IFRS Accounting

Staff paper

Agenda reference: 27B

IASB® meeting

Date	**February 2024**
Project	**Post-implementation Review of IFRS 9—Impairment**
Topic	**Feedback analysis—Significant Increases in Credit Risk**
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Introduction

1. The purpose of this paper is to analyse feedback received on the requirements in IFRS 9 *Financial Instruments* for determining significant increases in credit risk (SICR), in response to the Request for Information Post-implementation Review of IFRS 9—Impairment (the RFI).

2. This paper provides:

   (a) a summary of staff recommendation and question for the IASB;

   (b) a summary of feedback and staff analysis of that feedback; and

   (c) staff assessment of whether to take action in response to feedback.

Summary of staff recommendation

3. Based on the analysis in this paper, we recommend the IASB does not take any further action on the matters identified with regards to requirements for determining SICR.

Question for IASB

Question for IASB
Do IASB members agree with the staff recommendation in paragraph 3 of this paper to not take any further action on the matters identified with regards to the requirements in IFRS 9 for determining SICR?

Feedback

Overview of feedback

4. Almost all respondents supported the principles-based approach to assessing whether significant increases in credit risk occurred and said that there are no fundamental questions (fatal flaws) with the requirements. They said that the approach generally works as intended, including in times of uncertainty such as covid-19 pandemic.

5. Many preparers who commented on this topic said that the principles allow them to align the SICR approaches to credit risk stewardship, reflecting expectations about economic losses, which ultimately result in useful information. Similarly, because IFRS 9 does not prescribe methods for assessing SICR, entities are able to tailor the approaches they use based on the characteristics of instruments, industries they operate in and the level of sophistication of entity's credit risk management practices. In their view, applying judgement is necessary and varying practices are also inherent in the alignment between accounting and credit risk management practices. They therefore consider that without that alignment, the benefits of any comparability achieved would be limited.

6. In contrast, many respondents (prudential and securities regulators, some standard-setters and accounting firms) said that despite the principles and related guidance in IFRS 9, requirements are not applied consistently, and the varying practices are not always justified by differences in how entities manage credit risk. They highlighted

the consequences of this diversity—ie seemingly similar financial instruments allocated to different ECL stages and different loss amounts being recognised by different entities for those instruments.

7. To support a more consistent and robust application of the requirements, some of these respondents said the IASB should consider providing further application guidance or illustrative examples. Others shared the view that maintaining principles-based requirements and enabling entities to align the SICR assessment to their own credit risk management practices will inevitably lead to diversity in practice. Instead, they expressed a preference for improving the disclosures about the approaches entities use and judgements they make in determining what constitutes a significant increase in credit risk.

8. However, most respondents, including some who suggested the IASB add further application guidance, asked the IASB to carefully consider the incremental benefits of any potential standard-setting in this area. In their view, determining SICR is a key concept of the ECL model and entities have developed accounting policies, so amendments could lead to disruption in practice. They also cautioned against introducing prescriptive rules that might create 'bright lines' in attempts to improve comparability.

Varying practices in determining SICR

9. Prudential and securities regulators provided examples of the varying practices on SICR assessment which might ultimately delay the recognition of lifetime ECL:[1]

    (a) setting arbitrarily high thresholds for the risk of default occurring, for example, above the levels used to inform risk management (such as determining watchlist or special mention assets, pricing, or capital planning).

[1] Similar findings were also reported in the academic literature review, set out in Agenda Paper 27C of this IASB meeting.

(b) relaxing/changing the thresholds used to assess SICR for portfolios on which credit quality is likely to deteriorate, thereby avoiding or delaying recognition of lifetime ECL.

(c) using a combination of absolute and relative levels of credit risk as thresholds to assess SICR, so that recognition of lifetime ECL is delayed until both sets of thresholds are met.

10. Many respondents made general suggestions for additional application guidance or illustrative examples to support a more consistent assessment of 'significance' in the context of determining SICR. Only some however identified specific areas:

(a) *objective of determining SICR*. An accounting firm said the IASB should articulate more clearly the objective of the SICR assessment, which might assist entities in developing qualitative SICR approaches. However, no specific suggestions were made about what those improvements might be.

