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Wayne Upton
Chairman
IFRS Interpretations Committee
30 Cannon Street
London
United Kingdom
EC4M 6XH

23 November 2015

Dear Mr Upton

## Tentative agenda decision – IFRS 5 Non-current Assets Held for Sale and Discontinued Operations: Various IFRS 5-related issues

Deloitte Touche Tohmatsu Limited is pleased to respond to the IFRS Interpretations Committee's publication in the September IFRIC Update of the tentative decision not to take onto the Committee's agenda various issues relating to the application of IFRS 5, namely:

- the scope of the held-for-sale classification with respect to planned loss of control events other than the sale of shares;
- whether IFRS 5 applies to a disposal group consisting mainly of financial instruments;
- impairment of a disposal group when the difference between the carrying amount and the fair value less costs to sell of a disposal group exceeds the carrying amount of non-current assets within the scope of the measurement requirements of IFRS 5;
- reversal of an impairment loss relating to goodwill in a disposal group;
- how to apply the definition of 'major line of business' in presenting discontinued operations; and
- how to apply the presentation requirements in paragraph 28 of IFRS 5 when there has been a change to a plan to dispose of a disposal group that consists of both a subsidiary and other noncurrent assets.

We agree with the IFRS Interpretations Committee's decision not to add these items onto its agenda for the reasons set out in the tentative agenda decision but note that the number and variety of issues raised provides clear evidence that standard-setting activity is required on a number of elements of IFRS 5 including the issues noted above and the question of presentation of intragroup transaction between continuing and discontinued operations addressed in a separate tentative agenda decision.

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

## **Deloitte.**

Yours sincerely

Veronica Poole

Global IFRS Leader