



**The Japanese Institute of
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Mr. John Stanford
Technical Director
International Public Sector Accounting Standards Board
International Federation of Accountants
277 Wellington Street West
Toronto, Ontario, Canada M5V 3H2

Comments on Exposure Draft 68 “Improvements to IPSAS, 2019”

Dear Mr. Stanford,

The Japanese Institute of Certified Public Accountants (hereafter “JICPA”) highly respects the International Public Sector Accounting Standards Board (hereafter “IPSASB”) for its continuous effort to serve the public interest. We are also pleased to comment on the Exposure Draft 68 “Improvements to IPSAS, 2019” (hereafter “ED”). Our comments to ED are as follows.

Comment:

1. Part 1d – Amendments to IPSAS 33, *First-time Adoption of Accrual Basis International Public Sector Accounting Standards (IPSASs)*.

(a) Descriptions of paragraphs

Part 1d proposes deletion of paragraph 114 and newly established paragraph 114A by amending paragraph 114. Paragraph 114A is the result of an amendment to paragraph 114, hence it should be presented as a single paragraph with a revision history (marked-up) in order not to mislead users.

We also note that IPSAS 41, *Financial Instruments* already prescribes paragraph 114A. Paragraph 114A proposed in this ED should be stated before the current Paragraph 114A. Thus paragraph numbers should carefully be considered and established.

(b) A table on page 6 and explanatory sentences of BC119 on page 19 of this ED

The phrase “inadvertently omitted” in part 1d should be rephrased to “inadvertently amended.”

Paragraph 114 of IPSAS 33 in “Amendments to Other IPSAS” on page 251 of IPSAS 41 has become ambiguous in meaning as a result of the deletion of the term “available for sale.” An overall review of the whole paragraph, including the amendment to the deleted

term, resulted in Paragraph 114A on page 18 of this ED. We therefore believe that “inadvertently amended” would be a more appropriate description than “inadvertently omitted.”

2. Amendments to impairment standards in Part 4a and 4b

While the proposed BC on pages 25 and 27 of this ED describes a “provision of guidance on impairment of revalued assets in the scope of IPSAS 31 *Intangible Assets*,” the core text of the standard only adds the term “relevant standard.” With this, it would be rather difficult to understand that both IPSAS 17 *Property, Plant and Equipment* and IPSAS 31 are intended. We therefore believe that the titles of IPSAS 17 and IPSAS 31 should be clearly referred in the core text.

Yours sincerely,

Hiroshi Shiina

Executive Board Member - Public Sector Accounting and Audit Practice

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