

# Constructing a European Governance Space

## The Case of Harmonized Public Sector Accounting Standards for European Union Member States

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# **Constructing a European Governance Space: The case of harmonised Public Sector Accounting Standards for European Union Member States**

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## **ABSTRACT**

Financial crisis has emphasized the need for harmonized public sector accounts in Europe. After a public consultation on the suitability of the IPSAS for EU Member States, the European Commission considers that the proper way is the development of European Union Standards adapted to IPSAS (renaming it EPSAS). As a consequence, the issue of the governance for the future development of EPSAS was identified as a priority for follow-up. A first meeting of a Task Force of experts delegated from EU national governments took place in October 2013 to exchange views on possible future governance arrangements. On the basis of that discussion, Eurostat launched another public consultation named; 'Towards implementing European Public Sector Accounting Standards for EU member states-Public consultation on future EPSAS governance principles and structures'.

This paper seeks to provide an in-depth understanding of the negotiations and interactions that took place prior to, during and after the issuance of the public consultation on the 'Suitability of IPSAS'. The focus of this paper is therefore on a systematic analysis of the construction of regional-transnational governance of public sector accounting, using the EPSAS as a focus of study. In doing so it is sought to identify the institutional pressures, trace the actor dynamics, as well as strategies enrolled leading up to the IPSAS consultation and consultation about governance at the European level. The method of the paper will be based on document review.

**Keywords:** EPSAS, Accounting harmonization, IPSAS, transnational governance, accounting diversity.

## **1. INTRODUCTION**

The European Commission is working on several fronts to achieve the implementation of uniform and comparable accruals-based accounting practices for the European Union Member States and for all the sectors of General Government, that is, Central Government, State Government, Local Government and Social Security, considering that at the same time it can help ensure high quality statistics (European Commission, 2013a).

These initiatives have become stronger in force in the light of the current public sector financial crisis, where the role of fiscal discipline in safeguarding economic and monetary union is apparent. The repercussion of this is that monitoring fiscal discipline should rely on high-quality measurement of the fiscal situation of each Member State within the European Union. Financial stability is founded on trust, and lack of trust in the way the financial situation of the governments is measured has been one element in the sovereign debt crisis in Europe. In the light of this, Eurostat issued a Public Consultation on the suitability of the International Public Sector Accounting Standards (IPSAS) for EU Member States in 2012. The consultation on suitability of IPSAS and a harmonized accruals-based EU public sector accounting standards was carried out in the light of it being considered an important component of building trust across the public sector.

The overall conclusion drawn from the public consultation is that European Union member states (2013b, p. 8) considers that IPSASs cannot easily be implemented in EU Member States as they stand currently and that it is preferable to develop European Union Standards adapted to IPSAS (renaming them EPSAS). EPSAS are seen as a necessary tool for further fiscal and budgetary integration in the EU.

At the moment, the issue of the governance for the future EPSAS is identified as a priority within the EU. In this framework, Eurostat launched a public consultation in order to collect views from the widest possible range of stakeholders.

The objective of this paper is to examine the process that has led to that consultation as well as the main conclusions of the consultation. Our aim is to show the importance of interactions and its implications for regulatory capacity. The paper is

inspired by the framework for transnational governance analysis proposed by Eberlein et al. (2013).

This paper seeks to provide an in-depth understanding of the negotiations and interactions that took place prior to, during and after the issuance of the public consultation on the ‘Suitability of IPSAS’. The focus of this paper is therefore on a systematic analysis of the construction of regional-transnational governance of public sector accounting, using the EPSAS as a focus of study. In doing so it is sought to identify the institutional pressures, trace the actor dynamics, as well as strategies enrolled leading up to the IPSAS consultation. The paper seeks to include the consultation papers about governance at the European and International level.

In public sector accounting we have researched isolated aspects of interactions between governance actors and institutions. This paper seek so attend the transnational governance interactions within the European Union pertaining to the idea of establishing harmonised public sector accounting standards. We are tracing the idea backwards to it’s roots and from there analyzing the “myriad ways in which governance actors and institutions” have engaged and reacted with one another through the ideas travel through time. At the end, EPSAS emanate not from conventional state and interstate institutions, but from an array of multi-stakeholder and hybrid national-international institutions operating in a dynamic and transnational regulatory space, as Eberlein et al. (2013) conceptualize.

