



CARIN RYTOFT DRANGEL
PKE

The Technical Director
International Public Sector Accounting Standards Board
International Federation of Accountants
277 Wellington Street West, 6th Floor,
Toronto, Ontario M5V 3 H2 CANADA

Date May 15, 2012
Ref. no.
Your Date
Your Ref.

**Comments on Consultation Paper: Conceptual Framework
for General Purpose Financial Reporting by Public Sector
Entities: Presentation in General Purpose Financial Reports.**

The Swedish National Audit Office wishes to make the following
comments on the Consultation Paper. Comments are requested by May
31, 2012.

Response to the Specific Matters for Comments:

Specific Matter for Comment 1 (See paragraphs 2.1 to 2.18)

With respect to the descriptions of "presentation", "display",
"disclosure", "core information", and "supporting information", and the
proposed relationships between these terms:

- (a) Do you agree that the proposed descriptions and relationships
are appropriate and adequate?

Yes.

- (b) Do you agree that identification of core and supporting
information for GPFRs should be made at a standards level
rather than as part of the Conceptual Framework?

Yes.

Specific Matter for Comment 2 (See paragraphs 3.1 to 3.12)

With respect to the IPSASB's approach to presentation of information:



- (a) Do you agree with the development of presentation concepts that can be adopted for the more comprehensive scope of GPFs including, but not restricted to, financial statements?

Yes.

- (b) Do you agree with the approach of (i) focusing on user needs to identify presentation objectives, (ii) application of the qualitative characteristics (QCs) to presentation decisions, and (iii) separate presentation concepts?

Yes.

Specific Matter for Comment 3 (*See paragraphs 4.1 to 4.5*)

This CP discusses the importance of developing presentation objectives as part of standard setting.

- (a) Do you agree that presentation objectives should be developed?

Yes.

- (b) If so, in your view, should they be developed at a standards level, or as part of the Conceptual Framework?

Yes.

Specific Matter for Comment 4 (*See paragraphs 6.1 to 6.27*)

This CP proposes three presentation concepts. Please provide your views on these concepts, in particular whether:

- (a) Any of these concepts should be excluded from the Conceptual Framework; and

No.

- (b) The description of each concept could be improved and, if so, indicate how.

We have no suggestion of improvements.

Specific Matter for Comment 5 (*See paragraphs 6.1 to 6.27*)



In addition to the three concepts proposed in Section 6, please provide your views on:

- (a) Whether there are further concepts that should be included in the Conceptual Framework; and

We have no suggestions of further concepts.

- (b) What those further concepts should be.

We have no suggestions of further concepts.

Specific Matter for Comment 6 (*See paragraphs 6.12, 6.17, 6.24, and 6.27*)

Each presentation concept refers to the possibility of developing criteria to determine the presentation techniques to be used in setting accounting standards. Please provide:

- (a) Your views on whether it would be useful and workable for the IPSASB to apply such techniques; and

Yes

- (b) Any suggestions you have for developing these techniques.

We have no suggestions of further developments.

On behalf of the Swedish National Audit Office

Carin Rytöft Drangel