

Post-implementation review of IFRS 9—Classification and Measurement

Phase 1—identifying matters to be examined

Accounting Standards Advisory Forum meeting

ASAF Agenda Paper 4
March 2021

Purpose of this session

Agenda ref 4

Purpose

- Ask ASAF members to share their views on the overall experience of applying IFRS 9 in their jurisdiction and prioritise matters they think should be considered by the IASB in the post-implementation review (PIR) of the classification and measurement requirements in IFRS 9

Questions for ASAF members

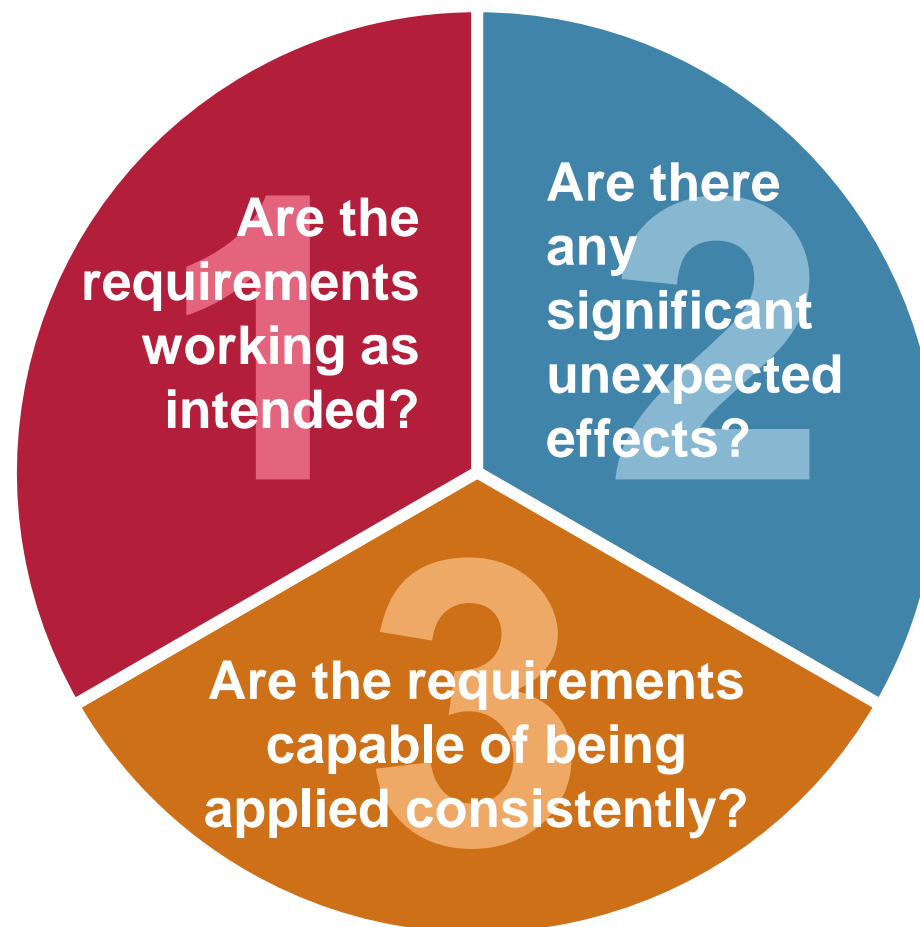
❓ See **three questions** on the next slide

ℹ Slides 6–11 provide background information. Slides 12–26 include detailed information and questions on six areas of the classification and measurement requirements. We do not expect ASAF members to answer all of those detailed questions at this meeting. The purpose of those questions is to support ASAF members in gathering information in advance of this meeting and to act as focus points for the further outreach we will carry out over the coming months

Questions for ASAF members

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- Have the requirements resolved the issues they were designed to address?
- Is the resulting information useful to investors?
- Are the requirements responsive to market changes? (eg changes in economic conditions or new products)

