

Mr Wayne Upton
Chairman
IFRS Interpretations Committee
30 Cannon Street
London
United Kingdom
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Email: ifric@ifrs.org

28 November 2012

Dear Mr Upton,

Tentative agenda decision: IAS 27 Consolidated and Separate Financial Statements and IFRS 10 Consolidated Financial Statements – Non-cash acquisition of non-controlling interest by a controlling shareholder in the consolidated financial statements

Deloitte Touche Tohmatsu Limited is pleased to respond to the IFRS Interpretation Committee's publication in the September 2012 *IFRIC Update* of the tentative decision not to take onto the IFRIC's agenda a request for interpretation of whether the difference between the carrying amount and fair value of non-cash consideration for the purchase of a non-controlling interest should be recognised in profit or loss in the controlling shareholders' consolidated financial statements.

We agree with the IFRS Interpretations Committee's decision not to add this item onto its agenda but note that the reference to IFRSs 'generally requiring' recognition of a gain or loss on derecognition of an asset in profit or loss could be enhanced by reference to the specific requirements of paragraph 68 of IAS 16 *Property, Plant and Equipment* and paragraph 113 of IAS 38 *Intangible Assets*.

If you have any questions concerning our comments, please contact Veronica Poole in London at +44 (0)20 7007 0884.

Yours sincerely,



Veronica Poole
Global IFRS Leader
Technical