



Project:	IPSASB Exposure Drafts on Public Sector Measurement	Meeting:	AASB August 2021 (M182)
Topic:	Current value measurement of operational capacity assets	Date of this paper:	26 July 2021
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		Project Priority:	Medium
		Decision-Making:	High
		Project Status:	Comment letter drafting

Objective of this agenda item

1. Subject to submissions to be received on AASB Invitation to Comment ITC 45,¹ the objective of this agenda item is for the Board to **consider** preliminary responses (Agenda Paper 5.2) to:
 - (a) Specific Matters for Comment (SMC) 3 and 5 in IPSASB ED 76 *Conceptual Framework Update: Chapter 7, Measurement of Assets and Liabilities in Financial Statements*; and
 - (b) SMC 5, 6 and 8 in IPSASB ED 77 *Measurement*.

Reasons for bringing this agenda item to the Board

2. At its June 2021 meeting, the Board decided that its submission to the IPSASB should respond specifically to SMC 3–5 in ED 76 and SMC 5–9 in ED 77 and include its views on:
 - (a) all aspects of the proposed current operational value (COV) measurement basis; and
 - (b) the IPSASB's rationale why fair value is inappropriate for measuring the current value of operational capacity assets.²
3. Accordingly, staff have prepared for the Board's consideration a working draft submission

1 On 11 May 2021, the Board issued AASB ITC 45, [Request for Comment on IPSASB Exposure Drafts ED 76 Conceptual Framework Update: Chapter 7, Measurement of Assets and Liabilities in Financial Statements and ED 77 Measurement](#), to request comments on the IPSASB EDs. Comments are due by 3 August 2021.

2 For ease of reference in this agenda item, staff have used the term 'operational capacity assets' as an abbreviation for the phrase used in ED 76 and ED 77 – 'non-financial assets held for their operational capacity'. This phrase has the same meaning as the following phrase used in AASB Standards (e.g. AASB 136 para. Aus5.1) – non-financial assets of a not-for-profit public sector entity 'not held primarily for their ability to generate net cash inflows'.

(Agenda Paper 5.2), which addresses some of those SMCs. The draft text has been prepared based on:

- (a) the Board’s discussions at the June 2021 meeting; and
 - (b) feedback received from stakeholders on the Board’s Fair Value Measurement for Not-for-Profit Entities project (FVM project)³ and in targeted outreach on ITC 45 (see paragraph 1212 for details).
4. Based on the Board’s feedback at this meeting and submissions to be received on AASB ITC 45, staff will provide an updated draft submission for the Board’s consideration at the September 2021 meeting. That draft submission will include consideration of other aspects of the proposed COV measurement basis that the Board has deliberated upon, but in the context of fair value (see [Appendix A](#)).
 5. In respect of the Board’s decision noted in paragraph 2(a) above, staff note that ED 77 proposes mandatory guidance for measuring the COV of restricted operational capacity assets that aligns with the Board’s tentative decision made in 2019-20 in its FVM project about the fair value measurement of such assets – that, under certain circumstances, the current value of restricted operational capacity assets should be measured using the cost approach, without a reduction for the effect of restrictions. That is, under certain circumstances, the market and the income approach should not be used to measure the current value of restricted operational capacity assets.
 6. However, staff observed from the June 2021 meeting that some Board members expressed an alternative view that public sector entities’ choice of using the market, income or cost approach to measure the fair value of restricted assets (or other assets) should not be circumscribed in any way. This is in line with the majority of the feedback received during the targeted outreach in the FVM project to date. Staff have interpreted those comments to mean that those Board members may want to reconsider the Board’s tentative decision mentioned in paragraph 5.
 7. Therefore, staff expect a key focus of this meeting will be for the Board to decide (provisionally: subject to submissions to be received on ITC 45) its comments in the submission on the measurement of restricted assets. See Note 6 to Board members in Agenda Paper 5.2.
 8. As was mentioned in [Agenda Paper 12.1](#) for the Board’s June 2021 meeting, staff observe that the NZASB decided at its May 2021 meeting to respond to the majority of the SMCs in ED 76 and ED 77. This is because it adopts IPSAS for Public Benefit Entities (PBEs) and some of the proposals could lead to changes in practice for these entities. Staff are monitoring developments in the preparation of the NZASB’s submission.