## **2. CONTEXTUAL LOCATION AND IPSAS RHETORIC.**

### **2. 1. The legitimization of the IPSAS in the international context**

The Public Sector Committee (PSC) of the International Federation of Accountants (IFAC), emerged in 1986 as a standing committee of the IFAC, with the objective of developing programs for improving public sector financial management and accountability (Sutcliffe, 2003). In 1997 the IFAC-PSC embarked upon a project to develop a set of accounting standards for public sector entities referred to as International Public Sector Accounting Standards (IPSAS), what aim is to improve the quality of general purpose financial reporting by public sector entities, leading to better information for decisions making process and increasing transparency and accountability (Bergmann, 2010b). The Committee was constituted as an independent

standard-setting board in 2004 and its labor can be compared to that of IASB in business accounting. The impact of its work (various studies, recommended practice guidelines and accounting standards have been issued, while other projects are still under way) on international governmental accounting has been decisive.

The operationalisation of these standards in a variety of different countries and setter bodies has been far quickly. At the moment, more than 39 countries have open processes for adopting or converging with IPSAS, as well as most of the public international organizations (Deloitte, 2013a; Jensen and Smith, 2013). Using Humphrey et al. (2009)'s terminology, we can say that an international public sector accounting architecture has been emerged. At the same time, different professional and academics are being aware of the importance of accounting harmonization in the public sector (Benito and Brusca, 2004, Christians' et al., 2010; Ball, 2012; Malson, 2012 ).

Among the arguments for the legitimization of the IPSASs, the association with Anglo-Saxon business-oriented models of government accounting has gain interest (Chan, 2008; Brusca et al., 2013), and especially the convergence to IFRS. In this way, the IPSAS can take an important advantage of the legitimacy of the IASB standards (Richardson and Eberlein, 2010). In fact, in Anglo-Saxon countries early convergence to IPSAS become from the application of local adaptation to IFRS to public sector entities. This is the case of UK, where both the Government Financial Reporting Manual and the Code of Practice on Local Authority Accounting contain guidance on the application of IFRS, adapted and interpreted for the public sector context.

In Australia, the Australian Accounting Standards Board (AASB) has issued Australian equivalentents to IFRS (A-IFRS, with certain amendments to the IASB pronouncements, that apply to public sector reporting. In New Zealand, although public sector applied NZ-IFRS, recently the New Zealand External Reporting Board and the New Zealand Accounting Standards Board (NZASB) have developed standards based on IPSASs.

The close model of IPSASs to IFRS has been used also by big audit firms, taking into account that they had the acknowledgement and expertise in private sector accounting and have considered the IPSASs as an opportunity for developing training programs. For example, Ernst and Young and CIPFA have announced an alliance offering public and not-for-profit organizations support with the implementation IPSAS.

The IPSAS-IFRS convergence has been also an important reason for many countries moving forward IPSASs because in business sector accounting the IFRS have gained legitimacy and aim to maintain uniform accounting systems between private and public sector. This has been the case of Estonia (Tikk, 2010), Nigeria (Deloitte, 2013b), Romania (Ilie and Miose, 2012) or Spain (Brusca et al., 2013).

The mimetic isomorphism behind the institutional theory (DiMaggio and Powel, 183), can have also some influence in the legitimization of IPSASs around the world. The implication of international organizations for supporting IPSASs has been important, with most entities adopting them (NATO, OECD, UN or European Commission are some examples) and also recommending to countries the adoption or use of IPSAS. For example, the World Bank (2004) encouraged borrowers that projects' financial monitoring reports comply with IPSAS.

As IPSASs are successful implemented by many international organizations (Grossi and Soverchia, 2011), many countries consider that IPSASs can lead a process of accounting reform for attending international requirements of transparency and accountability. This has been the case of many Latin-American countries, where international institutions, such as the World Bank, have had an important influence leading countries toward accounting reforms, which have considered IPSASs (Araya et al., 1011; Gomez and Montesinos, 2012) as a tool for legitimating the reforms.

Other factor to which we can refer as a driver for the legitimization of the IPSASs is the global financial crisis that streams the necessity of governments to be transparent and produce comparable information. This is especially important in the European Union, as we will refer later, but also at the global level. We can show as an example the first G20 Finance Ministers and Central Bank Governors' meeting held in Russia, where was concluded that (G20 Finance Ministers, 2013) "work is needed to better assess risks to public debt sustainability, which includes looking at transparency and comparability of public sector reporting, and monitoring the impact of financial sector vulnerabilities on public debt." The report calls on the International Monetary Fund (IMF) and World Bank to further explore the issue and provide updates. Prior to the G-20 meeting, the executive chief of IFAC, Ball (2013), called on to G-20 to strengthen global financial stability by supporting adoption and implementation of International Public Sector Accounting Standards (IPSASs).

