SAAJ The Securities Analysts Association of Japan

20 January 2025

Mr. Andreas Barckow
Chair
International Accounting Standards Board

Re: Exposure Draft "Equity Method of Accounting"

Dear Mr. Barckow,

The Corporate Accounting Committee (CAC) of the Securities Analysts Association of Japan (SAAJ) is pleased to comment on the Exposure Draft *Equity Method of Accounting—IAS 28 Investments in Associates and Joint Ventures (Revised 202x)* (hereinafter referred to as the "ED") published on 19 September 2024.

The SAAJ is a not-for-profit organization for professionals in the areas of investment and finance, offering education and certification programs in these fields. Its certified member analysts (holding the CMA designation) number around 29,500.

The CAC is a standing committee of the SAAJ composed of 11 members, most of whom are users of financial statements including equity and credit analysts, portfolio managers, and academics.

The SAAJ sent a questionnaire survey on the ED to members of the CAC and CMAs, of which 14 responded. This comment letter is based on the ED questionnaire results and the discussions among members of the CAC. Please see the attached questionnaire results on the ED.

General Comments

The IASB states that the ED focuses on answering application questions rather than a fundamental review, excluding "whether the equity method is a one-line consolidation or a measurement method" from the scope of the project. Based on these premises, we believe that the IASB should not fundamentally review the current approach to the equity method of accounting in the proposals of the ED.

Therefore, we strongly disagree with the proposal in "Question 4—Transactions with associates," which would fundamentally change the current approach, as well as parts of the proposals in "Question

7—Disclosure requirements" and "Question 9—Transition" that are related to the proposal in Question 4.

Japanese companies have more associates than those in other countries and regions, and many of these associates hold significant management positions. In addition, compared to Western companies, Japanese companies often use their associates strategically. Therefore, the equity method of accounting is important in understanding and analyzing the financial performance of Japanese companies.

Moreover, in businesses such as those in China and resource development, companies often operate through associates instead of subsidiaries to comply with the regulations of the countries and regions they enter. The use of associates to comply with such regulations is not limited to Japanese companies but is also practiced by many companies worldwide.

We understand that the current equity method of accounting is based on a hybrid approach of one-line consolidation and measurement basis, with more emphasis on one-line consolidation. The idea that situations where there is no control but significant influence are considered "similar to situations where there is control" underlies the one-line consolidation approach. At least in Japan, this is widely accepted understanding. Considering the actual use of associates by Japanese companies and the use of associates to comply with regulations in various countries and regions, we believe that the current approach of equity method of accounting strikes an appropriate balance.

We added "Q0: One-line consolidation or measurement basis" to the questionnaire regarding the ED. As a result, half of the respondents supported maintaining the current approach of the equity method of accounting. On the other hand, more than one-third of respondents supported the introduction of proportionate consolidation or believed that a fundamental review was necessary. We discuss the need for a fundamental review of the approach to the equity method of accounting, including the introduction of proportionate consolidation in "Question 11–Other Comments."

Below are our comments on each question. We do not respond to "Question 6—Investments in subsidiaries to which the equity method is applied in separate financial statements" and "Question 8—Disclosure requirements for eligible subsidiaries" due to their importance to users of financial statements. As in the ED, we refer to "associates" including joint ventures for simplicity.

Question 1—Measurement of cost of an associate **(Appendix A and paragraphs 13, 22, 26 and 29 of [draft] IAS 28 (revised 202x))**
Paragraph 32 of IAS 28 requires an investor that obtains significant influence to account for the difference between the cost of the investment and the investor's share of the net fair value of the associate's identifiable assets and liabilities either as goodwill (included in the carrying amount of

the investment) or as a gain from a bargain purchase (recognised in profit or loss). However, IAS 28 does not include requirements for how an investor measures the cost of the investment on obtaining significant influence—for example:

(a) whether to measure any previously held ownership interest in the associate at fair value; or

(b) whether and if so how to recognise and measure contingent consideration.

The IASB is proposing an investor:

(a) measure the cost of an associate, on obtaining significant influence, at the fair value of the consideration transferred, including the fair value of any previously held interest in the associate.

(b) recognise contingent consideration as part of the consideration transferred and measure it at fair value. Thereafter:

  (i) not remeasure contingent consideration classified as an equity instrument; and

  (ii) measure other contingent consideration at fair value at each reporting date and recognise changes in fair value in profit or loss.

