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Re: Comments on draft comment letter on ED/2017/6 Definition of Material

(Proposed amendments to IAS 1 and IAS 8)

Dear members of the EFRAG Technical Expert Group,

The Dutch Accounting Standards Board (DASB) appreciates the opportunity to respond to your draft comment letter on 'Exposure Draft ED/2017/6 Definition of Material (Proposed amendments to IAS 1 and IAS 8)'.

We concur with the comments made by EFRAG in its draft comment letter with due regard to our comments below.

In response to your questions we can answer you as follows:

DASB supports EFRAG's suggestion to define material information more simply and directly and therefore removing the references to 'omitting', 'misstating' and 'obscuring' from the definition of material information. We agree with your suggestion to address these references separately from the definition in accompanying guidance, provided that these are included in the standards as a non-exhaustive list of manifestations of material information.

In addition we would like to express our preference for the use of the term "either" and therefore propose to amend your proposed definition of 'material information' as follows: "Material information is information that, either individually or in combination with other information, can reasonably be expected to influence the economic decisions that the primary users of financial statements make." (1)

We are not aware of any specific areas where the proposed exclusion might create legal issues in the specific context of our jurisdiction. (2)

We will be pleased to give you any further information that you may require. Yours sincerely,

prof. dr. Peter Sampers Chairman Dutch Accounting Standards Board