	9	30

Arguments supporting alignment

- Easier for SMEs to migrate to full IFRS Standards
- ✓ IFRS for SMEs Standard should not diverge too much from IFRS Standards

Concerns

- Alignment with recently issued IFRS Standards, such as IFRS 9 and IFRS 16, might add costs and complexity to the IFRS for SMEs Standard
- Does not consider the needs of users of SMEs' financial statements

G1—Extent of alignment

G1B. What extent of	Principles	3	Principles and important definitions definitions, precise work			
alignment is most useful?	Respondent	%	Respondent	%	Respondent	%
ascial:	5	17	17	59	7	24

Arguments supporting alignment

Aligning the principles and important definitions would minimise the divergence between IFRS for SMFs Standard and full IFRS Standards

Concerns

Precise wording is unnecessary and might be inconsistent with the objective of simplifying the requirements in the IFRS for SMEs Standard



"...one of the strengths of the IFRS for SMEs Standard is that it is a simplified version of IFRS Standards, and therefore understandable and recognisable to many users with at least some knowledge of IFRS Standards, but much easier and less costly to use. To diverge too much from this status would mean losing most of the Standard's appeal that this strength brings."

G2—Alignment principles

Cost



Benefit

Relevance

Simplification

Faithful representation

G2. Do the alignment principles provide a framework to assist in determining whether and how the IFRS for SMEs Standard should be aligned with full IFRS Standards?

Yes		No	
Respondent	%	Respondent	%
28	93	2	7

Argument supporting the principles

The principles provide a framework for consistent decisions about aligning the IFRS for SMEs Standard with IFRS Standards

Concerns

The costs could outweigh the benefits of aligning the IFRS for SMEs Standard with IFRS Standards

G3—When to consider alignment

Mixed views

G3.	Which	of	date	do	you
pre	fer?				

Those IFRS Standards, amendments to IFRS Standards and IFRIC Interpretations...

the publicati	issued up to the publication date of the RFI		effective before the publication date of the RFI		with PIR completed before the publication date of the RFI		S
Respondent	%	Respondent	%	Respondent	%	Respondent	%
6	21	4	14	14	48	5	17

Argument supporting the principles

Strike a balance between avoiding undue delay in alignment and allowing sufficient implementation and experience of applying the Standards

Concerns

Post-implementation Reviews are completed a long time after an IFRS Standard is effective and might conclude the IFRS Standard is working as intended—waiting for completion of the Post-implementation Review is unnecessary





S1—Alignment with 2018 Conceptual Framework

SMEIG Agenda ref 3

		Align		Do not alig	n
S1(a). What are your views on aligning Section 2 with the 2018 Conceptual Framework?	/ith	Respondent	%	Respondent	%
the 2010 conceptual Framework.		18	95	1	5

S1(b). What are your views on making appropriate amendments to other sections of the *IFRS for SMEs* Standard?

	Agree
%	Respondent
100	12

S1(c). What are your views on retaining the concept of 'undue cost or effort'?

Retain		Remove	•
Respondent	%	Respondent	%
18	95	1	5

Arguments supporting alignment

- Avoids creating gaps between concepts and principles in the IFRS for SMEs Standard and full IFRS Standards
- The concept of undue cost or effort provides a useful mechanism to balance the costs and benefits of the requirements in the *IFRS* for *SMEs* Standard

S2—Alignment with IFRS 10 Consolidated Financial Statements

SMEIG Agenda ref 3

S2A(a). What are your views on aligning the definition of control in Section 9 with IFRS 10?

Align		Do not ali	gn
Respondent	%	Respondent	%
15	94	1	6

S2A(b). What are your views on retaining and updating paragraph 9.5 (the presumption of control where an entity holds the majority of the voting power) of the *IFRS for SMEs* Standard?

Retain and ι	update	Remove	
Respondent	%	Respondent	%
15	94	1	6

Argument supporting alignment

 Ensures that all entities, regardless of their size, apply the same definition of control, which is a fundamental concept underlying consolidation

Concerns

Benefits would not justify the costs of aligning the definition of control

S2—Alignment with IFRS 10 Consolidated Financial Statements continued

SMEIG Agenda ref 3

S2B. What are your views on not introducing the requirement that investment entities measure investments in subsidiaries at fair value through profit and loss?