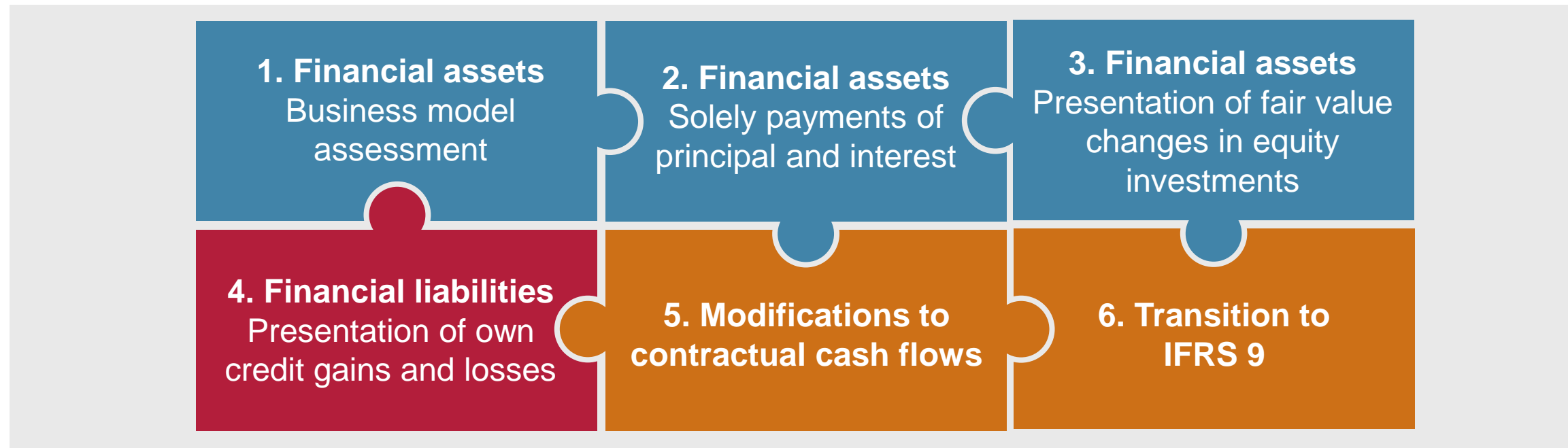


- Do actual effects differ from the expected effects set out in the Effects Analysis?
- Have there been any significant effects (positive or negative) that were not identified in the Effects Analysis?
- What can we learn from the effects?

- Are the requirements sufficiently detailed?
- If diversity in practice exists, what is the cause and what is the effect?

Classification and measurement—topic areas

Agenda ref 4



Note

When responding to the questions on slide 3, please specify which of these six areas of the requirements your feedback relates to

Slides 12–26 provide an overview of the requirements for each of these areas

Supporting material

Agenda ref 4

| | Slides |
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| Background | 6 |
| Overview of IFRS 9, classification and measurement, and post-issuance activities | 7–9 |
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| 4. Financial liabilities—presentation of own credit gains and losses | 22–23 |
| 5. Modifications to contractual cash flows | 24 |
| 6. Transition to IFRS 9 | 25–26 |

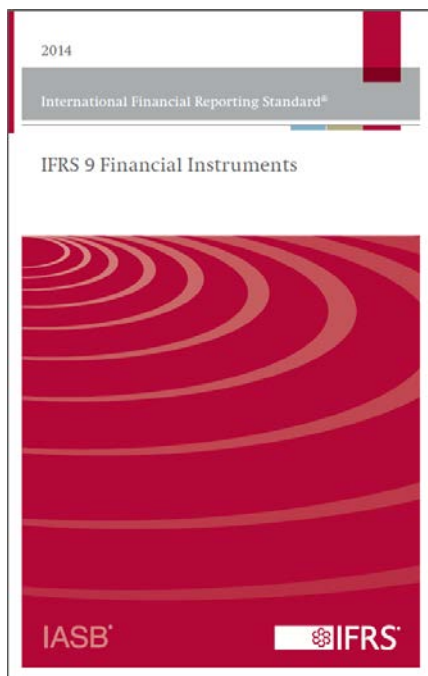
The background of the slide is a dark gray color. On the left side, there is a stylized world map in a lighter gray tone. Overlaid on the map are several curved, concentric lines that sweep from the bottom left towards the center. These lines include both solid and dotted patterns. The word "Background" is written in a clean, white, sans-serif font on the right side of the slide.

