Impairment of Revalued Assets
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REQUEST FOR COMMENTS

This Exposure Draft, *Impairment of Revalued Assets*, was developed and approved by the International Public Sector Accounting Standards Board® (IPSASB®).

The proposals in this Exposure Draft may be modified in light of comments received before being issued in final form. **Comments are requested by January 15, 2016.**

Respondents are asked to submit their comments electronically through the IPSASB website, using the “Submit a Comment” link. Please submit comments in both a PDF and Word file. Also, please note that first-time users must register to use this feature. All comments will be considered a matter of public record and will ultimately be posted on the website. This publication may be downloaded from the IPSASB website: www.ipsasb.org. The approved text is published in the English language.

**Objective of the Exposure Draft**

The objective of this ED is to amend IPSAS 21, *Impairment of Non-Cash-Generating Assets*, and IPSAS 26, *Impairment of Cash-Generating Assets*, to include property, plant and equipment and intangible assets measured at revalued amounts within the scope of IPSAS 21 and IPSAS 26.

**Guide for Respondents**

The IPSASB welcomes comments on all the changes proposed to IPSASs 21 and 26. The ED highlights one specific matter for comment, which is provided below to facilitate the comments. Comments are most helpful if they indicate the specific paragraph or group of paragraphs to which they relate, contain a clear rationale and include reasons for agreeing or disagreeing. If you disagree, please provide alternative proposals.

**Specific Matter for Comment**

The IPSASB proposes to include revalued property, plant and equipment and intangible assets within the scope of IPSAS 21 and IPSAS 26 in order to (a) provide information to users on impairment losses and reversals to property, plant and equipment and intangible assets carried at revalued amounts and (b) clarify that when a revalued asset is impaired and an impairment loss is recognized, an entity is not required to revalue the entire class of assets to which that item belongs.

Do you agree with the changes to IPSAS 21 and IPSAS 26 proposed in the ED and the consequential amendments to IPSAS 17, *Property, Plant and Equipment*, and IPSAS 31, *Intangible Assets*? If not, please provide your reasons.
# IMPAIRMENT OF REVALUED ASSETS (ED 57)

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Objective


2. As a result of the proposals, an entity would be required to assess at each reporting date whether there is any indication that an asset may be impaired. If any indication exists, the entity would then be required to assess the recoverable service amount (non-cash-generating asset) or recoverable amount (cash-generating asset) of that asset and recognize an impairment loss if recoverable service amount or recoverable amount is less than carrying amount.

3. However, where an impairment loss is recognized for an asset that is revalued, an entity would not necessarily be required to revalue the entire class of assets to which that impaired asset belongs as required by IPSAS 17.
Amendments to IPSAS 21, *Impairment of Non-Cash-Generating Assets*

Paragraphs 2, 54, 69 and 73 are amended, paragraphs 7 and 11 are deleted, and paragraphs 54A, 69A, 81A and 82C are added. New text is underlined and deleted text is struck through.

**Scope**

2. An entity that prepares and presents financial statements under the accrual basis of accounting shall apply this Standard in accounting for impairment of non-cash-generating assets, except:

   (a) …

   (d) Investment property that is measured using the fair value model (see IPSAS 16, *Investment Property*); and

   (e) [Deleted] Non-cash-generating property, plant, and equipment that is measured at revalued amounts (see IPSAS 17, *Property, Plant, and Equipment*);

   (f) [Deleted] Non-cash-generating intangible assets that are measured at revalued amounts (see IPSAS 31, *Intangible Assets*); and

   (g) Other assets in respect of which accounting requirements for impairment are included in another IPSAS.

…

7. [Deleted] This Standard excludes non-cash-generating intangible assets that are regularly revalued to fair value from its scope. This Standard includes all other non-cash-generating intangible assets (e.g., those that are carried at cost less any accumulated amortization) within its scope. Entities apply the requirements of this Standard to recognizing and measuring impairment losses, and reversals of impairment losses, related to such non-cash-generating intangible assets.

…

11. [Deleted] This Standard does not require the application of an impairment test to non-cash-generating assets that are carried at revalued amounts under the allowed alternative treatment in IPSAS17. This is because, under the allowed alternative treatment in IPSAS 17, (a) assets will be revalued with sufficient regularity to ensure that they are carried at an amount that is not materially different from their fair value at the reporting date, and (b) any impairment will be taken into account in the valuation. In addition, the approach adopted in this Standard to measuring an asset’s recoverable service amount means that it is unlikely that the recoverable service amount of an asset will be materially less than its revalued amount, and that any such differences would relate to the costs of disposal of the asset.

