

Mr. Mackenzie
IFRS Interpretations Committee
7 Westferry Circus
Canary Wharf, London
United Kingdom
E14 4HD

16 May 2023

Dear Mr. Mackenzie

IFRS IC Tentative Agenda Decision: Premiums Receivable from an Intermediary

This letter has been drafted by the European Insurance CFO Forum (“CFO Forum”), a body representing the views of 23 of Europe’s largest insurance companies, and Insurance Europe, representing 95% of the premium income of the European insurance market. Accordingly, it represents the consensus view of European insurance industry.

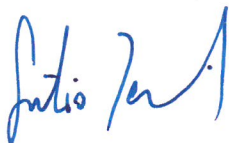
We welcome the opportunity to comment on the IFRS Interpretations Committee’s (IFRS IC) tentative agenda decision regarding ‘Premiums Receivable from an Intermediary’ issued in March 2023.

We appreciate the effort that has gone into this tentative agenda decision, including the outreach conducted by the IASB staff, and support this tentative agenda decision (including the technical analysis).

We agree that in accounting for premiums receivable from an intermediary when payment by the policyholder discharges their obligation under the insurance contract, an entity can apply either IFRS 17 (View 1) or IFRS 9 (View 2). We therefore fully concur with the IFRS IC’s conclusion that both views are equally valid. The tentative agenda decision remains appropriately principles-based while still balancing the operational practicalities of implementing IFRS. As such, this tentative agenda decision will not create any significant disruptions to IFRS 17 and IFRS 9 implementation programs at this late stage.

Furthermore, we support the IFRS IC’s conclusion that adding a standard-setting project for this matter is not required as it would involve assessing any unintended consequences of a possible amendment and the costs of such a standard-setting project would likely far outweigh any potential limited benefits.

Yours sincerely



Giulio Terzariol
Chair
European Insurance CFO Forum



Olav Jones
Deputy Director General
Director Economics & Finance, Insurance Europe