



Association pour la participation des  
entreprises françaises à l'harmonisation  
comptable internationale



EFRAG  
35 Square de Meeûs  
B-1000 Brussels  
Belgium

Paris, 17 July 2013

Dear Madam Flores,

### **Exposure Draft ED/2013/5 Regulatory Deferral Accounts**

We write in reaction to the invitation to comment on *Exposure Draft ED/2013/5 Regulatory Deferral Accounts* (the ED). At this stage we have not considered the detailed technical aspects of the ED but wish to express our views on the general principle of publishing a temporary (“interim”) IFRS aimed at a very restricted sub-set of entities.

Given the current situation of widespread use of IFRS throughout the globe, we believe that the Board should be following a policy of publishing a single set of standards which are available to all on equal terms. It is our understanding that this is the essence of the IFRS Foundation’s objectives. We therefore do not agree with the finalisation of this ED as an “interim” standard.

In contrast, we agree with the alternative views expressed in the ED by Messrs Edlmann, Gomes and Zhang, namely, that the proposals of this ED will lead to reduced comparability and consistency with established current IFRS practice and that this ED sets an unwarranted precedent for future major projects. Now that a critical mass of jurisdictions and companies across the globe has adopted IFRS, we believe that the best approach for the sake of comparability is for all new adopters to accept IFRS as it is and then move towards any new standards together.

We think that this ED has been primarily motivated by the wish of the IASB to provide certain jurisdictions with an incentive to adopt IFRS. As current users of IFRS who have invested a great deal of effort in the IFRS “brand” over the last decade, we find this unacceptable, since we believe that this approach will weaken the reputation of the IFRS “brand”. In addition, this proposal may have the negative effect of creating uncertainty, and perhaps undesirable expectations, about what the IASB’s approach might be in the context of the next potential adoption of IFRS by a major jurisdiction. The resulting situation of inconsistent accounting cannot be rectified by enhanced disclosure.

In our view, in the interests of the objective of the “level playing field”, which is at the very base of the drive for globally accepted accounting standards, this ED should be abandoned and we have expressed this request to the IASB.

However, if the Board were to continue on this path, we would recommend that Europe does not endorse this interim standard in order to maintain comparability at European level.

Please do not hesitate to contact us if you would like to discuss this further.

Yours faithfully

ACTEO

AFEP

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Patrice MARTEAU  
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