…

**Recognizing and Measuring an Impairment Loss**

…

54. An impairment loss shall be recognized immediately in surplus or deficit, unless the asset is carried at revalued amount in accordance with another Standard (for example, in accordance
with the revaluation model in IPSAS 17 and IPSAS 31). Any impairment loss of a revalued asset shall be treated as a revaluation decrease in accordance with that other Standard.

54A. An impairment loss on a non-revalued asset is recognized in surplus or deficit. However, an impairment loss on a revalued asset is recognized in revaluation surplus to the extent that the impairment loss does not exceed the amount in the revaluation surplus for that class of assets. Such an impairment loss on a revalued asset reduces the revaluation surplus for that class of assets.

... 

Reversing an Impairment Loss

...

69. A reversal of an impairment loss for an asset shall be recognized immediately in surplus or deficit, unless the asset is carried at revalued amount in accordance with another Standard (for example, the revaluation model in IPSAS 17 and IPSAS 31). Any reversal of an impairment loss of a revalued asset shall be treated as a revaluation increase in accordance with that other Standard.

69A. A reversal of an impairment loss on a revalued asset is recognized directly in the revaluation reserve and increases the revaluation surplus for that class of assets. However, to the extent that an impairment loss on the same class of revalued assets was previously recognized in surplus or deficit, a reversal of that impairment loss is also recognized in surplus or deficit.

...

Disclosure

...

73. An entity shall disclose the following for each class of assets:

(a) The amount of impairment losses recognized in surplus or deficit during the period, and the line item(s) of the statement of financial performance in which those impairment losses are included; and

(b) The amount of reversals of impairment losses recognized in surplus or deficit during the period, and the line item(s) of the statement of financial performance in which those impairment losses are reversed;

(c) The amount of impairment losses on revalued assets recognized directly in revaluation surplus during the period; and

(d) The amount of reversals of impairment losses on revalued assets recognized directly in revaluation surplus during the period.

...
Transitional Provisions

81A Paragraphs 2, 54, 69 and 73 were amended, paragraphs 7 and 11 were deleted, and paragraphs 54A and 69A were added by Impairment of Revalued Assets (Amendments to IPSASs 21 and 26) in [Month] 2016. Those amendments shall be applied prospectively from the date of their application.

Effective Date

82C. Impairment of Revalued Assets amended paragraphs 2, 54, 69 and 73, deleted paragraphs 7 and 11, and added paragraphs 54A, 69A and 81A. An entity shall apply those amendments for annual financial statements covering periods beginning on or after [date]. Earlier application is encouraged. If an entity applies those amendments for a period beginning before [date], it shall disclose that fact.

Basis for Conclusions

Paragraphs BC17, BC18 and BC19 are amended and paragraphs BC20A to BC20F are added. Paragraph BC20 is not amended but is provided for context. New text is underlined and deleted text is struck through.

Property, Plant and Equipment and Intangible Assets

BC17. At the time this The Standard was approved in December 2004, it did not require the application of an impairment test to non-cash-generating assets that are carried at revalued amounts under the allowed alternative treatment (“revaluation model”) in IPSAS 17 and IPSAS 31. The IPSASB was of the view that under the allowed alternative treatment in IPSAS 17 and IPSAS 31, assets would be revalued with sufficient regularity to ensure that they are carried at an amount that is not materially different from their fair value as at the reporting date, and any impairment would be taken into account in the valuation. Therefore any difference between the asset’s carrying amount and its fair value less costs to sell would be the disposal costs. The IPSASB was of the view that, in most cases, these would not be material and, from a practical viewpoint, it is not necessary to measure an asset’s recoverable service amount and to recognize an impairment loss for the disposal costs of a non-cash-generating asset.

BC18. In contrast to this approach, IAS 36 requires entities to test revalued assets for impairment after they have been revalued. The rationale for this difference was explained by reference to the factors set out in paragraphs BC19 and BC20 below.

BC19. Firstly, there are different methods of determining recoverable service amount under this Standard, and of determining recoverable amount under IAS 36. Recoverable service amount is defined in this Standard as the higher of a non-cash-generating asset’s fair value less costs to sell and its value in use. Under this Standard, an entity determines an asset’s value in use by determining the current cost to replace the asset’s remaining service potential. The current cost to replace the asset’s remaining service potential is determined using the depreciated replacement cost approach, and approaches described as the restoration cost approach and the service units approach. These approaches may also be adopted to measure fair value under IPSAS 17 and
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IPSAS 31 and therefore the value in use is a measure of fair value. Recoverable amount is defined in IAS 36 as the higher of an asset’s fair value less costs to sell and its value in use. Value in use under IAS 36 is determined using the present value of the cash flows expected to be derived from continued use of the asset and its eventual disposal. IAS 36 states that the value in use may be different from the fair value of the asset.

