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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, "Agriculture"

Dear Sir:

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

We agree with the proposals contained in this ED.

This ED deals with biological assets and agricultural produce for sale, including exchange or non-exchange transactions, as part of the International Financial Reporting Standards (IFRSs) Convergence Program. In the public sector there are important biological assets which are used in the supply of services, including plants and trees used for environmental protection purposes. But such biological assets are not dealt with in this ED. We hope that the International Public Accounting Standards Board (IPSASB) will soon develop standards which deal with such biological assets.

Yours sincerely,

Yasuo Kameoka Takao Kashitani Executive Board Member Chair of the Public Sector Committee The Japanese Institute of Certified Public Accountants