

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

14 December 2009

Dear Mr Garnett,

**Tentative agenda decision: IFRS 4 Insurance Contracts and IAS 32 Financial Instruments
Presentation - Scope issue for investments in REITs**

Deloitte Touche Tohmatsu is pleased to respond to the IFRIC's publication in the November 2009 IFRIC Update of the tentative decision not to take onto the IFRIC's agenda a request for an Interpretation of IFRS 4 *Insurance Contracts* and IAS 32 *Financial Instruments: Presentation* with respect to including investments in REITs in the scope of the respective standards.

We agree with the IFRIC's decision not to take this item onto its agenda. Nonetheless, we find the text of the tentative agenda decision unclear as we understand it to open the door to the application of various treatments. While the text sets out the appropriate definition by which the specific feature of a REIT should be assessed, it does not indicate the general conclusion that would be reached and on which we believe there was a high degree of consensus within the IFRIC. We think that the IFRIC should state that, based on the accounting literature, investments in REITs would be in the scope of IAS 32.

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

Yours sincerely,



Ken Wild
Global IFRS Leader