Case Id: 9e91d910-43ba-45b6-a2bf-25e04e6bde0b

Effects of using International Financial Reporting Standards (IFRS) in the EU: public consultation

Fields marked with * are mandatory.

Impact of International Financial Reporting Standards (IFRS) in the EU: public consultation

Purpose of the consultation

The European Commission is holding a public consultation to seek views from all interested parties on their experience of Regulation 1606/2002 ("the IAS Regulation"). The results of this public consultation will feed into the European Commission's evaluation of the IAS Regulation.

Background

Applying internationally accepted standards - the International Financial Reporting Standards (IFRS) – means standardising companies' financial reporting to make financial statements more transparent and comparable. The ultimate aim is for the EU capital market and the single market to operate efficiently.

Scope of the IAS Regulation

The IAS Regulation states that the IFRS must be applied to the consolidated financial statements of EU companies whose securities are traded on a regulated EU market. EU countries may extend the application of IFRS to annual financial statements and non-listed companies (view an update on the use of options in the EU). The Transparency Directive (2004/109/EC), as subsequently amended, also stipulates that all issuers (including non-EU ones) whose securities are listed on a regulated market located or operating in an EU country must use IFRS.

Impact of the IAS Regulation

The implementation of IFRS in the EU has had an impact on cross-border transactions, trade, the cost of capital, investor protection, confidence in financial markets and stewardship by management. However, it is difficult to differentiate their impact from that of other significant factors, including other regulatory changes in the EU and internationally.

Developments since adoption

Over 100 countries now use IFRS. These accounting standards have been increasingly discussed at international level (e.g. G20, Basel Committee) and with various interested parties in the EU, especially in the wake of the financial crisis.

Several initiatives concerning technical issues and governance are under way at both international and EU level. In the EU, the Maystadt report's recommendations are being implemented. These are designed to strengthen the EU's contribution to achieving global and high quality accounting standards by beefing up the role of the European Financial Reporting Advisory Group (EFRAG), which advises the Commission on IFRS matters.

Current Commission evaluation

The Commission is evaluating the IAS Regulation to assess:

- IFRS's actual effects
- how far they have met the IAS Regulation's initial objectives
- whether these goals are still relevant
- any areas for improvement.

This consultation is part of the evaluation process. The questionnaire was drafted with the help of an informal expert group which is to assist the Commission throughout the process.

Target group(s)

Any interested party – commercial, public, academic or non-governmental, including private individuals.

Especially: capital market participants and companies preparing financial statements or using them for investment or lending purposes (whether or not they use IFRS).

Consultation period

7 August — 31 October 2014 (12 weeks).

How to submit your contribution

If possible, to reduce translation and processing time, please reply in one of the Commission's working languages (preferably English, otherwise French or German).

Contributions will be published on this website with your name (unless – in your response – you ask us not to).

N.B.: Please read the specific privacy statement to see how your personal data and contribution will be dealt with.

Reference documents and other, related consultations

- IAS/IFRS standards & interpretations
- IFRS Foundation
- European Financial Reporting Advisory Group (EFRAG)
- Commission reports on the operation of IFRS

Results of public consultation & next steps

The results will be summarised in a technical report and will feed into the evaluation report to be presented by the Commission in line with Article 9.2 of Regulation 258/2014.

Questions

Please note that some questions do not apply to all groups of respondents.

Who are you?