(b) *absolute level of credit risk*. A few respondents suggested the IASB reconsider whether an approach based on absolute changes in credit risk, in combination with the current relative approach, could result in better comparability. In this context, two respondents asked whether the term 'maximum credit risk' mentioned in paragraph BC5.161 of the Basis for Conclusions on IFRS 9 implies the use of the absolute level of credit risk is acceptable for assessing SICR.

(c) *counterparty assessment of SICR*. A few respondents were concerned that different ECL amounts (eg 12-month ECL for one instrument and lifetime ECL for others) are recognised for financial instruments held with the same counterparty. They noted that this outcome is because IFRS 9 requires that the SICR assessment is performed at the financial instrument level, and not at the counterparty, level. Furthermore, a standard-setter from Asia added that some entities assess changes in credit risk at the counterparty level for credit risk management purposes, suggesting that the IASB add guidance on how those entities can use that information to comply with IFRS 9.

(d) *low credit risk exemption*. A few preparers said that regulators or auditors generally discourage the use of the 'low credit risk' exemption in paragraph 5.5.10 of IFRS 9. This exemption allows an entity to not recognise lifetime ECL for financial instruments with a low risk of default. These respondents suggested the IASB clarify the scope of the exemption, so that it can be applied to different types of financial instruments.[2]

11. Respondents shared mixed views on the fact that IFRS 9 does not define default:

(a) a few respondents expressed concerns that the absence of prescriptive guidance creates application challenges and results in inconsistent application. They made a general suggestion for the IASB to consider adding more specific application guidance about the notion of default.

(b) many others who commented said they continue to support the lack of definition for default because it allows for alignment with thresholds used for credit risk management and regulatory purposes. They noted that, while the point of default is different for different instruments and across jurisdictions, most regulated entities in a jurisdiction tend to apply a definition consistent with what is used for regulatory purposes. They also said that any diversity arising (eg from entities that are not regulated) is mitigated by the 90-day rebuttable presumption in IFRS 9 which serves as a 'backstop'.

12. A few respondents (a standard-setter and a regulator) said that the educational material published at the start of the covid-19 pandemic contains helpful reminders about applying the requirements in times of increased uncertainty. They suggested the IASB consider adding those conclusions into IFRS 9 to facilitate enforcement and accessibility.

[2] The staff note that the November 2023 monitoring report of the European Banking Authority—IFRS 9 implementation by EU institutions reports that the low credit risk exemption in IFRS 9 is used more broadly than expected.

Assessing SICR on collective basis

13. Some respondents (mostly prudential regulators and some standard-setters) said that despite the IFRS 9 requirements for assessing SICR on a collective basis, there is limited, or inconsistent, use of such an assessment in practice.[3] In their view, the main reasons for this outcome are lack of:

    (a) *clarity over the requirements*. Some entities say it is not clear whether IFRS 9 requires collective assessment of SICR, or it is optional. Specifically, it is not clear in which circumstances a collective assessment is necessary. They attributed this to the ambiguity in paragraph B5.5.1 of IFRS 9 which uses the words 'it may be necessary to perform the assessment of SICR on a collective basis to meet the objective of recognising lifetime ECL when there are significant increases in credit risk'.

    (b) *explicit guidance on the approaches to use for collective assessment*. These respondents observed that the complex nature of the risks entities face makes it challenging to group financial instruments by shared credit risk characteristics. Despite the current application guidance and illustrative examples in IFRS 9, some respondents suggested the IASB provides more explicit guidance on approaches to use for collective assessment of SICR. For example, two prudential regulators reported that some entities do not apply the 'top-down' approach illustrated in Example 5 of the Illustrative Examples accompanying IFRS 9, as it would require grouping financial instruments by several risk dimensions at a time and determine the aggregated effects. A few preparers suggested that the IASB either expand that example by illustrating more clearly how to determine the share of the portfolio that has SICR or replace it with a more practical illustrative example.

[3] Limited use of collective assessment of SICR was also a finding reported in the November 2023 monitoring report of the European Banking Authority—IFRS 9 implementation by EU institutions.

Staff analysis

14. We note that feedback received suggests that almost all RFI respondents view the principles-based assessment of SICR to be the right approach, although the feedback highlights varying practices used to assess changes in credit risk and the resulting effect on recognition of lifetime ECL. Most of the suggestions from respondents are aimed at improving consistency and robustness in the application of the requirements. However, for the most part, the approaches recommended by a few respondents to support consistent application are those that the IASB had deliberated during the development of IFRS 9 (eg an approach based on absolute level of credit risk). Furthermore, most requests for application guidance or illustrative examples are made in areas for which IFRS 9 already provides guidance but respondents require more extensive or explicit guidance.

