

# Lack of Exchangeability

Emerging Economies Group Meeting

Agenda Paper 2  
May 2022

# Overview

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Purpose of this meeting

Recap of the proposals

Feedback and possible ways forward

# Purpose of this meeting

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## Background

In April 2021 the IASB published the Exposure Draft *Lack of Exchangeability*, which proposed amendments to IAS 21 *The Effects of Changes in Foreign Exchange Rates*. At its January 2022 meeting the IASB discussed a [summary of feedback](#) on the Exposure Draft.

## Purpose

The staff will ask EEG members to provide views on possible ways forward on:

- Step I—assessing exchangeability between two currencies; and
- Step II—determining the spot exchange rate when exchangeability is lacking.

Questions for EEG members are on slides 14, 16, 18, 20, 22, 24 and 25.



# Recap of the proposals

# Why publish the Exposure Draft?

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## IAS 21 requirements

Use a spot exchange rate\* to report foreign currency transactions, present financial statements in a different currency or translate a foreign operation

## What if exchangeability between two currencies is lacking?



IAS 21 specifies the exchange rate to use when exchangeability between two currencies is temporarily lacking.



IAS 21 is silent when a lack of exchangeability is not temporary.



The Exposure Draft proposes to address *all* situations in which exchangeability between two currencies is lacking.

## IASB's objectives

Improve usefulness

Reduce diversity

\* Spot exchange rate is the exchange rate for immediate delivery

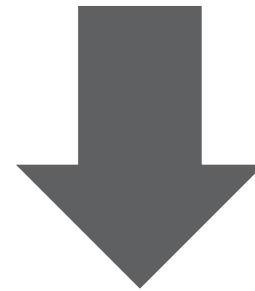
# The proposed approach—at a glance

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## The IASB proposed a two-step approach

**Step I**

Assess exchangeability between two currencies



If the currency is not exchangeable  
into the other currency

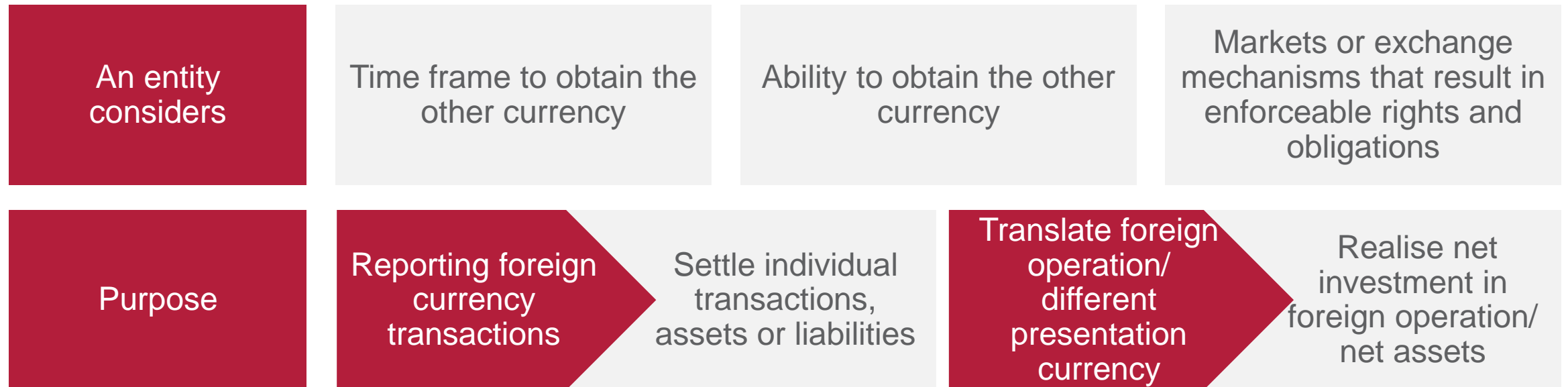
**Step II**

Determine the spot exchange rate when exchangeability is lacking

# Step I: Assessing exchangeability between two currencies

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A currency is exchangeable into another currency when an entity is able to exchange that currency for the other currency



A currency is not exchangeable into the other currency if the entity is able to obtain **no more than an insignificant amount** of the other currency for the identified reporting purpose

# Step II: Determining the spot exchange rate (1/2)

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Estimate the spot exchange rate at the measurement date