Paragraphs BC17–BC18 and BC89–BC93 of the Basis for Conclusions explain the IASB's rationale for these proposals.

Do you agree with these proposals?

If you disagree, please explain why you disagree and your suggested alternative.

We agree with these proposals. In Q1 of our questionnaire corresponding to Question 1, 78.6% of respondents agreed, 0.0% disagreed, and 21.4% neither agreed nor disagreed.

Proposal (a) suggests that obtaining significant influence should be viewed as a similar event to obtaining control to align with the requirements of IFRS 3 *Business Combinations*. As this approach has a certain rationality, we agree with this proposal.

We understand that the revaluation difference of previously held ownership interests measured at fair value remains in equity without recycling if the OCI option under IFRS 9 *Financial Instruments* is adopted.

We also agree with proposal (b) because changes in the fair value of contingent consideration, other than equity instruments, make it easier for users to understand changes in future amounts to be paid.

Some suggested that while IAS 28 requires recognizing a gain from a bargain purchase in profit or loss when an interest is purchased at a price lower than the fair value of the associate's net assets, it should instead require recognizing this gain in OCI. When control is obtained, it is reasonable to recognize the gain from the bargain purchase in profit or loss because the acquisition price, even if it reflects a control premium, is lower than the fair value of the subsidiary's net assets. On the other hand, merely obtaining significant influence does not include such a premium and may involve future restructuring and other measures.

Question 2—Changes in an investor's ownership interest while retaining significant influence
(Paragraphs 30–34 of [draft] IAS 28 (revised 202x))

IAS 28 does not include requirements on how an investor accounts for changes in its ownership interest in an associate, while retaining significant influence, that arise from:

(a) the purchase of an additional ownership interest in the associate;

(b) the disposal of an ownership interest (partial disposal) in the associate; or

(c) other changes in the investor's ownership interest in the associate.

The IASB is proposing to require that an investor:

(a) at the date of purchasing an additional ownership interest in an associate:

  (i) recognise that additional ownership interest and measure it at the fair value of the consideration transferred;

  (ii) include in the carrying amount the investor's additional share of the fair value of the associate's identifiable assets and liabilities; and

  (iii) account for any difference between (i) and (ii) either as goodwill included as part of the carrying amount of the investment or as a gain from a bargain purchase in profit or loss.

(b) at the date of disposing of an ownership interest:

  (i) derecognise the disposed portion of its investment in the associate measured as a percentage of the carrying amount of the investment; and

  (ii) recognise any difference between the consideration received and the amount of the disposed portion as a gain or loss in profit or loss.

(c) for other changes in its ownership interest in an associate:

(i) recognise an increase in its ownership interest, as if purchasing an additional ownership interest. In (a)(i), 'the fair value of the consideration transferred' shall be read as 'the investor's share of the change in its associate's net assets arising from the associate's redemption of equity instruments'.

(ii) recognise a decrease in its ownership interest, as if disposing of an ownership interest. In (b)(ii) 'the consideration received' shall be read as 'the investor's share of the change in its associate's net assets arising from the associate's issue of equity instruments'.

Paragraphs BC20–BC44 of the Basis for Conclusions explain the IASB's rationale for these proposals.

Do you agree with these proposals?

If you disagree, please explain why you disagree and your suggested alternative.

We agree with these proposals. In Q2 of our questionnaire corresponding to Question 2, all respondents agreed.

Regarding proposal (a), similar to the proposal in Question 1, it is reasonable to measure the consideration transferred at fair value when obtaining significant influence. However, when purchasing an additional ownership interest after obtaining significant influence, the significant influence continues, and there is no change in the relationship between the investor and the investee. Therefore, remeasuring the carrying amount of the previously held interests at fair value should not be required. Such remeasurement does not provide useful information to users.

Regarding proposal (b), at the date of disposing of an ownership of interest, it would be sufficient to recognize the difference between the carrying amount and the consideration received in profit or loss, given that there is no change in significant influence.

Regarding proposal (c), given that there is no change in significant influence, it would be sufficient to recognize an increase or decrease in ownership interest in the same manner as the purchase in (a) and the disposal in (b), even if there is no exchange of consideration by the investor.