Background

IFRS 9 *Financial Instruments*

Agenda ref 4

- Effective for annual reporting periods beginning on or after 1 January 2018
- Improved and simplified accounting that replaced IAS 39
- First stage of post-implementation review starting now (classification and measurement)



Classification and measurement

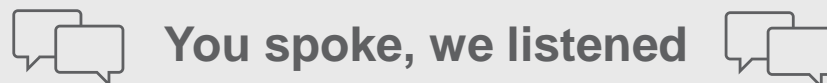
A single logical classification approach driven by contractual cash flow characteristics and how the instrument is managed

Impairment

A much needed and strongly supported forward-looking 'expected loss' model

Hedge accounting

An improved and widely welcomed model that better aligns accounting with risk management



IFRS 9 responded to the many application issues that arose from the IAS 39 classification and measurement requirements and gives investors better information about the amounts, timing and uncertainty of cash flows

Issues with IAS 39

Rule-based classification

Complex and difficult to apply

Own credit gains and losses recognised in profit or loss for fair value option (FVO) liabilities

Complicated reclassification rules

Solutions in IFRS 9

Principle-based classification

Logical approach based on business model and nature of contractual cash flows

Own credit gains and losses presented in OCI for FVO liabilities

Business model-driven reclassification

IASB activities since IFRS 9 was issued

Agenda ref 4



A solid foundation for the PIR



The IASB has put significant efforts into monitoring and supporting the implementation of IFRS 9. The information gathered through all our activities since IFRS 9 was issued provides a solid foundation on which to start the post-implementation review.

Here are just some examples of what we have been doing:

