

International Financial Reporting Standard

Presentation of Items of Other Comprehensive Income

June 2011

BASIS FOR CONCLUSIONS – AMENDMENTS

[IAS 1]

[Related to AASB 2011-9]

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Amendments to the Basis for Conclusions on IAS 1 *Presentation of Financial Statements*

After paragraph BC6A, a heading and paragraph BC6B are added. Paragraphs BC20A and BC20B, BC54A–BC54J and BC105A–BC105B are added.

Presentation of Items of Other Comprehensive Income **(Amendments to IAS 1)**

- BC6B In May 2010 the Board published an exposure draft of proposed amendments to IAS 1 relating to the presentation of items of other comprehensive income (OCI). The Board subsequently modified and confirmed the proposals and in June 2011 issued *Presentation of Items of Other Comprehensive Income* (Amendments to IAS 1). The amendments were developed in a joint project with the US national standard-setter, the Financial Accounting Standards Board (FASB), with the aim of aligning the presentation of OCI so that information in financial statements prepared by entities using IFRSs and entities using US generally accepted accounting principles (GAAP) can be more easily compared.
- BC20A In May 2010 the Board published the exposure draft *Presentation of Items of Other Comprehensive Income* (proposed amendments to IAS 1) relating to the presentation of items of other comprehensive income (OCI). One of the proposals in the exposure draft related to the title of the statement containing profit or loss and other comprehensive income. The Board proposed this change so that it would be clear that the statement had two components: profit or loss and other comprehensive income. A majority of the respondents to the exposure draft supported the change and therefore the Board confirmed the proposal in June 2011. IAS 1 allows preparers to use other titles for the statement that reflect the nature of their activities.
- BC20B Several other IFRSs refer to the ‘statement of comprehensive income’. The Board considered whether it should change all such references to ‘statement of profit or loss and other comprehensive income’. The Board noted that the terminology used in IAS 1 is not mandatory and that ‘statement of comprehensive income’ is one of the examples used in the standard. The Board decided that there was little benefit in replacing the title ‘statement of comprehensive income’ in other IFRSs or ‘income statement’ with the ‘statement of profit or loss’. However, the Board did change the terminology when an IFRS made reference to the two-statement option.

- BC54A In *Presentation of Items of Other Comprehensive Income* published in May 2010 the Board proposed to eliminate the option to present all items of income and expense recognised in a period in two statements, thereby requiring presentation in a continuous statement displaying two sections: *profit or loss* and *other comprehensive income*. The Board also proposed to require items of OCI to be classified into items that might be reclassified (recycled) to profit or loss in subsequent periods and items that would not be reclassified subsequently.
- BC54B In its deliberations on financial instruments and pensions the Board discussed the increasing importance of consistent presentation of items of OCI. Both projects will increase the number of items presented in OCI, particularly items that will not be reclassified subsequently to profit or loss. Therefore the Board thought it important that all income and expenses that are components of the total non-owner changes in equity should be presented transparently.
- BC54C The Board has no plans to eliminate profit or loss as a measure of performance. Profit or loss will be presented separately and will remain the required starting point for the calculation of earnings per share.
- BC54D The Board had previously received responses to similar proposals for a single statement of comprehensive income. In October 2008 the Board and the FASB jointly published a discussion paper, *Preliminary Views on Financial Statement Presentation*. In that paper, the boards proposed eliminating the alternative presentation formats for comprehensive income and to require an entity to present comprehensive income and its components in a single statement. The boards asked for views on that proposal. The responses were split on whether an entity should present comprehensive income and its components in a single statement or in two separate statements. In general, respondents supporting a single statement of comprehensive income said that it would lead to greater transparency, consistency and comparability. Furthermore, the process of calculating financial ratios would be made easier.
- BC54E Respondents disagreeing with the proposal for a single statement of comprehensive income urged the boards to defer any changes to the guidance on the statement of comprehensive income until the boards had completed a project to revise the guidance on what items should be presented in OCI. Those respondents also said that a single statement would undermine the importance of profit or loss by making it a subtotal and that presenting total comprehensive income as the last number in the statement would confuse users. They also feared that requiring all items of income and expense to be presented in a single statement was

the first step by the boards towards eliminating the notion of profit or loss. In addition, they argued that the items that are presented in OCI are different from items presented in profit or loss. Therefore they preferred either to keep the presentation of profit or loss separate from the presentation of OCI or to allow management to choose to present them either in a single statement or in two statements.

BC54F In the responses to the exposure draft of May 2010 many of the respondents objected to the proposals to remove the option to present all items of income and expense in two statements. The arguments used by those objecting were much the same as those received on the discussion paper. However, many respondents, regardless of their views on the proposed amendments, said that the Board should establish a conceptual basis for what should be presented in OCI. Those opposed to a continuous statement cited OCI's lack of a conceptual definition and therefore believed that OCI should not be presented in close proximity to profit or loss because this would confuse users. However, users generally said that the lack of a conceptual framework made it difficult to distinguish the underlying economics of items reported in profit or loss (net income) from items reported in other comprehensive income. Although users also asked for a conceptual framework for OCI, most supported the notion of a single statement of comprehensive income.

