

International Accounting Standards Board  
30 Cannon Street  
London EC4M 6 XH  
United Kingdom

Dear Sirs,

**Re: IASB Exposure Draft ED/2014/3 – Recognition of Deferred Tax Assets for Unrealised Losses – Proposed amendments to IAS 12**

The Swedish Financial Reporting Board is responding to your invitation to comment on the Exposure Draft regarding recognition of deferred tax assets for unrealised losses.

The Exposure Draft addresses a very narrow and specific question regarding accounting for deferred tax assets related to investments in debt instruments. In the Exposure Draft it is also proposed to add more guidance for estimating taxable profits in future periods in general.

We support the clarification regarding deferred tax assets related to investments in debt instruments as expressed in the example illustrating paragraph 26(d). However, we do not believe that this very detailed and narrow example should be part of the standard. Instead, it should be an illustrative example of how to apply the standard. We also believe that proposed example in paragraph 26(d) should explain that it is irrelevant whether the instrument is measured at FVPL or at FVOCI.

Regarding the other amendments to the standard, we support the proposal to add paragraphs 27A and 29 (a)(i).

We find paragraph 29A very vague. It could be read in different ways. If read together with the debt instrument example – based on one specific asset - in mind, the paragraph seems to add guidance for this specific situation. But if read as guidance for estimating taxable profits in future periods in entities in general, paragraph 29A seems to add rule-based guidance not proper for a principle based standard. If read as general guidance, the first two sentences do not, according to our view, add anything to what already can be read into the standard. Those two sentences therefore are redundant. The last two sentences seem to introduce rules which we believe are too detailed while at the same time being very broad in scope. We therefore do not support the introduction of paragraph 29A.



# Rådet **för** **finansiell rapportering**

If you have any questions concerning our comments please address our Executive member Claes Janzon by e-mail to: [claes.janzon@radetforfinansiellrapportering.se](mailto:claes.janzon@radetforfinansiellrapportering.se)

Stockholm, 5 December 2014

Yours sincerely



Anders Ullberg  
Chairman