

## **Summary Report on Responses to Consultation Paper on Structure and Scope of the International Valuation Standards**

This report was considered by the IVSC Standards Board at its meeting on 24 October 2014.

The Board agreed with the recommendations in the report and instructed the IVSC staff to reflect these in the changes that would be proposed by the Board in the review of the IVSs that was due to take place in 2015

1. In July 2014 the Board issued a Consultation Paper to seek views on whether the current structure of the IVSs could be improved, in particular with regard to the relationship between mandatory requirements and supporting guidance. The paper looked at the structure adopted by other international standard setters and sought views on whether there are aspects of these that could be adopted to improve the clarity and presentation of the IVSs. The paper also asked for views on the overall scope of the standards and the type of material that should be included and excluded. The comment period closed on 10 October..

2. Eleven comment letters were received. The types of respondent can be categorised as follows:

Valuation Professional Bodies	4
Global Consulting Networks	3
Valuation Firms	2
Other Standard Setters	1
Others	1

3. One global consulting network did not submit a comment letter specifically on this consultation, but its letter on the concurrent Agenda Consultation included a number of comments germane to Structure and Scope. With its consent these are included in this analysis.

4. The comment letters are displayed on the IVSC web site. Annexed is a table summarising the responses, in particular the answers to the questions asked in the Exposure Draft. Not all comments are referenced. The purpose of this summary is to identify common themes and readers are advised to read individual comment letters for more detail.

5. The responses to the questions in the Consultation Paper are analysed below.

\* \* \* \* \*

**Question 1:**

**Paragraph 15.1 describes two alternative views on what constitutes a “standard”. Please indicate whether you agree with either statement a) or b) below:**

**a) the word standard in the context of the IVSs should be reserved only for rules or principles that have to be applied, or**

**b) the word standard in the context of the IVSs means a required level of quality and will necessarily include not only rules and principles but also guidance and supporting information to assist consistent application of those rules and principles?**

a)	b)	Unanswered or response unclear
<b>5</b>	<b>4</b>	<b>2</b>

**Additional Comments**

Those who consider that the word “standard” should be reserved only for mandatory requirements are mainly from North America (three of five). In other parts of the world there is preference for the more broadly based usage outlined in option b). Where a reason is

given, those preferring a) say this is important to distinguish mandatory requirements from guidance. Some indicated that the semantics were secondary to the principle that there should be a clear separation on mandatory and advisory material.

**Question 2:**

**Paragraph 15.2 describes two alternative views on what is meant by the word “mandatory” in the context of standards. Please indicate whether you agree with either statement a) or b) below:**

- a) a satisfactory level of compliance with the IVSs can be achieved by following only the Requirements in the standards and that all other material issued by the IVSC is of no relevance in determining compliance, or**
- b) a satisfactory level of compliance with the IVSs can only be achieved by following the Requirements and also having regard to the supporting information and guidance included in the standards.**

<b>a)</b>	<b>b)</b>	<b>Unanswered or response unclear</b>
<b>3</b>	<b>7</b>	<b>1</b>

**Additional Comments**

A clear majority favour alternative b), including some of those who agreed with a) in Q1.

A few caveat their support; One requests that an explanation of what “having regard to” means in the context of IVS guidance. One VPO supports view b) on the understanding that the supporting information and guidance is included “in the standards”. One VPO expressed the view that to not consider guidance and supporting information along with rules and principles is “nonsensical”.

**Question 3**

Paragraph 15.3 describes confusion that has been identified by some around the purpose of the current TIPs. To assist the Board in considering whether changes are appropriate and if so what those changes should be, please answer the following questions:

**3a Do you consider that the title “Technical Information Paper” is an appropriate description for the content of the TIPs issued to date and for those proposed TIPs for which public exposure drafts have been issued?**

a) yes or

b) no

If you have answered no please provide reasons for your view and suggest a preferred alternative.