Question 3—Recognition of the investor's share of losses
(Paragraphs 49–52 of [draft] IAS 28 (revised 202x))

Paragraph 38 of IAS 28 requires that if an investor's share of losses equals or exceeds its interest in the associate, the investor discontinue recognising its share of further losses. However, IAS 28 does not include requirements on whether an investor that has reduced the carrying amount of its investment in an associate to nil:

(a) on purchasing an additional ownership interest, recognises any losses not recognised as a 'catch up' adjustment by deducting those losses from the cost of the additional ownership interest; or

(b) recognises separately its share of each component of the associate's comprehensive income.

The IASB is proposing an investor:

(a) on purchasing an additional ownership interest, not recognise its share of an associate's losses that it has not recognised by reducing the carrying amount of the additional ownership interest.

(b) recognise and present separately its share of the associate's profit or loss and its share of the associate's other comprehensive income.

Paragraphs BC47–BC62 of the Basis for Conclusions explain the IASB's rationale for these proposals.

Do you agree with these proposals?

If you disagree, please explain why you disagree and your suggested alternative.

We basically agree with these proposals but have some suggestions for improvement. In Q3 of our questionnaire corresponding to Question 3, 64.3% of respondents agreed, 14.3% disagreed, and 21.4% neither agreed nor disagreed.

Regarding proposal (a), we basically agree as it aligns with the proposal in Question 2. According to the proposal in Question 2, the investor measures the additional ownership interest at the fair value of the consideration transferred when recognizing the additional ownership interest. Recognizing any losses not recognized as a 'catch-up' adjustment by deducting those losses from the cost of the additional ownership interest at the date of purchasing additional ownership interests is inconsistent with the proposal in Question 2.

However, there are some cases, for example, where an associate is in or near insolvency, and the investor, as a major shareholder, makes an additional investment to rescue the associate. In such cases, the recoverability of goodwill, which is the difference between the additional ownership interest (fair

value of the consideration transferred) and the investor's additional share of the fair value of the associate's identifiable assets and liabilities, is very low. This can be addressed through subsequent impairment instead of recognizing it as a 'catch-up' adjustment. That said, in these cases, we encourage the IASB to add a note that a 'catch-up' adjustment would more faithfully represent the economic substance of the additional investment. Moreover, from the perspective of accountability to the investor's shareholders, the appropriateness of the price and the prospects for the associate's restructuring should be disclosed.

Regarding proposal (b), we basically agree.

However, the various items included in OCI are inconsistent, particularly regarding whether they are subject to recycling or not. This is not a matter of presentation and should essentially be addressed as an accounting treatment issue across accounting standards.

Question 4—Transactions with associates **(Paragraph 53 of [draft] IAS 28 (revised 202x))**
Paragraph 28 of IAS 28 requires an investor to recognise gains and losses resulting from transactions between itself and an associate only to the extent of unrelated investors' interests in the associate.2 This requirement applies to both 'downstream' transactions (such as a sale or contribution of assets from an investor to an associate) and 'upstream' transactions (such as a sale of assets from an associate to an investor). If an investor loses control of a subsidiary in a transaction with an associate, the requirement in IAS 28 to recognise only a portion of the gains or losses is inconsistent with the requirement in IFRS 10 to recognise in full the gain or loss on losing control of a subsidiary. The IASB is proposing to require that an investor recognise in full gains and losses resulting from all 'upstream' and 'downstream' transactions with its associates, including transactions involving the loss of control of a subsidiary. Paragraphs BC63–BC84 of the Basis for Conclusions explain the IASB's rationale for this proposal. Do you agree with this proposal? If you disagree, please explain why you disagree and your suggested alternative.

We strongly disagree with this proposal. In Q4 of our questionnaire corresponding to Question 4, all respondents disagreed.

The reasons for our strong disagreement are as follows:

- As stated in "General Comments," we believe that the IASB should not fundamentally review the current approach to the equity method of accounting, which is based on a hybrid approach of one-line consolidation and measurement basis, with more emphasis on one-line consolidation, in the proposals of the ED. However, we believe that this proposal fundamentally reviews this approach, as it significantly deviates from the approach with more emphasis on one-line consolidation.

- The inconsistency between IFRS 10 and IAS 28 regarding the gains and losses on the sale of a subsidiary's interest differs in nature from general upstream and downstream transactions involving inventories and other items. The IASB should not extend a solution for a local issue to an unrelated issue. Instead, this inconsistency should be resolved by requiring IFRS 10 to recognize gains and losses only to the extent of unrelated investors' interests in the associate when control of a subsidiary is lost in a transaction with the associate.

