

**16<sup>th</sup> Meeting of the Advisory Expert Group on National Accounts,  
12-14 July 2021, Remote Meeting**

**Agenda item: 5.3**

**D.5 Eliminating the Imputations for an Entity Owned or Controlled by General Government that is Used for Fiscal Purposes<sup>1</sup>**

If a government uses an entity resident in a different economic territory to conduct fiscal operations, special imputations of transactions and positions between the government and that entity should be made under current guidelines. This is to ensure that fiscal operations undertaken through nonresident entities are appropriately reflected in the general government accounts, in order to remove any possible distortions resulting, notably, in a misguided representation of government debt and expenditure. In doing so, the residency criterion is maintained. However, the complex construction of these required imputations, the inappropriate breakdown of government expenditure, and the degree/lack of autonomy of decision-making of the entity have raised concerns. There have been suggestions, over time, to eliminate imputations altogether for specific direct investment enterprise and instead consider consolidating these government-owned nonresident entities with their controlling governments, that is, to adopt the nationality approach with respect to government special purpose entities (SPEs). This guidance note examines this option, while also alternatively proposing either a no change in the current treatment or retaining the System of National Accounts 2008/ Balance of Payments and International Investment Position Manual, sixth edition, treatment, but with a more appropriately defined imputation. This enhanced compilation approach is deemed necessary to adequately reflect the proper nature, value and counterpart of relevant flows and positions in the government accounts, to better support fiscal analysis. The treatment of SPE, incorporated in a different jurisdiction than the parents, as an institutional unit is thus maintained, reinforcing the discussion on SPEs currently undertaken by the Globalization Task Team (GZTT).

Links between Direct Investment Task Team (DITT) GN D.5 and GZTT GN G.4 “Treatment of SPEs and Residency”

- The GZTT GN G.4 on ‘*Treatment of SPEs and Residency*’ makes reference to SPEs, resident in another territory, that are created by the government to be used for fiscal purposes. However, the GN does not discuss these entities, incorporated by governments, resident in the economy of incorporation or registration, and not in the economy of the government at length. The premise was to consider the discussion by the DITT, which as part of the *BPM6* update, was preparing a guidance note on the elimination of imputations for an entity owned or controlled by general government that is used for fiscal purposes (Guidance Note D.5). The GZTT was consulted on GN D.5 to provide feedback.

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<sup>1</sup> Prepared by Mmes. Padma Hurree-Gobin, Fadhila Alfaraj (both IMFBP), Mr. Bruno Rocha (IMFGO), and Mr. Philippe de Rougemont (Eurostat).

- The GN D.5 discusses the current *BPM6*, *2008 SNA* and the *GFSM 2014* standards, which consistently put forward the special imputations of transactions and positions between the government and the nonresident entity (SPE) that are adopted in order to ensure that all fiscal operations undertaken are reflected in the transactions and positions of the government concerned. These special imputations are made for nonresident entities owned or controlled by general government and **not** for similar nonresident entities owned or controlled by the private sector, so as to remove any possible distortions resulting, notably, in a misguided representation of government debt and expenditure. In doing so, the residency criterion is maintained.
- However, the complex construction of these required imputations, the inappropriate breakdown of government expenditure, and the degree/lack of autonomy of decision-making of the entity have raised concerns. There have been suggestions, over time, to eliminate imputations altogether for these specific direct investment enterprises and instead consider consolidating these government-owned nonresident entities with their controlling governments, that is, to adopt the nationality approach with respect to government SPEs – **Option 1**. D.5 examines Option 1, while also alternatively proposing either a no change in the current treatment (**Option 2**) or retaining the current treatment, but with a more appropriately defined imputation (**Option 3**).
- The majority of DITT members support **Option 3** considering that the enhanced compilation approach is deemed necessary to adequately reflect the proper nature, value and counterpart of relevant flows and positions in the government accounts, to better support fiscal analysis. The agreement is that this option remains aligned to the *BPM6/2008 SNA* standards by maintaining the treatment of SPE incorporated in a different jurisdiction than the parents as an institutional unit, as reinforced by the discussion on SPEs undertaken by the GZTT.
- The GN D5 was shared with the GZTT, and the OECD Working Group on International Investment Statistics before going for Balance of Payments' public consultation. The outcomes of these different consultations are outlined in the GN as well as in the accompanied document 4.3.2.
- The GN was presented and discussed at the IMF's Balance of Payments Committee meeting in June 2021. It is now presented at the AEG.

