

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

Ref: The IFRS Interpretations Committee's tentative agenda decision on IFRS 12 Disclosure of Interests in Other Entities — disclosures for a subsidiary with a material non-controlling interest and for a material joint venture or associate

Dear Mr Upton,

The European Securities and Markets Authority (ESMA) thanks you for the opportunity to respond to the IFRS Interpretations Committee's (IFRS IC) publication in the September 2014 IFRIC Update of the tentative decision related to the application of IFRS 12 *Disclosure of Interests in Other Entities*. We are pleased to provide you with the following comments with the aim of improving the consistent application and enforceability of IFRSs.

ESMA has considered the IFRS IC's tentative decision not to add to its agenda a request for clarification in respect of the requirements in paragraphs 12(e)–(g) of IFRS 12. These requirements concern the disclosure of information about a subsidiary that has non-controlling interest that is material to the reporting entity.

ESMA agrees with the decision of the Interpretations Committee that, in the light of the existing IFRS requirements, sufficient guidance exists and that neither an Interpretation nor an amendment to a Standard is necessary.

ESMA particularly welcomes the reasoning included in the tentative agenda decision that the approach chosen to present the required disclosures should reflect the disclosure objective of a Standard. ESMA in particular believes that the tentative agenda decision contributes to the enforceability of IFRS 12 and enables to provide the most relevant information to users of financial statements.



Furthermore, ESMA believes that, by referring to the presentation of disclosures that best reflects the disclosure objective, IFRS IC could help to address the perceived problem of disclosure overload and contribute to making disclosures more relevant.

We would be happy to discuss these issues further with you.

Yours sincerely,

A handwritten signature in blue ink, consisting of a stylized 'S' followed by a vertical line and a horizontal stroke ending in a dot.

Steven Maijor
Chair
European Securities and Markets Authority