

Comments on Exposure Draft No.2

This Statement is intended to apply to national governments and their agencies of the countries receiving external assistance. To avoid confusion about the scope of application of each disclosure requirement, the terms 'national governments' and 'governmental agencies' are to be used instead of more general terms such as 'entities' or 'recipients'. The explanation about the flow of external resources given in paragraph 20 is to be moved to earlier paragraph and explanations on the disclosure requirements are to be given with reference to explanations about the flow of external resources, which will facilitate our understanding of the disclosure requirements.

Regarding whether 'external resource' is to include not only official resources but resources by or through NGO, those resources from NGO are to be included in the Statement of Cash Receipts and Payments of national governments or governmental agencies as long as those flow of resources are under the 'control' of governments or governmental agencies, but it is usually hard to determine who 'control (benefit from)' the flow of resources when NGO provides its services directly to people living in the country. Problems might be caused by the definition of the term 'control' and the usage of 'entity' and 'recipient' in the Statement.

As long as the purpose of the disclosure requirements of the Statement is to require the recipient national governments or governmental agencies to disclose the flow of development funds they receive, specifications of resources as prescribed in paragraph 13-15 are not to be used since classification of funds under such specifications might be easily subject to arbitrariness of the government.

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