BC20. Secondly, the requirement under IAS 36 to combine non-cash-generating assets with cash-generating assets to form a cash-generating unit is not replicated in this Standard. Under IAS 36, where an asset does not produce cash inflows, it is combined with other assets to form a cash-generating unit, the value in use of which is then measured. The sum of the fair values of the assets that make up a cash-generating unit may be different to the value in use of the cash-generating unit.

Impairment of Revalued Assets (Amendments to IPSAS 21 and IPSAS 26)

BC20A. As a consequence of requests from jurisdictions that apply IPSASs, the IPSASB revisited the original decision to exclude revalued property, plant and equipment and intangible assets from the scope of IPSAS 21.

BC20B. The IPSASB considers that the rationale in paragraphs BC19 and BC20 for the different requirements in IPSAS 21 and IAS 36 is sound. The IPSASB acknowledged the view that impairments would be taken into account when carrying out revaluations of assets to ensure that their carrying amounts do not differ materially from fair value, as required by paragraph 44 of IPSAS 17 and paragraph 74 of IPSAS 31.

BC20C. The IPSASB also acknowledged that it was ambiguous whether impairment losses and reversals of impairment losses are revaluations, given they are accounted for in a similar manner. Paragraph 51 of IPSAS 17 requires an entire class of assets to be revalued if an item of property, plant and equipment belonging to that class is revalued. Therefore, if impairment losses and reversals of impairment losses are interpreted as revaluations the consequences are onerous. The IPSASB considered that it should resolve this ambiguity.

BC20D. The IPSASB is of the view that impairments are conceptually different from revaluations and that assets carried at revalued amounts can experience impairments. The IPSASB considered it important that users are provided with the quantitative and qualitative information on impairments specified in paragraphs 77 and 78 of IPSAS 21.

BC20E. The IPSASB’s objective in clarifying the ambiguity, was to ensure that impairment losses and reversals of impairment losses of a revalued asset did not require an entity to revalue the entire class of assets to which that item belongs in order to recognize an impairment loss in respect of that item.

BC20F. Although including property, plant and equipment and intangible assets that are measured at revalued amounts within the scope of IPSAS 21 means that an entity is required to assess annually whether there is any indication that an asset may be impaired, it is likely that an entity will be aware of any indicators of impairment. The IPSASB therefore concluded that bringing property, plant and equipment and intangible assets that are measured at revalued amounts within the scope of IPSAS 21 will not be overly onerous for the preparers of financial statements.
Amendments to IPSAS 26, Impairment of Cash-Generating Assets

Paragraphs 2, 73, 108, 115 and 124 are amended, paragraphs 6 and 11 are deleted, and paragraphs 73A, 108A and 126D are added. New text is underlined and deleted text is struck through.

Scope

2. An entity that prepares and presents financial statements under the accrual basis of accounting shall apply this Standard in accounting for the impairment of cash-generating assets, except for:

(a) …

(e) [Deleted] Cash-generating property, plant, and equipment that is measured at revalued amounts (see IPSAS 17, Property, Plant, and Equipment);

(f) …

(h) [Deleted] Cash-generating intangible assets that are measured at revalued amounts (see IPSAS 31, Intangible Assets);

(i) Goodwill;

(j) …

6. [Deleted] This Standard excludes cash-generating intangible assets that are regularly revalued to fair value from its scope. This Standard includes all other cash-generating intangible assets (for example, those that are carried at cost less any accumulated amortization) within its scope.

11. [Deleted] This Standard does not require the application of an impairment test to cash-generating assets that are carried at revalued amounts under the revaluation model in IPSAS 17. Under the revaluation model in IPSAS 17, assets will be revalued with sufficient regularity to ensure that they are carried at an amount that is not materially different from their fair value at the reporting date, and any impairment will be taken into account in that valuation.

Recognizing and Measuring an Impairment Loss

73. An impairment loss shall be recognized immediately in surplus or deficit, unless the asset is carried at revalued amount in accordance with another Standard (for example, in accordance with the revaluation model in IPSAS 17 and IPSAS 31). Any impairment loss of a revalued asset shall be treated as a revaluation decrease in accordance with that other Standard.

