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Our ref: RJ-IASB 512 B
Direct dial: Tel.: (+31) 88 4960 391
Date: Hoofddorp, 11 December 2023
Re: Comments on Exposure Draft ED/2023/1 'Annual Improvements – Volume 11'

Dear members of the International Accounting Standards Board,

The Dutch Accounting Standards Board (DASB) appreciates the opportunity to provide a response on the Exposure Draft ED/2023/1 'Annual Improvements – Volume 11' issued by the IASB in September 2023.

The DASB welcomes the IASB's efforts to clarify the wording in an Accounting Standard or correct relatively minor unintended consequences, oversights or conflicts between the requirements of the Accounting Standards. We agree with the comments provided by EFRAG in the draft comment letter¹.

We in particular echo EFRAG's comments on the following topics:

- the recommendation of EFRAG to clarify the interaction between IFRS 9 and IFRS 16 as part of a narrow scope standard-setting project. The proposed amendments to IFRS 9 on the 'Derecognition of lease liabilities' does not address the interaction between IFRS 9 and IFRS 16. Currently a change in a lease arrangements that results in a lease liability being extinguished in accordance with IFRS 9 also meets the definition of a lease modification in Appendix A of IFRS 16.
- the recommendation to reconsider whether, in assessing if a party is a de facto agent of an entity, the entity needs to look upward to the powers held by its parent over that party (IFRS 10).

Besides the matters mentioned above, the DASB agrees with the IASB's proposals to amend the IFRS Accounting Standards and accompanying guidance in the manner described in the Exposure Draft.

Please feel free to contact us if you wish to discuss the contents of this letter.

Yours sincerely,

drs. G.M. van Santen RA, Chairman Dutch Accounting Standards Board

¹ [EFRAG DCL on ED/2023/1](#)