BC54G Another issue on which many respondents commented was the reclassification (recycling) of OCI items. Those respondents said that in addition to addressing the conceptual basis for the split between profit or loss and OCI the Board should set principles for which OCI items should be reclassified (recycled) to profit or loss and when they should be reclassified. The Board acknowledges that it has not set out a conceptual basis for how it determines whether an item should be presented in OCI or in profit or loss. It also agrees that it has not set out principles to determine whether items should be reclassified to profit or loss. Those matters were not within the scope of this project, which focused on presentation, and therefore the Board has not addressed them at this time. However, the Board is consulting on its future agenda, which could lead to those matters becoming part of the work programme.

BC54H In the light of the response the Board confirmed in June 2011 the requirement for items of OCI to be classified into items that will not be reclassified (recycled) to profit or loss in subsequent periods and items that might be reclassified.

- BC54I The Board also decided not to mandate the presentation of profit or loss in a continuous statement of profit or loss and other comprehensive income but to maintain an option to present two statements. The Board did this in the light of the negative response to its proposal for a continuous statement and the resistance to this change signified by a majority of respondents.
- BC54J The FASB also proposed in its exposure draft to mandate a continuous statement of comprehensive income but decided in the light of the responses not to go as far as mandating a single statement and instead to allow the two-statement option. Nevertheless, the changes made by the FASB are a significant improvement for US GAAP, which previously allowed an option to present OCI items in stockholders' equity or in the notes to the financial statements.
- BC68A In its exposure draft *Presentation of Items of Other Comprehensive Income* published in May 2010 the Board proposed requiring that income tax on items presented in OCI should be allocated between items that will not be subsequently reclassified to profit or loss and those that might be reclassified, if the items in OCI are presented before tax. Most respondents agreed with this proposal as this would be in line with the existing options in IAS 1 regarding presentation of income tax on OCI items. Therefore the Board confirmed the proposal in June 2011.
- BC105A The exposure draft *Presentation of Items of Other Comprehensive Income* published in May 2010 proposed changes to presentation of items of OCI. The Board finalised these changes in June 2011 and decided that the effective dates for these changes should be for annual periods beginning on or after 1 July 2012, with earlier application permitted. The Board did not think that a long transition period was needed as the changes to presentation are small and the presentation required by the amendments is already allowed under IAS 1.
- BC105B The Board had consulted on the effective date and transition requirements for this amendment in its *Request for Views on Effective Dates and Transition Requirements* in October 2010 and the responses to that document did not give the Board any reason to reconsider the effective date and the transition requirements.

Dissenting opinion on amendments issued in June 2011

Dissent of Paul Pacter

- DO1 Mr Pacter voted against issuing the amendments to IAS 1 *Presentation of Financial Statements* set out in *Presentation of Items of Other Comprehensive Income* in June 2011. Mr Pacter believes that the Board has missed a golden opportunity to align the performance statement with the Board's *Conceptual Framework* and, thereby, improve information for users of IFRS financial statements.
- DO2 Mr Pacter believes that ideally this project should have provided guidance, to the Board and to those who use IFRSs, on which items of income and expense (if any) should be presented as items of other comprehensive income (OCI) and which of those (if any) should subsequently be recycled through profit or loss. Mr Pacter acknowledges and accepts that this project has a more short-term goal – 'to improve the consistency and clarity of the presentation of items of OCI'. He believes that this project fails to deliver on that objective, for the following reasons:
- (a) Consistency is not achieved because the standard allows choice between presenting performance in a single performance statement or two performance statements. Users of financial statements—and the Board itself—have often said that accounting options are not helpful for understandability and comparability of financial statements.
 - (b) Clarity is not achieved because allowing two performance statements is inconsistent with the *Conceptual Framework*. The *Conceptual Framework* defines two types of items that measure an entity's performance—income and expenses. Mr Pacter believes that all items of income and expense should be presented in a single performance statement with appropriate subtotals (including profit or loss, if that can be defined) and supporting disclosures. This is consistent with reporting all assets and liabilities in a single statement of financial position, rather than multiple statements. Unfortunately, neither IAS 1 nor any other IFRS addresses criteria for which items are presented in OCI. And the recent history of which items are presented in OCI suggests that the decisions are based more on expediency than conceptual merit. In Mr Pacter's judgement, that is all the more reason to have all items of income and expense reported in a single performance statement.
- DO3 Mr Pacter believes that the Board should breathe new life into its former project on performance reporting as a matter of urgency.