1. In what capacity are you completing this questionnaire?

If it's *not* on behalf of an organisation, please indicate that you are a "private individual".*

- ( ) Company preparing financial statements *[some specific questions for preparers marked with 'P']*
- ( ) Company using financial statements for investment or lending purposes *[some specific questions for users marked with 'U']*
- ( ) A company that both prepares financial statements and uses them for investment or lending purposes *[some specific questions for preparers and users marked with 'P' and 'U']*
- (x) Association
- ( ) Accounting / audit firm
- ( ) Trade union / employee organisation
- ( ) Civil society organisation / non-governmental organisation
- ( ) Research institution / academic organisation
- ( ) Private individual
- ( ) Public authority *[one specific question for public authorities marked with 'PA']*
- ( ) Other

1.4.1. How many organisations do you represent?*

Over 50 national and transnational members

1.4.2. What type of business do you represent?*

- [ ] Industry
- [ ] Banking
- [ ] Insurance
- [x] Other

1.4.2.1. Other - please specify*

Financial services users (individual shareholders, small investors, pension savers, end-users and consumers of financial services in general)

2. Where is your organisation/company registered, or where are you are located if you do not represent an organisation/company? Select a single option only.*

- EU-wide organisation
- Global organisation
- Austria
- Belgium
- Bulgaria
- Croatia
- Cyprus
- Czech Republic
- Denmark
- Estonia
- Finland
- France
- Germany
- Greece
- Hungary
- Ireland
- Italy
- Latvia
- Lithuania
- Luxembourg
- Malta
- The Netherlands
- Poland
- Portugal
- Romania
- Slovakia
- Slovenia
- Spain
- Sweden
- United Kingdom
- Norway
- Iceland
- Liechtenstein
- Other European country
- Other

3. What is the name of the organisation or authority you represent? If you are part of a group, give the name of the holding company as well.*

Better Finance for all, the European Federation of Financial Services Users

4. In the interests of transparency, we ask organisations to supply relevant information about themselves by registering in the Transparency Register (http://ec.europa.eu/transparencyregister). If your organisation is not registered, your submission will be published separately from those of registered organisations. Is your organisation registered in the European Parliament/Commission Transparency Register?*

- (x) Yes
- ( ) No

4.1. Please give your registration number.*

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5. In the interests of transparency, your contribution will be published on the Commission's website. How do you want it to appear?*

- (x) Under the name supplied? (*I consent to the publication of all the information in my contribution, and I declare that none of it is subject to copyright restrictions that would prevent publication.*)
- ( ) Anonymously? (*I consent to the publication of all the information in my contribution except my name/the name of my organisation, and I declare that none of it is subject to copyright restrictions that would prevent publication.*)

Relevance of the IAS Regulation

Objective

6. The rationale for the IAS Regulation, imposing internationally accepted standards - the International Financial Reporting Standards (IFRS) - was to make companies use the same set of accounting standards, thus ensuring a high level of transparency and comparability of financial statements. The ultimate aim was to make the EU capital market and the single market operate efficiently.

In your view, are the Regulation's objectives still valid today?*

- (x) Yes
- ( ) No
- ( ) No opinion

6.1. Comments.

It is noticed that the protection of investors is regarded as a secondary aim of the IAS Regulation (recital 4). Such protection should be a primary aim.

7. The IAS Regulation refers to IFRS as a set of global accounting standards. Over 100 countries use or permit the use of these standards. The US, for instance, allows EU companies listed in the US to report under IFRS. However, it continues to rely on its "generally accepted accounting principles" (GAAPs) for its domestic companies' financial statements, while the EU requires IFRS to be used for the consolidated accounts of EU listed companies.

Has the IAS Regulation furthered the move towards establishing a set of globally accepted high-quality standards?*

- (x) Yes
- ( ) No
- ( ) No opinion

7.1. Please explain.

The IAS Regulation has ensured that all EU companies whose shares are publicly traded follow identical standards. Such standards, of course, must comply with EU law. We believe that global acceptance has increased. We have a doubt over the "high-quality" at least in the EU in that it is not clear that all IFRS comply with the EU legal requirement for prudence, nor, in the UK with the requirements for capital maintenance.