#### Documentation

Item 4.3.1 Guidance Note D.5 Eliminating the Imputations for an Entity Owned or Controlled by General Government that is Used for Fiscal Purposes

Item 4.3.2 Guidance Note D.5 Eliminating the Imputations for an Entity Owned or Controlled by General Government that is Used for Fiscal Purposes Outcomes of BOP Consultation

#### Questions for discussion

1. *Do the AEG members agree with including Option 3 in the update of the manual, implying keeping the current 2008 SNA/BPM6 standards that government SPEs abroad remain institutional units (like all other SPEs abroad) but with more enhanced imputations of the SPE transactions and positions in the government accounts? This is in line with what the GZTT is recommending for treatment of SPEs. However, the GZTT in GN G.4 also proposes the*

*option of extending the core framework with a supplemental presentation of SPEs re-classified from their countries of legal incorporation to the countries of their parents meant to be constructed only for countries for which SPEs were deemed important.*

- 2. Do the AEG members agree that the classification, valuation and recording of the imputed government debt towards the SPE abroad, be further discussed by GFS experts?*
- 3. Do the AEG members see potential merit in establishing a new convention where the imputed debt of government would follow the same classification/recording as the SPE debts?*

## D.5 Eliminating the Imputations for an Entity Owned or Controlled by General Government that is Used for Fiscal Purposes<sup>2</sup>

### SECTION I: THE ISSUE

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#### BACKGROUND

1. **A government can create and use a direct investment enterprise (DIE), typically a special purpose entity (SPE), resident in another economic territory, to carry out fiscal activities on its behalf.** Based on the current methodological standards,<sup>3</sup> any entity created by a parent under the laws of another jurisdiction is treated as a separate institutional unit, by convention, resident in the host jurisdiction. This convention is also applicable when the parent is a government unit, which implies that the transactions or positions of that entity are not consolidated as part of the controlling general government sector (and, obviously, are neither part of the government in the host economy). In sum, these entities are currently not treated in the same way as embassies and other territorial enclaves (*BPM6*, paragraph 4.93).
2. **The *Government Finance Statistics Manual 2014 (GFSM 2014)* further underscores in paragraph A3.56 that government may conduct fiscal activities through a nonresident SPE.** This SPE is not part of the general government sector in either home or host economy. Such entities are not treated in the same way as embassies and other territorial enclaves because they operate under the laws of the host economy. Governments may be direct investors in these units/entities. However, special imputations of transactions and stock positions between the government and the SPE abroad must be used to ensure that any fiscal operations undertaken through nonresident entities are reflected in the transactions and stock positions of the home government concerned.
3. **Under the current standards of the IMF's *Balance of Payments and International Investment Position Manual*, sixth edition (*BPM6*), special accounting rules also apply for nonresident entities owned or controlled by general government as opposed to similar nonresident entities owned or controlled<sup>4</sup> by the private sector.** These *BPM6* special rules are consistent with both the *2008 SNA* and the *GFSM 2014*. Special imputations of transactions and positions between the government and the nonresident entity are adopted in order to ensure that all fiscal operations undertaken are reflected in the transactions and positions of the government concerned.
4. **The *BPM6*, paragraphs 8.24–8.26, state that multiple imputation entries are required between the government and its DIE/SPE, notably to avoid distortions in the government balance sheet, including debt statistics.** These imputations are made symmetrically for both the government and the nonresident DIE/SPE borrowing or spending on behalf of the government. They, however, do not

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<sup>2</sup> Prepared by Mmes. Padma Hurree-Gobin, Fadhila Alfaraj (both IMFBP), Mr. Bruno Rocha (IMFGO), and Mr. Philippe de Rougemont (Eurostat).