Since IFRS 9 was issued



Provided educational materials such as articles and webcasts



Amended IFRS 9 for prepayment features with negative compensation



Analysed application questions at the IFRS Interpretations Committee



Established a Transition Resource Group for impairment

Most recently

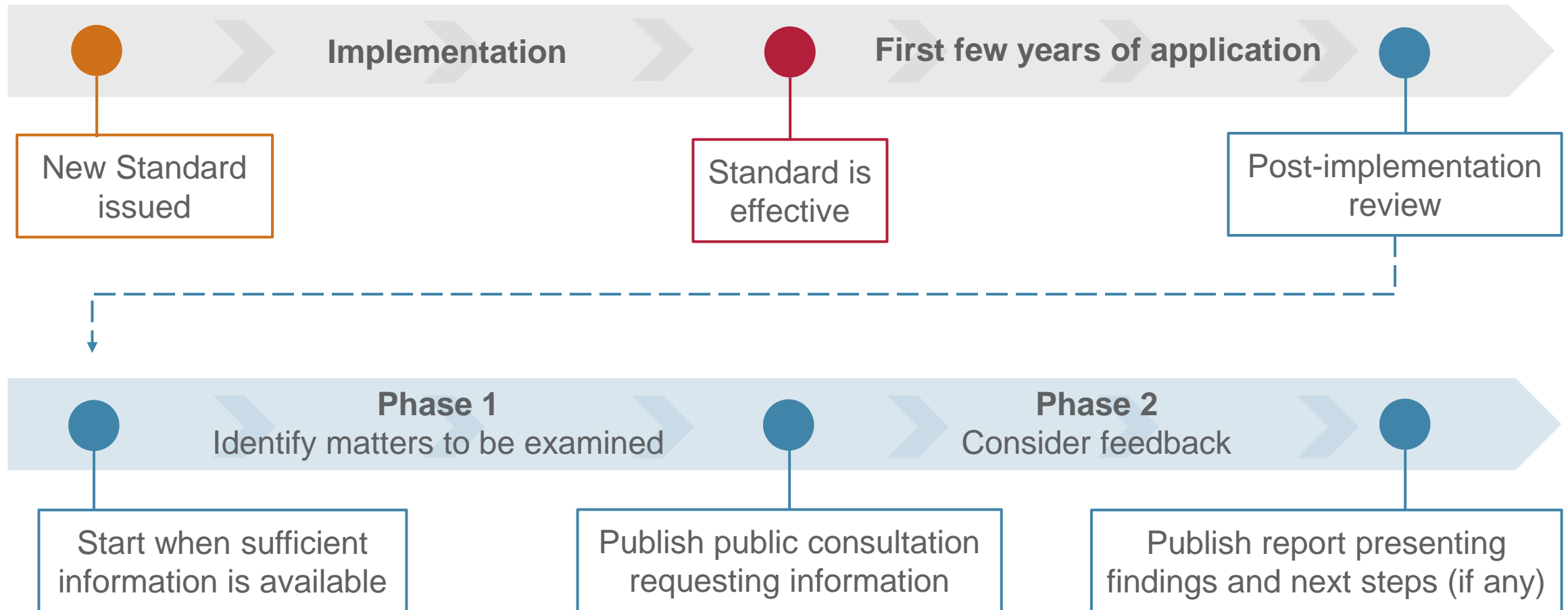


Amended IFRS 9 for IBOR Reform and its effect on financial reporting



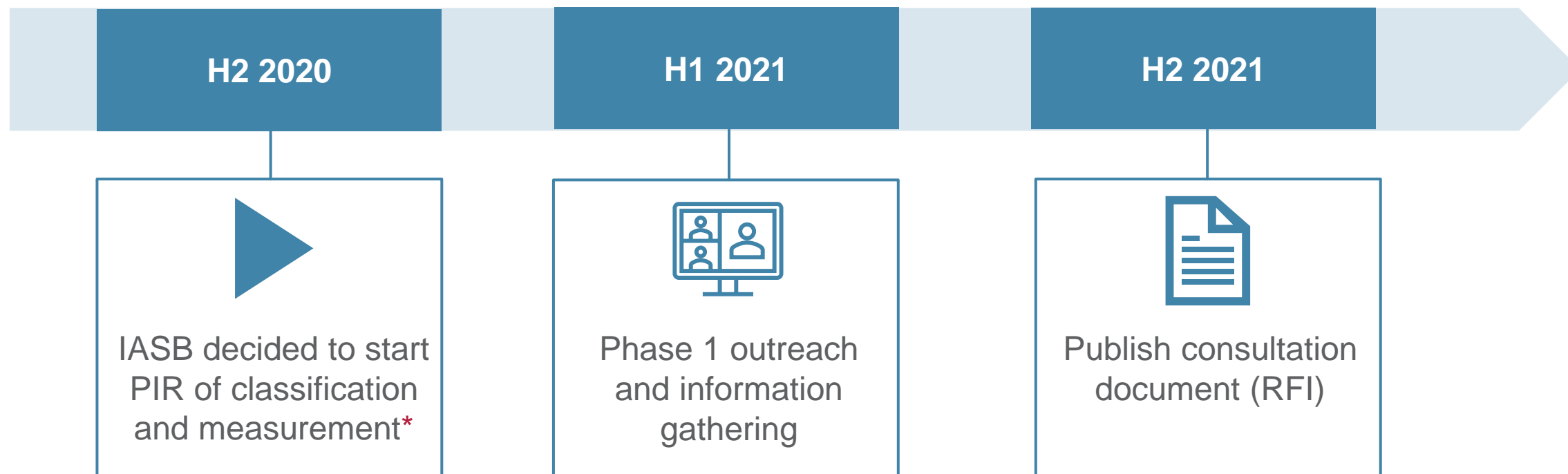
Provided educational material on applying IFRS 9 in the light of coronavirus uncertainty

PIR—what is the process?



PIR—where in the process are we?

Agenda ref 4



* In H2 2020 the IASB concluded more time was needed for it to have sufficient information to start the PIR of the impairment and hedge accounting requirements

A grayscale world map is the background. Overlaid on the map are several thick, light gray curved lines that sweep across the continents. Additionally, there are dotted lines forming a grid-like pattern across the map, suggesting latitude and longitude.

