



March 18, 2016

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

Dear Board Members:

Consejo Mexicano de Normas de Información Financiera (CINIF), the accounting standard setting body in Mexico, welcomes the opportunity to submit its comments on the **Exposure Draft ED/2015/9, *Transfers of Investment Property*** – Proposed amendment to IAS 40 issued in November 2015 (the ED). Set forth below you will find our comments on the topics included in the ED.

Overall comments

In general terms we agree with the proposed amendment to IAS 40. We believe the amendment will clarify the standard.

Questions for respondents

Question 1—Proposed amendment
<p>The IASB proposes to amend paragraph 57 of IAS 40 to:</p> <ul style="list-style-type: none">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. <p>Do you agree? Why or why not?</p>

Yes, we agree with the scope of the amendment. We believe that the amendment will make the standard more clear and precise.

We also agree with re-characterization of the list of examples in paragraph 57 as non-exhaustive.

Question 2 — Transition provisions

The IASB proposes retrospective application of the proposed amendment to IAS 40. Do you agree?
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Why or why not?

We agree with retrospective application, considering that an entity could find itself in the situation where it could not previously have made the transfer that is now appropriate pursuant to revised paragraph 57. Upon application of revised paragraph 57, the entity could find itself in the situation where the transferred item might be subject to a measurement different from that used prior to the transfer. Such changes in measurement and transfers are recognized retrospectively.

Should you require additional information on our comments listed above, please contact Elsa B. García at (52) 55 5596 5633 ext. 108 or me at (52) 55 5596 5633 ext. 103 or by e-mail at egarcia@cinif.org.mx or fperezcervantes@cinif.org.mx, respectively.

Kind regards,



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cc: Amaro Gomes