<sup>3</sup> *System of National Accounts 2008 (2008 SNA)* paragraphs 4.67, 22.23, and 26.43, *Government Finance Statistics Manual (GFSM)*, paragraphs 2.137–2.139, and *Balance of Payments and International Investment Position Manual*, sixth edition (*BPM6*), paragraphs 4.93 and 8.24–8.26.

<sup>4</sup> Control is defined as in paragraphs 6.12–6.14 of the *BPM6*, i.e. by combining direct and indirect ownership, and paragraphs 4.68–4.74 and 4.81–4.82 of the *2008 SNA*.

affect the transactions or positions between the borrowing entity and its creditors or other third parties, which are recorded as they occur.

**5. The transactions carried out by a nonresident SPE are recorded in the host territory, but imputed "mirror" transactions are added between the SPE and the "parent" government.**

For instance, any borrowing by the SPE gives rise to an imputation of a claim of the SPE on government (an increase in government debt), matched by a corresponding increase in the equity stake of the government in the SPE (*BPM6* paragraph 8.25(a)). When the SPE passes cash to government, the flow of funds is recorded as a withdrawal in the government equity stake in the SPE (*BPM6* paragraph 8.25(b)). Any expenditure carried out directly by the SPE benefiting a third party (i.e. that is not passing to the government), a current or capital transfer between the government and the SPE is imputed, with a matching decrease in government equity (*BPM6* paragraph 8.25(c)). Therefore, even when there are no cash flows occurring between the SPE and government, transactions should be nonetheless imputed in the accounts of both the general government and the rest of the world to reflect the fiscal activities of the government (*BPM6*, paragraph 3.18, and *GFSM 2014*, paragraphs 2.139, and 3.28). These entries are made symmetrically for both the government and the borrowing entity. These entries do not affect the transactions or positions between the borrowing entity and its creditors or other third parties, which are recorded as they occur with no imputations.

**6. The reason for having a special approach for government entities is that, unlike the private sector, government-owned or controlled entities function on the behest of the controlling government for fiscal purposes,<sup>5</sup> not for commercial reasons.**

The special imputations enable a transparent presentation of government finance statistics. Fiscal purposes should be distinguished from commercial purposes because they are always oriented to serving the objectives for the government's home territory. Without the imputations, a misleading picture of government expenditure or/and debt would arise. Unlike other DIES, these government-owned entities, when they are used solely for fiscal purposes, do not give rise to reinvested earnings (*BPM6*, paragraph 11.40).

**7. The current imputations prescribed by the *BPM6* paragraph 8.25 have, however, some shortcomings.**

Many of these Government SPEs qualify as financial conduits<sup>6</sup> established to raise funds (issuing debt), often from unrelated enterprises, and remit those funds to their parents. Firstly, while the *BPM6* does not specify the exact instrument to be imputed as debt of government, one can presume it is a loan. However, the valuation for loans is at nominal value, while the valuation for any debt securities issued by the SPE is at market value: thus, the SPE liability position will not be fully reflected in government's accounts, without further adjustments. Secondly, the *BPM6* prescribes recording current or capital transfers to the SPE rather than according to the nature and counterpart of the expenditure. This

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<sup>5</sup> Fiscal purposes emanate from the conduct of fiscal policy, which is when government uses public spending and taxation to influence the economy. The *GFSM 2014* (paragraph 1.2) defines fiscal policy as the use of the level and composition of the general government and public sectors' spending and revenue—and the related accumulation of government assets and liabilities—to achieve such goals as the stabilization of the economy, the reallocation of resources, and the redistribution of income. Governments typically use fiscal policy to promote economic growth. In that respect, DIES incorporated by governments would consist of those entities, controlled by government units, that solely form part of general government sector.