Introduce t requireme		Do not intro the requirer	
Respondent	%	Respondent	%
12	75	4	25

Argument supporting the Board's rationale

✓ Few entities eligible to apply the *IFRS for SMEs* Standard are investment entities

Concerns and alternative suggestions

Introducing the requirement for investment entities would align the with full IFRS Standards

S3—Alignment with IFRS 9 *Financial Instruments*: classify financial asset

SMEIG Agenda ref 3

S3A. What are your views on supplementing the list of examples in Section 11 with a principle for classifying financial assets based on their contractual cash flow characteristics?

Agree		Disagree	
Respondent	%	Respondent	%
12	67	6	33

Arguments supporting alignment

✓ The principle supplementing the list of examples would assist SMEs in applying the Standard

Concerns

The principle supplementing the list of examples could introduce complexity



"a principle is better than a list of examples which is not exhaustive."

S3—Alignment with IFRS 9 *Financial Instruments*: impairment

SMEIG Agenda ref 3

S3B. What are your views on aligning the *IFRS for SMEs* Standard with the simplified approach to the impairment of financial assets in IFRS 9?

Align		Do not alig	ın
Respondent	%	Respondent	%
12	71	5	29

Arguments supporting alignment

- ✓ The simplified approach in IFRS 9 is easy to apply and will not lead to undue cost or effort for SMEs
- ✓ Suggestions for provision matrix:
 - remove the requirements to use appropriate groupings of trade receivables if the historical credit loss experience shows significantly different loss patterns for different customer segments
 - allow expected credit loss to be calculate on the total balance of trade receivables rather than by category

Concerns

The expected credit loss model is complex for SMEs to apply

S3C(a). Do you consider Section 12 (Other Financial
Instrument Issues) needs to include requirements on
hedge accounting?

Yes		No	
Respondent	%	Respondent	%
11	69	5	31

S3C(b). If your answer is yes, what are your views on retaining the current requirements to address the needs of entities applying the Standard, rather than aligning Section 12 with IFRS 9?

Retain		Align with IF	RS 9
Respondent	%	Respondent	%
2	17	10	83

Arguments supporting retaining

Hedge accounting is not common for SMEs and current requirements in Section 12 are adequate

Aligning hedge accounting in Section 12 with IFRS 9 might be a challenge

Arguments for alignment

- SMEs may engage in hedging—additional guidance would be helpful.
- ✓ Alignment would improve clarity, comparability and facilitate consolidation with holding companies using full IFRS Standard.
- ✓ IFRS 9 hedge accounting introduced significant improvements, and alignment would provide equivalent improvements, in the IFRS for SMEs Standard.

S3—Fallback to IFRS 9 *Financial Instruments*

SMEIG Agenda ref 3

S3D(a). Are you aware of entities that opt to apply the recognition and measurement requirements of IAS 39 with the disclosure requirements of Sections 11 and 12?

Yes		No	
Respondent	%	Respondent	%
7	47	8	53

S3D(b). What are your views on changing the reference to IAS 39 to permit an entity to opt to apply the recognition and measurement requirements of IFRS 9 and the disclosure requirements of Sections 11 and 12?

Refer to IFRS 9		Retain the reference to	
Respondent	%	Respondent	%
13	93	1	7

Argument supporting updating reference to IFRS 9

✓ Fallback to IFRS 9 will be helpful for holding companies that consolidate subsidiaries that are SMEs



"...given that most entities are now familiar with IFRS 9, the Board should update the fallback to IFRS 9."

S3—Alignment with IFRS 9 *Financial Instruments*: financial guarantee

SMEIG Agenda ref 3

S3E(a). What are your views on adding the definition of a financial guarantee contract from IFRS 9 to the *IFRS for SMEs* Standard?

Yes		No	
Respondent	%	Respondent	%
13	81	3	19

S3E(b). What are your views on aligning the requirements in the *IFRS for SMEs* Standard for issued financial guarantee contracts with IFRS 9?

Align		Do not align	
Respondent	%	Respondent	%
11	79	3	21

Arguments supporting aligning with IFRS 9

Adding the definition of a financial guarantee contract would bring greater clarity to the IFRS for SMEs Standard

✓ Aligning with IFRS 9 will lead to consistent application for financial guarantee contracts treatment with full IFRS Standards

Concerns

IFRS 9 measurement requirements for issued financial guarantee contracts are complex

S4—Alignment with IFRS 11 *Joint Arrangements*

S4(a) What are your views on aligning the definition of joint control in	Align	
S4(a). What are your views on aligning the definition of joint control in Section 15 with IFRS 11?	Respondent	%
	12	100

S4(c). What are your views on retaining the accounting
requirements of Section 15, including the accounting policy
election for jointly controlled entities in Section 15?