In this point, it is also necessary to recognize that there are also some detractors of IPSASs, considering that they do not assure the best practices for public sector

entities. Some Nordic countries could be considered in this group, where only Sweden has partly adapted standards to IPSASs, while Finland is an example of a developed country reluctant to adapt to IPSASs (Oulasvirta, 2013).

## 2.2. Background in the European Union Member States

Far from being harmonized, there are important differences between the accounting systems of the 28 countries of the European Union. Most of them have accrual accounting but only a few of them have accounting standards that are close to the IPSAS. As the European Union (2013c, p. 42) summarizes “current public sector accounting and auditing practices vary widely, not just between Member States but, in many cases, also across different levels of government within Member States”. The Ernst and Young (2012) report shows that there are many countries that use cash or modified accruals for central government and for local government. Table 1 summarizes the situation about the adoption or adaptation to IPSAS.

Table 1: Initiatives with respect to the IPSAS in the European Union countries

	Total	Percentage
National standards are based on IPSAS	9	33%
Some IPSAS references	5	19%
IPSAS for some local government entities	1	4%
None	12	44%

Source: European Commission, 2013c

There are nine countries with national accounting standards based on IPSAS: Austria, Czech Republic, Estonia, Lithuania, Malta, Romania, Spain, Sweden and UK. Furthermore, in Belgium the Flemish local government accounting system was reformed considering the IPSAS as guideline. However, none of the countries in the European Union have directly adopted IPSAS. In all the experiences there is an indirect application. National accounting standards are adapted to IPSAS, as in the case of Spain. In the case of supra-national European Institutions, the European Commission decided in 1999 to reform its accounting system, adapting its accounting standards to IPSASs, and the financial statements of 2005 were based on IPSAS (European Commission, 2008).

### **3. ORIGIN AND DEVELOPMENTS OF THE EPSAS IN THE EUROPEAN UNION**

The financial crisis has reinforced the importance of controlling the deficit and debt, especially in the European Union, where budgetary (and now currency) stability is critical. For example, the Council Regulation (EC) No 479/2009 of 25 May 2009 on the application of the Protocol on the excessive deficit procedure annexed to the Treaty establishing the European Community strengthened the Commission's powers to verify statistical data used for the excessive deficit procedure.

At the same time, the comparability of debt and deficit data of governments has been opened to question (Bergmann, 2010a, 2010b; Ball, 2012). High quality government finance statistics GFS data is needed to ensure a proper functioning of EU fiscal surveillance, particularly given recent economic developments. To this end, the European System of Accounts (ESA) has important role in international macroeconomic comparisons, but harmonized microeconomic government accounting information can make such information easier to use and more reliable through disaggregation (Jones, 2003). The implementation of uniform and comparable accruals-based accounting practices for all the sectors of General Government, that is, Central Government, State Government, Local Government and Social Security, can help ensure high quality statistics (European Commission, 2013a).

This central rhetoric is extended further in the call for harmonization between the micro (i.e., bottom-up and largely accounting-derived approaches) with more macro-based data (i.e. National Accounts). For example, the International Monetary Fund (2012) claims for harmonizing reporting standards for budgets, statistics, and accounts. Accounting standards are also moving in this direction (e.g., IPSASB's No.22 and the Australian Accounting Standards Board, AASB's No.1049). In a questionnaire commissioned by the External Review Panel (IFAC, 2004), 84.4% of the respondents considered harmonization of accounting standards and statistical accounting very important. In 2003 was created an international Task Force on Harmonization of Public Sector Accounting (TFHPSA) for enhancing the harmonization between statistical guidelines and accounting standards. At the moment, the IPSASB is working with the IMF to harmonize statistical and accounting standards.

Aware of this, the European Parliament in 2011 considered that "The Member States' provisions of the budgetary surveillance framework established by the Treaty on the

Functioning of the European Union (TFEU) and in particular the Stability and Growth Pact should be updated to International Public Sector Accounting Standards" (European Parliament, 2011, introd., sect. 18). It appears that the European Parliament had decided to open a process for the endorsement of the IPSASs.

Continuing with this process, in a Communication from the Commission to the European Parliament and the Council (European Commission, 2011), the Commission supported the implementation of public accounting standards providing the information needed to compile ESA-based data for all sub-sectors of general government, and said that "*Eurostat intended to play an active role within the framework of the International Public Sector Accounting Standards, which promote accrual-based public accounting close to ESA-based principle*".