15. We agree with the respondents who note that principles-based requirements, ie clear but broadly defined objectives, and alignment to credit risk management practices inevitably lead to different approaches to assessing SICR. However, as noted in the RFI, the fact that entities use varying approaches in making their assessments does not automatically indicate the requirements are applied inconsistently. An indication of inconsistent application would be similar entities reaching different conclusions on the same set of facts and circumstances, in the same context.

16. We also agree with PIR feedback suggesting that uniformity does not necessarily result in more useful information. As noted in paragraph BC5.171 of the Basis for Conclusions on IFRS 9, selecting a single measure to determine SICR might facilitate comparability, but it could not properly reflect the assessment of credit risk across entities, products, and geographical regions. Because of the arbitrariness of defining the extent of increases in credit risk, the benefits of the resulting comparability would be questionable.

17. We, nonetheless, acknowledge feedback noted in paragraph 6 of this paper indicating that the varying practices to determine SICR are not always justified by differences in entities' credit risk management.

Varying practices in determining SICR

18. We considered feedback described in paragraph 9 of this paper about the varying practices which delay the recognition of lifetime ECL. We, however, note that omitting reasonable and supportable information available that is indicative of SICR, is not consistent with IFRS 9 (see paragraph 5.5.9 of IFRS 9). Similarly, using approaches that are not based on changes in credit risk since initial recognition, as required by the SICR assessment, would be inconsistent with IFRS 9 (eg using approaches based only on the absolute credit risk at each reporting date).

19. While the IFRS 9 requirements for determining SICR are principles-based, they contain clearly described objectives and requirements, such as:

    (a) paragraph 5.5.4 of IFRS 9 states that the objective of the impairment requirements is to recognise lifetime ECL for all financial instruments for which there have been SICR since initial recognition—whether assessed on an individual or collective basis—considering all reasonable and supportable information, including that which is forward-looking.

    (b) paragraph 5.5.9 of IFRS 9 is explicit that determining SICR requires evaluation of changes in credit risk since initial recognition. Specifically, an entity is required to assess changes in credit risk at each reporting date, by comparing the risk of a default occurring on the financial instrument as at the reporting date with the same risk as at the date of initial recognition. It also states that determining SICR shall consider reasonable and supportable information, available without undue cost or effort, that is indicative of SICR since initial recognition.

    (c) paragraph 5.5.11 of IFRS 9 makes it clear that if reasonable and supportable forward-looking information is available without undue cost or effort, an entity cannot rely solely on past due information when determining whether credit risk has increased significantly since initial recognition. This paragraph also states that regardless of the way in which an entity assesses SICR, there is a rebuttable presumption that the credit risk on a financial asset has increased

significantly since initial recognition when contractual payments are more than 30 days past due.

(d) paragraph B5.5.17 of IFRS 9 sets out a non-exhaustive, but insightful, list of information that may be relevant in assessing changes in credit risk. For instance, it discusses the use of information arising from an entity's credit risk management that might be relevant in assessing SICR. Specifically, it lists the emerging indicators of changes in the credit risk of the financial instrument or changes in the entity's credit risk management practice (including the instrument becoming more closely monitored or controlled) as a relevant factor in determining SICR.

Objective of determining SICR

20. As noted in paragraph 19(a) of this paper, IFRS 9 sets out the objective of impairment requirements, making it clear what an entity needs to achieve—that is, to recognise lifetime ECL for all financial instruments for which there have been significant increases in credit risk since initial recognition, considering all reasonable and supportable information, including that which is forward-looking. The objective of determining SICR is therefore self-explanatory—that is, to capture all the financial instruments that, at the reporting date, have significant increases in credit risk since initial recognition. Furthermore, IFRS 9 emphasises the importance of identifying such increases in a timely manner before financial instruments become past due.

