



To: Mr Roger Marshall
Acting President
EFRAG
Cc: Ms Françoise Flores
Chairman EFRAG TEG

Our
reference: ECO-FRG-14-284

Subject: Insurance Europe response to the Discussion Paper of EFRAG/ASBJ/OIC: Should Goodwill still not be amortised? Accounting and Disclosure for Goodwill.

Brussels, 28 November 2014

Dear Mr Marshall,

Insurance Europe welcomes the opportunity to comment on the Discussion Paper "*Should Goodwill still not be amortised? Accounting and Disclosure for Goodwill*" as issued by the European Financial Reporting Advisory Group (EFRAG), the Accounting Standard Board of Japan (ASBJ) and, the Italian Standard Setter, the Organismo Italiano di Contabilità (OIC) on 22 July 2014.

We would like to express our strong support for the proactive activities the EFRAG is undertaking to stimulate discussions on issues of significant importance in the field of financial reporting in accordance with IFRS. In particular, we appreciate the efforts undertaken by the EFRAG to investigate whether the current accounting treatment for goodwill purchased in a business combination (IFRS 3) should be fundamentally revised by the International Accounting Standards Board (IASB). While Insurance Europe has not yet reached a single conclusion on this complex topic, we would greatly appreciate if further education and research on this matter becomes available.

Insurance Europe also welcomes that the Discussion Paper is analysing various aspects of existing and potential disclosure requirements on goodwill impairment. We believe such an analysis is in line with the objective of the Disclosure Initiative undertaken by the IASB which Insurance Europe supports. As a general principle, we also do not believe that just adding new disclosure requirements to IAS 36 would make the financial statements automatically more effective.

We are looking forward to EFRAG's initial assessment of its comments received and any next steps that will be taken in order to provide you with more detailed feedback. We encourage EFRAG to share the final conclusions on the Discussion Paper with the IASB ahead of the upcoming Agenda Consultation 2015.

Please feel free to contact us should you have any further questions or comments.

Yours sincerely,

Olav Jones
Director Economics & Finance / Deputy Director General