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July 31, 2009

Technical Director International Public Sector Accounting Standards Board International Federation of Accountants 277 Wellington Street West Toronto Ontario Canada M5V 3H2

Comments on the Proposed International Public Sector Accounting Standard, "Financial Instruments: Disclosures"

Dear Sir:

The Japanese Institute of Certified Public Accountants (JICPA) is pleased to comment on the Proposed International Public Sector Accounting Standard, "Financial Instruments: Disclosures" (the "ED"), as follows:

On "Specific Matters for Comment"

1. The IPSASB considered all of the required disclosures in IFRS 7 to assess whether any disclosures should be deleted for public sector specific reasons. Examples of disclosures specifically considered include sensitivity analyses and collateral. The IPSAS concluded that there is no public sector specific reason to depart from the requirements of IFRS 7 by deleting any disclosures. Do you agree?

We agree with this proposal.

Yours sincerely,

Yasuo Kameoka Executive Board Member — Public Sector Accounting and Audit Practice The Japanese Institute of Certified Public Accountants Takao Kashitani Executive Board Member — Public Sector Accounting and Audit Practice The Japanese Institute of Certified Public Accountants