73A. An impairment loss on a non-revalued asset is recognized in surplus or deficit. However, an impairment loss on a revalued asset is recognized in revaluation surplus to the extent that the impairment loss does not exceed the amount in the revaluation surplus for that class of assets. Such an impairment loss on a revalued asset reduces the revaluation surplus for that class of assets.
Reversing an Impairment Loss for an Individual Asset

108. A reversal of an impairment loss for an asset shall be recognized immediately in surplus or deficit, unless the asset is carried at revalued amount in accordance with another Standard (for example, the revaluation model in IPSAS 17 and IPSAS 31). Any reversal of an impairment loss of a revalued asset shall be treated as a revaluation increase in accordance with that other Standard.

108A. A reversal of an impairment loss on a revalued asset is recognized directly in the revaluation reserve and increases the revaluation surplus for that class of assets. However, to the extent that an impairment loss on the same class of revalued assets was previously recognized in surplus or deficit, a reversal of that impairment loss is also recognized in surplus or deficit.

Disclosure

115. An entity shall disclose the following for each class of assets:
   (a) The amount of impairment losses recognized in surplus or deficit during the period, and the line item(s) of the statement of financial performance in which those impairment losses are included;
   (b) The amount of reversals of impairment losses recognized in surplus or deficit during the period, and the line item(s) of the statement of financial performance in which those impairment losses are reversed;
   (c) The amount of impairment losses on revalued assets recognized directly in revaluation surplus during the period; and
   (d) The amount of reversals of impairment losses on revalued assets recognized directly in revaluation surplus during the period.

124. If some or all of the carrying amount of intangible assets with indefinite useful lives is allocated across multiple cash-generating units, and the amount so allocated to each unit is not significant in comparison with the entity’s total carrying amount of intangible assets with indefinite useful lives, that fact shall be disclosed, together with the aggregate carrying amount of intangible assets with indefinite useful lives allocated to those units. In addition, if (a) the recoverable amounts of any of those units are based on the same key assumption(s), and (b) the aggregate carrying amount of intangible assets with indefinite useful lives allocated to them is significant in comparison with the entity’s total carrying amount of intangible assets with indefinite useful lives, an entity shall disclose that fact...
Effective Date

...

126D. Impairment of Revalued Assets amended paragraphs 2, 73, 108, 115 and 124, deleted paragraphs 6 and 11, and added paragraphs 73A and 108A. An entity shall apply those amendments prospectively for annual financial statements covering periods beginning on or after [date]. Earlier application is encouraged. If an entity applies those amendments for a period beginning before [date], it shall disclose that fact.

Basis for Conclusions

Paragraphs BC4 and BC7 are amended and paragraphs BC7A to BC7F are added. Paragraphs BC5 and BC6 are not amended but are provided for context. New text is underlined and deleted text is struck through.

Exclusion of Property, Plant, and Equipment Carried at Revalued Amounts and Intangible Assets that are Regularly Revalued to Fair Value from Scope

BC4. At the time this Standard was approved in February 2008, the scope of IPSAS 21 excluded non-cash-generating property, plant, and equipment carried at revalued amounts in accordance with the revaluation model in IPSAS 17. The Basis for Conclusions in IPSAS 21 stated that the IPSASB was of the view that assets carried at revalued amounts in accordance with the revaluation model in IPSAS 17 would be revalued with sufficient regularity to ensure (a) that they are carried at an amount that is not materially different from their fair value at the reporting date, and (b) that any impairment will be taken into account in that valuation. The IPSASB therefore considered whether a similar scope exclusion should be included in this Standard.

BC5. The IPSASB acknowledged that property, plant, and equipment held on the revaluation model are within the scope of IAS 36, and considered the view that guidance on determining impairment losses for such assets would be appropriate for public sector entities with assets on the revaluation model. The IPSASB noted that in IAS 36, in cases where the fair value of an item of property, plant and equipment is its market value, the maximum amount of an impairment loss is the disposal costs. In the Basis for Conclusions for IPSAS 21, it is stated that “the IPSASB is of the view that, in most cases, these will not be material and, from a practical viewpoint, it is not necessary to measure an asset’s recoverable service amount and to recognize an impairment loss for the disposal costs of a non-cash-generating asset.” The IPSASB considered that disposal costs are also unlikely to be material for cash-generating assets.

BC6. For specialized cash-generating assets where fair value has not been derived from market value, IAS 36 requires recoverability to be estimated through the value in use. Because value in use is based on cash flow projection, it might be materially greater or lower than carrying amount. This analysis is also relevant in the public sector. However, it is questionable whether public sector entities hold specialized assets that meet the definition of a cash-generating asset in this Standard.

