



**Organismo Italiano di Contabilità – OIC  
(The Italian Standard Setter)**

E-mail: presidenza@fondazioneoic.eu

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

29 October 2024

**Re: EFRAG DCL/ IASB Exposure Draft Amendments to IFRS 19 *Subsidiaries without Public Accountability: Disclosures***

Dear Wolf,

We are pleased to have the opportunity to provide our comments on the EFRAG Draft Comment Letter on the IASB Exposure Draft Amendments to IFRS 19 *Subsidiaries without Public Accountability: Disclosures*, issued on 20 September 2024 (the 'ED').

We support the IASB's approach to updating IFRS 19 *Subsidiaries without Public Accountability: Disclosures* with all the new and amended disclosures proposed in the IFRS Accounting Standards issued between February 2021 and May 2024.

We have discussed the proposed amendments to IFRS 19 with our stakeholders and no objections were raised to the IASB's proposals included in the ED.

We support the IASB's proposal not to develop reduced disclosures for the future standard on Regulatory Assets and Regulatory Liabilities at this stage of the project for eligible subsidiaries.

However, we note that some preparers have expressed concerns about the disclosures that will be required by the future standard on RRA. For this reason, we suggest that the IASB carefully evaluate the trade-off between costs and benefits of such disclosures during the drafting process of the new accounting standard on RRAs.

Should you need any further information, please do not hesitate to contact us.

Yours sincerely,  
Michele Pizzo  
(OIC Chair of the Board of Directors)