## Conditions the estimated rate would be required to meet (assessed at the measurement date)



would have applied to an exchange transaction



would have applied to an orderly transaction between market participants

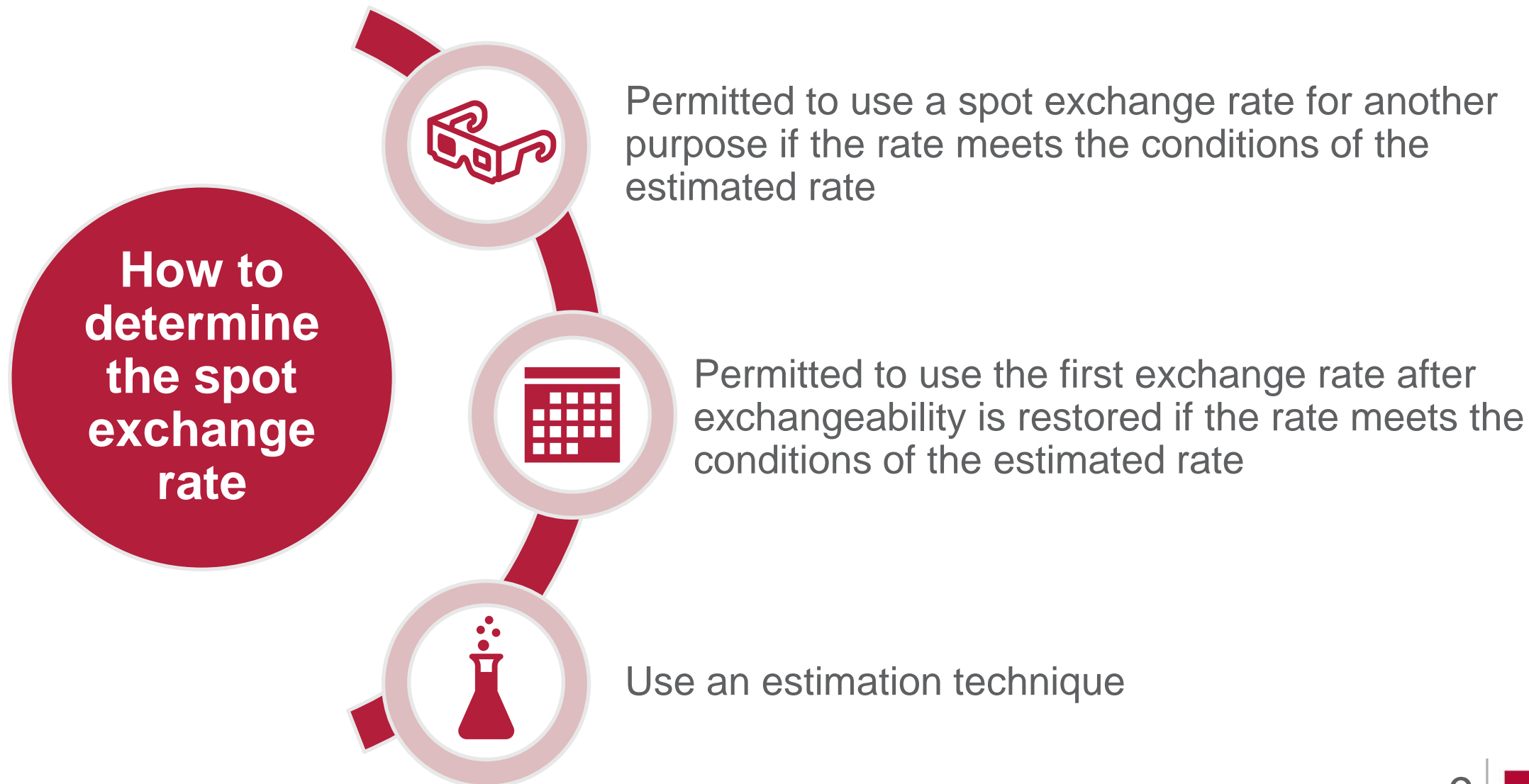


faithfully reflects prevailing economic conditions



# Step II: Determining the spot exchange rate (2/2)

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# Disclosure when a currency is not exchangeable