Yes	No	Unanswered or response unclear
5	4	2

**Additional Comments**

Those who agree that the title “Technical Information Paper” is appropriate tend not to elaborate, although two indicated that they did not consider the title to be important. Those opposed to the term do so for different reasons. One VPO disagrees with the title as it opposes the principle of publishing TIPs; they do however support guidance and explanatory information within the standards (see Q2). Another objects to the title on the grounds that it considers “technical papers” to be scientific or technical research papers published for academic purposes. Others consider that the term is too narrow given the range of material currently included in TIPs. Among the alternative terms suggested are “Interpretive Guidance”, Implementation Guidance, “Explanatory Comments”, “Standards Guidance” and “Technical Guidance”.

**3b Do you find the content of the current TIPs helpful in understanding and applying the IVSs? If you do not, please identify any other material that you rely on to support the interpretation and application of the IVSs.**

Yes	No	Unanswered or response unclear
6	2	3

### Additional Comments

This question revealed a wide range of opinions some of which are diametrically opposed. Among the reasons given for finding the current TIPs unhelpful were: “Text books and the internet are more useful”, “They include information very similar to that in a text book” and “They are an unnecessary duplication of material produced by VPOs”

Those who found the current TIPs helpful often caveated their comments. A few, including the large accounting networks both indicated that they considered the guidance to be helpful but often insufficiently detailed to increase the quality of valuations. One referenced the AICPA Practice Guides and the Monograph produced by the Appraisal Foundation. One large valuation firm called for a more expansive consideration of the issues and a mechanism for periodic review.

**3c Is there anything in the current TIPs that you consider should not be included, or that should not form part of the standards? If you believe there is please explain what should be excluded and why.**

<b>Yes – there is material that should not form part of the standards</b>	<b>No – there is no material that should not form part of the standards</b>	<b>Unanswered or response unclear</b>
<b>3</b>	<b>4</b>	<b>4</b>

### Additional Comments

One VPO considers that the TIPs in issue read like instruction guides and cannot see why they should not be considered “educational”, although the same organisation also objected to the title TIP on the grounds that this suggested it was an educational or research paper. Another specifically identified the “Forestry TIP” (not issued – a proposed TIP on Forestry was exposed for comment in 2013) as being “immensely detailed” and duplicative of its own material.

Those that do not think that there is anything included that should not be include the global accounting networks, all of whom say that they would rather see more detail. One requests that the IVSC focus on matters in the public interest which are not already covered in other standards. Unfortunately it is not stated whether this comment is intended to suggest that there is material in the current TIPs already covered in other valuation standards or in other types of standard, eg accounting standards.

#### Question 4

Do you agree that the Board should issue commentaries, guidance and information to support the concepts, principles and requirements in the standards? If you disagree please explain what alternative sources providers and users of valuations can use and how diversity of application and interpretation across different jurisdictions and markets can be avoided.

Yes or mostly agree	No or mostly disagree	Unanswered or response unclear
9	0	1

#### Additional Comments

There is a clear consensus that the requirements need supporting with additional material. One VPO argues that this supporting material should not be part of the standards. However, another argues that a statement that material is not part of the standards is meaningless because a standard setter does not put out material “for fun” and such a distinction may not be made by a court of law called upon to consider whether a practitioner’s actions were in accordance with accepted standards.

#### Question 5

This consultation paper highlights four other sets of international standards that are in use in the financial markets and the different types of pronouncement that fall within their scope. An overview of each is provided in the Appendices. Please indicate if you consider that there are any aspects of the way these standards are presented that the Board should consider as a way of improving the presentation and clarity of the IVSs.

#### Responses

Few respondents offered any substantive comments on the other standards referenced. Some VPOs say that they see little relevance in standards produced for other professions/disciplines, and one questions why we have not looked instead at some nationally based VPO standards. One VPO that did offer comments on the structure of the sample standards considers that the approach taken by the IAA in explaining the meaning of must, shall and may was helpful, and that both the IFRS and IAASB standards offered “appropriate” formats (although both are different from each other).

### Question 6

When it adopted a structure for the standards that contained five different categories of pronouncement the Board was responding to requests for a clear distinction be made between those parts that included mandatory requirements and those that contained supporting guidance. It also considered that a taxonomy that grouped similar types of pronouncement together would make it easier for users to navigate to the parts relevant to their needs. However, some other standard setters do not make the same distinction. For example the IFRSs are simply numbered consecutively according to the date of their first issue, with no attempt to group by the type of topic each standard addresses.