Absolute level of credit risk

21. As explained in paragraph BC5.160 of the Basis for Conclusions on IFRS 9, using only an absolute level of credit risk to identify financial assets for which lifetime ECL are recognised was considered, but rejected, by the IASB. The IASB concluded that, while that approach might be simpler to apply because it would not require tracking of changes in credit risk since initial recognition, it would not capture the economic effect of initial credit loss expectations and subsequent changes in those expectations. Also, depending on which absolute credit risk threshold is selected, such an approach

might result in understatement or overstatement of ECL, or be similar to the incurred loss model in IAS 39 *Financial Instruments: Recognition and Measurement* (in which the absolute threshold is objective evidence of impairment). We note that the PIR feedback does not provide any evidence on how these disadvantages which informed the IASB's conclusion at the time would be resolved now.

22. The IASB, however, noted in paragraph BC5.161 of the Basis for Conclusions on IFRS 9 that the SICR assessment could be applied by specifying a maximum level of credit risk an entity would accept at initial recognition for a portfolio of financial instruments that have similar credit risk characteristics. The entity would then use that maximum level of initial credit risk as an absolute threshold that indicates that there has been a significant increase in credit risk since initial recognition. An example of such an approach is illustrated in Example 6 of the Illustrative Examples accompanying IFRS 9.

23. We think the term 'maximum initial credit risk' as used in paragraph BC5.161 of the Basis for Conclusions on IFRS 9, seeks to explain that an entity could nonetheless use an absolute threshold to capture changes in credit risk *relative to initial recognition* (for example, an internal rating worse than 5 might be considered significant if an entity determined that the maximum initial credit risk rating it would accept is 4). We, however, do not think this term would justify the use of only an absolute level of credit risk that does not take into account the credit risk of the financial instrument at initial recognition.

Counterparty assessment

24. We note that assessing changes in credit risk on a counterparty basis (ie all financial instruments held with the same borrower) was also considered, but rejected, by the IASB. The rationale is described in paragraph BC5.167 of the Basis for Conclusions on IFRS 9, including an explanation that a counterparty assessment could misstate ECL if counterparty's credit risk had changed; for example, because it would not

reflect that a recently recognised financial instrument of a counterparty was priced taking into consideration the current credit risk.

25. However, the IASB acknowledges that assessing credit risk on a basis that considers a customer's credit risk (ie the risk that a customer will default on its obligations) more holistically may nevertheless be consistent with the impairment requirements. Paragraph BC5.168 of the Basis for Conclusions on IFRS 9 explains that an overall assessment of a counterparty's credit risk could be undertaken, for example, to make an initial assessment of whether credit risk has increased significantly, as long as such an assessment satisfies the requirements for recognising lifetime ECL and the outcome would not be different to the outcome if the financial instruments had been individually assessed.

Low credit risk exemption

26. Feedback described in paragraph 10(d) of this paper raises concerns that the low credit risk exemption in paragraph 5.5.10 of IFRS 9 cannot be applied to instruments such as loan to customers. However, we note that IFRS 9 does not list the types of financial instruments that are eligible for that exemption. Instead, it describes the characteristics of the financial instruments for which the low credit risk exemption was designed.

27. Those characteristics include the financial instrument having a low risk of default and the borrower having a strong capacity to meet its contractual cash flow obligations in the near term and adverse changes in economic and business conditions in the longer term may, but will not necessarily, reduce the ability of the borrower to fulfil its contractual cash flow obligations.

28. Furthermore, it is explained that an external rating of 'investment grade' is an example of a financial instrument that may be considered as having low credit risk. However, financial instruments are not required to be externally rated to be considered to have low credit risk. They should, however, be consistent with a globally understood definition of low credit risk and considered to have low credit

risk from a market participant perspective considering all the terms and conditions of the instrument.[4]

29. We note that an exemption is inherently not intended to be applied too broadly. Therefore, to avoid delayed recognition of lifetime ECL, IFRS 9 also clarifies what financial instruments are not considered to have low credit risk for the purposes of the exemption in paragraph 5.5.10 of IFRS 9. Specifically, paragraph B5.5.22 of IFRS 9 clarifies that financial instruments are not considered to have low credit risk when they are regarded as having a low risk of loss simply because of the value of collateral and the financial instrument without that collateral would not be considered low credit risk. Financial instruments are also not considered to have low credit risk simply because they have a lower risk of default than the entity's other financial instruments or relative to the credit risk of the jurisdiction within which an entity operates.

Definition of default

30. We note that the conflicting views described in paragraph 11 around the definition of default (or lack thereof) are very similar to stakeholders' views at the time of developing IFRS 9 (see paragraphs BC5.248- BC5.253 of the Basis for Conclusions on IFRS 9).

