Exposure Draft ED/2015/2: Effective Date of IFRS 15 – Proposed amendments to IFRS 15

Dear Hans,

Mazars welcomes the opportunity to comment on the International Accounting Standards Board’s Exposure Draft (hereafter ED) Effective Date of IFRS 15 – Proposed amendments to IFRS 15, issued on 19 May 2015.

We agree with the proposal made by the IASB to defer the effective date of IFRS 15 by one year. We believe this change is reasonable considering that:

- It enables an alignment with what should be the effective date of Topic 606;

- Even though the forthcoming exposure-draft on IFRS 15 will propose relatively minor amendments to the standard, preparers need additional time to assess the impact of those amendments since they will clarify the guidance as regards important topics such as the identification of performance obligations, licenses and the principal versus agent distinction;

- Implementation issues are still being raised by stakeholders so that the TRG may identify new topics on which the IASB will have to work on in the coming months;

- Contrary to what might have been feared, we understand that most preparers have no intent to delay their transition project assuming the effective date is indeed differed by one year. This anticipated change is welcome in most cases to ensure a smoother and less risky transition, especially in situations where information systems will be significantly impacted;

- Furthermore, we do not believe that a deferral will penalise entities prepared to transition in 2017 since early application will still be permitted.
Please do not hesitate to contact us should you want to discuss any aspect of our comment letter.

Yours sincerely,

Michel Barbet-Massin
Head of Financial Reporting Technical Support