Retain		ain Align with IFRS	
Respondent	%	Respondent	%
4	33	8	67

Argument supporting alignment

✓ Reduce divergence between IFRS for SMEs Standard and full IFRS Standards

S4—Alignment with IFRS 11 Joint Arrangements continued

S4(b). What are your views on retaining the categories of joint arrangements: jointly controlled operations, jointly controlled assets and jointly controlled entities?

Retain		Align with IFF	RS 11
Respondent	%	Respondent	%
3	25	9	75

Arguments supporting the Board's rationale

Retaining the categories of joint arrangements will avoid application challenges for SMEs

✓ The current categories of joint arrangement and accounting requirements in Section 15 are simpler than IFRS 11 to apply

Concerns

Aligning the classification of joint arrangements with IFRS 11 will reduce the differences between categories of joint arrangements and increase comparability

S5—Alignment with IFRS 3 Business Combinations (2008)

SMEIG Agenda ref 3

S5A(a). Do you consider Section 19 needs to include
requirements for the accounting for step acquisitions?

Yes		No	
Respondent	%	Respondent	%
11	73	4	27

S5A(b). Should the requirements be aligned	with
IFRS 3?	

Yes		No	
Respondent	%	Respondent	%
11	92	1	8

Argument supporting the Board's rationale

✓ Introducing requirements for the accounting for step acquisitions would fill a gap, because Section 19 currently does not include such requirements

S5—Alignment with IFRS 3 Business Combinations (2008) continued

SMEIG Agenda ref 3

S5B. What are your views on aligning Section 19 with IFRS 3 (2008) for acquisition costs and contingent consideration?

Align		Do not alig	gn
Respondent	%	Respondent	%
11	79	3	21

S5C. What are your views on aligning the *IFRS for SMEs* Standard with the amended definition of a business issued in October 2018?

Align	
Respondent	%
15	100

Arguments supporting the Board's rationale

- ✓ The definition of a business is an important definition. Consistency with the definition of a business in IFRS 3 would reduce any possibility of confusion amongst preparers and users familiar with full IFRS Standards
- ✓ In most cases, alignment would not make a significant difference in effort or cost for acquisition costs or contingent consideration. Alignment would improve comparability not only with entities applying the *IFRS for SMEs* Standard, but also with entities applying IFRS Standards.

S6. What are your views on aligning Section 20 with IFRS 16, with simplifications included (a) simplifying recognition and measurement requirements; (b) retaining the disclosure requirements of Section 20; and (c) simplifying the language?

Align		Do not aliç	gn
Respondent	%	Respondent	%
11	61	7	39

Argument supporting alignment

✓ Leases are important sources of financing for SMEs. Alignment with IFRS 16 would bring uniformity in lease accounting by ensuring that all leases are reflected in the statement of financial position

Concerns

- SMEs applying IFRS 16 would face cost and complexity
- The information needs of users of SMEs' financial statements might differ from those of other users



"Alignment will bring consistency and improvements..."

S7—Alignment with IFRS 15 Revenue from Contracts with Customers

SMEIG Agenda ref 3

S7A. Which of the three alternatives do you prefer for amending Section 23 to align with IFRS 15?

Alternative 1 Modifying Section 23		Alternative 2 Fully rewriting		Alternative 3 Do not to make amendments	
Respondent	%	Respondent	%	Respondent	%
6	38	8	50	2	12

S7B. Should transitional relief be provided?

Continue its current pol	icy within a set time
Respondent	%
14	100

Some support for two possible approaches

- ✓ Alternative 1 would minimise the work needed by SMEs in making the transition to an approach that reflects the principles of IFRS 15
- ✓ Alternative 2 would be more efficient given the fundamentally different approach to revenue recognition introduced by IFRS 15

Concerns and alternative suggestions

Include illustrative examples that form part of the Standard



"...given that for many straightforward contracts IFRS 15 has little, if any, effect on the amount and timing of revenue recognition, the Board should be fully rewriting Section 23"

S8—Alignment with IAS 19 *Employee Benefits* (2011)

SMEIG Agenda ref 3

S8. What are your views on aligning Section 28 with the 2011 amendments to IAS 19 only in respect of the recognition requirements for termination benefits?

Align		Do not ali	gn
Respondent	%	Respondent	%
8	89	1	11

Argument supporting the Board's rationale

 Alignment would provide clear guidance on termination benefit recognition, which helps faithful representation

S9—Alignment with IFRS 13 Fair Value Measurement

SMEIG Agenda ref 3

S9(a). What are your views on aligning the definition of fair value in the *IFRS for SMEs* Standard with IFRS 13?

