

# Invitation to Comment

## Call for comments on the UKEB Draft Comment Letter on IASB's Exposure Draft Amendments to IFRS 19 *Subsidiaries without Public Accountability: Disclosures*

Deadline for completion of this Invitation to Comment:

Midday, Monday, 11 November 2024

Please submit to:

[UKEndorsementBoard@endorsement-board.uk](mailto:UKEndorsementBoard@endorsement-board.uk)

### Introduction

The objective of this Invitation to Comment is to obtain input from stakeholders on the UKEB Draft Comment Letter (DCL) on the [Exposure Draft Amendments to IFRS 19 \*Subsidiaries without Public Accountability: Disclosures\*](#), published by the International Accounting Standards Board (IASB) on 30 July 2024. The IASB's comment period ends on 27 November 2024.

### UK endorsement and adoption process

The UK Endorsement Board (UKEB) is responsible for endorsement and adoption of IFRS for use in the UK and therefore is the UK's National Standard Setter for IFRS. The UKEB also leads the UK's engagement with the IFRS Foundation (Foundation) on the development of new standards, amendments and interpretations. This letter is intended to contribute to the IASB's due process. The views expressed by the UKEB in the letter are separate from, and will not necessarily affect the conclusions in, any endorsement and adoption assessment on new or amended International Accounting Standards undertaken by the UKEB.

### Who should respond to this Invitation to Comment?

Stakeholders with an interest in the quality of accounts prepared in accordance with international accounting standards.

## How to respond to this Invitation to Comment

Please download this document, answer any questions on which you would like to provide views, and return it together with the 'Your Details' form to [UKEndorsementBoard@endorsement-board.uk](mailto:UKEndorsementBoard@endorsement-board.uk) by midday on Monday, 11 November 2024.

**Brief responses providing views on individual questions are welcome, as well as comprehensive responses to all questions.**

## Privacy and other policies

The data collected through responses to this document will be stored and processed by the UKEB. By submitting this document, you consent to the UKEB processing your data for the purposes of influencing the development of and adopting IFRS for use in the UK. For further information, please see our [Privacy Statements and Notices](#) and other Policies (e.g. Consultation Responses Policy and Data Protection Policy)<sup>1</sup>.

The UKEB's policy is to publish on its website all responses to formal consultations issued by the UKEB unless the respondent explicitly requests otherwise. A standard confidentiality statement in an e-mail message will not be regarded as a request for non-disclosure. If you do not wish your signature to be published, please provide the UKEB with an unsigned version of your submission. The UKEB prefers to publish responses that do not include a personal signature. Other than the name of the organisation/individual responding, information contained in the "Your Details" document will not be published. The UKEB does not edit personal information (such as telephone numbers, postal or e-mail addresses) from any other response document submitted; therefore, only information that you wish to be published should be submitted in such responses.

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<sup>1</sup> These policies can be accessed from the footer in the UKEB website here: <https://www.endorsement-board.uk>

## Questions

### Overall

1. The UKEB’s draft comment letter (DCL) encourages the IASB to give greater consideration to proportionality to ensure that the disclosure requirements of IFRS 19 are not excessive for subsidiaries that are not publicly accountable.

Do you agree with this overall recommendation? Please explain why or why not.

Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
<p>The proposals provide only limited disclosure exemptions compared to the full disclosure requirements in the respective IFRSs. The existing reduced disclosure framework in FRS 101 <i>Reduced Disclosure Framework</i>, provides generally more generous disclosure exemptions than IFRS 19 and hence we consider that IFRS 19 may not be an attractive alternative to “full” IFRS or FRS 101 for eligible entities in the UK.</p> <p>We note that Forvis Mazars LLP plans to respond to the UKEB Endorsement Criteria Assessment on IFRS 19 when issued for consultation in 2025.</p>			

## Presentation and disclosure in financial statements

### Management-defined performance measures (MPMs)

2. Do you agree that eligible subsidiaries using MPMs should be required to provide all the related disclosures required by IFRS 18? If not, which of the MPMs disclosures in IFRS 18 do you think should not apply to eligible subsidiaries applying IFRS 19? Please explain your response.

Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
<p><i>Response above intentionally left blank. (Forvis Mazars will comment on the proposed disclosure exemption in its response to the IASB).</i></p>			

## Supplier finance arrangements

3. The DCL does not support including the description of supplier finance arrangements. Do you agree with this position? Please explain why or why not.

Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
<p><i>Response above intentionally left blank. (Forvis Mazars will comment on the proposed disclosure exemption in its response to the IASB).</i></p>			

## Regulatory assets and regulatory liabilities

4. The DCL supports the development of reduced disclosure requirements for the forthcoming IFRS Accounting Standard *Regulatory Assets and Regulatory Liabilities* (RARL) by the effective date of the forthcoming RARL Standard. Do you agree with this position? Please explain why or why not.

<b>Yes</b>	<input type="checkbox"/>	<b>No</b>	<input type="checkbox"/>
<i>Response above intentionally left blank. (Forvis Mazars will comment on the proposed disclosure exemption in its response to the IASB).</i>			

5. Which of the disclosure requirements listed in Table 1 of the ED should an eligible subsidiary applying IFRS 19 not be required to apply? Please explain your response.

<b>Yes</b>	<input type="checkbox"/>	<b>No</b>	<input type="checkbox"/>
<i>Response above intentionally left blank. (Forvis Mazars will comment on the proposed disclosure exemption in its response to the IASB).</i>			

## Other comments

6. Please let us know if you have any additional points you would like to make on the ED.

<i>Intentionally left blank.</i>
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**Thank you for completing this Invitation to Comment**

Please submit this document by  
midday on Monday, 11 November 2024 +to  
[UKEndorsementBoard@endorsement-board.uk](mailto:UKEndorsementBoard@endorsement-board.uk)