Do you believe that the current structure of the IVSs that groups pronouncements into five different categories with distinct titles is easy to understand and use? If not, what alternative would you prefer?

Yes or mostly agree	No or mostly disagree	Unanswered or response unclear
7	2	2

### Additional Comments

Most consider the current format as being clear and easy to follow. One party that disagreed considers there to be too many levels of pronouncement and that the requirements are not clearly distinguished from guidance material. The other felt that there just needed to be simple split between mandatory and non mandatory.

### Question 7

The Board will generally exclude from the IVSs any matter that reflects requirements arising from national law or regulation or from established practice in a particular jurisdiction but which either does not arise or that conflicts with those in other jurisdictions. The IVSs may refer to valuation methods or techniques, provide high level explanations of those methods or give examples of when their use may be appropriate. Finally, the paper confirms that the IVSs are not intended to provide educational material and will not examine methods defined or discussed in the standards at the level of detail necessary to apply them in practice.

Do you agree with these limitations on the scope of the IVSs? If not, please describe the types of additional material you believe should be included or matters currently included you believe should be excluded.

Yes or mostly agree	No or mostly disagree	Unanswered or response unclear
9	0	2

### Additional Comments

No one disagreed with this statement of scope. A few caveated their agreement with comments. One VPO cautioned against the high level explanations of methods and where their use was appropriate becoming too prescriptive. A global accounting network's agreement was conditional upon the scope not excluding more comprehensive guidance than is currently issued.

### General Observations:

With the exception of one global consulting network that considers that IVSC should not be a standard setter but an "educational and coordinating body", most respondents are supportive of the IVSs, with a number of respondents making positive comments about the standards. The majority also supported the current organisation into different types of pronouncement, with a number saying they find it clear and easy to use.

Most respondents accept the proposition that a satisfactory level of compliance with the IVSs can only be achieved by following the Requirements and also having regard to the supporting information and guidance included in the standards. However, many also made the point that while requirements and guidance were necessary components of the standards, a clear distinction should be maintained between the two. One respondent wanted clarification of what "having regard to" guidance meant.

Two main areas of controversy appear to be:

#### Degree of Detail in Guidance:

The firms that prepare and use valuations would like to see more detailed guidance included in the standards. Even the firm that does not believe the IVSC should set standards supports it developing "guidance based on clear principles". In contrast the VPOs were mainly of the view that the detail in the current TIPs was either at an appropriate level or too detailed.

#### Technical Information Papers

About half dislike the title, even if they otherwise support the standards including guidance. The reasons for opposing the title were varied but it is clear that some see this as an obstacle to recognising the content as guidance that forms part of the standards. Of the remainder who had no objection to the title, two indicated that they considered the title less important than the content. One global network pointed out that the TIPs in issue are not consistent in the type of content they contain.

### Staff Recommendations for Board:

Subject to any remaining responses the Board is invited to consider the following recommendations based on the comments received to date.