Detailed information and
questions to support
outreach

1. Financial assets—business model assessment

Agenda ref 4

| | | | | |
|---|-------|-----------------|------------------------|-------|
| Classification of debt financial assets | | Business model | | |
| | | Hold to collect | Hold to collect & sell | Other |
| Cash flows | SPPI | Amortised cost* | FVOCI* | FVPL |
| | Other | FVPL | FVPL | FVPL |

*Irrevocable option to designate at FVPL if doing so eliminates or significantly reduces an accounting mismatch

- The business model is a matter of fact and not merely an assertion or management’s intention for an individual instrument
- Sales information is considered but does not in isolation determine the business model

The business model is:

- typically observed through activities undertaken (eg business plans, manager compensation)
- determined at a level that reflects how financial assets are managed

1. Financial assets—business model assessment

Distinction between business models

Agenda ref 4

Background

- The business model assessment aligns the measurement of financial assets with the way the entity manages those assets to realise contractual cash flows (ie from collecting contractual cash flows, selling financial assets or both)
- The business model provides information that is useful in assessing the amounts, timing and uncertainty of the entity's future cash flows
- There are no 'bright lines' between the different business models in IFRS 9, rather an entity needs to consider all relevant evidence available to make the assessment

Outreach questions

- Is the distinction between the different business models in IFRS 9 clear?
- Are the requirements and application guidance to determine the business model capable of being applied consistently?
- Does the business model assessment achieve the IASB's intention of aligning measurement with the way the entity manages financial assets to realise contractual cash flows?

1. Financial assets—business model assessment

Reclassification after initial recognition

Agenda ref 4

Background

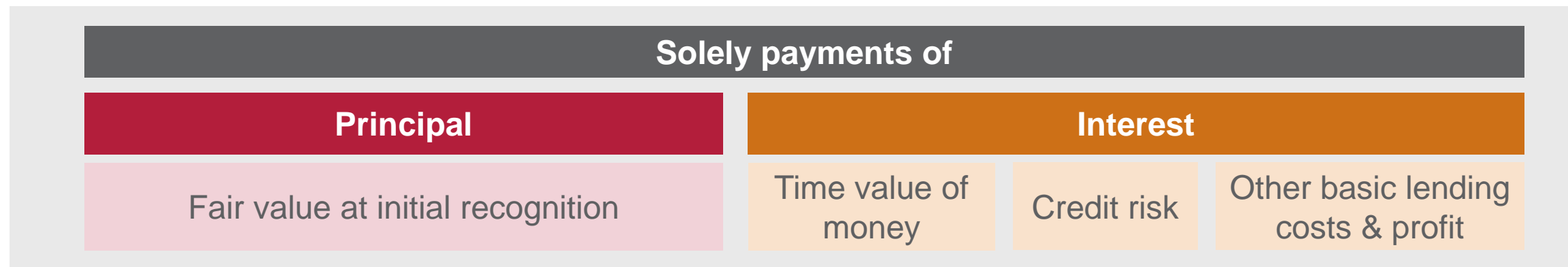
- Users of financial statements questioned the usefulness of information about reclassifications in IAS 39 and expressed concern that opportunistic reclassification could be used to manage earnings
- The IASB considered prohibiting reclassification completely, but decided to limit reclassification to changes in business model only. The IASB expected events leading to changes in business model to be rare and significant enough to be demonstrable to external parties
- Reclassification when there is a change in business model ensures that information is provided that is useful to users in predicting likely actual cash flows

Outreach questions

- How frequent and in what circumstances have financial assets been reclassified due to a change in business model?
- Is the information disclosed about reclassification both useful and sufficient for users to understand the reason for the reclassification and the effect?

2. Financial assets—SPPI

Agenda ref 4



- Only debt financial assets with cash flows that are solely payments of principal and interest (SPPI) are eligible for measurement at amortised cost or FVOCI
- IFRS 9 provides extensive guidance on assessing whether contractual cash flows are SPPI
- For cash flows to be SPPI they must not introduce exposure to risks that are not consistent with a basic lending arrangement
- Often it is apparent whether cash flows are SPPI but sometimes closer analysis is required

2. Financial assets—SPPI

Scope

Agenda ref 4

Background

- Amortised cost is a simple measurement approach for contractual cash flows that are SPPI
- Fair value measurement reflects the amount, timing and uncertainty of more complex cash flows arising from contractual features other than basic lending features
- The SPPI requirement draws a line between contractual cash flows for which amortised cost provides useful information and those for which it does not
- Some contracts might commonly be considered ‘vanilla’ but include features with cash flows that are not SPPI

Outreach questions

- Is the SPPI requirement appropriate to define financial assets for which amortised cost measurement provides useful information?
- Is there sufficient and appropriate application guidance in IFRS 9 for the SPPI requirement to be applied consistently in the light of market developments since IFRS 9 was issued?