Align		Do not alig	ın
Respondent %		Respondent	%
10	77	3	23

S9(b). What are your views on aligning the guidance on the principles of the fair value hierarchy set out in IFRS 13?

Align		Do not align	
Respondent	%	Respondent	%
10	77	3	23

Argument supporting alignment

✓ Aligning the guidance on fair value with IFRS 13 would minimise divergence and ensure comparability with full IFRS Standards

Alternative suggestion

× Simplify the language

S9—Alignment with IFRS 13 Fair Value Measurement continued

SMEIG Agenda ref 3

	Agree	
S9(c). What are your views on including examples that illustrate how to apply the hierarchy?	Respondent	%
	11	100

S9(d). What are your views on moving the guidance and
related disclosure requirements to Section 2?

Agree		Disagree	
Respondent	%	Respondent	%
8	67	4	33

Arguments supporting the Board's rationale

- ✓ Examples would support the correct applications of the *IFRS for SMEs* Standards
- ✓ Moving to Section 2 would streamline the guidance making it easier to understand

Table A1
6 responses

Align

- 5 respondents agree with alignment
- 1 respondent disagreed with aligning with *Agriculture: Bearer Plants* (Amendments to IAS 16 and IAS 41), because bearer plants are not similar to property, plant and equipment

2

Table A2

7 responses

Leave unchanged

- 4 respondents agree to leave the IFRS for SMEs Standard unchanged.
- 2 respondents agree to leave the *IFRS for SMEs* Standard unchanged for some but not all
- 1 respondents agrees with alignment for all the amendments



^{*} Appendix groups the amendments to IFRS Standards and IFRIC Interpretations that the Board seek views on aligning the *IFRS for SMEs* Standard, leaving *the IFRS for SMEs* Standard unchanged and request further information.

S10—Alignment with amendments to IFRS Standards and IFRIC Interpretations

SMEIG Agenda ref 3

3

Table A3

7 responses

Request further information

Annual Improvement to IAS 40:

4 respondents support alignment,

1 respondent disagrees, because it could introduce complexity

• IFRIC 21:

5 respondents support alignment

• IFRIC 22:

5 respondents support alignment

• IFRIC 23:

7 respondents support alignment

Amendments to IAS 12:

5 respondents support alignment





N1—Alignment with IFRS 14 Regulatory Deferral Accounts

SMEIG Agenda ref 3

N1. What are your views on not aligning the *IFRS for SMEs* Standard with IFRS 14, that is, not including requirements for regulatory deferral account balances in the IFRS for SMEs Standard?

Align		Do not align	
Respondent	%	Respondent	%
5	38	8	62

Arguments supporting the Board's rationale

- The Board has an active project on Rate-regulated Activities which could lead to the replacement of IFRS 14
- This topic is not relevant to many SMEs

N2—Cryptocurrency

N2. Are holdings of cryptocurrency and issues of cryptoassets prevalent (that is, are there material holdings among entities eligible to apply the *IFRS for SMEs* Standard) in your jurisdiction?

Yes		No	
Respondent	%	Respondent	%
4	27	11	73

Argument supporting to address the topic

 Cryptocurrencies might become prevalent in the future

Other comments

Some entities do not disclose holdings of cryptocurrency because they are not required to do so

N3—Defined benefit plans

N3A. Are you aware of entities applying the simplifications allowed by paragraph 28.19 of the *IFRS* for *SMEs* Standard?

Yes		No	
Respondent	%	Respondent	%
6	50	6	50

N3B. If so, are you aware of difficulties arising in applying the simplifications?

Yes		No	
Respondent	%	Respondent	%
3	30	7	70

*Respondents who mention they are aware of difficulties arising in applying the simplifications did not provide details about the difficulties

Topics not addressed

1

Assets held for sale and discontinued operations

- Provide more illustrative examples
- IFRS for SMEs Standard does not include detailed requirements on asset held for sale and discontinued operations

2

Government grants

- Align Section 24 Government Grants with IAS 20 Accounting for Government Grants
- Provide an option to apply either Section 24 or IAS 20
- Concerns about lack of comparability with full IFRS Standards and inconsistency with the definition of income and expense
- Entities applying IFRS for SMEs Standard have a significant increase of current income tax expense in the tax period when grant income is recognised