Scope

8. The obligation to use IFRS as set out in the IAS Regulation applies to the consolidated financial statements of EU companies whose securities are traded on a regulated market in the EU. There are about 7,000 such firms.
In your view, is the current scope of the IAS Regulation right (i.e. consolidated accounts of EU companies listed on regulated markets)?*

- ○ Yes
- ◉ No
- ○ No opinion

8.1. How would you propose it be changed?*

- ☑ By making IFRS compulsory for the individual annual accounts of listed companies on regulated markets
- ☑ By making IFRS compulsory for the consolidated accounts of large non-listed companies
- ☐ By allowing any company to opt for reporting under IFRS
- ☐ Other

8.2. Comments.

The extension of the range of companies required to use IFRS would increase comparability and might, in practice, be no more onerous for companies in groups which already have to use IFRS.

9. National governments can decide to extend the application of IFRS to:
- individual annual financial statements of companies listed on regulated markets
- consolidated financial statements of companies that are not listed on regulated markets
- individual annual financial statements of companies that are not listed on regulated markets.

In your view, are the options open to national governments:*

- (x) Appropriate
- ( ) Too wide
- ( ) Too narrow
- ( ) No opinion

Cost-benefit analysis of the IAS Regulation

10. Do you have pre-IFRS experience/ experience of the transition process to IFRS?*

- (x) Yes
- ( ) No

11. In your experience, has applying IFRS in the EU made companies' financial statements more transparent (e.g. in terms of quantity, quality and the usefulness of accounts and disclosures) than they were before mandatory adoption?*

- (x) Significantly more transparent
- ( ) Slightly more transparent
- ( ) No change
- ( ) Slightly less transparent
- ( ) Significantly less transparent
- ( ) No opinion

11.1. Please elaborate.

A lot more information is available. It is not always "transparent" in that costs are often hidden by valuations (along with the extensive sets of assumptions those valuations require) and the sheer volume of information makes accounts difficult to read.

12. In your experience, has applying IFRS in the EU altered the comparability of companies' financial statements, compared with the situation before mandatory adoption?

	Significantly increased	Slightly increased	No change	Slightly reduced	Significantly reduced	No opinion
In your country	○	○	●	○	○	○
EU-wide	●	○	○	○	○	○
Compared with non-EU countries	●	○	○	○	○	○

12.1. Please elaborate.

13. Have financial statements become easier to understand since the introduction of IFRS, compared with the situation before mandatory adoption?*

- ○ Yes, in general
- ○ Yes, but only in certain areas
- ● No, in general
- ○ No, except in certain areas
- ○ No opinion

13.2. Please elaborate.

The introduction of several IFRS which emphasize valuations rather than costs has made acconts harder to understand. A further example is the spreading of interest cost and income over the period of a loan by calculation of a notional "underlyig rate of interest" which has resulted in balance sheet figures which neither the lender nor the borrower can readily understand.

14. Has the application of IFRS in the EU helped create a level playing field for European companies using IFRS, compared with the situation before mandatory adoption? *

- (x) Yes
- ( ) Yes, to some extent
- ( ) No
- ( ) No opinion

14.1. Please elaborate.

15. Based on your experience, to what extent has the application of IFRS in the EU affected access to capital (listed debt or equity) for issuers in domestic and non-domestic markets that are IFRS reporters?

	Made it a lot easier	Made it easier	No effect	Made it more difficult	Made it a lot more difficult	No opinion
Domestic capital	○	○	○	○	○	◉
EU capital other than domestic	○	○	○	○	○	◉
Non-EU capital	○	○	○	○	○	◉

16. In your experience, has the application of IFRS in the EU had a direct effect on the overall cost of capital for your company or the companies you are concerned with? (Please distinguish - as far as possible – the impact of IFRS from other influences, e.g. other regulatory changes in the EU and the international credit crunch and crisis.)*

- ○ Cost has fallen significantly
- ○ Cost has fallen slightly
- ○ No effect
- ○ Cost has risen slightly
- ○ Cost has risen significantly
- ◉ No opinion

17. In your view, has the application of IFRS in the EU improved protection for investors (compared with the situation before mandatory adoption), through better information and stewardship by management?*

- ○ Yes, to a great extent
- ◉ Yes, to a small extent
- ○ It had no impact
- ○ No, protection for investors has worsened
- ○ No opinion

17.1. Please provide data/ examples if available.

Generally the additional information required by IFRS has been helpful. However, the reporting of stewardship has not. Because of the extensive use of valuations it is not easy to see what management has laid out from the resources of the company and thus how good or bad their stewardship has been. To this extent protection for investors has worsened.