<sup>6</sup> Guidance Note (GN) D.14 "Financial Conduits" discusses proposals for capturing the activities of the latter that would better serve analysts. These include the possible separate identification of the DI transactions and positions of Financial Conduits as well as a supplemental presentation by the economy of the ultimate investors.

would also concern (it would seem) interest expenditure incurred on the SPE debt (meaning, *inter alia*, that no interest expenditure on the imputed government debt is recorded, which is anomalous).<sup>7</sup> Thirdly, the current guidance neglects that SPEs may collect revenue (this can occur notably in certain cases of securitization): should these be recorded as current transfer revenue of government from the SPE?<sup>8</sup> Lastly, the *BPM6* also neglects that government owned SPEs may engage in lending or equity acquisition that should preferably be reported as such in government accounts. Other manuals are much less detailed than the *BPM6* and are notably silent on the nature of the reinvested amounts to impute (equity according to the *BPM6*) that is the counterpart of the imputed debt.

## ISSUES FOR DISCUSSION

**8. These special rules and associated imputations have been viewed as being complex and somewhat artificial and as not appropriately reflecting government revenue/expenditure or liability/asset positions arising from government owned SPEs abroad.** Due to the difficulties encountered, this guidance note discusses, amongst others, the proposal to consider eliminating altogether the imputations currently being made by regarding the nonresident fiscal entity to be part of the government of the economic territory that owns or controls it. This will be in much the same way that overseas embassies, military bases, etc. are regarded as part of the territory of the general government that occupies them (*BPM6*, paragraph 4.138). Alternatively, this guidance note also explores a more comprehensive approach to the rerouting.

**9. The options, for discussion, for the treatment of nonresident government entities created for fiscal operations in macroeconomic statistics are thus three-fold:**

- a. **Option 1:** Eliminate all imputations and consider these entities as part of the controlling government.
- b. **Option 2:** No changes in the current *BPM6* treatment.
- c. **Option 3:** Retain the 2008 *SNA/BPM6* treatment, but with a more appropriately defined imputations necessary to adequately reflect the proper nature, value and counterpart of relevant flows and positions in the government accounts.

**10. Option 1—eliminating all imputations—implies treating those entities similarly to other enclaves of government, whose accounts are consolidated into those of the general government.**<sup>9</sup>

The rationale for this proposal is that government tends to incorporate these entities abroad primarily for strategic fiscal considerations, with no economic autonomy. This type of SPEs do not exhibit behavior of a market producer; rather they serve the needs of a nonmarket producer. Treating these entities as part of the territorial enclaves of the controlling government would be equivalent to expanding the concept of economic territory to include these nonresident entities. The embassy treatment can be supported by the fact that, in contrast to other nonresident DIE of government, these SPE are *de facto* brass-plate

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<sup>7</sup> Thus, the nominal and market value of debts of governments with SPE abroad is understated, given that interest accrued but not paid is added to any debt securities issued or loans incurred by the SPE, while the imputed loan does not carry interest under current guidelines.

<sup>8</sup> This would not seem appropriate and could lead to biases in measures of fiscal/tax burden.

<sup>9</sup> Implying an elimination of the second sentence of the *BPM6* paragraph 4.93.

businesses, with no physical footprint, such that locating these together with the embassy territory appears plausible and a good reflection of their nature. The impact of such a proposal would be that the notion of general government would comprise both resident and some legally nonresident units and would automatically eliminate the remaining current distortions of government revenue/expenditure or liability/asset positions (discussed in paragraph 6).

11. **However, it must be acknowledged that contrary to embassies and enclaves, government SPEs are established in particular jurisdictions so as to derive the specific advantages provided by the host economies.** The non-resident SPE cannot be considered in a similar manner than other territorial enclaves given that it is operating under the legal jurisdiction of the host economy and not under the jurisdiction of the parent country. For example, confidentiality is one of the motivations for the use of SPEs; it results in a lack of transparency that includes fiscal transparency when governments sponsor the SPE.

