

22 May 2017

Sue Lloyd  
Chair  
IFRS Interpretations Committee  
30 Cannon Street  
London  
United Kingdom  
EC4M 6XH

Dear Ms Lloyd

**Tentative agenda decision – IFRS 1 *First-time Adoption of International Financial Reporting Standards*: Subsidiary as a first-time adopter**

Deloitte Touche Tohmatsu Limited is pleased to respond to the IFRS Interpretations Committee's publication in the March IFRIC Update of the tentative agenda decision not to take onto the Committee's agenda the request for clarification of the amount of cumulative translation differences to be recognised by a subsidiary that becomes a first-time adopter later than its parent.

We agree with the IFRS Interpretations Committee's analysis of the current requirements of IFRS 1, but recommend that the Board consider whether a narrow scope amendment to that standard extending the exemption in paragraph D16 to the calculation of cumulative translation differences at a subsidiary's date of transition to IFRSs would be appropriate.

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