2. Financial assets—SPPI

Contractually linked instruments

Agenda ref 4

Background

- In some types of transactions an issuer may prioritise payments to the holders of financial assets using multiple contractually linked instruments (CLIs) that create concentrations of credit risk (tranches)
- IFRS 9 provides guidance on assessing whether each tranche has contractual cash flows that are SPPI
- Some stakeholders have said they find the guidance in IFRS 9 on assessing whether contractually linked instruments are SPPI limited and unclear

Outreach questions

- Is there sufficient application guidance in IFRS 9 to:
 - a. determine the scope of financial instruments that are within the scope of the CLI requirements; and
 - b. apply the requirements consistently?

3. Financial assets—equity investments

| | | |
|--|-------------------------|-------------------------------------|
| Presentation of fair value changes in equity investments | Most equity investments | Election in specified circumstances |
| | P&L | OCI |

- Equity investments are measured at fair value because they have cash flows that are not SPPI
- The default in IFRS 9 is to recognise changes in fair value in P&L
- In some specific circumstances an entity can irrevocably elect to present fair value changes in OCI (election at initial recognition and on an instrument-by-instrument basis)
- To be eligible the investment must be equity as defined in IAS 32 and not held for trading
- If an entity presents fair value changes in OCI, dividends continue to be recognised in P&L, gains and losses recognised in OCI are not ‘recycled’ to P&L on sale of the investment, and there is no impairment test



For more information on IFRS 9 and equity investments read our article [here](#)



3. Financial assets—equity investments

Recognition of fair value changes in P&L

Agenda ref 4

Background

- In the IASB's view, if an equity investment and changes in its value are relevant to an entity's performance, the most useful information about that investment is provided by measuring the investment at fair value through profit or loss
- Recognising fair value changes in P&L reflects the economic reality of the nature, timing and uncertainty of future cash flows
- Some stakeholders continue to express concern that recognising fair value changes in P&L does not reflect the business model of a long-term investor

Outreach questions

- Are the requirements for equity investments clear and capable of being applied consistently?
- Do users of financial statements find the information in P&L about changes in fair value of equity investments held by an entity that is a long-term investor useful in understanding the entity's performance?

3. Financial assets—equity investments

Option to present fair value changes in OCI

Agenda ref 4

Background

- The option to present fair value changes in OCI for equity investments was created for unusual cases in which changes in fair value of an equity investment may not be indicative of the entity's performance, for example when the entity holds the investment for strategic reasons (eg to strengthen a business relationship)
- Gains and losses recognised in OCI on such investments are not recycled to P&L—even on sale of the investment—because those gains and losses are not part of the entity's performance
- Some stakeholders suggest the IASB amend IFRS 9 to require recycling of such gains and losses, similar to the AFS category in IAS 39