12. **Option 1, if considered conveys an exception to the residency principle.** Paragraph 4.61 of the 2008 SNA states that “*An entity .... that cannot act independently of its parent and is simply a passive holder of assets and liabilities (sometimes described as being on auto-pilot) ... is not treated as a separate institutional unit unless it is resident in an economy different from that of its parent. If it is resident in the same economy as its parent, it is treated as an “artificial subsidiary”* (bold added). As is, the residency criterion is already an exception to the concept of institutional unit for those entities that are on autopilot and, thus, do not have autonomy of decision, of which SPEs. Consequently, consolidating government owned SPEs with their controlling governments because they are not genuine institutional units but rather artificial subsidiaries of the parent will be tantamount to merely establishing an “exception within an exception,” that is: limiting the extent of the initial exception.

13. **The IMF’s Balance of Payments Committee (Committee), while endorsing the SPE definition at its meeting in October 2018, approved retaining the exception from the general principles by considering SPEs incorporated in an economic territory other than any of its owners as separate institutional units.** The nonresident entity is resident in its economy of incorporation. The same treatment for SPEs is currently being applied by the Globalization Task Team (GZTT),<sup>10</sup> with a view to maintaining consistency across statistical domains. The introduction of the nationality approach for SPEs owned by government would, therefore, imply an exception for government-controlled SPEs to the current guidance put forward by the GZTT,<sup>11</sup> thereby privileging instead the general approach of consolidating entities not meeting the criteria of being institutional units already applied for resident units.

14. **Option 2 implies keeping the current BPM6 standards unchanged.** The uniqueness of government-owned or controlled nonresident entities is that these are used for fiscal purposes. The current imputation practices broadly ensure a better recording for the government accounts (main indicators: deficit, debt) than with no imputations. These imputations encompass cross-border transactions and positions of the general government activities with an entity residing in a different

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<sup>10</sup> See GZTT GN G.4 “Treatment of Special Purpose Entities and Residency.”

<sup>11</sup> However, for countries that have enough information, the GZTT is proposing to produce complementary statistics on nationality basis. The consolidation of government-owned nonresident entities with the controlling government can be considered as an extension to the residency-based statistics, which remains the underlying core framework for macroeconomic statistics.

territory operating for government's fiscal activities. While, in the past, concerns about the possibility of concealing the government debt or expenditure have been raised when SPEs are used for government fiscal operations, the current standards as prescribed in the *BPM6* have been useful in addressing those concerns. They prevented any serious misrepresentation of the fiscal operations of general government. However, as mentioned in paragraph 6, Option 2 does not fully prevent all distortions of the government accounts regarding government revenue/expenditure breakdowns and/or asset/liability positions (including positions at nominal and market value). It notably distorts the relation between interest expenditure and the underlying liability.

15. **Option 3 keeps the current 2008 SNA/BPM6 standards that government SPEs abroad remain institutional units (like all other SPEs abroad) but with a more enhanced imputations of the SPEs' transactions and positions in the government accounts.** Option 3 would entail modifying the current guidance with respect to the imputation of withdrawal/increase in equity between the SPE and the parent government and considering some new imputations in order to correctly represent government transactions and positions by nature and counterpart:

- (i) to record interest expenditure on the imputed debt of government (instead of the current recording of current transfer), against withdrawal of equity in the SPE (i.e., implying recording interest revenue of the SPE, as a mirror to the SPE interest expenditure on the debt levied).
- (ii) to directly record the SPE expenditure as government expenditure according to their nature and counterpart (e.g., capitals transfer to public corporations), against withdrawal of equity in the SPE.
- (iii) to record acquisition of assets (like loans or equity) in government accounts, against withdrawal of equity in the SPE.
- (iv) to record any/main SPE revenue (e.g. some cases of securitization) directly as government revenue, against an increase in equity in the SPE (and ultimately reduction in debt).

