

Stephenie Fox
Technical Director
International Public Sector
Accounting Standards Board
International Federation of Accountants
277 Wellington Street, 4th Floor
Toronto, Ontario M5V 3H2
CANADA

Lausanne, June 27, 2011

**Swiss Comments to
ED 45: *Improvements to IPSASs 2011***

Dear Stephenie,

With reference to the request for comments on the proposed Exposure Draft, we are pleased to present the Swiss Comments to Exposure Draft 45: *Improvements to IPSASs 2011*.

We thank you for giving us the opportunity to put forward our views and suggestions. You will find our comments to ED 45 in the attached document.

Should you have any questions, please do not hesitate to contact us.

Yours sincerely,

SRS-CSPCP



Prof Nils Soguel, President



Sonja Ziehli, Secretary

Swiss Comments to ED 45

Swiss Comments to

ED 45: *Improvements to IPSASs 2011*

Table of Content	Page
1. Introduction	1
2. Comments to Exposure Draft 45 <i>Improvements to IPSASs 2011</i>	1
2.1. Part I: Deletion of Introduction	1
2.2. Part II: Insertion of objective paragraph.....	1
2.3. Part III: General Improvements	1

1. Introduction

The Swiss Public Sector Financial Reporting Advisory Committee (SRS-CSPCP) has discussed ED 45 *Improvements to IPSASs 2011* and comments as follows. The SRS-CSPSP was established in 2008 by the Swiss Federal Ministry of Finance together with the Ministers of Finance at the cantonal level. One of its aims is to provide the IPSAS Board with a consolidated statement for all the three Swiss levels of government (municipalities, cantons and Confederation).

2. Comments to Exposure Draft 45 *Improvements to IPSASs 2011*

2.1. Part I: Deletion of Introduction

In the drafts the Introduction paragraphs are useful and informative, but in the final standard they can be omitted: the SRS-CSPCP agrees with the deletions.

2.2. Part II: Insertion of objective paragraph

The insertion of the missing objective paragraphs in the four standards makes sense, so that in all the standards the objective is clearly stated: the SRS-CSPCP agrees with the insertions.

2.3. Part III: General Improvements

The Exposure Draft does not clearly state why the improvements have been made. Are they based on updates to IFRS or do they concern peculiarities of the public sector? What is the thinking behind them? Without this information it was difficult to assess the improvements. For future improvements the corresponding background information should therefore be included in the Exposure Draft to facilitate assessment.

Standard 16, Investment Property

The SRS-CSPCP agrees with the improvements to this standard.

Standard 17, Property, Plant, and Equipment

The insertion with IPSAS 26 for the realisation of the impairment gave rise to a controversial discussion in the SRS-CSPCP, because in IPSAS 17 fixed assets, whose main purpose is not to generate a return, are covered. In special cases uncertainties could arise as to when and which valuation method is applicable.

Otherwise we agree with the improvements to the standard.

Standard 19, Provisions Contingent Liabilities and Contingent Assets

The insertion of the example under Item IG 14 with IPSAS 29 gave rise to controversial discussion in the SRS-CSPCP. The question arises whether in the public sector there could not also be financial guarantees that would not fall under IPSAS 29. In this connection therefore the sector specific aspects should once again be reviewed.

Otherwise we agree with the improvements to the standard.

Standard 21, Impairment of Non-Cash-Generating Assets

The SRS-CSPCP agrees with the improvements to this standard.

Lausanne, June 27, 2011