

International Accounting Standards Board
30 Cannon Street
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United Kingdom

Correspondant	Your references	Our references	Date
Ignace Bogaert Tel. 02 277 61 74	IAS 36	C – 2013/23	27.03.2013

Subject : Invitation to comment – IASB ED *Recoverable Amount Disclosures for Non-Financial Assets - Proposed Amendments to IAS 36*

Dear Sir, Madam,

The Belgian Accounting Standards Board (BASB) is pleased to respond to the Exposure Draft on *Recoverable Amount Disclosures for Non-Financial Assets - Proposed Amendments to IAS 36* issued by the IASB (the “Boards”) in January 2013 (hereinafter the “ED”).

Question 1 – Disclosures of recoverable amount

We support the proposed amendment to paragraph 134(c) and note that in the absence of amendment, the disclosure requirements in the paragraph would exceed the IASB’s original intention.

Question 2 - Disclosures of the measurement of fair value less costs of disposal

We agree that the proposed disclosures on the measurement of fair value less costs of disposal should be provided in the event of an impairment or reversal as they are a proportionate means of incorporating the principal disclosure requirements of IFRS 13 for non-recurring fair value measurement into the disclosure of impairments and reversals.

The proposed disclosures would lead to a situation where the required disclosures if the impairment loss were calculated by reference to the *fair value less costs of disposal* would go far beyond the required disclosures if the same impairment loss were calculated by reference to the *value in use*.

The BASB questions whether this difference in disclosure requirements was included intentionally in the ED as we fail to understand the reasoning behind.

Question 3 - Transition provisions

The proposed wording about earlier application is: "Earlier application is permitted. An entity shall not apply those amendments in periods (including comparative periods) in which it does not also apply IFRS 13."

This means that an entity applying the amendment for the year ended 31 December 2014 will also apply them in the comparative period (year ended 31 December 2013) as IFRS 13 will be mandatory in that earlier year.

Consider an entity that applies the amendments earlier, say in the year ended 31 December 2013. This is also the first year in which it applies IFRS 13. The entity has to apply IFRS 13's measurement but not its disclosure requirements for the year ended 31 December 2012, the comparative period.

It appears that the entity would not be permitted to apply the amendments in the ED in the comparative period. By contrast, IFRS 13 allows an entity to make IFRS 13 disclosures in the comparative period should it so wish. Is it reasonable that IAS 36 should forbid it? This appears to be giving precedence to the requirements of IFRS 13 over those of IAS 36.

Question 4 – Other comments

We have no other comments on the proposals.

Should you wish to discuss the content of this letter with us, please contact Jan Verhoeve at jan.verhoeve@cnc-cbn.be.

Yours faithfully



Jan Verhoeve
Chairman BASB