

Organismo Italiano di Contabilità – OIC
(The Italian Standard Setter)
Italy, 00187 Roma, Via Poli 29
Tel. 0039/06/6976681 fax 0039/06/69766830
e-mail: presidenza@fondazioneoic.it

EFRAG
35 Square de Meeûs
B-1000 Brussels
BELGIUM
commentletter@efrag.org

4th May 2012

Re: Draft endorsement advice on IASB *Amendments to IFRS 1 - Government Loans*

Dear Madam/Sir,

We are pleased to provide EFRAG with our comments in order to contribute to the finalization of the EFRAG endorsement advice on the IASB *Amendments to IFRS 1 - Government Loans*

With regard to the EFRAG's technical assessment of the Amendments to IFRS 1 against the endorsement criteria and the EFRAG's evaluation of the costs and benefits of the Amendments to IFRS 1, we agree with both its two assessments.

Our responses to your invitation to comment are provided in the Appendix A to this letter.

If you have any questions concerning our comments, please do not hesitate to contact us.

Yours sincerely,

Angelo Casò
(Chairman)

Appendix A

Specific responses

- 1 Please provide the following details about yourself:
- (a) Your name or, if you are responding on behalf of an organisation or company, its name:
[Organismo Italiano di Contabilità - the Italian Standards Setter](#)

- (b) Are you a:
 Preparer User Other (please specify)
[National Standards Setter](#)

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

- (d) Country where you are located:
[Italy](#)

- (e) Contact details including e-mail address:
[The Italian Standards Setter - OIC](#)
[Italy, 00187 Rome, Via Poli 29 Tel. +39\(6\)6976681](#)
[Fax +39\(6\)69766830 Email: \[presidenza@fondazioneoic.it\]\(mailto:presidenza@fondazioneoic.it\)](#)

- 2 EFRAG's initial assessment of the Amendments is that they meet the technical criteria for endorsement. In other words, they are not contrary to the principle of true and fair view and they meet the criteria of understandability, relevance, reliability and comparability. EFRAG's reasoning is set out in Appendix 2.
- (a) Do you agree with this assessment?
 Yes No
If you do not, please explain why you do not agree and what you believe the implications of this should be for EFRAG's endorsement advice.

-
-
- (b) Are there any issues that are not mentioned in Appendix 2 that you believe EFRAG should take into account in its technical evaluation of the Amendments? If there are, what are those issues and why do you believe they are relevant to the evaluation?

No, there are not.

- 3 EFRAG is also assessing the costs that are likely to arise for preparers and for users on implementation of the Amendments 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 **Errore. L'origine riferimento non è stata trovata.** and **Errore. L'origine riferimento non è stata trovata.** of Appendix 3. To summarise, EFRAG's initial assessment is that overall, the Amendments are likely to reduce the one-off costs at the date of transition to IFRS for first-time adopters and do not impact the ongoing costs of applying IFRS for preparers. In addition, EFRAG's initial assessment is that the Amendments will not significantly affect the costs for users.

Do you agree with this assessment?

X 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?

- 4 In addition, EFRAG is assessing the benefits that are likely to be derived from the Amendments. The results of the initial assessment of benefits are set out in paragraphs **Errore. L'origine riferimento non è stata trovata.**, **Errore. L'origine riferimento non è stata trovata.** and **Errore. L'origine riferimento non è stata trovata.** of Appendix 3. To summarise, EFRAG's initial assessment is that users are likely to benefit from the Amendments, as they will make it possible for more entities to adopt IFRS; while first-time adopters are likely to benefit from the Amendments, as they are likely to reduce the costs of transition to IFRS.

Do you agree with this assessment?

X Yes No

If you do not agree with this assessment, please provide your arguments and indicate how this should affect EFRAG's endorsement advice?

- 5 EFRAG's initial assessment is that the benefits to be derived from implementing the Amendments in the EU as described in paragraph 4 above are likely to outweigh the costs involved as described in paragraph 3 above.

Do you agree with this assessment?

X Yes No

If you do not agree with this assessment, please provide your arguments and indicate how this should affect EFRAG's endorsement advice?

- 6 EFRAG is not aware of any other factors that should be taken into account in reaching a decision as to what endorsement advice it should give the European Commission on the Amendments.

Do you agree that there are no other factors?

X Yes No

If you do not agree, please provide your arguments and indicate how this should affect EFRAG's endorsement advice?