31. When developing IFRS 9, the IASB considered that the notion of default is fundamental to the application of the model and that the point of default would be different for different instruments and across jurisdictions and legal systems. The IASB was convinced by stakeholders' views that any attempt to be more prescriptive or provide more guidance would add confusion and could result in differing default definitions for credit risk management, regulatory and accounting purposes.

32. As a result, in addition to the 90-day backstop, paragraph B5.5.37 of IFRS 9 requires an entity to:

[4] See paragraphs B5.5.22-B5.5.24 of IFRS 9 and paragraphs BC5.180-BC5.189 of the Basis for Conclusions on IFRS 9.

(a) apply a definition of default that is consistent with the definition used for internal credit risk management purposes for the relevant financial instrument, consistently from one period to another; and

(b) consider qualitative indicators of default (for example, for financial instruments that include covenants that can lead to events of default) when appropriate.

Assessing SICR on collective basis

33. As previously noted, the objective of the impairment requirements is set out in paragraph 5.5.4 of IFRS 9. Furthermore, paragraph B5.5.1 of IFRS 9 states: [emphasis added]

> In order to meet the objective of recognising lifetime expected credit losses for significant increases in credit risk since initial recognition, it may be necessary to perform the assessment of significant increases in credit risk on a collective basis by considering information that is indicative of significant increases in credit risk on, for example, a group or sub-group of financial instruments. **This is to ensure that an entity meets the objective of recognising lifetime expected credit losses when there are significant increases in credit risk, even if evidence of such significant increases in credit risk at the individual instrument level is not yet available**.

34. Having considered the requirements in IFRS 9, we think it is clear that assessing SICR on a collective basis is not an accounting option. But it is neither a must in all circumstances. For instance, unlike IAS 39, IFRS 9 does not require that an entity first performs an individual assessment and then a collective assessment for all financial instruments that were not impaired individually. In other words, whether an entity is required to evaluate financial instruments for SICR collectively depends on whether

the entity has already met the objective of impairment requirements by evaluating financial instruments individually.

35. As explained in paragraph BC5.136 of the Basis for Conclusions on IFRS 9, the IASB added the requirements on collective assessment in response to the feedback on its 2013 Impairment Exposure Draft. It was apparent that some stakeholders had misunderstood the proposals as only requiring lifetime ECL to be recognised when there was evidence of SICR on an individual instrument level (eg a financial asset became past due).

36. IFRS 9 provides relevant considerations for determining when a collective assessment may be necessary, including:[5]

    (a) the timeliness of capturing SICR primarily depends on whether the entity has reasonable and supportable information that is available without undue cost or effort to identify such increases in a timely manner before financial assets become past due. However, when credit risk management systems are heavily dependent on past due information, there may be a delay between identifying SICR and when the increase in credit risk has actually occurred, meaning an assessment that also evaluates financial instruments collectively is needed.

    (b) the extent to which existing credit risk management systems capture a comprehensive range of credit risk information that is forward-looking and is updated on a timely basis at the individual instrument level to avoid a delay in identifying financial instruments that have SICR. For example, the delay is more apparent for portfolios of financial instruments that are managed based on past due information only.

    (c) an entity could use the change in a macroeconomic indicator to determine that the credit risk of one or more segments of financial instruments in the portfolio has increased significantly, although it is not yet possible to identify the

[5] See paragraphs B5.5.1-B5.5.6 of IFRS 9 and paragraphs BC5.138-BC5.142 of the Basis for Conclusions on IFRS 9.

individual financial instruments for which credit risk has increased significantly.

37. We considered the feedback in paragraph 13(b) of this paper suggesting that the IASB add an example that is more practical illustrating how to collectively determine SICR. In our view, expanding current illustrative examples or replacing an example with others is unlikely to result in increased use of collective assessment of SICR. As the feedback indicates, it is the complex nature of financial instruments that makes it challenging to collectively group them by shared credit risk characteristics. Additional examples or guidance can be useful if they apply to a common arrangement type. However, providing examples for specific complex fact patterns would be unlikely to help many entities as the outcome could be dependent on small changes to facts and circumstances.