- 1 That the term Technical Information Paper no longer be used. It was introduced in 2011 to replace the former term Guidance Note (GNs were part of the earlier IVSs) but it is clear that this change has created confusion as to the status of the content, regardless of the objections raised by some as to the suitability or relevance of the title to the content.
- 2 That the current and emerging TIPs are reviewed and a decision made as to whether the content is required to assist consistent application or understanding of standards or is purely informational or “educational” material that some may find helpful. Currently it is probably fair comment that the term TIP has been applied to different types of material which probably should have different status. For example the TIPs that explain the principles of certain valuation methods should probably not be in the standards while those such as TIP 4 that provide explanation of a mandatory reporting requirement should be an essential part of applying the standards.
- 3 Guidance material that should be included in the standards is renamed and presented as an annex to the relevant standard. For example the emerging Development Property guidance could be issued as an annex to IVS 230, and the emerging CVA/DVA TIP as an annexe to IVS 250.
- 4 If the above recommendations are agreed by the Board they can be reflected in the proposed 2015 changes to the IVSs, which will be exposed for comment in Q1 2015. Some other minor changes to help reinforce the distinction between the mandatory requirements and the guidance within the standards have already been suggested (see Agenda Item 7).
- 5 The purpose of the Commentary that appears in each of the IVS 200 standards needs to be clearly stated – in most cases the material is guidance but its purpose and relationship to the Requirements that precede it are not always clear.
- 6 The Board needs to develop a clear explanation of the relevance of the guidance in the introduction to the standards. IVS 2013 currently says that in applying the standards “due account” should be taken of any supporting guidance issued by the IVSC. In the Consultation Paper views were invited on the need to “have regard to” guidance. There needs to be clarity about what guidance this refers to (ie guidance within the standards) and a short discussion around the words chosen to describe its relevance. Other standard setters may have some helpful wording.
- 7 The Board needs to decide what should be done with any existing TIPs (or parts thereof) that should not be guidance within the standards, eg should it still be issued and, if so, under what title.
- 8 The problem of the degree of detail that the standards should contain, particularly in supporting guidance, is one that consistently divides opinion. From experience of developing the IVSs to date it is clear that the degree of detail that constituents either need or accept depends on factors such as the degree of diversity between markets or jurisdictions or the extent of valuation guidance that has already been developed by others. The diversity of views in this consultation reinforces the view that there is no single formula or template that can be applied. The degree of detail in an IVSC pronouncement can only be realistically be determined through the consultation process as each is developed.

Summary of Comment Letters

001	Great Realty Advisors	1 2 3a 3b 3c 4 5 6 7	<p>Agree with a)</p> <p>Agree with a)</p> <p>Yes</p> <p>No. Textbooks, internet and discussions are superior</p> <p>No part of TIPS should be part of minimum requirements that must be followed.</p> <p>Yes. Additional guidance material needs to be identified as optional not a requirement.</p> <p>No comment</p> <p>Suggest keeping it simple. Requirements and Optional Guidance to explain application of standards</p> <p>Strongly agree with statement that IVS's not intended to provide educational material and inappropriate material should be deleted.</p>
002	RICS	1 2 3a 3b 3c 4 5 6 7	<p>Agree with a). Want no risk of confusion between what constitutes a "valuation standard", which should be high level, principles-based and clearly defined, and what constitutes a level of excellence or quality in professional performance and delivery</p> <p>Agree with b) on the grounds that the 'supporting information and guidance is included in the standards' and not in any separate document.</p> <p>No. RICS strongly oppose the production of TIPs, therefore no alternative title suggested.</p> <p>No. Consider IVS TIPs already issued are an unnecessary duplication of guidance they issue and could create market confusion.</p> <p>Yes. Specifically oppose proposed TIP on Forests which is immensely detailed and duplicates RICS guidance.</p> <p>Yes. Board should issue commentaries and information to support the concepts, principles and requirements within the standards but strictly limited to that.</p> <p>No. There is no consistency of approach between other standards because they relate to different disciplines and although comparison to a certain extent is useful it is not entirely relevant.</p> <p>Current structure and taxonomy is easier than that adopted by IFRS.</p> <p>Broadly support but caution against high level explanations of methods being too prescriptive. Also caution against use of examples which can be misused and misapplied by inexperienced practitioners.</p> <p><b>Other Comments:</b></p> <ul style="list-style-type: none"> <li>Focus of IVSC should be on high level principles and their embodiment in high level international standards rather</li> </ul>