In line with this, the European Parliament introduced an amendment to the Commission proposal for a Council directive on requirements for budgetary frameworks of the Member States that textually said (European Parliament, 2011, art. 3) "1b. Member States shall move to adopt International Public Sector Accounting Standards within three years of this Directive coming into force". At that moment, the decision of the Parliament was a compulsory requirement for the adoption of IPSAS. However, the European Parliament change soon its strategy and when the European Parliament passed the Council Directive 2011/85/EU of 8 November 2011 on requirements for budgetary frameworks of the Member States the Council Directive, it does not require implementation of IPSAS. Instead, it sets that the Commission shall assess the suitability of the International Public Sector Accounting Standards for the Member States. With the aim of increasing comparability of data, the council directive remarks that Member States shall have in place public accounting systems comprehensively and consistently covering all sub-sectors of general government and containing the information needed to generate accrual data with a view to preparing data based on the ESA 95 standard. Those public accounting systems shall be subject to internal control and independent audits.

As a consequence, the Commission considers that accrual accounting systems are necessary for public administrations but do not close if IPSASs are or not the best way to achieve the comparability of data, opening a public debate about the suitability of them for European Member Countries.

Two facts can have lead the Commission for that change: a) following the consultation process started for the business sector (Crawford et al., 2013), where EU

is for example consulting on amendments to Accounting Directives in order to harmonize accounting requirements for non-listed companies (Malson, 2012); and b) awareness of the problems that the endorsement process can have, with the privatization of the accounting standards (Chiapello and Medjad, 2009), where the control is translated to a professional private sector. Crawford et al. (2013, p. 13) epitomized that the European Union “wake up” to its own endorsement processes and has initiate, arguably, a more substantive form of resistance to the perceived power of the IASB.

Following the requirement, the Commission opened a Public Consultation on the suitability of the IPSAS for EU Member States, followed by another public consultation about EPSAS governance. These facts are summarized in Figure 1.

(Figure 1)

#### **4. PUBLIC CONSULTATIONS ABOUT EPSAS**

##### **4.1. Public consultation on IPSASs suitability**

The objective of the public assessment was to gather the views of the relevant stakeholders within the EU on the advantages and disadvantages of a potential adoption of IPSAS. The report accompanying to the public consultation highlighted benefits and advantages of the implementation comparable accounting standards but it does not raise any critique or negative comments about the existence of comparable standards, nothing nevertheless that this can involve major changes and important costs.

The public consultation process (between February and May 2012) received 68 contributions. More than 80 percent of these were from stakeholders (governing bodies, statistical offices, accounting professionals and representatives from academia) within the EU. Table 2 summarizes the stakeholders that have participated and which countries representing them.

Table 2. Stakeholder participation in the public consultation

<b>Stakeholder</b>	<b>Country</b>	<b>Number of responses</b>
Treasury / Ministry of Finance	Cyprus (1)	1
	France (1)	1
	Germany (2)	2
	Latvia (1)	1
	Netherlands (1)	1
	Poland (1)	1

	Romania (1) Hungary (1)	1 1
National Audit Office	Cyprus (1) Estonia (1) France (2) Sweden (2)	1 1 2 2
Regional Audit	Germany (8) UK (1)	8 1
Regional Authority	Austria (2) Germany (1)	2 1
Statistical Office	Lithuania (1) Malta (1) Poland (1) UK (1)	1 1 1 1
Standard setter/prof. Association	Belgium (1) Germany (1) Ireland (1) Poland (1) Spain (1) Sweden (1) UK (2)	1 1 1 1 1 1 2
Parliament	None	NA
Central government	None	NA
Local government	None	NA
Big 4 and other accounting firms	Germany (2) UK (1) Netherlands/France (1)	2 1 1
Social security pension fund	Austria (1) Finland (1) Germany (1)	1 1 1
Private individual	Belgium (3) Germany (1) Poland (1) Portugal (1) UK (1)	3 1 1 1 1
International / Regional institutions	International Federation of Accountants (IFAC) Chartered Institute of Public Finance and Accountancy (CIPFA) Association of Chartered Certified Accountants (ACCA) Federation of European Accountants European Securities and Market Authorities (ESMA) International Monetary Fund (Fiscal Affairs, European, and Statistics Departments)	
Non EU participants	South Africa Australia Canada USA Brazil	1 1 1 2 1

Out of the 28 EU member states 8 countries did not participate. These 8 countries were; Bulgaria, Croatia, Denmark, Greece, Italy, Luxembourg, Slovakia and Slovenia.

