



สภาวิชาชีพบัญชี ในพระบรมราชูปถัมภ์

FEDERATION OF ACCOUNTING PROFESSIONS
UNDER THE ROYAL PATRONAGE OF HIS MAJESTY THE KING

January 20, 2016

Mr. Hans Hoogervorst
Chairman
International Accounting Standards Board (IASB)
30 Cannon Street
London EC4M 6XH
United Kingdom

Dear Mr. Hoogervorst,

Comment Letter on ED/2015/9 Transfers of Investment Property (Proposed amendments to IAS40)

The Federation of Accounting Professions of Thailand would like to show our appreciation on the opportunity to comment on *ED/2015/9 Transfers of Investment Property (Proposed amendments to IAS40)*. Overall, we support the clarifications and the amendments on the concept of transferring of a property to, or from, investment property. We also agree the retrospective adjustment in this regard for the comparative purpose.

Please find our responses to the specific questions raised in *ED/2015/9 Transfers of Investment Property (Proposed amendments to IAS40)* in an attachment. We believe that this proposed amendment will help the practitioners in the future and that our comment letter will contribute positively to the IASB's due process. Should you need more information, please kindly contact the Federation of Accounting Professions of Thailand.

The Federation of Accounting Professions avails itself of this opportunity to the International Accounting Standards Board the assurances of its highest consideration.

Yours sincerely,

Associate Professor Dr. Vorasak Tummanond
Chair of Thai Accounting Standards Board
Federation of Accounting Professions of Thailand
Bangkok, Thailand

Copied to:

- 1) Chairman, Accounting Standard-Setting Committee of Thailand
- 2) Chairman, Subcommittee on Studying and Monitoring of International Financial Reporting Standards
- 3) President, Federation of Accounting Professions of Thailand



Exposure Draft ED/2015/9 Transfers of Investment Property Proposed amendment to IAS 40

Question 1: Proposed amendment

The IASB proposes to amend paragraph 57 of IAS 40 to:

- (a) state that an entity shall transfer a property to, or from, investment property when, and only when, there is evidence of a change in use. A change in use occurs when the property meets, or ceases to meet, the definition of investment property.
- (b) re-characterise the list of circumstances set out in paragraph 57(a)–(d) as a non-exhaustive list of examples of evidence that a change in use has occurred instead of an exhaustive list.

Do you agree? Why or why not?

FAP: We support IASB to re-characterise the circumstances to a list of non-exhaustive examples for the transfer from or to investment properties. This adjustment will cover all changes in uses of investment property. It is also helpful to provide more illustrative examples of this change.

Question 2: Transition provisions

The IASB proposes retrospective application of the proposed amendment to IAS 40.

Do you agree? Why or why not?

FAP: We support the retrospective adjustment since it helps the comparability.