18. In your view, has the application of IFRS in the EU helped maintain confidence in financial markets, compared with the likely situation if it had not been introduced?

(N.B.: the "enforcement" section of this questionnaire deals with how IFRS are/ were applied.)*

- ○ Yes, to a great extent
- ○ Yes, to a small extent
- ○ It had no impact
- ◉ No, confidence in financial markets has decreased
- ○ No opinion

18.1. Please provide data/ examples if available.

The obvious example is the failure of many banks throughout Europe who failed, to properly provide for their bad debts under IFRS. The increased use of "fair values" has reduced trust in balance sheets.

19. Do you see other benefits from applying IFRS as required under the IAS Regulation?*

- (x) Yes
- ( ) No
- ( ) No opinion

19.1. Yes - please specify (you may select more than 1 option).*

- [ ] Improved ability to trade/expand internationally
- [ ] Improved group reporting in terms of process
- [ ] Robust accounting framework for preparing financial statements Administrative savings
- [ ] Group audit savings
- [x] Other

19.1.1. Other - please specify.*

As previously suggested the adoption of IFRS has much increased the comparability of accounts throughout Europe.

19.2. If yes, please give details, with examples/ data if possible.

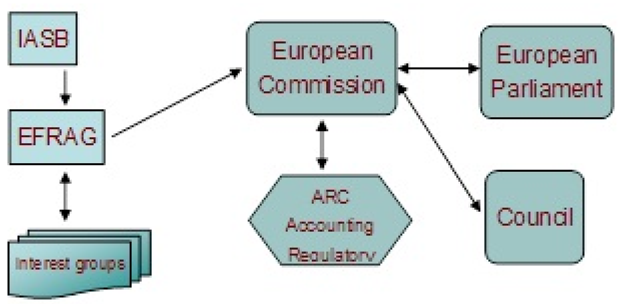
20. In your experience, on balance and at global level, how do the benefits of applying IFRS compare to any additional costs incurred – compared with the situation before mandatory adoption, bearing in mind the increasing complexity of businesses that accounting needs to portray?*

- (selected) Benefits significantly exceed the costs
- Benefits slightly exceed the costs
- Benefits and costs are broadly equal
- Costs slightly exceed the benefits
- Costs significantly exceed the benefits
- No opinion

20.1. Please provide any additional comments you think might be helpful.

Endorsement mechanism & criteria

The EU's IFRS endorsement process



In the EU, IFRS are adopted on a standard-by-standard basis. The procedure is as follows:

- The International Accounting Standards Board (IASB) issues a standard.
- The European Financial Reporting Advisory Group (EFRAG) holds consultations, advises on endorsement and examines the potential impact.
- The Commission drafts an endorsement regulation.
- The Accounting Regulatory Committee (ARC) votes and gives an opinion.
- The European Parliament and Council examine the standard.
- The Commission adopts the standard and publishes it in the Official Journal.

This process typically takes 8 months.

Endorsement criteria

Under Article 3.2 of the IAS Regulation, any IFRS to be adopted in the EU must:

- be consistent with the "true and fair" view set out in the EU's Accounting Directive
- be favourable to the public good in Europe
- meet basic criteria on the quality of information required for financial statements to serve users (i.e. statements must be understandable, relevant, reliable and comparable, they must provide the financial information needed to make economic decisions and assess stewardship by management).