- This proposal is expected to reduce costs for preparers (That said, the costs associated with updating accounting systems due to the amendment of the standard will inevitably occur, even if they are one-time costs). On the other hand, users will need to make adjustments based on the disclosed information proposed in the ED if they need to eliminate unrealized gains or losses from transactions with associates, resulting in increased costs for users. Additionally, as gains or losses arising from upstream transactions will not be disclosed, the scope of possible adjustments for users will be limited, and their benefits will decrease. Since preparers, as investors, can request associates to provide relevant information, cost reduction for preparers should not be justified. Fundamentally, the basic concept of accounting standards should not be decided solely based on preparers' costs and users' benefits. We are concerned that this proposal could significantly compromise the quality of accounting standards and reduce the usefulness of information.

- This proposal raises concerns about the potential for earnings management, such as selling assets with unrealized gains not only to a joint venture but also to an associate. In companies where executive compensation is determined based on profit-related performance measures, even with sufficient disclosure, it may encourage earnings management by executives.

- Paragraphs BC72 to BC74 of the ED mention 'user information needs.' Among them, BC72(a) states that users evaluate the associate separately, but many users use financial statement figures as reported without conducting their own evaluations. Thus, this proposal could lead such users to make incorrect decisions.

Question 5—Impairment indicators (decline in fair value)
(Paragraph 57 of [draft] IAS 28 (revised 202x))

Paragraphs 41A–41C of IAS 28 describe various events that indicate the net investment in an associate could be impaired. Paragraph 41C of IAS 28 states that a significant or prolonged decline in the fair value of an investment in an equity instrument below its cost is objective evidence of impairment. One of the application questions asked whether an investor should assess a decline in the fair value of an investment by comparing that fair value to the carrying amount of the net investment in the associate at the reporting date or to the cost of the investment on initial recognition.

The IASB is proposing:

(a) to replace 'decline…below cost' of an investment in paragraph 41C of IAS 28 with 'decline…to less than its carrying amount';

(b) to remove 'significant or prolonged' decline in fair value; and

(c) to add requirements to IAS 28 explaining that information about the fair value of the investment might be observed from the price paid to purchase an additional interest in the associate or received to sell part of the interest, or from a quoted market price for the investment.

The IASB is also proposing to reorganise the requirements in IAS 28 relating to impairment to make them easier to apply, and to align their wording with the requirements in IAS 36 Impairment of Assets.

Paragraphs BC94–BC106 of the Basis for Conclusions explain the IASB's rationale for these proposals.

Do you agree with these proposals?

If you disagree, please explain why you disagree and your suggested alternative.

We agree with these proposals. In Q5 of our questionnaire corresponding to Question 5, 71.4% of respondents agreed, 21.4% disagreed, and 7.1% neither agreed nor disagreed.

We particularly agree with proposal (b).

Removing the 'significant or prolonged' decline in fair value is expected to increase the frequency of impairment tests that do not recognize impairment losses, leading to increased costs for investors. Some suggested that requiring investors to measure the fair value of associates at each financial reporting period, although the information obtained from the associates would not be as sufficient as

the information from subsidiaries and accurate fair value measurement would be difficult, could lead to overly conservative practices and potentially mislead management's decisions.

However, when the fair value does not fall below the carrying amount, impairment tests are not required, and the frequency of impairment tests will not increase. On the other hand, when the fair value is near or below the carrying amount, it may indicate that the investment in the associate is not meeting the cost of capital. When the valuation of investment in the associate is higher than the market valuation due to information asymmetry, the recoverable amount exceeds the carrying amount in impairment tests, and no impairment occurs. That said, requiring relatively frequent impairment tests, rather than arguing whether an indication of impairment exists or not, would encourage investors to manage their investments in associates more prudently and align with the interests of the investors' shareholders, justifying the increased costs for investors.

We agree with proposal (b) because the ambiguous term 'prolonged' could not only delay the recognition of impairment but also cause investors to avoid regularly measuring the fair value of associates.