Papers for this agenda item

- Agenda Paper 5.2: Working draft submission covering issues addressed in the Board’s June 2021 meeting and in this Board meeting
- Agenda Paper 5.3: AASB ITC 45, which includes ED 76 and ED 77, for reference (in supplementary folder)

3 The project summary for the FVM project is available [here](#).

Appendices in this memo

- 9. There are two appendices in this memo for the Board’s information:
 - [Appendix A](#) outlines topics to be discussed at the September 2021 meeting; and
 - [Appendix B](#) provides a high-level summary of the feedback on ITC 45 received from the meeting with the Project Advisory Panel (the Panel) held on 29 June 2021 and the virtual outreach event held on 6 July 2021 on the SMCs discussed at this meeting.

Questions for Board members

- 10. There are no questions for Board members in this memo. Questions for Board members are included in Agenda Paper 5.2.

Summary of staff’s proposed draft text in the working draft submission

- 11. The following Table provides a high-level summary of staff’s proposed draft text for the Board’s submission in Agenda Paper 5.2 for each of the SMCs.

Summary of IPSASB SMC	Key points in Agenda Paper 5.2, subject to feedback to be received on ITC 45
ED 76	
SMC 3: Do you agree with the proposed inclusion of current operational value as a measurement basis for assets in the Conceptual Framework?	(a) The IPSASB’s explanation of why it concluded that fair value is appropriate for assets held primarily for their financial capacity but inappropriate for operational capacity assets should be expanded to provide better justification for that conclusion. (b) The measurement objective of COV is not clearly stated in ED 76 and ED 77, particularly whether the aim is solely to measure an asset’s entry price.
SMC 5: Noting that ED 77 <i>Measurement</i> proposes the use of the cost approach and the market approach as measurement techniques, do you agree with the proposed deletion of the following measurement bases from the Conceptual Framework? <ul style="list-style-type: none"> • Market value for assets and liabilities. • Replacement cost for assets. 	(a) Agree with the proposed deletion of ‘market value’ given the proposal to conform the definition of ‘fair value’ to that used in IFRS 13 <i>Fair Value Measurement</i> . (b) The reasons given in ED 76 and ED 77 for proposing to remove replacement cost as a current value measurement basis should be expanded to provide better justification for that proposal. This is because COV is meant to reflect an entry price and the IPSASB’s proposals include using the cost approach as a measurement technique to estimate COV.

Summary of IPSASB SMC	Key points in Agenda Paper 5.2, subject to feedback to be received on ITC 45
ED 77	
SMC 5: Do you agree that current operational value is the value of an asset used to achieve the entity's service delivery objectives at the measurement date?	<p>(a) ED 76 and ED 77 appear to contain some inconsistencies in respect of the measurement objective of COV:</p> <ul style="list-style-type: none"> i. it is unclear whether COV is a measure of the cost required to replace the service potential of an asset or an intrinsic value to the entity of an asset's remaining service potential; and ii. ED 77 para. B4 requires measurement of COV to disregard potential alternative uses and any other characteristics of the asset that could maximise its market value. However, ED 76 para. 7.53 describes COV as providing a useful measure of the resources available to provide services in future periods. <p>(b) In relation to current value measurement of restricted assets, five draft text alternatives have been included in Agenda Paper 5.2 for Board members' consideration:⁴</p> <ul style="list-style-type: none"> i. Option 1 – not expressing a AASB view about current value measurement of restricted assets and only provide the IPSASB with a summary of feedback received from stakeholders regarding fair value measurement of restricted assets; ii. Option 2A – express a view based on the Board's tentative decision to mandate the use of the cost approach in measuring restricted assets under certain circumstances, which aligns with the proposals in ED 77; iii. Option 2B – express a view based on Option 2A, but also include rationale for the alternative view (noted in Option 3A) expressed by some Board members, to provide both sides of the debate; iv. Option 3A – express a view based on the alternative views expressed by some Board members in the June 2021 meeting and consistent with the majority of stakeholder feedback from the FVM project to date, that the selection of the measurement approaches to measure the fair value of
SMC 6: Do you agree that the proposed definition of current operational value and the accompanying guidance is appropriate for public sector entities?	

⁴ A staff recommendation is not included regarding which option to select, for the reasons described in para. 73 of Agenda Paper 5.2.