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			<p>than attempting to provide guidance on the exercise of judgement in different, often very diverse, situations. There are more appropriate bodies such as VPO's, who are able to fill any actual or perceived gaps in information and practical implementation at this level</p> <ul style="list-style-type: none"> <li>• Any explanation necessary for consistent application of the standards should be included in the standards.</li> <li>• A reduction in diversity of application and interpretation across different jurisdictions and markets can be achieved by working with VPOs to agree an overall framework. VPOs can collectively work together to reach common application and interpretation across different jurisdictions and markets, ensuring consistent implementation by their members.</li> <li>• Consultations should be sent directly to VPOs and other interested parties and not solely posted on IVSC website, which can be missed by less practiced users.</li> </ul>
003	Appraisal Foundation	<p>1 Agree with a)</p> <p>2 Agree with b) – would like explanation of what “having regard to “guidance means.</p> <p>3a Agree with a) (Yes)</p> <p>3b No opinion.</p> <p>3c TIPS should be guidance, which are not necessarily mandatory, or to be considered requirements or standards.</p> <p>4 Yes</p> <p>5 No. Standards for other professions are not good examples for valuation standards.</p> <p>6 No. There are too many levels of pronouncements and there is not a clear differentiation between requirements and guidance.</p> <p>7 Yes.</p> <p><b>Other Comments:</b></p> <ul style="list-style-type: none"> <li>• The framework, which includes 5 types or levels of pronouncements, is quite complex and this may lead to confusion among practitioners and users of valuation services.</li> <li>• There is not a clear enough distinction between requirements (what a valuer must do) and guidance (what a valuer should do in specific situations).</li> </ul>	
004	Canadian Institute of Chartered Business Valuators	<p>1 Agree with a)</p> <p>2 Agree with a)</p> <p>3a No. Title is misleading as the IVSC does not intend the TIPS to be “educational material”. In our view, a better title for the TIPS could be “Explanatory Comments”/“Interpretive Guidance”,</p> <p>3b The information is very informative.</p> <p>3c The TIPS read like an instruction guide, and include information very similar to information in valuation text books.</p>	

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		<p>4</p> <p>5</p> <p>6</p> <p>7</p>	<p>We are not certain how people could not consider them “educational”</p> <p>Yes, we are of the view that such supporting information may be helpful to users of the IVSs. However, we do not believe that such supporting information should be part of the standards</p> <p>Do not consider other standards to be helpful as they relate to professions that are much more regulated and therefore have to be more prescriptive. Consider national valuation standards to be more relevant comparison.</p> <p>The current structure is easy to understand and use. However, disagree with the inclusion of the TIPs in the standards.</p> <p>Yes. Education should be for VPOs to provide.</p> <p><b>Other Comments:</b></p> <ul style="list-style-type: none"> <li>• The commentaries, guidance and TIPs should not be considered as part of the standards. Compliance with or adoption of the Technical Information Papers (the TIPs) should not be necessary in order to arrive at an “IVS Compliant Valuation”</li> <li>• Certain of the TIPs refer specifically to IFRS. Request that the IVSC takes into consideration that many valuation practitioners, particularly in North America, perform valuations for purposes other than financial reporting. As such, examples and references to valuations for financial reporting are of limited assistance to these practitioners.</li> </ul>
005	KPMG	<p>1</p> <p>2</p> <p>3a</p> <p>3b</p> <p>3c</p> <p>4</p> <p>5</p> <p>6</p> <p>7</p>	<p>Agree with b)</p> <p>Agree with b)</p> <p>Yes – agree is an appropriate description.</p> <p>TIPs are useful in providing a high level understanding of selected topics. However, where complex questions arise, they provide limited guidance on how a valuer should apply their judgment.</p> <p>Rather than suggest the exclusion of material from TIPs, we believe that their utility would be increased by more comprehensive guidance, while remaining principles based.</p> <p>Agree that such material should be included in standards. Guidance that is too high level and generic is unlikely to reduce diversity in practice and help valuation professionals and the user community better understand complex issues. There is also a risk that a high level approach would allow a very wide range of practices to claim to comply with IVS, which may weaken the IVS.</p> <p>Answer doesn’t address question, although see third bullet under other comments below.</p> <p>Believe that the current structure is readily understood and appropriate.</p> <p>Believe that the limitations on the scope of the IVSs are generally appropriate given the mandate of the IVSC and its desire to provide an overarching structure for valuation guidance. However, we believe that having more</p>