Outside EU Member States were all in support of IPSAS being implemented within the EU. This indicates that countries and institutions in favour of a global solution for public sector accounting would naturally support that IPSAS was institutionalised across EU member states. With an EPSAS solution EU would go deviate from the global harmonisation process in public sector accounting.

The outcome of the consultation was published on March 6, 2013 in a report entitled, The Suitability of IPSAS for the Member States. Later, the Commission has issued the report “Towards implementing harmonised public sector accounting standards in Member States. The suitability of IPSAS for the Member States” (European Commission, 2013b). The official position of Eurostat and the European Commission is that harmonised public sector accounting standards are needed for European Union Countries and that the proper way is the development of European Union Standards adapted to IPSAS.

#### 4.2. Public consultation on EPSAS Governance

The issue of the governance for the future EPSAS was identified as a priority after a conference about EPSAS in May 2013, with more than 200 participants. Following this, a Task Force of experts delegated from EU Member States government authorities took place on 2 October 2013 to exchange views on possible future governance arrangements and on the underlying key principles.

Considering the discussion of the Task Force, Eurostat decides to launch a second public consultation on EPSAS governance in order to ensure that views are collected from the widest possible range of stakeholders. In total 203 have been received. For the moment, the responses are not yet publicly available. We have based on data contained in the paper presented by Eurostat (European Commission, 2014) “Public consultation on future EPSAS governance principles and structures: Draft Report”.

Table 3 shows to which countries correspond the responses, while table 4 contains the type of respondents. As can be seen, the 69.5% of responses come from Germany. There are 6 European Union Member States not represented: Cyprus, Estonia, Greece, Lithuania, Luxembourg and Malta. Furthermore, in most of the countries there are only up to three ( 15 countries).

Table 3: Responses by country of origin

Country	Number	Percentage
Austria	2	1.0%
Belgium	2	1.0%
Bulgaria	2	1.0%
Croatia	1	0.5%
Czech Republic	3	1.5%
Denmark	1	0.5%
Finland	4	2.0%

Germany	141	69.5%
France	6	3.0%
Hungary	1	0.5%
Italy	3	1.5%
Ireland	1	0.5%
Latvia	1	0.5%
Malta	1	0.5%
Netherlands	2	1.0%
Poland	5	2.5%
Portugal	2	1.0%
Romania	3	1.5%
Slovakia	1	0.5%
Slovenia	1	0.5%
Spain	2	1.0%
Sweden	4	2.0%
United Kingdom	7	3.4%
Brazil	1	0.5%
Other	6	3.0%
Total	203	100%

If we consider the stakeholders that have participated, we can see that most of them correspond to professionals in local or regional government, all of them from Germany. There are also many agents from public accounting authorities and standard setters.

Table 4: Responses by type of stakeholder

Type of respondent	Number	Percentage
Public accounting authority/standard setter	31	15.3%
Public audit authority	11	5.4%
National Statistical Institute	5	2.5%
Local or regional authority (Germany)	110	54.2%
Other national public institution	6	3.0%
Private financial (accounting/audit/consulting) company	5	2.5%
Private other	2	1.0%
Professional association	14	6.9%
Academic	7	3.4%
Individual	12	5.9%
Total	203	100%

About the content of the public consultation, the Commission states the following principles related to the EPSAS governance structure and process: Professional

independence, Impartiality, Legitimacy, Transparency, Competence and capacity, Cost effectiveness, Accountability. The principles related to the EPSAS standards are Reliability, Relevance, Coherence and comparability and Accessibility and clarity’,

Of the total of respondents to this question (196), many of them do not consider these principles relevant (54.59), most of which correspond to local or regional authority from Germany. Other 22.95 consider that only partially can be considered relevant.

The proposal of Eurostat is that EPSAS governance would be subject to oversight by the Commission itself, and by the Council, the European Parliament and the European Court of Auditors. Most of respondents consider that is not necessary any further oversight function.

Respondents consider important that an organised, formal representation of EPSAS stakeholders be established, considering that public consultation is not enough.

The process of developing EPSAS will be overseen by the Commission, the European Parliament and the Council. Nevertheless the purpose of the Governance Advisory Board would be to provide a wide stakeholder oversight of the EPSAS standard setting process as regards the implementation of the key principles and due process to enhance the professional independence, integrity and accountability of EPSAS governance and the standard-setting process.