Summary of IPSASB SMC	Key points in Agenda Paper 5.2, subject to feedback to be received on ITC 45
	<p>restricted assets (or other assets) should not be circumscribed in any way; and</p> <p>v. Option 3B – express a view based on Option 3A, but also include rationale for the Board’s tentative decision (noted for Option 2A) to present both sides of the debate.</p> <p>Refer to Appendix A for other aspects of COV to be discussed in the September 2021 meeting.</p>
<p>SMC 8: Do you agree that the income approach is applicable when estimating the value of an asset measured using the current operational value measurement basis?</p>	<p>(a) ED 76 and ED 77 are unclear whether COV is meant to be limited to the entry price of an asset and, where not, what the nature of the measurement is.</p> <p>(b) If reflecting an asset’s entry value is the sole objective of COV, the AASB would support the observation noted in the Alternative View in ED 77 para. AV14 that permitting the use of the income approach in estimating current operational value would mean that the resulting valuation might not reflect an entry price.</p>

Feedback received from stakeholders

12. The working draft submission (Agenda Paper 5.2) reflects staff recommendations based on the analysis of the stakeholders’ feedback received:
- (a) during the targeted outreach throughout 2019-21 as part of the FVM project to date. This includes comments from the meetings of the Project Advisory Panel (the Panel) held on 16 May 2018, 10 April 2019, 10 February 2020⁵ and 14 August 2020.⁶ It also includes letters received from: three valuers (the two non-confidential letters are Agenda Papers [6.4](#) and [6.5](#) for the November 2019 meeting); the Australasian Council of Auditors-General (ACAG) (see Agenda Paper [6.6](#) for the November 2019 meeting); and the Heads of Treasuries Accounting and Reporting Advisory Committee (HoTARAC) (see Agenda Paper [11.3](#) for the March 2020 meeting);
 - (b) from the 2020 targeted outreach discussions with some users of public sector entities’ financial statements regarding the current value measurement perspective most useful to them, and on the previously tentatively proposed additional disclosures regarding restricted land (see Agenda Paper [4.2](#) for the November 2020 meeting);
 - (c) from the 2021 survey sent to members of the Panel and stakeholders who originally requested guidance to assist NFP public sector entities in applying AASB 13 (see Agenda

5 Appendix A of [Agenda Paper 11.1](#) for the March 2020 meeting includes a high-level summary of feedback received from Panel members at the 10 February 2020 meeting.

6 [Agenda Paper 7.2](#) for the September 2020 meeting is a copy of the staff paper for the Panel meeting held on 14 August 2020, annotated with a summary of feedback received from stakeholders.

Paper [10.3](#) for the February 2021 meeting). The purpose of that survey was to understand whether circumstances and the scope of guidance sought have changed since they originally requested guidance, and the specific aspects of fair value measurement for which guidance is most promptly needed;

(d) from the Panel meeting on ITC 45 held on 29 June 2021 (see [Appendix B](#) of this paper); and

(e) from the virtual outreach event on ITC 45 held on 6 July 2021 (see [Appendix B](#) of this paper). The event was attended by 25 people, comprising mostly preparers (43%) and auditors (29%) of financial statements and valuers (21%), but no users of financial statements.

13. Staff will provide an oral update at the August meeting on the informal feedback received on ITC 45 from meetings with HoTARAC and the Financial Reporting and Accounting Committee (FRAC) of ACAG.

14. Any reference to stakeholder comments in Agenda Paper 5.2 does not include submissions on ITC 45, which are due to the AASB by 3 August 2021 and have yet to be received.

Timeline and Milestones

15. The Table below contains a draft timeline for finalising the submission, for the Board's noting.

Meeting / Deliverable	Milestones
8–9 September 2021: Board meeting	Board to consider: <ul style="list-style-type: none"> • remaining aspects of the proposed current operational value measurement basis (see Appendix A); • submissions on ITC 45; and • a revised draft submission to the IPSASB.
October 2021	Board subcommittee to approve the submission out of session.
10–11 November 2021: Board meeting	Board to consider implications of comments received on ITC 45 for the direction of future work on the FVM project. Amongst other measurement issues, this would include discussion of whether the Board should consider, in respect of current value measurement of operational capacity assets by Australian NFP entities: <ul style="list-style-type: none"> (a) adopting the IPSASB's proposed current operational value; or (b) continuing to apply AASB 13 and either: <ul style="list-style-type: none"> (i) continuing their current practice in applying AASB 13; or (ii) possibly changing their current practice if, through due process, the Board's tentative decisions to date in its project (where different from current practice) were to come into effect.

