

23 February 2007

Robert Garnett, Chairman  
International Financial Reporting Interpretations Committee  
30 Cannon Street  
London EC4M 6XH  
United Kingdom  
Email: ifric@iasb.org

Dear Bob,

**Proposed agenda decision wording: IAS 19 *Employee Benefits*—Special Wages Tax**

Deloitte Touche Tohmatsu is pleased to respond to the IFRIC's publication in the January 2007 *IFRIC Update* of the tentative decision not to take onto the IFRIC's agenda a request for an Interpretation of IAS 19 *Employee Benefits* with respect to taxes related to defined benefits and whether those taxes should be treated as part of the defined benefit obligation.

We support the IFRIC's decision not to take this item to the agenda. We note the references to existing guidance within IFRS which should be considered when determining the appropriate accounting treatment for taxes related to employee benefits. We are of the view that there is sufficient guidance within these sources to determine an appropriate accounting treatment. We concur with the IFRIC's conclusion that to develop an Interpretation would involve an examination of a large number of tax jurisdictions and that such an examination would prevent developing guidance in a reasonable period of time.

If you have any questions concerning our comments, please contact Ken Wild in London at +44 (0)20 7007 0907.

Sincerely,



**Ken Wild**  
**Global IFRS Leader**

cc: Allan Cook, IFRIC