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Technical Accounting Alert
TA 2017-07

IASB issues IFRIC 23 'Uncertainty over Income Tax Treatments'

Introduction

The IFRS Interpretations Committee (IFRIC) has published a new Interpretation IFRIC 23 *Uncertainty over Income Tax Treatments*, specifying how entities should reflect uncertainty in accounting for income taxes.

IAS 12 *Income Taxes* specifies how to account for current and deferred tax but not how to reflect the effects of uncertainty. IFRIC 23 addresses this previous lack of guidance.

IFRIC 23

The table below illustrates the main issues that are addressed by the Interpretation.

Issue	Interpretation
When and how the effect of uncertainty over income tax treatments should be included in the determination of taxable profit (tax loss), tax bases, unused tax losses, unused tax credits and tax rates	· an entity is required to consider whether it is 'probable' that a taxation authority will accept an uncertain tax treatment · if it is, the entity would determine taxable profit (tax loss), tax bases, unused tax losses, unused tax credits or tax rates consistently with the tax treatment used or planned to be used in its income tax filings · if the entity concludes that it is not probable that the taxation authority will accept an uncertain tax treatment, it uses either the most likely amount or the expected value in determining taxable profit (tax loss), tax bases, unused tax losses, unused tax credits and tax rates (depending on which method is expected to better predict the resolution of the uncertainty)
The assumptions that an entity should make about the examination of tax treatments by taxation authorities	· an entity is required to assume that a tax authority will examine amounts it has a right to examine and will have full knowledge of all relevant information when making those examinations
Changes in facts and circumstances	· entities are also required to reassess their judgements and estimates if facts and circumstances change (e.g. upon reaching a time limit where the taxation authority is no longer able to challenge an entity's tax treatments) or as a result of new information that affects the judgement or estimate becoming available
Whether uncertain tax treatments should be considered separate	· entities would be required to use judgement to determine whether each uncertain tax treatment should be considered separately, or whether some uncertain tax treatments should be considered together. In determining the approach to be followed, entities shall consider which approach better predicts the resolution of the uncertainty

Issue	Interpretation
Disclosure	· when addressing uncertainty over income tax treatments, entities are required to disclose judgements, assumptions and estimates made in accordance with the normal requirements of IAS 1 *Presentation of Financial Statements* · in addition, if an entity concludes it is probable that a taxation authority will accept an uncertain tax treatment, it should consider whether to disclose the potential effect of the uncertainty as a tax-related contingency under IAS 12.88
Transition	· entities shall apply IFRIC 23 retrospectively by applying IAS 8, if that is possible without the use of hindsight; or · retrospectively with the cumulative effect of initially applying the effect of the changes being recognised in the opening balance of retained earnings (or another component of equity) in the period of first application, without adjusting comparative information

Effective date and transition

IFRIC 23 is effective for annual reporting periods beginning on or after 1 January 2019. Early application is permitted.

On initial application, an entity can elect to apply the interpretation either:

- retrospectively applying IAS 8, if that is possible without the use of hindsight; or
- retrospectively with the cumulative effect of initially applying the interpretation recognised at the date of initial application as an adjustment to the opening balance of retained earnings (or other component of equity, as appropriate); under this approach, comparative information is not restated.

Grant Thornton Comment

We welcome the publication of this Interpretation as it provides specific guidance in a number of areas where IAS 12 was silent and hence will help reduce diversity in practice. Entities should revisit their current approaches to accounting for tax uncertainties with the guidance in IFRIC 23 and determine the impact.

Australian context

In the Australian context, the Australian Accounting Standards Board is expected to issue the equivalent Australian interpretation shortly.

Further information

If you wish to discuss any of the information included in this Technical Accounting Alert, please get in touch with your local Grant Thornton Australia contact or a member of the National Assurance Quality Team at national.assurance.quality@au.gt.com.