Appendix A: Topics to be discussed at the September meeting

1. The Table below summarises the topics yet to be discussed at the September meeting.

Topic	Staff proposed key points to address in the submission, subject to feedback received on ITC 45
<i>SMC 4 in ED 76</i>	
(a) The IPSASB's proposal to remove value in use as a current value measurement basis in its Conceptual Framework	The IASB has retained value in use as a current value measurement basis for assets in its revised Conceptual Framework. Staff consider that insufficient reasons have been provided in the IPSASB EDs to justify the proposed removal of this measurement basis from the IPSASB's Conceptual Framework.
<i>SMC 5–6 in ED 77</i>	
(b) Nature of component costs to include in an asset's current replacement cost	In respect of the costs of a modern equivalent asset to estimate an asset's current replacement cost: <ul style="list-style-type: none"> • the IPSASB proposes that certain costs could be ignored; and • in contrast, the Board has reached a tentative view that the current replacement cost of an asset includes all necessary costs intrinsically linked to acquiring the asset at the measurement date (see the June 2019 meeting Action Alert).
(c) Whether the current replacement cost of a self-constructed asset should include borrowing costs	In respect of the costs of a modern equivalent asset used to estimate an asset's current replacement cost: <ul style="list-style-type: none"> • the IPSASB proposes that if an entity does not capitalise borrowing costs when initially recognising an asset, the entity should disregard any financing costs in measuring the modern equivalent asset in subsequent measurement; and • in contrast, the Board has reached a tentative view that the accounting policy choice for borrowing costs regarding an asset's initial recognition is irrelevant to how those costs should be treated when measuring the fair value of an asset that necessarily takes a substantial period of time to get ready for its intended use. This is because the price that market participant buyers would pay for an asset is unaffected by accounting policies adopted in respect of that asset (see the June 2019 meeting Action Alert).

Topic	Staff proposed key points to address in the submission, subject to feedback received on ITC 45
(d) Consideration of obsolescence when determining current operational value	<p>Staff consider that the guidance in ED 77 is not clear in distinguishing whether a loss of utility of an asset should be treated as:</p> <ul style="list-style-type: none"> (a) surplus capacity, which is not adjusted for when measuring the asset's current operational value; or (b) an indication of economic obsolescence, which is deducted when measuring the asset's current operational value; or (c) an indication of impairment. (This staff view is consistent with the Alternative View on this aspect of ED 77 expressed by two IPSASB members). <p>The Board has reached a tentative view that, when measuring an asset's current replacement cost under fair value, economic obsolescence should not:</p> <ul style="list-style-type: none"> (a) be identified if the asset has apparent 'excess capacity' that is temporary or occurs cyclically; and (b) be limited to circumstances in which a formal decision has been made to reduce the asset's physical capacity (see the April 2019 meeting Action Alert).
<i>SMC 7 in ED 77</i>	
(e) Whether an asset's current value should assume that the notional replacement will be situated in the same location as the existing asset is situated or used	<p>The Board has reached a tentative view that an asset's fair value should assume that the notional replacement will be situated in the same location as the existing asset is situated or used (see the November 2019 meeting Action Alert).</p>
<i>SMC 9 in ED 77</i>	
(f) The IPSASB's proposal that fair value is applicable to the current value measurement of assets held primarily for their financial capacity	<ul style="list-style-type: none"> (a) Fair value is the appropriate current value measurement basis for non-financial assets held primarily for their financial capacity; but (b) the Board would not limit the application of fair value to assets held primarily for their financial capacity (this comment was developed having regard to Board members' comments about fair value generally at the June 2021 meeting).