Question 7—Disclosure requirements **(Paragraphs 20(c), 21(d)–21(e) and 23A–23B of IFRS 12 and paragraph 17A of IAS 27)**
The IASB is proposing amendments to IFRS 12 in this Exposure Draft. For investments accounted for using the equity method, the IASB is proposing to require an investor or a joint venturer to disclose: (a) gains or losses from other changes in its ownership interest; (b) gains or losses resulting from 'downstream' transactions with its associates or joint ventures; (c) information about contingent consideration arrangements; and (d) a reconciliation between the opening and closing carrying amount of its investments. The IASB is also proposing an amendment to IAS 27 to require a parent—if it uses the equity method to account for its investments in subsidiaries in separate financial statements—to disclose the gains or losses resulting from its 'downstream' transactions with its subsidiaries. Paragraphs BC137–BC171 of the Basis for Conclusions explain the IASB's rationale for these proposals. Do you agree with these proposals?

If you disagree, please explain why you disagree and your suggested alternative.

We disagree with proposal (b) but agree with proposals (a), (c), and (d). In Q6 of our questionnaire corresponding to Question 7, 7.7% of respondents agreed, 23.1% disagreed, and 69.2% neither agreed nor disagreed. Many respondents disagreed with proposal (b).

We disagree with proposal (b) because we strongly disagree with the proposal in Question 4, which should be considered together with this proposal. Even if the proposal in Question 4 is finalized against our position, we still disagree with proposal (b). This is because gains or losses arising from upstream transactions should also be disclosed if the proposal in Question 4 is finalized. Otherwise, when users need to adjust for unrealized gains or losses, the scope of possible adjustments will be limited.

On the other hand, we strongly agree with proposal (d) because many respondents emphasized the necessity of disclosing a reconciliation. Disclosing a reconciliation will help understand the cash recovery status of equity method investments, which currently requires significant effort for users to analyze.

Question 9—Transition
(Paragraphs C3–C10 of [draft] IAS 28 (revised 202x))

The IASB is proposing to require an entity:

(a) to apply retrospectively the requirement to recognise the full gain or loss on all transactions with associates or joint ventures;

(b) to apply the requirements on contingent consideration by recognising and measuring contingent consideration at fair value at the transition date— generally the beginning of the annual reporting period immediately preceding the date of initial application—and adjusting the carrying amount of its investments in associates or joint ventures accordingly; and

(c) to apply prospectively all the other requirements from the transition date.

The IASB is also proposing relief from restating any additional prior periods presented. Paragraphs BC178–BC216 of the Basis for Conclusions explain the IASB's rationale for these proposals.

Do you agree with these proposals?

If you disagree, please explain why you disagree and your suggested alternative.

We disagree with proposal (a) but agree with proposals (b) and (c). In Q7 of our questionnaire corresponding to Question 9, 53.8% of respondents agreed, 30.8% disagreed, and 15.4% neither agreed nor disagreed.

We disagree with proposal (a) because we strongly disagree with the proposal in Question 4, which should be considered together with this proposal.

We have no particular objections to proposals (b) and (c).

Question 10—Expected effects of the proposals
Paragraphs BC217–BC229 of the Basis for Conclusions explain the IASB's analysis of the expected effects of implementing its proposals. Do you agree with this analysis? If not, which aspects of the analysis do you disagree with and why?

This analysis includes items we agree with and those we disagree with. In Q8 of our questionnaire corresponding to Question 10, 25.0% of respondents agreed, 41.7% disagreed, and 33.3% neither agreed nor disagreed.

We disagree with the proposals in "Question 4—Transactions with associates," as well as parts of the proposals in "Question 7—Disclosure requirements" and "Question 9—Transition" that are related to the proposals in Question 4. The IASB's analysis does not include the increased costs for users to adjust for unrealized gains and losses, the reduced usefulness of information, concerns about earnings management, etc., as we mentioned in Question 4. Therefore, we disagree with these parts of the analysis. On the other hand, we agree with the analysis of the proposals we support.

Essentially, the question about the expected effects of the proposals should be included in each question of the proposals.

Question 11—Other comments
Do you have any comments on the other proposals in this Exposure Draft, including Appendix D to the Exposure Draft or the Illustrative Examples accompanying the Exposure Draft? Do you have any comments or suggestions on the way the IASB is proposing to re-order the requirements in IAS 28, as set out in [draft] IAS 28 (revised 202x)?