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			<p>comprehensive guidance would increase understanding of underlying technical issues and improve the quality of valuations</p> <p><b>Other Comments:</b></p> <ul style="list-style-type: none"> <li>• We believe that the IVSs should remain a principles based set of standards. However, frequently the Board adopts a very high level approach to its guidance that limits its influence and effectiveness. In particular, key topics are not explained at a sufficient level of detail nor is the basis of the application of valuer judgment to specific circumstances. We believe that more comprehensive, principles based guidance together with a greater number of more complex examples would increase the quality of valuations, reduce inconsistencies and improve the influence and effectiveness of IVSs.</li> <li>• We believe that the range of illustrative examples in a TIP should be expanded and the basis for conclusions be more clearly articulated. This will increase understanding of the core technical principles involved which will enhance application of such principles to individual valuations.</li> <li>• When evaluating other standards it should be noted that the professionals are typically members of well-established governing associations with clear ethical and other professional responsibilities. In the case of valuers, participation in an organized association is country dependent and not necessarily compulsory. In many countries, certain valuers, e.g., those specializing in business or derivative valuations may not be part of specialist professional valuation bodies. Where a valuer is a member of an association or governing body, the standards of that organization would be expected to take precedence over any standards issued by the IVS, given the member's local or national association typically provides education and enforcement of standards.</li> </ul>
006	Property Institute of New Zealand	<p>1 Agree with b). Consider a holistic view is required</p> <p>2 Agree with b)</p> <p>3a No. Prefer "Technical Guidance"</p> <p>3b Yes. Supplemented with local guidance</p> <p>3c Consider TIPs can be too detailed.</p> <p>4 Yes. Assists in giving context and background</p> <p>5 Recommend "Interpretation notes" be included.</p> <p>6 The category levels are good. However, the grouping within each level is not necessary.</p> <p>7 Yes, agree.</p>	
007	Ernst & Young Global	<p>1 Agree with b)</p> <p>2 Agree with b)</p> <p>3a Title suggests limited to technical guidance whereas TIPS serve other purposes as well. Suggest title such as "standards guidance".</p>	

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		<p>3b</p> <p>3c</p> <p>4</p> <p>5</p> <p>6</p> <p>7</p>	<p>In general, the content of the current TIPs has been helpful in to us in understanding and applying the IVSs. However, as only a limited number of TIPs has been issued, the benefit has been limited.</p> <p>Content of the current TIPs should be included and should form part of the standards. However, we believe the TIPs and the IVS in general should focus even more on issues of public interest, that are not covered in other standards rather than provide guidance on issues that are already covered in those other standards</p> <p>Welcome the board's intention to issue commentaries, guidance and information to support the concepts, principles and requirements in the standards.</p> <p>No specific comments</p> <p>Believe the current structure of the IVSs, that groups pronouncements into five different categories with distinct titles, is easy to understand and to use.</p> <p>We agree with the limitations on the scope as outlined in the document <i>Scope and Content of the International Valuation Standards</i>, issued in August 2013.</p> <p><b>Other Comments:</b></p> <ul style="list-style-type: none"> <li>• We encourage the IVSC to further pronounce the positive impact of IVSs on national law and regulation to increase their recognition in international standards.</li> </ul>
008	Australian Property Institute	<p>1</p> <p>2</p> <p>3a</p> <p>3b</p> <p>3c</p> <p>4</p> <p>5</p> <p>6</p> <p>7</p>	<p>Agree with b)</p> <p>Agree with b)</p> <p>Yes – It doesn't really matter what it is called – it is the quality of content that is critical, not the name.</p> <p>n/a</p> <p>No.</p> <p>Yes, the Board should issue commentaries, guidance and information to support the concepts, principles and requirements in the standards.</p> <p>Detailed comments provided on each. Consider both IFRS and IAASB take appropriate approaches. Query statements that certain material "is not part of the standards" as in litigation any material put out by a standard setter is likely to be to be used to challenge "left field" practices. Standard setters do not issue information for fun.</p> <p>The current grouping is easy to understand and use</p> <p>Have no issue with the limitations on the scope of the IVSs. However, query why the IVSC would not go down the track and look to providing educational material and examining methods defined or discussed in the standards at the level of detail necessary to apply them in practice. It may be more appropriate for such development by the IVSC rather than some monopolistic VPO or equivalent.</p> <p><b>Other Comments:</b></p> <ul style="list-style-type: none"> <li>• Standards should encapsulate the things that are mandatory. However they must be accompanied by</li> </ul>

