

Hans Hoogervorst  
Chairman  
International Accounting Standards Board  
30 Cannon Street  
London  
United Kingdom  
EC4M 6XH

6 October 2015

Dear Mr Hoogervorst

## **Exposure draft 2015/7 – Effective Date of Amendments to IFRS 10 and IAS 28**

Deloitte Touche Tohmatsu Limited is pleased to respond to the International Accounting Standards Board's (the IASB's) Exposure Draft *Effective Date of Amendments to IFRS 10 and IAS 28* ('the exposure draft').

Given the practical issues identified in application of these amendments, we do not object to the proposal to defer the effective date pending a fuller consideration of the accounting for transitions from consolidation to equity accounting and for transactions with equity accounted investees. Due to this deferral, however, the issues addressed by the amendments to IFRS 10 and IAS 28 (notably, the inconsistency between IFRS 10 and IAS 28 on loss of control of a subsidiary/contribution of a non-monetary asset to an equity accounted investee) will remain unresolved. We note that in its 2015 Agenda Consultation the Board lists the equity method as a development stage research project. We continue to encourage the Board to prioritise its work on the research project on equity accounting with a view to addressing those issues and other practical and conceptual questions around the equity method of accounting in a comprehensive manner.

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