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**Objective:** disclose information that enables investors to understand the effect of the lack of exchangeability on an entity's financial performance, financial position and cash flows

## An entity would be required to disclose

Details of the currency and a description of the restrictions

Description of affected transactions

Carrying amount of affected assets and liabilities

The spot rate used

Description of any estimation technique used, and qualitative and quantitative information about the inputs used

Information about risks to which the entity is exposed because of the currency's lack of exchangeability

Additional disclosures would apply when a foreign operation's functional currency lacks exchangeability



# Feedback and possible ways forward

Step I: Holistic consideration of factors

Level of assessment

Steps I and II: Use of unofficial rates

Step II: Estimated rate (19A conditions)

Observable rates (19B)

Reference rates

Examples / application guidance

# Step I: Holistic consideration of factors

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## Proposed requirements



Proposed paragraphs A2–A4 state [emphasis added]:

A2. A currency is **exchangeable** into another currency at a measurement date when an entity is **able** to exchange that currency for the other currency within a **time frame** that includes a normal administrative delay and through a **market or exchange mechanism** in which the exchange transaction would create enforceable rights and obligations. If an entity is **able** to obtain **no more than an insignificant amount** of the other currency, a currency is not exchangeable into the other currency.

A3. An entity shall assess whether a currency is exchangeable into the other currency separately **for each reporting purpose** specified in paragraph A9.

A4. The requirements in paragraphs A5–A11 specify how an entity assesses whether a currency is exchangeable into another currency.

# Step I: Holistic consideration of factors

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## Feedback



Feedback indicates that some respondents read the proposed required factors to be considered in assessing exchangeability as applying individually or separately, instead of holistically. If applied individually or separately, questions then arise about the interaction between the factors.

## Possible ways forward



Emphasise and clarify the requirements in proposed paragraphs A2–A4—that an entity needs to consider holistically all factors in assessing exchangeability.

Do you think this will address the feedback? Do you have any other comments or suggestions?

# Step I: Level of assessment

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## Existing requirements



The Exposure Draft does not propose to change IAS 21's level of assessment and application (which is at an entity level).

Paragraph 3 of IAS 21 states that the Standard shall be applied:

- (a) in accounting for transactions and balances in foreign currencies...;
- (b) in translating the results and financial position of foreign operations that are included in the financial statements of the entity by consolidation or the equity method; and
- (c) in translating an entity's results and financial position into a presentation currency.

# Step I: Level of assessment

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## Feedback



Paragraph 4 of IAS 29 *Financial Reporting in Hyperinflationary Economies* states ‘it is preferable that all entities that report in the currency of the same hyperinflationary economy apply this Standard from the same date’.

A few respondents suggested exchangeability be assessed at a jurisdiction level, rather than at an entity level—similar to assessing hyperinflation in IAS 29.

## Possible ways forward



Reaffirm assessment at an entity level—although entities might often be in the same position regarding the exchangeability of one currency into another, some entities may be able to obtain the other currency for an identified purpose whilst others are not.

Do you think exchangeability should be assessed at a jurisdiction level rather than at an entity level?

If yes, how would entities (practically) assess exchangeability at a jurisdiction level?



# Steps I and II: Use of unofficial rates

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## Proposed requirements



Proposed paragraph A7 states [emphasis added]:

In assessing whether a currency is exchangeable into another currency, an entity shall consider only markets or exchange mechanisms in which a transaction to exchange the currency for the other currency **would create enforceable rights and obligations**. Enforceability is a matter of law. Whether an exchange transaction in a market or exchange mechanism would create enforceable rights and obligations depends on facts and circumstances.

Proposed paragraphs 19A–19B are silent on the use of unofficial (or ‘parallel’ or ‘black market’) rates in determining the spot exchange rate when exchangeability is lacking.

# Steps I and II: Use of unofficial rates

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## Feedback



Clarify that an entity cannot consider unofficial (or 'parallel' or 'black market') rates in assessing exchangeability between two currencies (Step I) but, when exchangeability is lacking, those rates can be used to estimate the spot exchange rate (Step II).

## Possible ways forward



Clarify that those rates cannot be used in Step I but can be used as a starting point for estimating the spot exchange rate in Step II.

Do you think this will address the feedback? Do you have any other comments or suggestions?