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			Technical Information Papers and other guidance that assist in the application of the standards. To not consider guidance and supporting information along with rules and principles is nonsensical.
009	Comite Brasileiro de Avaliadores de Negocios (CBAN)	<p>1</p> <p>2</p> <p>3a</p> <p>3b</p> <p>3c</p> <p>4</p> <p>5</p> <p>6</p> <p>7</p>	<p>Agree with a). It is very important to distinguish what is mandatory and what can be used</p> <p>Agree with b). to make the rules effective in the rest of the world, ...can only happen if there is as much explanation and support it is possible</p> <p>Yes. Although title not important as long as purpose is clear.</p> <p>Helpful but could be improved with some interpretation material.</p> <p>Should include more links between the IVS and TIPS and examples that can widen the interpretation and application of the standards.</p> <p>Yes. Should include supporting (information) and examples.</p> <p>IFRS could be best model as used by many valuers.</p> <p>The current structure is good and the groups and categories make it easy to use.</p> <p>IVSs could contain more detail. IVSs should not be too general.</p> <p><b>Other Comments</b></p> <ul style="list-style-type: none"> <li>• (IVSC) Must help and incentivise the local jurisdictions, professional bodies, educators and regulators of valuation services to guarantee the good application of the standards.</li> <li>• (IVSC) Should provide worldwide IVS training through local Valuation Professional Organisations (presence courses and/or distance learning).</li> </ul>
010	Deloitte		<p>No questions answered.</p> <p><b>Other Comments</b></p> <ul style="list-style-type: none"> <li>• The role of the IVSC should be as an educational and coordinating body, providing guidance on best practice and promoting consistency, rather than as an international 'standard-setter', which suggests a significant degree of regulatory rigor and compliance.</li> <li>• Support the IVSC developing valuation guidance based on clear principles that can be applied across asset (and liability) types in order to facilitate a variety of valuation objectives. Such guidance should promote consistency in valuation for similar valuation objectives but should neither stifle innovation nor create a compliance mind-set</li> <li>• Do not support developing more asset- specific or sector-specific guidance, which we see as contrary to guidance based on clear principles and opening the prospect of issuing contradictory guidance for similar items</li> <li>• For valuations not prepared for financial reporting purposes, the current IVSs provide appropriate guidance on determining a measurement approach that is</li> </ul>

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			<p>consistent with the measurement objective, the available information, jurisdictional considerations.</p> <ul style="list-style-type: none"> <li>• Where fair value is the valuation objective, IFRS 13 and ASU Topic 820 provide sufficient guidance for valuation professionals to determine the appropriate valuation <i>methodology</i> to achieve the valuation <i>objective</i>. Guidance issued by the IVSC should not contradict the standards established in the recognised financial reporting frameworks.</li> </ul>
011	Duff and Phelps	<p>1</p> <p>2</p> <p>3a</p> <p>3b</p> <p>3c</p> <p>4</p> <p>5</p> <p>6</p> <p>7</p>	<p>Semantics less important than bright line delineating mandatory and non mandatory.</p> <p>Agree with a), While guidance might provide further insight on compliance each valuation is unique.</p> <p>No preference. Suggest could also be called “application guidance”, “implementation guidance”, “white papers”, “recommendations”, or “technical interpretations”.</p> <p>Generally find the TIPs helpful. However, more expansive consideration of the issues and ample time should go into their development. Should also be an established mechanism to amend.</p> <p>Nothing identified.</p> <p>Agree that guidance would be useful on the sub-asset class level and industry level, as well as for different valuation purposes. This should <u>not</u> be part of the mandatory standards.</p> <p>Each organization has their (sic) own approach and their own taxonomy, accepted by the marketplace and their constituents. There is no compelling reason to follow one model or another.</p> <p>The ultimate organization and taxonomy are less relevant than the clarity around what is considered mandatory</p> <p>Think limitations on scope are reasonable.</p>