BC7. The IPSASB was of the view that it would be onerous to impose a requirement to test for impairment in addition to the existing requirement in IPSAS 17, i.e., that assets will be revalued with sufficient regularity to ensure that they are carried at an amount that is not materially different from their fair value at the reporting date. Therefore, on balance, the IPSASB concluded that consistency with IPSAS 21 should take precedence over convergence with IAS 36, and that property, plant and equipment carried on the revaluation model in IPSAS 17 should be excluded from the scope of this Standard. Consistent with the approach to property, plant, and equipment, intangible assets that are regularly revalued to fair value were also excluded from the scope.
Impairment of Revalued Assets (Amendments to IPSAS 21 and IPSAS 26)

BC7A. As a consequence of requests from jurisdictions that apply IPSASs, the IPSASB revisited the original decision to exclude revalued property, plant and equipment and intangible assets from the scope of IPSAS 26.

BC7B. The IPSASB considers that the rationale in paragraphs BC5 and BC6 for the different requirements in IPSAS 26 and IAS 36 is sound. The IPSASB acknowledged the view that impairments would be taken into account when carrying out revaluations of assets to ensure that their carrying amounts do not differ materially from fair value, as required by paragraph 44 of IPSAS 17 and paragraph 74 of IPSAS 31.

BC7C. The IPSASB also acknowledged that it was ambiguous whether impairment losses and reversals of impairment losses are revaluations, given that they are accounted for in a similar manner. Paragraph 51 of IPSAS 17 requires the entire class of assets to be revalued if an item of property, plant and equipment belonging to that class is revalued. Therefore, if impairment losses and reversals of impairment losses are interpreted as revaluations the consequences are onerous. The IPSASB considered that it should resolve this ambiguity.

BC7D. The IPSASB is of the view that impairments are conceptually different from revaluations and that assets carried at revalued amounts can experience impairments. The IPSASB considered it important that users are provided with the quantitative and qualitative information on impairments specified in paragraphs 120 and 121 of IPSAS 26.

BC7E. Consistent with IPSAS 21, the IPSASB’s objective in clarifying the ambiguity, was to ensure that impairment losses and reversals of impairment losses of a revalued asset did not require an entity to revalue the entire class of assets to which that item belongs in order to recognize an impairment loss in respect of that item.

BC7F. Although including property, plant and equipment and intangible assets that are measured at revalued amounts within the scope of IPSAS 26 means that an entity is required to assess annually whether there is any indication that an asset may be impaired, it is likely that an entity will be aware of any indicators of impairment. The IPSASB therefore concluded that bringing property, plant and equipment and intangible assets that are measured at revalued amounts within the scope of IPSAS 26 will not be overly onerous for the preparers of financial statements.
Consequential Amendments to Other IPSASs

Amendment to IPSAS 17, Property, Plant and Equipment

Paragraphs 51A and 107E are added. Paragraph 51 is not amended but is provided for context. New text is underlined.

... 51. If an item of property, plant, and equipment is revalued, the entire class of property, plant, and equipment to which that asset belongs shall be revalued.

51A. Impairment losses and reversals of impairment losses of an asset under IPSAS 21 and IPSAS 26 Impairment of Cash-Generating Assets do not of themselves give rise to the need to revalue the class of assets to which that asset belongs.

... Effective Date ...

107E. Impairment of Revalued Assets (Amendments to IPSASs 21 and 26) added paragraph 51A. An entity shall apply that amendment for annual financial statements covering periods beginning on or after [date]. Earlier application is encouraged. If an entity applies that amendment for a period beginning before [date], it shall disclose that fact.

Basis for Conclusions

Paragraph BC10 is added.

Impairment of Revalued Assets (Amendments to IPSAS 21 and IPSAS 26)

BC10. As a consequence of amendments to IPSAS 21, Impairment of Non-Cash-Generating Assets, and IPSAS 26, Impairment of Cash-Generating Assets, the IPSASB decided to add paragraph 51A to clarify that the recognition of impairment losses and reversals of impairment losses of an asset do not give rise to the need to revalue the entire class of assets to which that asset belongs.
Amendment to IPSAS 31, *Intangible Assets*

Paragraph 110 is amended and paragraph 132B is added. New text is underlined and deleted text is struck through.

**Recoverability of the Carrying Amount—Impairment Losses**

110. To determine whether an intangible asset measured under the cost method is impaired, an entity applies either IPSAS 21 or IPSAS 26, as appropriate. ...

... 

**Effective Date**

... 

132B. *Impairment of Revalued Assets (Amendments to IPSASs 21 and 26)* amended paragraph 110. An entity shall apply that amendment for annual financial statements covering periods beginning on or after [date]. Earlier application is encouraged. If an entity applies that amendment for a period beginning before [date], it shall disclose that fact.