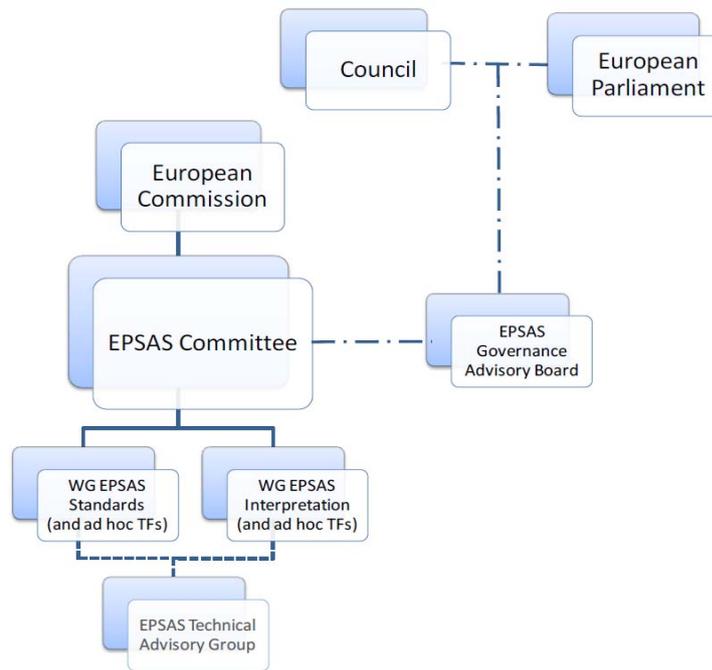
The Commission proposes also an EPSAS Technical Advisory Group, but 32% of respondents do not agree with the role of the Group as is presented in the consultation and 35% only partially.

A large majority of respondents do not see appropriate to have a single advisory group (Governance and Technical by a single group).

About the interpretation of EPSAS, most of the participants consider that an interpretation function should be foreseen for EPSAS, which should be kept separate from the standard setting function.

Eurostat proposes that the legal basis for EPSAS be established in a Framework Regulation anchored on the Treaty and to benefit from the experience of EU macro-level statistical standard setting. Figure 2 contains the structure proposed for the EPSAS governance.

Figure 2. Proposed EPSAS governance structure



With the EPSAS governance still in process of negotiation, there are many other issues pending, such as: define the due process of adoption for EPSAS standards (e.g. using implementing or delegated acts); set the core requirements of EPSAS (such as accrual, double entry), or confirm the reference to IPSAS as the starting point for the future EPSAS

## 5. The interactions in the process for the European Public Sector Accounting Standards

Transnational governance has growing in the last years in many areas. One example of it is the European Public Sector Accounting Standards, where a set of-specific governance arrangements have been established with the aim of implementing harmonized accounting standards at the European Level.

The origin of EPSAS and the two public consultations evidence the growing interactions among the European Commission and European Parliament and many other multi-stakeholder, such as standard-setting bodies, audit and control offices at the local and regional level, the big audit and accounting firms, academics and professionals from different level of governments that seek to regulate various aspects for constructing the comparability of accounting reporting in European Union Member States and the implementation a harmonized accounting standards (Eberlein et al., 2013).

## **6. Debate and Conclusions**

In the case of the European Union countries, the financial crisis has shown the need to improve public sector accounting systems and to gather comparable data because the data notified to Eurostat for the control of debt and deficit are not always of sufficient quality. The European Union and politicians have started to stress the importance of high-quality governmental financial reporting by governments.

After considering different options for the harmonization of public sector accounting in the European Union countries, the Commission decided that considering the responses to the public consultation, the best option is the development of European Union Standards for the public administrations, adopting a different strategy to that of the business sector, where the endorsement process was adopted. EPSAS could initially be based on the adoption of a set of key IPSAS principles and they could also use IPSAS standards if Member States agreed but IPSAS should not be as a constraint for the development of European standards.

The European Union considers that in the public sector intra-EU comparability is enough. That is an important difference compared to the business sector, although when the directives were issued intra EU comparability was also considered enough but economic development has made it clear that it was not enough.

The origin of EPSAS and the two public consultations evidence the growing interactions among the European Commission and European Parliament and many other multi-stakeholder, such as standard-setting bodies, audit and control offices at the local and regional level, the big audit and accounting firms, academics and professionals from different level of governments that seek to regulate various aspects for constructing the comparability of accounting reporting in European Union Member States and the implementation a harmonized accounting standards.

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**Figure 1. Origin and Development of EPSAS**