In his October 2013 report, Mr Maystadt discussed the possibility of clarifying the "public good" criterion or adding 2 other criteria as components of the public good, namely that:

- any accounting standards adopted should not jeopardise financial stability
- they must not hinder the EU's economic development.

He also suggested that more thorough analysis of compliance with the criteria of prudence and respect for the public good was needed.

21. In the EU, IFRS are adopted on a standard-by-standard basis. The process, which typically takes 8 months, is as follows:

- The International Accounting Standards Board (IASB) issues a standard.
- The European Financial Reporting Advisory Group (EFRAG) holds consultations, advises on endorsement and examines the potential impact.
- The Commission drafts an endorsement regulation.
- The Accounting Regulatory Committee (ARC) votes and gives an opinion.
- The European Parliament and Council examine the standard.
- The Commission adopts the standard and publishes it in the Official Journal.

Do you have any comments on the way the endorsement process has been or is being conducted (e.g. in terms of the interaction of players, consistency, length, link with effective dates of standards, outcome, etc.)?*

It is not clear what the role of the ARC is alongside EFRAG. Is there a need for two bodies? From its web site the ARC does not appear to have been very active recently. EFRAG is required to take into account the requirements of EU law most recently expressed in Directive 2013/34/EU. That directive refers to the need for prudence and that approach has been recently reinforced in the European Court of Justice decision of 3rd October 2013: State of Belgium vs GIMLE. Given that legal requirement and the fact that the IASB removed the requirement for prudence in their statement of Underlying Concepts in 2010 it is difficult to see how any consequent IFRS approved by EFRAG can have complied with EU law.
Further there is an apparent clash between the Accounting Directive (2013/34/EU) and the Fair Value Directive (2011/65/EC). The Fair Value Directive allows the inclusion of unrealised profits in accounts whils the Accounting Directive requires profits to be "made" which the judgement in the case referred to above makes clear means realised.

22. Under Article 3.2 of the IAS Regulation, any IFRS to be adopted in the EU must:

- be consistent with the "true and fair" view set out in the EU's Accounting Directive
- be favourable to the public good in Europe
- meet basic criteria on the quality of information required for financial statements to serve users (i.e. statements must be understandable, relevant, reliable and comparable, they must provide the financial information needed to make economic decisions and assess stewardship by management).

Are the endorsement criteria appropriate (sufficient, relevant and robust)?*

- ( ) Yes
- ( ) Yes, to some extent
- (•) No
- ( ) No opinion

22.1. *In his October 2013 report, Mr Maystadt discussed the possibility of clarifying the "public good" criterion or adding 2 other criteria as components of the public good:*

- *that any accounting standards adopted should not jeopardise financial stability*
- *that they must not hinder the EU's economic development.*

Please give any suggestion(s) you may have for additional criteria.

- [ ] Not jeopardising the EU's financial stability
- [ ] Not hindering economic development in the EU
- [ ] Not impeding the provision of long-term finance
- [x] More explicit reference to the concept of prudence
- [x] Consistency with other adopted IFRS
- [ ] Criterion concerning simplicity/proportionality
- [ ] Other

22.2. Comments.

The financial crisis revealed the deficiency in IFRS in that they did not result in proper provision for bad debts, particularly in banks. The IASB have been obsessed with a theoretical "balanced" approach which had not properly recognised the need for prudence. Becasue the IASB had removed the concept of prudence from IFRS any auditor was left with no grounds upon which naturally optimistic manageent.

This deficiencly applied equally to the purely subjective valuations of assets for which there was no observable market and to goodwill.

23. There is a necessary trade-off between the aim of promoting a set of globally accepted accounting standards and the need to ensure these standards respond to EU needs. This is why the IAS regulation limits the Commission's freedom to modify the content of the standards adopted by the IASB.

