



**JUNTA DE DECANOS DE  
COLEGIOS DE CONTADORES  
PÚBLICOS DEL PERÚ**

MIEMBROS  
DE:



Lima, May 30, 2024

**LETTER N°466-2024-JDCCPP/CD.**

**MR. IAN CARRUTHERS**

**Chairman,**

*International Public Sector Accounting Standards Board IPSASB,  
The International Federation of Accountants,  
277 Wellington Street West,  
Toronto, Ontario M5V 3H2 CANADA*

Re: *Comments on the ED 87*

*Dear Ian Carruthers,*

*Receive a cordial greeting and thanks for the support of the IPSASB. We are pleased to provide comments on the “ED 87 Stripping Costs in the Production phase of a Surface Mine (Amendments to IPSAS 12)” issued by the International Public Sector Accounting Standards Board (IPSASB) of the International Federation of Accountants (IFAC). Our comments on the aforementioned Exposure Draft are attached to this letter.*

*If you need any additional clarification, do not hesitate to contact us through the email [jaranibar@mef.gob.pe](mailto:jaranibar@mef.gob.pe) with Prof. Juan Francisco Martin Aranibar Romero, Chair of the National Public Sector Technical Committee of our represented Board of Deans of Colleges of Public Accountants of Peru.*

*Thanking you,*

*Yours sincerely,*



**CPC. Teodosio Paulino Ramírez Chávez**  
Chair

Board of Deans of Colleges of  
Public Accountants of Peru



**CPC. Helmer Gregorio Rivas Benites**  
Secretary

Board of Deans of Colleges of  
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## ***Comments on the ED 87 Stripping Costs in the Production phase of a Surface Mine (Amendments to IPSAS 12)***

### **Specific Matter for Comment 1**

*The IPSASB decided to propose IFRIC 20- aligned guidance in ED87 (See paragraph BC9). Do you agree that amendments to IFRIC 20, for the public sector, are limited to terminology and other IPSASB-specific formatting and consistency amendments (See paragraph BC10)?*

*We agree with the proposed guideline aligned with IFRIC 20, for the public sector, they are limited to terminology and other specific format and coherence modifications by IPSASB.*

*It is reasonable to understand that the amendments focus on adaptation to the public sector context, such as public sector-specific terminology and other financial reporting requirements unique to the public sector. However, the underlying principles of IFRIC 20 are likely to remain intact, as they provide a solid basis for accounting for these costs regardless of sector.*

*Additionally, consideration must be given to the recognition of an asset for the stripping activity if it is probable that the entity will obtain future economic benefits associated with the stripping activity, as well as identifying the component of the deposit whose access has been improved and the related stripping activity costs can be reliably measured.*

*Moreover, it is convenient to address aspects related to the segregation of costs in determining the proportion of mineral versus waste rock that may fluctuate, considering that the extraction of material with a low proportion of mineral to waste rock may produce some usable material, which can be used to produce inventory, for which the qualitative characteristic of relevance must be associated, as well as the constraints of general purpose financial reporting under the scope of materiality.*



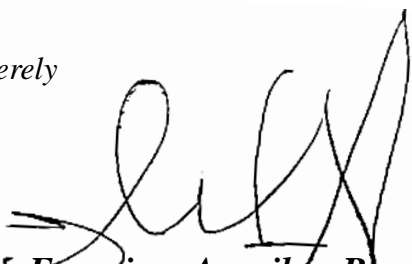
### **Specific Matter for Comment 2**

*The IPSASB decided to propose the IFRIC 20-aligned guidance in ED 87 as an amendment to IPSAS 12, Inventories, by including as an Appendix (see paragraph BC11). Do you agree with the IPSASB's decision?*

*We agree with IPSASB's proposal regarding the guidance aligned with IFRIC 20 in Exposure Draft 87 as an amendment to IPSAS 12, Inventories, including the guidance as an Appendix (see paragraph BC11).*

*By including this guidance as an appendix to IPSAS 12, specific guidance is provided on the accounting for stripping costs in an open-pit mine, in the sense that stripping costs ultimately form part of the cost of inventory of minerals produced by an open-pit mine, from which such mine will derive benefits, thus promoting consistency in the application of accounting standards with general purpose financial reporting in the public sector.*

*Sincerely*



**Juan Francisco Aranibar Romero**  
*Chair*  
*National Public Sector Technical Committee*  
*Board of Deans of Colleges of*  
*Public Accountants of Peru*



**Ismael Lavilla Latorre**  
*Technical Secretary*  
*National Public Sector Technical Committee*  
*Board of Deans of Colleges of*  
*Public Accountants of Peru*