38. The staff also note that, in commenting about post-model adjustments or management overlays (PMAs), a prudential regulator had reported that some entities recognise PMAs aiming to reflect information that has not otherwise been captured through collective assessment of SICR (for example, aiming to capture the impact from high inflation on the payment capacity of a group of customers). This may be another reason that explains the limited use of collective SICR assessment in practice. The IASB will holistically consider all feedback received about PMAs at a future meeting.

Conclusion

39. In considering requests for further application guidance or illustrative examples, we have sought to identify the root cause for the inconsistent application. However, as noted in the staff analysis, the requests for additional guidance do not necessarily arise because objectives or other requirements in IFRS 9 are unclear, inappropriate, or insufficient. Respondents generally ask for more explicit guidance to reduce the extent of judgement required in determining the significance of changes in credit risk.

40. The staff note that requests for more specific and up-to-date guidance by some respondents are common in areas where IFRS Accounting Standards are not

prescriptive. This is even more likely in an area such as determining SICR which requires a multifactor and holistic analysis, and when making that analysis entities have differences in financial instruments, credit risk management practices or the availability of data.

41. As previously noted, approaches that would minimise the need for application of judgement might be simpler to apply and achieve comparability, but they would not necessarily capture the economic losses that occur because of changes in credit risk from initial expectations. Furthermore, prescribing approaches would be inconsistent with strong support for principles-based requirements. We, therefore, conclude that any additional application guidance or illustrative examples by the IASB could only result in little incremental benefits. The application of judgement would continue to be required and questions will arise in other circumstances.

42. In analysing feedback requesting more guidance, we also considered the following:

    (a) amendments to IFRS 9 application guidance and illustrative examples would have to go through the same due process as amendments to the Standard.

    (b) consistent with feedback noted in paragraph 8 of this paper, now that most entities have developed accounting policies for their SICR assessment, additional application guidance and/or illustrative examples could lead to disruption in practice and additional costs because all entities would need to review their accounting policies to determine whether any changes are needed. Alignment to entities' own credit risk management practices might also be reduced. Because determining SICR is fundamental to the application of the ECL model, the extent of disruption and potential for unintended consequences might be significant, even for limited amendments.

43. In this context, we also considered feedback described in paragraph 12 of this paper, suggesting that the IASB incorporates the main conclusions from the educational material published at the start of covid-19 pandemic into IFRS 9. We acknowledge the usefulness of that material but note that it simply highlighted the requirements within IFRS 9 without changing, removing, or adding to them. All those conclusions or

reminders are therefore already in IFRS 9. Alternatively, amending IFRS 9 to simply change the phrasing in some paragraphs, would still require standard-setting activity and the benefits of such an action would be expected to outweigh the costs for reasons like those described in paragraph 42 of this paper.

44. The staff will consider feedback on potential enhancements to disclosure requirements on determining SICR at a future IASB meeting, along with feedback for other disclosures.

Staff assessment—Is further action needed?

45. The staff assessed the above topics against the PIR framework to determine whether any further action needs to be taken:

PIR evaluation requirements	Staff assessment
Are there fundamental questions (ie 'fatal flaws') about the clarity and suitability of the core objectives or principles in the new requirements?	**No.** PIR feedback and the staff analysis in this paper on the matters identified indicated that there are no fundamental questions about the clarity and suitability of the core objectives or principles about the requirements for determining SICR.
Are the benefits to users of financial statements of the information arising from applying the new requirements significantly lower than expected?	**No.** Although some respondents raised concerns on inconsistent application of requirements related to SICR, majority of respondents agree that varying practices in how entities assess changes in credit risk is inherent in the principle-based requirements, which in turn, facilitate alignment to credit risk management practices. That alignment ultimately results in useful information because it supports depiction of expectations about economic losses. However, at a future meeting, the IASB will consider the feedback on the disclosure requirements, including assessing whether any potential amendments might be needed to support consistent disclosures about SICR assessment.
Are the costs of applying some or all of the new requirements and auditing and enforcing their application significantly greater than expected?	**No.** Although some respondents ask for more explicit application guidance or illustrative examples that would reduce the need to apply judgement, thus, might reduce auditing or enforcement costs in some cases, the PIR feedback did not provide evidence that suggests those costs are significantly greater than what the IASB expected when developing the requirements. We also note that most respondents asked the IASB to carefully consider the incremental benefits of any potential standard-setting in this area, noting potential for significant disruption and operational costs that could arise from a change.