3

Borrowing Costs and Research & Development costs

 Suggestion to provide an option to capitalise borrowing costs on qualifying assets and research and development costs. Adding this option will ease the consolidation process of SMEs with a holding company that applies IFRS Standards. Title of the Standard

• Change title of the Standard to 'private entities', 'non-publicly accountable', or 'non-public interest entities'

Scope

• Extend the scope of the *IFRS for SMEs* Standard to permit credit unions, pension plans and other similar financial institutions to apply the Standard

Complexity

• Simplification is important for SMEs to avoid complexity

Micro-sized entities

The need for a separate Standard for micro-sized entities

- Not-for-profit organisations
- Suggestion to add a section in the IFRS for SMEs Standard for not-for-profit organisations





Feedback comparison of comment letters and the online survey

SMEIG Agenda ref 3

Most feedback on the comment letter and online survey has consistent views.

Views diverged about...

- alignment of the requirement on hedge accounting and financial guarantee contracts:
 - more respondents submitting a comment letter than online survey respondents agree with retaining the current requirement on the hedge accounting
 - more respondents to the online survey than comment letter respondents agree with aligning the requirements for financial guarantee with IFRS 9
- retaining the categories and accounting requirements of joints arrangements:
 - more respondents to the comment letter than online survey respondents agree with retaining the categories for joint arrangements

The reason for the divergence might be the composition of respondents:

- more preparers responded to the online survey than submitted a comment letter
- no accountancy bodies or national standard-setters responded to the online survey

Thank you

- The Board appreciates the engagement by stakeholders who responded to the online survey.
- The Board would also like to thank SMEIG members for promoting the online survey in their jurisdictions.





Amendments to IFRS Standards (1 of 3)

Board is seeking views on aligning the IFRS for SMEs Standard with ...

Definition of Material (Amendments to IAS 1 and IAS 8)

Disclosure Initiative (Amendments to IAS 7)

Transfers of Investment Property (Amendments to IAS 40)

Clarification of Acceptable Methods of Depreciation and Amortisation (Amendments to IAS 16 and IAS 38)

Annual Improvements to IFRSs 2010–2012 Cycle (IFRS 2)

Classification and Measurement of Share-based Payment Transactions (Amendments to IFRS 2)

Agriculture: Bearer Plants (Amendments to IAS 16 and IAS 41)

Board is seeking views on leaving the IFRS for SMEs Standard unchanged with regard to ...

Disclosure Initiative (Amendments to IAS 1)

Recoverable Amount Disclosures for Non-Financial Assets (Amendments to IAS 36)

Applying IFRS 9 Financial Instruments with IFRS 4 Insurance Contracts

Consolidated Financial Statements, Joint Arrangements and Disclosure of Interests in Other Entities: Transition Guidance (Amendments to IFRS 10, IFRS 11 and IFRS 12)

Annual Improvements to IFRS Standards 2012–2014 Cycle (IFRS 7)

Annual Improvements to IFRS Standards 2014–2016 Cycle (IFRS 12)

Annual Improvements to IFRS Standards 2015–2017 Cycle (IAS 12)

Novation of Derivatives and Continuation of Hedge Accounting (Amendments to IAS 39)

Sale or Contribution of Assets between an Investor and its Associate or Joint Venture (Amendments to IFRS 10 and IAS 28)

Amendments to IFRS Standards (3 of 3)

Board is seeking views on leaving the IFRS for SMEs Standard unchanged with regard to ...

Consolidated Financial Statements, Joint Arrangements and Disclosure of Interests in Other Entities: Transition Guidance (Amendments to IFRS 10, IFRS 11 and IFRS 12)

Annual Improvements to IFRSs 2010–2012 Cycle (IAS 38)

Effective Date of IFRS 15

Defined Benefit Plans: Employee Contributions (Amendments to IAS 19)

Plan Amendment, Curtailment or Settlement (Amendment to IAS 19)

Annual Improvements to IFRSs 2011–2013 Cycle (IFRS 1)

Annual Improvements to IFRS Standards 2014–2016 Cycle (IFRS 1)

Amendments to IFRS Standards and IFRIC Interpretations

Board is requesting further information on whether to align the IFRS for SMEs Standard with ...

Annual Improvements to IFRSs 2011–2013 Cycle (IAS 40)

IFRIC 21 Levies

IFRIC 22 Foreign Currency Transactions and Advance Consideration

IFRIC 23 Uncertainty over Income Tax Treatments

Recognition of Deferred Tax Assets for Unrealised Losses (Amendments to IAS 12)

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