

Criticisms of fair value

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Criticisms	Our response
Subjectivity of fair values measurements	 Other estimates require a similar process and involve similar uncertainties (for example, measurement of provisions). Use valuation technique when there are no observable market prices available or when observable market prices do not represent fair value. Measurements with a higher degree of subjectivity are subject to more disclosure requirements.
Volatility introduced in reported income	 Fair value reflects the underlying economic volatility of the assets and liabilities themselves. For earnings to be informative to investors, they need to reflect this volatility.
Procyclicality	 Procyclicality is a natural consequence of an economic downturn. Amplified by fair value? From 2004–2006 banks held c. 50% assets not subject to fair value and prudential filters neutralised the effect to Tier 1 capital of some fair value gains and losses.

Criticisms of fair value - continued

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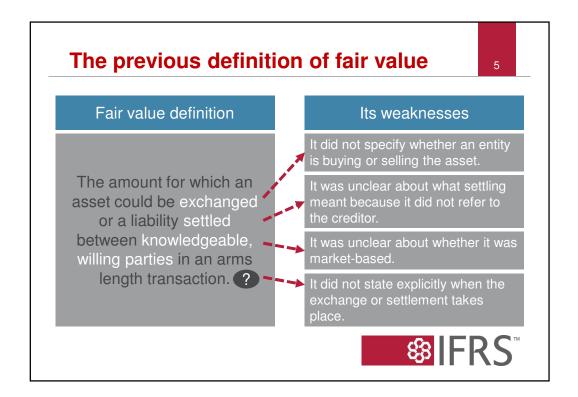
Criticisms	Our response
Information constraints (for example, few deep and liquid markets)	 The lack of market data or other key information is a global constraint, rather than a regional one. Even when limited information is available, fair value measurements can still be performed.
Limited valuation expertise	Commitment to provide educational material to assist in the implementation of fair value principles.
Guidance provided is not detailed enough	Educational material must benefit all entities (in developed and emerging economies).

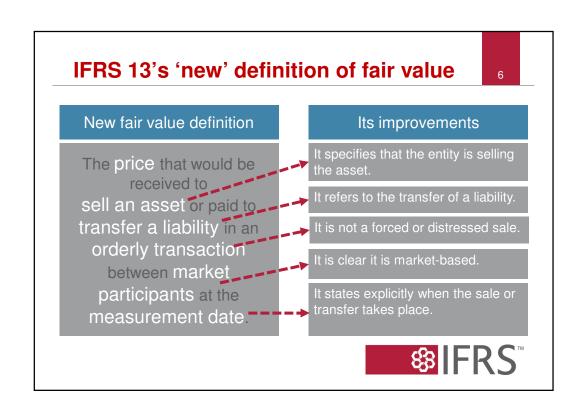
"Proposals for alternative accounting methods, such as historical cost or simplistic mechanisms to smooth valuation effects on bank balance sheets, reduce the transparency of a financial institution's health by blurring the underlying capital position." (4)

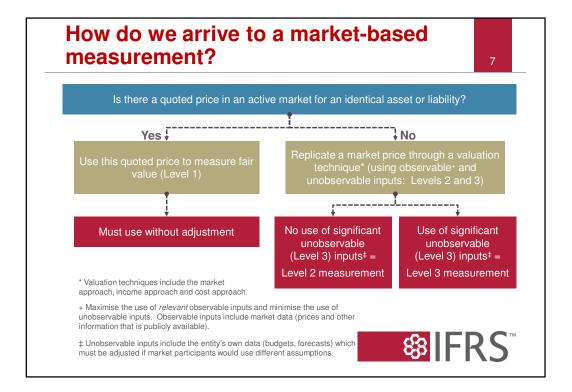
(4): Global Financial Stability Report, International Monetary Fund, October 2008.

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Disclosures

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- Fair value at end of reporting period
- Level in hierarchy
- Transfers between levels
- Valuation techniques and inputs used
- If highest and best use is different from current use



Disclosures continued

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- Disclosures also required for disclosed (but not recognised) fair values, even if on SFP at different amount
 - eg financial asset at amortised cost, but IFRS 7 requires disclosure of asset's fair value
- Quantitative disclosures in a table unless another format is better



More information about Level 3

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- Quantitative disclosure of unobservable inputs and assumptions used
- Reconciliation of opening to closing balances
- · Description of valuation process in place



More information about Level 3 continued

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- · Sensitivity analysis:
 - narrative discussion about sensitivity to changes in unobservable inputs, including inter-relationships between inputs that magnify or mitigate the effect on the measurement
 - quantitative sensitivity analysis for financial instruments
- · More granularity in determining classes



Thank you

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