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The Applicability of IPSASs™ to Government Business Enterprises and Other Public Sector Entities

I am Denise Juvenal this pleasure to have the opportunity to comment on this consultation about The Applicability of IPSASs™ to Government Business Enterprises and Other Public Sector Entities at International Public Sector Accounting Standards (IPSASs). This is my individual commentary for IFAC-IPSASb.

Guide for Respondents

The IPSASB welcomes comments on all of the matters discussed in this CP. The CP highlights the preliminary view of the IPSASB and two specific matters for comment. These are provided below to facilitate your comments. Comments are most helpful if they indicate the specific paragraph or groups of paragraphs to which they relate, and contain a clear rationale, including reasons for agreeing or disagreeing. If you disagree, please provide alternative proposals.

Preliminary View

The IPSASB has expressed a unanimous preliminary view (PV) that Approach 1 is the best way forward. A majority of IPSASB members expressed a PV on support for Option 1a. The IPSASB particularly values comments on the Specific Matters for Comment below.

Specific Matters for Comment 1

Do you agree with the IPSASB's PV? If so, do you prefer Option 1a or Option 1b? Please give the reasons for your view.

Yes, I agree with the IPSASB's PV. I prefer Option 1a, so, I have uncertain if for public sector has exceptions in relation contracts of business for some activities. Although, the public sector can modify the formal type of the organizations or create news activities in its structure.

However, is unclear for me if in the practice these modifications can impact the laws and jurisdictions for this standard, as, for example the sectors or areas with energy, communications, banks and technology. I believe that some sector or areas have formal structure, because these aspects described are very important for development in the country. Although, I do not recognize what is the risk of application for this Exposure Draft, I do not knowledge for this.

For this, in the page 17 report in this draft that "A public corporation is an entity controlled by another public sector entity that is market producer, is entitled to own goods or assets in its own right, is able to take economic decisions and engage in economic activities for which it is itself held to be directly responsible and accountable at law, is able to incur liabilities on its own behalf, to take on other obligations or future commitments and to enter into contracts and has a complete set of accounts, including a balance sheet of assets and liabilities."

I considering that the business for public sector involves public interest¹ and conflict interest² in relation the government with supplier and others areas of the public sector. I do not explain about literature or references described in this discussion, because I agree with Board's, so, I have doubt in relation which these modifications that the governments can impact in the implementation of the exposure draft whereas the complexity of the public sector.

¹ <http://www.ifac.org/news-events/2013-01/ipsasb-publishes-first-chapters-public-sector-conceptual-framework> and

² <http://www.ifac.org/news-events/2013-01/ipsasb-publishes-first-chapters-public-sector-conceptual-framework> and <http://www.ifac.org/news-events/2011-12/iesba-proposes-changes-code-ethics-professional-accountants-address-conflicts-in>, <http://www.ifac.org/about-ifac/organization-overview/our-business-model> and <http://www.ifac.org/publications-resources/definition-public-interest>

The public sector is the bigger organization that includes all activities that exist for operation products and services to attend for citizens, so I understand that for IFAC/IPSASB does not have problems with the application of this standard needs to observe if has exceptions and I am considering the responsibility, high quality, accountability, form, evidence and transparency of the public sector and governments in relation the activities in practice around the world. I suggest for the Board's, if agrees, that consults the Key International Regulators.

Specific Matters for Comment 2

If you do not agree with the IPSASB's PV, please indicate whether you support Option 2a or Option 2b in Approach 2 or identify an alternative approach. Please give the reasons for your view.

None.

Thank you for opportunity for comment this proposal, if you have questions do not hesitate contact to me, rio1042370@terra.com.br.

Yours,

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