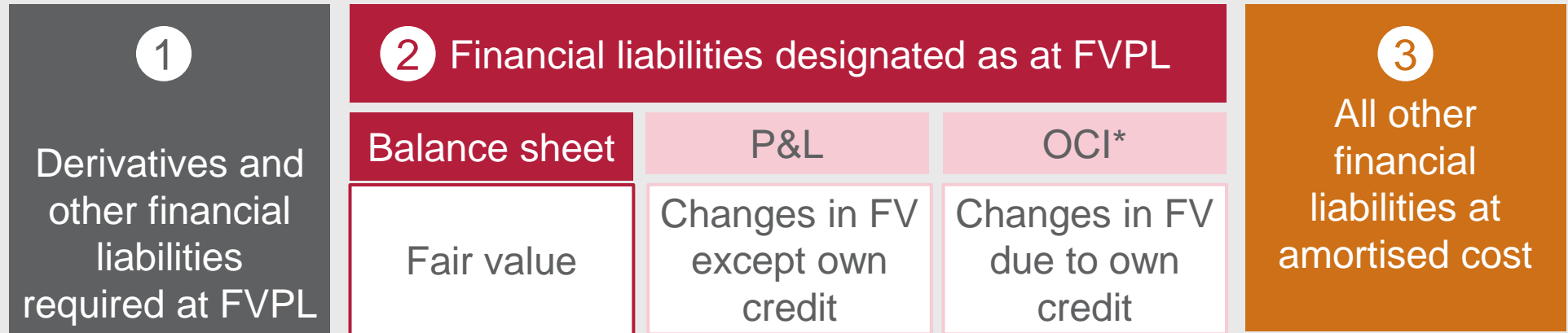
Outreach questions

- What is the significance and characteristics of the investments affected by the removal of the AFS category for equity investments?
- How has this affected entities' investment decisions (ie nature and type of investment?)
- How prevalent is the use of the FVOCI presentation election?
- How do investors respond to choices made?

4. Financial liabilities—own credit gains and losses

Agenda ref 4

Classification of financial liabilities



*An exception requires recognition in P&L if recognition in OCI would create or enlarge an accounting mismatch

- Financial liability accounting essentially unchanged from IAS 39, except for own credit on financial liabilities designated under the fair value option
- For those financial liabilities gains and losses arising from changes in fair value due to change in own credit risk are presented in OCI

4. Financial liabilities—own credit gains and losses

Presenting own credit gains and losses in OCI

Agenda ref 4

Background

- The fair value of an entity's own debt is affected by changes in the entity's own credit risk. This means when an entity's credit quality declines, the value of its liabilities fall resulting in the recognition of a gain (and vice versa) if the liability is designated as measured at fair value
- When developing IFRS 9, the IASB conducted extensive outreach on how best to address the effects of changes in the fair value of a financial liability caused by changes in own credit risk. Primary feedback from users indicated that effects of changes in a liability's credit risk should not affect P&L unless the liability is held for trading
- IFRS 9 requires changes in own credit to be presented in OCI

Outreach questions

- Is the scope of financial liabilities for which own credit gains or losses are presented in OCI, appropriate?

5. Modifications to contractual cash flows

Agenda ref 4

Modifications to contractual cash flows—financial assets and financial liabilities

If derecognition criteria met

Derecognise

If derecognition criteria not met

Recalculate gross carrying amount and recognise adjustment in P&L

Background

- When finalising the IBOR amendment, the IASB noted inconsistency in the wording used to describe what is a modification for financial assets and financial liabilities
- If different entities consider different factors in assessing whether there has been a modification, this could result in entities applying different accounting treatments to the same situations

Outreach questions

- Are the modification requirements and application guidance capable of being applied consistently?
- Are you aware of any diversity in practice in the application of the modification requirements to financial assets and financial liabilities?

6. Transition to IFRS 9

Classification and measurement

Applied retrospectively to determine opening balances in first set of IFRS 9 financial statements*



Apply IFRS 9 going forward

Date of initial application

* With some transition reliefs and exceptions (see below)

- Business model assessment performed at date of initial application
- SPPI assessment performed based on contractual cash flows at initial recognition. However, relief given for some aspects of the SPPI assessment if retrospective application is impracticable
- Specific requirements and permissions for designating debt financial assets at FVPL, equity investments at FVOCI and financial liabilities at FVPL, and revoking previous designations
- Some other specific requirements and reliefs

6. Transition to IFRS 9

Background

- When developing IFRS 9, the IASB considered the difficulties and associated costs of retrospective application of the classification and measurement requirements
- Whilst most stakeholders agreed that in principle retrospective application provides the best information, many questioned the practicability and noted a need for extensive reliefs
- The IASB considered requiring prospective application, but ultimately decided the best balance was achieved by requiring retrospective application with reliefs to address particular difficulties. The IASB also decided not to require restatement of comparative information, but to instead require extensive transition disclosures

Outreach questions

- Did entities face significant challenges applying classification and measurement retrospectively? Why? How did they overcome those challenges?
- What additional relief could have helped entities without significantly reducing the benefit of retrospective application?
- Did the combination of the relief from restating comparative information and the requirement for extensive transition disclosures achieve an appropriate balance between reducing difficulties and associated costs for entities and providing useful information for users?

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