Appendix B: High-level summary of the feedback received on ITC 45 to date

Project Advisory Panel meeting held on 29 June 2021	Virtual outreach event held on 6 July 2021
<p>ED 76 SMC 3: Do you agree with the proposed inclusion of current operational value (COV) as a measurement basis for assets in the Conceptual Framework (<i>note: this was also asked of stakeholders in relation to accounting standards</i>)?</p>	
<p>A majority of those who commented would prefer for the Board to retain fair value (with its three valuation approaches) and continue its work on clarifying the meaning of the requirements of AASB 13, including the notion of the market participant buyer ‘stepping into the shoes of the NFP public sector entity holding the asset’. A majority of those who commented on the assurance implications of adopting COV expressed concerns about the subjectivity of COV, particularly in view of its principle of entity-specific value.</p> <p>A Panel member who expressed support for COV argued that applying the notion of the market participant buyer ‘stepping into the shoes of the NFP public sector entity holding the asset’ under the fair value basis is difficult, and applying COV would avoid that challenge. The Panel member also expressed concern about public sector entities writing down properties that had just been acquired due to a change in zoning to use those properties for delivery of public services. However, the Panel member expressed ambivalence about whether COV or fair value would, overall, be preferable.</p> <p>Another Panel member commented that measuring assets under AASB 13 is misaligned with how a NFP entity makes decisions about resource allocation.</p>	<p>A majority of those who commented would prefer for the Board to retain fair value (with its three approaches) and continue its work on clarifying the meaning of the requirements of AASB 13, for example, identifying the market participant for an asset and what they would do with the asset.</p> <p>A commentator who preferred COV to fair value as the current value measurement basis for operational capacity assets argued that COV would reflect an entity’s decisions to limit the use of some assets to an operational capacity role.</p> <p>A majority of those who commented on the assurance implications of adopting COV expressed concerns about the subjectivity of COV, and likely increased costs of auditing the valuations (including the need to audit the reasons for categorising assets into two groups measured differently). One participant commented that COV moves away from established valuation principles, and would be likely to cause increased valuation costs.</p> <p>One commentator said they regard COV as likely to reduce some costs of the financial reporting process. For example, existing use values would be better understood by users of financial statements, who struggle to understand highest and best use. Asset planning and management (including planning for replacements) is centred around the existing use of assets; therefore, existing use measurement would integrate better with strategic asset management. Another commentator responded that adopting COV is more likely to affect the valuation of land than improvements on land, and strategic asset management (including replacement of components) is more concerned with improvements.</p>

Project Advisory Panel meeting held on 29 June 2021	Virtual outreach event held on 6 July 2021
ED 77 SMC 5 – SMC 6: Do you agree COV is ‘the value of an asset used to achieve the entity’s service delivery objectives at the measurement date’?	
<p>A majority of those who commented preferred the alternative definition of COV in the Alternative View of two IPSASB members, namely, ‘the cost to replace the service potential embodied in an asset at the measurement date’. One Panel member argued in favour of using exit value where evidence of exit value is available.</p> <p>Reasons for disagreeing with the proposed definition are that: it does not specify whether ‘value’ should be from the perspective of the entity or third parties; and it does not state whether ‘value’ should be exit or entry value.</p> <p>Other elaborating comments centred mostly on why some Panel members disagree with diverging from the exit value concept of fair value.</p>	<p>A majority of those who commented preferred the alternative definition of COV in the Alternative View of two IPSASB members. Elaborating comments centred mostly on why some commentators disagree with diverging from the exit value concept of fair value.</p>
ED 77 SMC 6: Do you agree that the guidance accompanying the proposed definition of COV is appropriate for public sector entities? (<i>This question is separated in two parts below</i>)	
(a) Do you agree with measuring an asset’s COV based only on its current use? (<i>this question is unrelated to restrictions, addressed in (b) below</i>)	
<p>A majority of those who commented disagreed with the ED 77 assumption of existing use value (however, a majority also preferred fair value to COV, hence the view was not confined to how COV should be measured). Some argued that an asset’s current value should:</p> <ul style="list-style-type: none"> • assume the asset’s current use because it is likely to also be highest and best use, without incurring the cost of demonstrating that is the case; and • use the cost approach based on current use, unless inputs to the valuation under another approach are more observable. 	<p>A majority of those who commented disagreed with the ED 77 assumption of existing use value, and supported the concept of ‘highest and best use’.</p> <p>A commentator who agreed with the ED 77 proposal said current value measurements should reflect management’s strategy for holding and using assets.</p>
(b) Do you agree that, in respect of restricted assets, if an equivalent restricted asset is not obtainable for an observable market price, the asset’s COV should be measured at the price of an equivalent unrestricted asset, without a reduction for the restriction(s)?	
<p>A majority of those who commented disagreed, in respect of restricted land and restricted improvements on land (e.g. buildings).</p>	<p>A majority of those who commented disagreed with the IPSASB’s proposals in respect of</p>

