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10 December 2019

International Accounting Standards Board
Columbus Building
7 Westferry Circus
Canary Wharf
London E14 4HD
United Kingdom

Dear Sir,

COMMENTS ON THE INTERNATIONAL ACCOUNTING STANDARDS BOARD'S EXPOSURE DRAFT ED/2019/4

We would like to take this opportunity to comment on Exposure Draft (ED) ED/2019/4 *Amendments to IFRS 17 Insurance Contracts* issued by the International Accounting Standards Board (IASB).

2. We welcome the proposed amendment in the ED that allows entities to present insurance contract assets and insurance contract liabilities in the Statement of Financial Position using "portfolios" rather than "groups" of insurance contracts as this will reduce implementation costs. However, we would like to highlight that this may not bring significant relief to entities as there are other disclosure requirements using "groups" of insurance contracts.

3. We observe that IFRS 17 Paragraphs 100 to 109 still require reconciliations to amounts presented in the Statement of Financial Position to be disaggregated into "groups" of assets and liabilities, and these disclosures have not been amended in the published ED:

a. While IFRS 17 Paragraphs 100 to 105C has been amended to require reconciliations to amounts presented in the Statement of Financial Position to be disaggregated into "portfolios" of assets and liabilities, there are certain reconciliation components, such as loss components, insurance finance income or expenses, etc., which are based on "group" level, as these information are presented in the Statement of Profit or Loss and Other Comprehensive Income (P/L).

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b. There are also other disclosures of P/L information that require reconciliations to information presented in the Statement of Financial Position, such as analysis of insurance revenue recognised to be reconciled against changes in liability for remaining coverage (see IFRS 17 Paragraphs 106).

4. Therefore, the IASB may like to consider relaxing or simplifying the aforementioned disclosure requirements in the notes to the financial statements, by allowing them to be based on "portfolios", instead of "groups" of insurance contracts. This will also align the presentation and disclosures in the notes to the financial statements with that in the main statements.

5. We hope that our comments will contribute to IASB's further deliberation on this ED. Should you require any clarifications, please contact the Secretariat, Advisory Committee on Accounting Standards for Statutory Boards. Thank you.

Yours sincerely

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SECRETARIAT
ADVISORY COMMITTEE ON ACCOUNTING STANDARDS FOR STATUTORY BOARDS
for ACCOUNTANT-GENERAL