16. **Proposal (i) within Option 3 is necessary to ensure that interest expenditure is recorded where there is a debt.** Proposals (ii), (iii), and (iv) relates to a case of rerouting as recognized by the *2008 SNA/BPM6*, which avoids recording debatable cross-border nonfinancial transactions, notably whenever the beneficiary of the expenditure has the same residency as the sponsoring government. *De facto*, Option 3 implies that the SPE to cash abroad, with government seen as drawing down on it (with a BOP impact in the financial accounts F.2 Currency and deposits/ F.5 Equity and investment fund shares) each time an SPE outflow takes place.

17. **A separate problem concerns the government debt towards the SPE.** Recognizing a loan rather than debt security (when the SPE issues such instruments) distorts the debt composition of government and its valuation. At the same time, the debt link between the government and the SPE does not meet the debt securities/ PI definitions. One possibility would be to nonetheless decide that the government debt to the SPE would be classified, by convention, identically to the SPE debts (including recognizing debt securities links, and their valuation and property income). This separate issue is not part of Option 3 but could be considered as a variant/extension of Option 3.

18. **The residency exception to the institutional unit test applied to all SPEs (public or private) in the 2008 SNA is based on the fact that these entities are usually established in particular jurisdictions to draw on specific advantages provided by the host economies as well as on the**



**serious difficulties that statisticians would face in consolidating them.** The motivations of government owned SPEs (see *GFSM 2014* paragraphs A3.54 to A3.56) are similar to private-owned/controlled SPEs contrary to embassies and enclaves. The latter are set up in different jurisdictions from a diplomacy perspective, are generally exempt from at least some laws in the host economy and are considered extensions of the home government's territory under international law (*BPM6*, paragraph 4.138). Thus, they are included in the same economic territory of the home government. From a compilation angle, compilers would face difficulties to effectively consolidate within each parent (sometimes themselves SPE, etc.), without errors, the very large number of nonresident SPEs existing across the world, with their large balance sheets and cross-border debtor/creditor relationships. The residency exception is, hence, largely a pragmatic solution to avoid significant errors when compiling cross-border positions and flows in the external sector accounts and associated Rest of the World accounts of the *2008 SNA*. However, it may be recognized that, to the extent that SPEs abroad created by governments are not numerous and often well identified, it may be easier to develop nationality-based statistics for this sector. In that respect, a specific treatment foreseen for them, different from private SPEs, may appear well-justified (exception within an exception).<sup>12</sup>

19. **The main issue is therefore whether it is more effective either to prescribe a simplified solution of directly consolidated government SPEs abroad (Option 1),** which has the merit to align SPEs abroad on domestic SPEs and to avoid a series of imputations as well as to avoid distorting government accounts (embassy treatment), **or to stick to the current BPM6 treatment (Option 2),** which has the advantage of treating all SPEs abroad as institutional units, but involves a series of imputations and results in significant remaining distortions of government accounts, **or to stick to the current BPM6 treatment however with adaptations (Option 3),** which has the advantage of treating all SPEs abroad as institutional units but without significant distortions of government accounts, although this involves a longer series of imputations.

## SECTION II: OUTCOMES

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20. **The recommendation of this guidance note is to keep the main 2008 SNA/BPM6 guidance unchanged but enhancing the special imputations by adopting Option 3.** This approach of keeping the residency of the government controlled SPE abroad was agreed during the last round of the manuals update, following intensive discussions. The drafting team does not see strong reasons to change this current treatment, especially given that the Committee has clearly endorsed the SPE with a foreign ownership/control as an institutional unit in its economy of incorporation or registration, towards which the GZTT is aligning during this update of the statistical standards. The drafting team sees good reasons to adapt them, as it is important to correctly reflect the SPE operations in government accounts. One of the drafting authors who prefers Option 1, following the arguments expressed in paragraph 9, agrees that Option 3 would be, nonetheless, satisfactory (although Option 3 may be in his view more challenging for compilers than Option 1). Option 3 addresses the needs of government accounts while keeping the general residency rule (especially when it would encompass classifying, by convention, the imputed debt of government to the SPE identically to the SPE debt).