Does the IAS Regulation reflect this trade-off appropriately, in your view? *

- (x) Yes
- ( ) No
- ( ) No opinion

24. Have you experienced any significant problems due to differences between the IFRS as adopted by the EU and the IFRS as published by the IASB ("carve-out" for IAS 39 concerning macro-hedging allowing banks to reflect their risk-management practices in their financial statements)? *

- ( ) Yes
- (x) No
- ( ) No opinion

Quality of IFRS financial statements

25. What is your overall opinion of the quality (transparency, understandability, relevance, reliability and comparability) of financial statements prepared by EU companies using IFRS?*

- ○ Very good
- ● Good
- ○ Moderate
- ○ Low
- ○ Very low
- ○ No opinion

25.1. Please provide any additional comments you think might be helpful.

Any comment applies equally to all companies using IFRS, not just European ones. We have commented above the approach taken by IFRS has been that accounts should reflect current values rather than costs. This has made the assessment of the management's stewardship of the assets of the company much harder as actual expenditures of those assets are hidden behind "fair" values.

26. Given that firms have complex business models and transactions, how would you rate financial statements prepared in accordance with IFRS in terms of complexity and understandability?*

- ● Very complex & difficult to understand
- ○ Fairly complex & difficult to understand
- ○ Reasonable
- ○ Not complex or difficult
- ○ No opinion

26.1. Please provide any further comments you think might be helpful, specifying any particular areas of accounting concerned, if appropriate.

One specific problem is that it is much harder, if not impossible, to determine the true realised ("made", according to the Directive) profits and therefore the distributable profits.

27. How would you rate financial statements prepared using IFRS in terms of complexity and understandability – compared with other sets of standards you use?

	IFRS information is easier to understand than...	IFRS information is neither easier nor more difficult to understand than …	IFRS information is more difficult to understand than …	No opinion
Information under your local GAAPs	○	○	●	○
Information under any other GAAPs	○	○	○	○

27.1. What are your local GAAPs?

27.3. Please provide any additional comments you think might be helpful.

28. How do IFRS compare with other GAAPs in terms of providing a true and fair view of a company's (group's) performance and financial position?

	IFRS are better than...	IFRS are equivalent to...	IFRS are worse than...	No opinion
Your local GAAPs (as identified under question 27)	○	○	●	○
Any other GAAPs (as identified under question 27)	○	○	○	○

28.1. Please provide any additional comments you think might be helpful.

29. How often is it necessary to depart from IFRS under “extremely rare circumstances” (as allowed by IFRS), to reflect the reality of a company’s financial performance and position in a fairer way?*

- Often
- Sometimes
- Hardly ever (selected)
- Never
- No opinion

29.1. Please provide additional comments and examples of departures from IFRS that you have seen.

There is part of the problem with IFRS. They do not ask for a "true and fair" (as required by EU law) view but rather that information should be presented "fairly". Thus the question at issue is when is it necessary to depart from IFRS to achieve the legally required "true and fair" view not just to reflect realiry in "a fairer way". Thus the available override of IFRS should have been used more frequently.

30. How would you rate the extent to which IFRS allows you to reflect your company's business model in your financial statements?*

- This is not an issue
- IFRS are flexible enough
- IFRS should be more flexible, so different business models can be reflected
- No opinion (selected)

Enforcement

Since 2011, the European Securities and Markets Authority (ESMA) has been coordinating national enforcers' operational activities concerning compliance with IFRS in the EU. ESMA has taken over where the Committee of European Securities Regulators (CESR) left off.

Enforcement activities regarding companies listed on regulated markets are defined in the Transparency Directive (2004/109/EC , as subsequently amended).