Although the equity method of accounting is established as a customary practice, it is a simplified accounting treatment involving fundamental issues, such as whether it is based on one-line consolidation or measurement basis. However, as stated in "General Comments," this issue is excluded

from the scope of the project. Therefore, we believe that the current approach to the equity method of accounting should not be fundamentally reviewed in the proposals of the ED.

That said, if the impact on performance is significant, the equity method of accounting may not necessarily represent the economic substance of the corporate group as gains or losses from equity method investments are excluded from operating profit. Some argue that proportionate consolidation, which the IASB abolished, would more faithfully represent the economic substance. Under proportionate consolidation, if there is significant non-controlling interest, concerns about overstatement of operating profit, which includes the portion attributable to non-controlling interests, would be mitigated.

On the other hand, some believe that accounting for investment securities would more faithfully represent the economic substance of investment in associates in certain cases.

It would be necessary to reach a consensus, through fundamental discussions, on which cases it is reasonable to measure the investment in associates based on the investor's ownership interest, even though the investee is not included in the corporate group of the investor.

We hope that the IASB will engage in essential discussions on how the equity method of accounting should be fundamentally amended, including the reintroduction of proportionate consolidation.

Sincerely yours,

Kenichi Akiba
Chair
Corporate Accounting Committee

Attachment: Questionnaire Results on the ED

The SAAJ sent a questionnaire survey on the ED to members of the CAC and CMAs, of which 14 responded.

Q0 is added before Q1 to Q8, which correspond to Questions of the ED.

Q0: One-line consolidation or measurement basis[1]

The ED excludes the issue of whether the equity method is a one-line consolidation or a measurement basis from the scope of the project because it addresses practical issues rather than a fundamental review.

If the issue of whether the equity method is a one-line consolidation or a measurement basis were included in the scope of the project, which of the following views would you most support?

	View	Number	%
(a)	The equity method of accounting should remain as it is now, which is based on a hybrid approach of one-line consolidation and measurement basis, with more emphasis on one-line consolidation.	7	50.0%
(b)	The equity method of accounting should be amended to enhance the one-line consolidation approach, for example by introducing proportionate consolidation.	2	14.3%
(c)	The equity method of accounting should be amended to enhance the measurement basis approach, for example by extending the scope of fair value measurement based on IFRS 9 *Financial Instruments*.	0	0.0%
(d)	Neither (a), (b), nor (c)	5	35.7%
	Total	14	100.0%

(*) Of the respondents in (d), three (21.4%) called for a fundamental review. Adding the number of respondents in (b), the total is five (35.7%).

[1] In answering Q0, respondents were encouraged to refer to ASBJ Short Paper Series No. 3: Perspectives on the Equity Method of Accounting, published by the Accounting Standards Board of Japan (ASBJ) on 3 September 2021.

Q1: Measurement of cost of an associate…Question 1

(a) Yes	11	78.6%
(b) No	0	0.0%
(c) Neither “Yes” nor “No”	3	21.4%
Total	14	100.0%

Q2: Changes in an investor’s ownership interest while retaining significant influence…Question 2

(a) Yes	14	100.0%
(b) No	0	0.0%
(c) Neither “Yes” nor “No”	0	0.0%
Total	14	100.0%

Q3: Recognition of the investor’s share of losses…Question 3

(a) Yes	9	64.3%
(b) No	2	14.3%
(c) Neither “Yes” nor “No”	3	21.4%
Total	14	100.0%

Q4: Transactions with associate…Question 4

(a) Yes	0	0.0%
(b) No	14	100.0%
(c) Neither “Yes” nor “No”	0	0.0%
Total	14	100.0%

Q5: Impairment indicators (decline in fair value)…Question 5

(a) Yes	10	71.4%
(b) No	3	21.4%
(c) Neither “Yes” nor “No”	1	7.1%
Total	14	100.0%

Q6: Disclosure requirements…Question 7

(a) Yes	1	7.7%
(b) No	3	23.1%
(c) Neither “Yes” nor “No”	9	69.2%
Total	13	100.0%

Q7: Transition…Question 9

(a) Yes	7	53.8%
(b) No	4	30.8%
(c) Neither “Yes” nor “No”	2	15.4%
Total	13	100.0%

Q8: Expected effects of the proposals…Question 10

(a) Yes	3	25.0%
(b) No	5	41.7%
(c) Neither “Yes” nor “No”	4	33.3%
Total	12	100.0%