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<sup>12</sup> This "exception within the exception" also probably acted as an effective disincentive to create such SPEs abroad for purely statistical reasons, which would otherwise have probably multiplied.

21. **The majority of the DITT members, with the exception of two members,<sup>13</sup> supported including Option 3 in the update.** There was agreement that this option remains aligned to the *BPM6/2008 SNA* standards by maintaining the treatment of SPE incorporated in a different jurisdiction than the parents as an institutional unit. This reinforces the discussion on SPEs currently undertaken by the GZTT, and also entails an enhanced imputation that shall adequately represent government flows and stocks by nature and counterpart, thereby supporting better fiscal analysis. Nonetheless, some members noted the practical difficulties that may be associated with implementing Option 3. One DITT member underscored the relevance of having some background statistics to be able to understand the magnitude of activities by SPEs sponsored by Governments. This will be a pre-requisite to understand what potential impact this may have on the forthcoming SPEs data collection.

22. **The DITT largely supported that the classification as well as the valuation of the imputed government debt towards the SPE abroad be further discussed by the government finance statistics (GFS) community.** Additionally, many saw the potential merit in establishing a new convention where the imputed debt of government would follow the same classification/recording as the SPE debts. Nonetheless, some members underscored the importance of understanding the implications of these revised imputations so as to have a proper recording. The practicality of the recording of the imputed debt of government towards the SPE (classification and valuation) was seen as important.

23. **Of the four GZTT members, who expressed a preference, there was an equal inclination between Option 3 and Option 1.** Those favoring Option 3 expressed the view of keeping the treatment of these SPEs incorporated in a different jurisdiction than the Government parent as institutional units, aligned with the *BPM6* and *2008 SNA* standards. This thus avoids establishing an “exception within an exception,” as these units meet the same definition as the other nonresident SPEs. Those members preferring Option 1 underscored the practicability of its implementation, although they recognized that Option 3 is an improvement of the current representation of government flows and stocks. Additionally, the GZTT members agreed that the discussion regarding the classification, valuation, and recording of the imputed government debt towards the SPE abroad be further maintained by the GFS community. It was also proposed to extend the discussion to the “counterpart” of the debt.

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<sup>13</sup> The two members, including one who was part of the drafting team, showed a preference for Option 1.

## Annex I. Examples to Illustrate the Proposed Differences Between Option 2 and Option 3<sup>14</sup>

The example uses a single scenario and shows how this would be reflected in the accounts under the three options as explained in the Guidance Note.

### Scenario:

SPE in Country A borrows \$1000 on behalf of Government of Country B by issuing debt securities. During Year 1 after borrowing, \$600 of the funds are transferred to the Government and \$400 directly to a public corporation as a capital transfer. In addition, \$50 is paid by the SPE in interest, which is reimbursed by the government. For the purposes of the example the Government does not use the funds it receives during Year 1.

#### I. Option 2: No Changes in the Current BPM6 Treatment.

This option recognizes Government debt of Country B towards the SPE of Country A of \$1000 as a *loan*, and the \$50 paid interest by the SPE under *current transfer*. The capital transfer of \$400 to the public corporation is recognized in both the SPE and Government accounts.

#### II. Option 3: Retain the 2008 SNA/BPM6 Treatment with Better Imputations

This option recognizes Government debt of Country B towards the SPE of Country A of \$1000 as a *loan*, and the \$50 paid interest by the SPE under *interest*. The capital transfer of \$400 to the public corporation is recognized only in the Government accounts.

#### III. Extension to Option 3 (with type of debt instrument mirrored in government accounts)— Paragraph 17 of the GN which states “.....The debt link between the government and the SPE does not meet the debt securities/ PI definitions. One possibility would be to nonetheless decide that the government debt to the SPE would be classified, by convention, identically to the SPE debts (including recognizing debt securities links, and their valuation and property income) .....”