31. Are the IFRS adequately enforced in your country?*

- (selected) Yes
- Yes, to some extent
- No
- Not applicable
- No opinion

31.1. Please provide any additional comments you think might be helpful.

32. Does ESMA coordinate enforcers at EU level satisfactorily? *

- Yes
- Yes, to some extent
- No
- Not applicable
- (selected) No opinion

33. Has enforcement of accounting standards in your country changed with the introduction of IFRS?*

- Enforcement is now more difficult
- Enforcement has not changed
- Enforcement is now easier
- (selected) Not applicable
- No opinion

34. In your experience, have national law requirements influenced the application of IFRS in the EU country or countries in which you are active? *

- ( ) Yes, significant influence
- (x) Yes, slight influence
- ( ) No
- ( ) No opinion
- ( ) Not applicable

34.1. If you have identified differences in the way IFRS are applied in different EU countries, to what extent does this limit the transparency and comparability of company financial statements? *

- ( ) Much less transparent & comparable
- ( ) Slightly less transparent & comparable
- ( ) No impact on transparency or comparability
- (x) No opinion

35. If you are aware of any significant differences in enforcement between EU countries or with other jurisdictions, do they affect your practice in applying IFRS or analysing financial statements? *

- ( ) Yes, significantly
- ( ) Yes, but the impact is limited
- (x) No
- ( ) No opinion
- ( ) Not applicable

35.1. Please provide specific details.

36. The recitals of the IAS Regulation stress that a system of rigorous enforcement is key to investor confidence in financial markets. However, the Regulation contains no specific rules on penalties or enforcement activities, or their coordination by the EU.

Should the IAS Regulation be clarified as regards penalties and enforcement activities?*

- (x) Yes
- ( ) No
- ( ) No opinion

36.1. Please explain.*

No comment

37. Should more guidance be provided on how to apply the IFRS? *

- ( ) Yes
- (x) No
- ( ) No opinion

Consistency of EU law

There are different types of reporting requirements in the EU (e.g. prudential requirements, company law, tax, etc.)

38. How would you assess the combined effects of, and interaction between, different reporting requirements, including prudential ones? *

One major question which arises is whether there should or should not, in the case of financial companies, be more than one way of assessing the value of their assets. EU law requires prudence in making such assessments. Prudence, properly and consistently applied, should increase the confidence of regulators in such financial institutions. In theory, therefore, properly drawn up accounts of such institutions would suffice for the purposes of their regulation.
Tax is generally based on accounting profits, thus the collection of tax will be delayed by more prudent accounting.

39. Do you see any tensions in interaction between the IAS Regulation and EU law, in particular:

	No	Yes	To some extent	No opinion
Prudential regulations (banks, insurance companies)	○	○	○	●
Company law	○	●	○	○
Other	○	○	○	○

39.2. If you answered "yes" or "to some extent", please give details and state what the main effects of these tensions are.*

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As has previously been mentioned there is doubt as to whether the
application of the IAS regulation has always resulted in IFRS adopted in
the EU complying with the EU law. Equally the Fair Values Directive -
introduced to facilitate the use of IFRS in the EU - appears to slash
with the requirement of the Accounting Directive that accounts shall
only include profits "made".
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User-friendliness of legislation

All standards are translated into the official EU languages before they are adopted. The Commission also regularly draws up a consolidated version of the current standards enacted by the EU (http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=CELEX:02008R1126-20130331:EN:NOT). The consolidated version does not include any standards that are not yet in force, but can be applied before the date of entry into force.

40. Are you satisfied with the **consolidated version** of *IFRS standards adopted by the EU*, which is not legally binding, or would you like to see improvements?

- ( ) Satisfied
- ( ) Need for improvements
- (x) I wasn't aware of it
- ( ) I don't use it
- ( ) No opinion

41. Are you satisfied with the quality of **translation** of IFRS into your language *provided by the EU* ?*

- (x) Yes
- ( ) Yes, to some extent
- ( ) No
- ( ) No opinion
- ( ) Not applicable

41.1. Please give details.

General

42. Do you have any other comments on or suggestions about the IAS Regulation?

Thank you for your valuable contribution.

Contact

✉ MARKT-F3@ec.europa.eu