## Step II: Estimated rate (19A conditions)

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### Proposed requirements



Proposed paragraph 19A states [emphasis added]:

When exchangeability between two currencies is lacking—that is, when a currency is not exchangeable into another currency (as described in paragraphs A2–A11) at a measurement date—an entity **shall estimate** the spot exchange rate at that date. The estimated spot exchange rate **shall meet** the following conditions assessed at the measurement date:

- (a) a rate at which an entity would have been able to enter into an exchange transaction had the currency been exchangeable into the other currency;
- (b) a rate that would have applied to an orderly transaction between market participants; and
- (c) a rate that faithfully reflects the prevailing economic conditions.

## Step II: Estimated rate (19A conditions)

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### Feedback



- when exchangeability is lacking, meeting the conditions in proposed paragraph 19A may be impracticable.
- it is questionable whether exchangeability would actually be lacking if the conditions were met.
- revise the proposal to specify that the conditions are objectives an entity aims to meet when estimating the spot exchange rate, rather than requirements to be met.

### Possible ways forward



Amend proposed paragraph 19A to require an entity to best reflect, rather than meet, all the conditions in paragraphs 19A(a)–19A(c).

Do you think this will address the feedback? Do you have any other comments or suggestions?

## Step II: Observable rates (19B)

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### Proposed requirements



Proposed paragraph 19B states [emphasis added]:

In estimating the spot exchange rate as required by paragraph 19A, an entity **may use** an observable exchange rate as the estimated spot exchange rate when that observable exchange rate meets the conditions in paragraph 19A and is either:

- (a) a spot exchange rate for a purpose other than that for which the entity assesses exchangeability; or
- (b) the first exchange rate at which an entity is able to obtain the other currency after exchangeability of the currency is restored (first subsequent exchange rate).

## Step II: Observable rates (19B)

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### Feedback



- wording in proposed paragraph 19B is unclear.
- maximise the use of observable exchange rates, similar to the fair value hierarchy in IFRS 13 *Fair Value Measurement*.
- specify a required sequencing of using observable exchange rates, with differing views as to what the sequence should be.

### Possible ways forward



Continue to permit, but not require, the use of observable rates and further explain in the Basis for Conclusions why we are doing so.

Do you agree? Do you have any other comments or suggestions?

# Step II: Reference rates and examples / application guidance

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## Basis for Conclusions



Paragraph BC18 of the Exposure Draft states [emphasis added]:

...The [IASB] **did not propose any detailed requirements** on how an entity should make that estimation because:

- (a) estimating a spot exchange rate can be complicated and would depend on entity-specific and jurisdiction-specific facts and circumstances.
- (b) there are many economic models an entity might use to estimate a spot exchange rate... Prescribing one estimation technique or approach would be inappropriate** because it would be unlikely to capture all relevant factors for all possible situations in a way that would not be too burdensome.
- (c) the requirements for assessing exchangeability are expected to result in an entity estimating the spot exchange rate only in a narrow set of circumstances.
- (d) the uncertainties inherent in estimating a spot exchange rate are similar to those that relate to other financial information based on estimates.** Disclosing relevant information about the estimated spot exchange rate and the estimation technique would supplement the proposed approach...
- (e) such an approach is consistent with the measurement requirements in other IFRS [Accounting] Standards...

# Step II: Reference rates

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## Feedback



- permit or illustrate use of particular references (for example, inputs or mechanisms) in estimating the spot exchange rate.
- require an entity to maximise the use of observable inputs.
- clarify whether implied rates or rates from indirect currency exchange mechanisms are observable exchange rates.

## Possible ways forward



Reaffirm reasons in the Basis for Conclusions for not providing application guidance on estimation techniques or approaches.

However, should particular reference rates be specifically permitted? Should an entity be required to maximise the use of observable inputs?

Do you have any other comments or suggestions?



# Step II: Examples / application guidance

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## Feedback



- provide examples or application guidance to support application of paragraphs 19A and 19B.
- provide examples or application guidance on estimating a spot exchange rate (for example, techniques and inputs).

## Possible ways forward



Reaffirm reasons for not providing more application guidance on estimation techniques or approaches.

Recommend not adding examples—other changes will make it easier for entities to estimate a spot exchange rate.

Do you agree? Do you have any other comments or suggestions?

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