This option recognizes Government debt of Country B towards the SPE of Country A of \$1000 as *debt securities*, and the \$50 paid interest by the SPE under *interest*. The capital transfer of \$400 to the public corporation is recognized only in the Government accounts.

### Color code:

**Black** - transaction, or stock position, is the same in all 3 options

**Blue** - transaction, or stock position, under Option 2

**Green** - transaction, or stock position, under Option 3

**Tan** - transaction, or stock position, under Extension to Option 3

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<sup>14</sup> Draft jointly prepared by Bruno Rocha, David Bailey (STAGO), and Fadhila Alfaraj, and Padma Hurree-Gobin (STABP).

	Country A (SPE)		Country B (Government)	
<b>Opening Balance Sheet – at the time of issuance of debt securities/borrowing</b>	Assets	Liabilities	Assets	Liabilities
Currency & Deposits (Other Investment)	+1000			
Debt Securities (Portfolio Investment)		+1000		+1000
Loans (Direct Investment, debt) [imputed]	+1000 +1000			+1000 +1000
Equity (Direct Investment, DIE)	+1000	+1000	+1000	
<i>Net financial worth</i>	0		0	
<b>Nonfinancial transactions (Balance of Payments - Current accounts) [Year 1]</b>	Revenue (Credits)	Expenditure (Debits)	Revenue (Credits)	Expenditure (Debits)
Interest (Primary Income, Investment Income, DI, Interest)	+50 +50	+50		+50 +50
Current transfer (Secondary Income, Current transfers) [imputed]	+50			+50
Capital transfer to public corporation (Secondary Income, Capital transfers – I) <sup>a</sup> (Domestic transaction – II, III) <sup>b</sup>	+400	+400		+400 <sup>a</sup> +400 <sup>b</sup> +400 <sup>b</sup>
<i>Net borrowing / net lending</i>	0		-450	

	Country A (SPE)		Country B (Government)	
<b>Financial transactions (Balance of Payments - Financial account) [Year 1]</b>	Assets (Net acquisition of financial assets)	Liabilities (Net incurrence of liabilities)	Assets (Net acquisition of financial assets)	Liabilities (Net incurrence of liabilities)
Currency & Deposits (Other Investment/Reserve assets)	<b>-1000</b>		<b>+550<sup>15,16</sup></b>	
Debt Securities				
Loans				
Equity (Direct Investment, DIE)		<b>-1000</b>	<b>-1000</b>	
<b>Closing Balance Sheet – at end of year 1</b>	Assets (Net acquisition of financial assets)	Liabilities (Net incurrence of liabilities)	Assets (Net acquisition of financial assets)	Liabilities (Net incurrence of liabilities)
Currency & Deposits (Other investment/Reserve assets)	<b>0</b>		<b>+550</b>	
Debt Securities (Portfolio Investment)		<b>+1000</b>		<b>+1000</b>
Loans (Direct Investment, debt) [imputed]	<b>+1000</b> <b>+1000</b>			<b>+1000</b> <b>+1000</b>
Equity (Direct Investment, DIE)	<b>+1000</b>	<b>0</b>	<b>0</b>	
<i>Net financial worth</i>	0		-450	

<sup>15</sup> The additional \$400 will be reflected as a net acquisition of financial assets by the public corporations of Country B.

<sup>16</sup> If the interest expense \$50 paid by the SPE is not reimbursed by the government, then this will be reflected as follows in the *financial transactions*: currency of deposits -1050 (assets) for the SPE, +600 (assets) for the government; equity for SPEs will be -1050 (liabilities) and +1050 (assets) for government; and in the *closing balance sheet*—currency and deposits for SPEs -50 (assets) and +600 (assets) for the government; and equity direct investment -50 (liabilities) for SPEs and -50 (assets) for the government.