Project Advisory Panel meeting held on 29 June 2021	Virtual outreach event held on 6 July 2021
<p>Comments included:</p> <ul style="list-style-type: none"> measuring restricted land at a value of an equivalent unrestricted asset appears to factor in opportunity cost. It is not clear in AASB 13 whether opportunity cost should be reflected in fair value; the IPSASB proposals would be difficult to apply because it can be arbitrary to identify an unrestricted asset that is equivalent to the restricted asset being measured; and under AASB 13, there would be no need to mandate a particular measurement technique to measure the fair value of a restricted asset. AASB 13 requires an entity to maximise the use of observable inputs, and in applying this concept an entity would use the market approach to measure restricted land, and would use the cost approach to measure specialised improvements on land. <p>A minority of those who commented supported the IPSASB proposal because it is consistent with the fair value concept of ‘highest and best use’, taking into account the asset’s use by its NFP entity holder.</p>	<p>restricted land. Comments included:</p> <ul style="list-style-type: none"> the fair value of land typically is estimated using the market approach; the market value of land is reduced by restrictions; and identifying ‘equivalent’ unrestricted land involves considerable subjectivity and therefore it is more difficult to obtain audit evidence. <p>A minority of those who commented agreed with the IPSASB’s proposal in respect of restricted land. However, reasons were not provided for their view.</p> <p>Although a minority of participants indicated that, in principle, any asset’s fair value should include a reduction for the effects of restrictions, none of them identified that applying the IPSASB’s proposal to estimate the current value of improvements on land, such as buildings, would have a practical effect. Those who provided a reason for their view indicated improvements are typically measured using the cost approach, under which the existence of restrictions does not affect the measurement of current replacement cost.</p>
<p>ED 77 SMC 8: Do you agree the income approach is applicable to estimate the value of an asset measured using the COV basis?</p>	
<p>A majority of those who commented agreed with permitting use of the income approach to measure the current value of an operational asset. Reasons given for this view included:</p> <ul style="list-style-type: none"> the distinction between operational capacity assets and assets held primarily for their financial capacity can be unclear (e.g. for some assets, both the provision of services and generation of commercial returns are essential); therefore, allowing any of the three approaches to be used, as appropriate—consistent with IFRS 13—for all non-financial assets avoids the application of different approaches based on unclear distinctions; and because for-profit entities can also hold operational capacity assets, the 	<p>A majority of those who commented agreed with permitting use of the income approach to measure the current value of an operational asset. Reasons given for this view included:</p> <ul style="list-style-type: none"> a valuer should derive much the same measure of an asset’s fair value under any of the market, income or cost approaches; therefore, it would be inappropriate to exclude an approach that, in the circumstances, may have the most observable inputs; some assets being valued are asserted by their holders to be held primarily for non-cash-generating purposes, yet have considerable income-generating potential; therefore, permitting use of the income approach enables the full cash-generating

Project Advisory Panel meeting held on 29 June 2021	Virtual outreach event held on 6 July 2021
<p>measurement rules for operational capacity assets should be consistent with the unmodified text of IFRS 13.</p> <p>A minority of those who commented disagreed with permitting use of the income approach to measure the current value of an operational asset. One reason given was that permitting use of the income approach to measure ‘non-cash-generating assets’ could result in such assets being reported at a low value, which would not be appropriate.</p> <p>One Panel member who agreed with permitting use of the income approach to measure the current value of an operational asset said it would seldom be appropriate to use the income approach (but prohibiting use of the income approach would not cater for the unusual cases in which it is appropriate). Nevertheless, the Panel member expressed concern that, with price capping of some services rendered by public utilities, valuations of assets based on the income approach can be significantly less than their valuations determined under the cost approach, and current replacement costs provide important information for predicting future cash outflows on replacements of components.</p>	<p>potential of the asset to be reflected; and</p> <ul style="list-style-type: none"> the value of some assets, such as landfill sites, is affected by future cash outflows for which other data often is not readily available. <p>A minority of those who commented disagreed with permitting use of the income approach to measure the current value of an operational asset. However, reasons were not provided for their view.</p>