

To: EFRAG
Attn: Jean-Paul Gauzès
Square de Meeûs 35/5th floor
1000 Bruxelles

Subject: IE CFOF letter Regarding Endorsement of Initial Application of IFRS 17 and IFRS 9 – Comparative Information (Amendment to IFRS 17)

14 January 2022

Dear Mr. Gauzès

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 the European insurance industry.

We welcome and appreciate the amendments to IFRS 17 made by the IASB to address the concerns raised by the European insurance industry regarding the presentation of meaningful comparative information on initial application of IFRS 17 and IFRS 9 and we support a swift endorsement of the IASB amendments to IFRS 17. We welcome the IASB’s high level of responsiveness in providing this important amendment in due time for implementation of the standard.

The IASB Amendment addresses our main concerns in this area by permitting an entity to apply a classification overlay in the comparative period and to achieve a consistent accounting treatment between financial assets and contracts within the scope of IFRS 17. The amendment also addresses the main operational concerns raised by the industry.

Furthermore, we agree with EFRAG’s tentative assessment and believe that the IASB Amendment meets the technical criteria for endorsement, is conducive to the European public good and hence can be recommended for EU endorsement. In particular, we appreciate that the IASB extended the scope of the classification overlay to be in line with that of the temporary exemption from applying IFRS 9 as currently included in paragraphs 20A and 20B of IFRS 4 and to surplus assets.

If you would like any further information on any of these matters or wish to discuss them further with us, we would be pleased to assist.

Yours sincerely,



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



Delfin Rueda
Chair
European Insurance CFO Forum

INVITATION TO COMMENT ON EFRAG'S ASSESSMENTS ON IFRS 17 AND IFRS 9 – COMPARATIVE INFORMATION (AMENDMENT TO IFRS 17)

Once filled in, this form should be submitted by 19 January 2022 using the 'Comment publication link' available at the bottom of the respective news item. All open consultations can be found on EFRAG's web site: [Open consultations: express your views](#).

EFRAG has been asked by the European Commission to provide it with advice and supporting material on *Initial Application of IFRS 17 and IFRS 9 – Comparative Information (Amendment to IFRS 17)* ('the Amendment'). In order to do so, EFRAG has been carrying out an assessment of the Amendment against the technical criteria for endorsement set out in Regulation (EC) No 1606/2002 and has also been assessing the costs and benefits that would arise from its implementation in the European Union (the EU) and European Economic Area.

A summary of the Amendment is set out in Appendix 1 of the accompanying *Draft Letter to the European Commission* regarding endorsement of the Amendment.

Before finalising its assessment, EFRAG would welcome your views on the issues set out below. Please note that all responses received will be placed on the public record, unless the respondent requests confidentiality. In the interests of transparency, EFRAG will wish to discuss the responses it receives in a public meeting, so it is preferable that all responses can be published.

EFRAG's initial assessments, summarised in this questionnaire, will be updated for comments received from constituents when EFRAG is in the process of finalising its *Letter to the European Commission* regarding endorsement of the Amendment.

Your details

1 Please provide the following details:

- (a) Your name or, if you are responding on behalf of an organisation or company, its name:

Insurance Europe and European Insurance CFO Forum

- (b) Are you a:

Preparer User Other (please specify)

Preparer organisations

- (c) Please provide a short description of your activity:

Insurance –

The European Insurance CFO Forum ("CFO Forum") is a body representing the views of 23 of Europe's largest insurance companies,

Insurance Europe is the European insurance and reinsurance federation. Through its 37 member bodies — the national insurance associations — it

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represents all types of insurance and reinsurance undertakings, e.g. pan-European companies, monoliners, mutuals and SMEs. It represents 95% of the premium income of the European insurance market.

(d) Country where you are located:

Europe

(e) Contact details, including e-mail address:

Philippe Angelis, angelis@insuranceeurope.eu
Harm van de Meerendonk gbl_cfoforum.vpo@pwc.com

EFRAG’s initial assessment with respect to the technical criteria for endorsement

2 EFRAG’s initial assessment of the Amendment is that it meets the technical criteria for endorsement. In other words, the Amendment is not contrary to the principle of true and fair view and meets the criteria of understandability, relevance, reliability, comparability and lead to prudent accounting. EFRAG’s reasoning is set out in Appendix 2 of the accompanying *Draft Letter to the European Commission* regarding endorsement of the Amendment.

(a) Do you agree with this assessment?

Yes No

If you do not agree, please provide your arguments and what you believe the implications of this could be for EFRAG’s endorsement advice.

(b) Are there any issues that are not mentioned in Appendix 2 of the accompanying *Draft Letter to the European Commission* regarding endorsement of the Amendment that you believe EFRAG should take into account in its technical evaluation of the Amendment? If there are, what are those issues and why do you believe they are relevant to the evaluation?

The European public good

3 In its assessment of the impact of the Amendment on the European public good, EFRAG has considered a number of issues that are addressed in Appendix 3 of the accompanying *Draft Letter to the European Commission* regarding endorsement of the Amendment.

Improvement in financial reporting

4 EFRAG has identified that in assessing whether the endorsement of the Amendment is conducive to the European public good it should consider whether the Amendment is an improvement over current requirements across the areas which have been subject to changes (see paragraphs 3 to 7 of Appendix 3 of the accompanying *Draft Letter to the European Commission*). To summarise, EFRAG’s initial assessment is that the Amendment is likely to improve the quality of financial reporting.

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Do you agree with the assessment?

Yes No

If you do not agree, please provide your arguments and indicate how this could affect EFRAG’s endorsement advice.

Costs and benefits

- 5 EFRAG is also assessing the costs that are likely to arise for preparers and for users on implementation of the Amendment in the EU, both in year one and in subsequent years. Some initial work has been carried out, and the responses to this invitation to comment will be used to complete the assessment.

The results of the initial assessment of costs are set out in paragraphs 8 to 14 of Appendix 3 of the accompanying *Draft Letter to the European Commission* regarding endorsement of the Amendment. To summarise, EFRAG’s initial assessment is that the Amendment is likely not to result in significant costs for preparers and not directly impact users.

Do you agree with this assessment?

Yes No

If you do not, please explain why you do not and (if possible) explain broadly what you believe the costs involved will be?

- 6 In addition, EFRAG is assessing the benefits that are likely to be derived from the Amendment. The results of the initial assessment of benefits are set out in paragraph 15 to 16 of Appendix 3 of the accompanying *Draft Letter to the European Commission* regarding endorsement of the Amendment. To summarise, EFRAG’s initial assessment is that both preparers and users will benefit from the Amendment.

Do you agree with this assessment?

Yes No

If you do not agree with this assessment, please provide your arguments and indicate how this could affect EFRAG’s endorsement advice.

- 7 EFRAG’s initial assessment is that the benefits to be derived from the Amendment in the EU, as described in paragraph 6 above, are likely to outweigh the costs involved, as described in paragraph 5 above.

Do you agree with this assessment?

Yes No

If you do not agree with this assessment, please provide your arguments and indicate how this could affect EFRAG’s endorsement advice.

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Overall assessment with respect to the European public good

- 8 EFRAG has initially concluded that endorsement of the Amendment would be conducive to the European public good (see paragraphs 18 to 21 of Appendix 3 of the accompanying *Draft Letter to the European Commission*).

Do you agree with this conclusion?

Yes No

If you do not agree, please explain your reasons.