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FACULTIES OF THOUGHT IN ACCOUNTING HISTORY AND THE DEVELOPMENT OF ACCOUNTING STANDARDS IN NIGERIA: HISTORICAL PERSPECTIVE

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ABSTRACT: *This study explored the history of accounting standard in Nigeria in relation to how it has evolved globally. Theories influencing the setting of accounting standard process were reviewed. The birth of the International Accounting Standard Committee in relation to the International Accounting Standard Board was discussed in an historical view. The emergence of International Financial Reporting Standard was discussed as a global focus. The study being exploratory in nature discussed the adoption and convergence of IFRS in Nigeria. The study made use of purely secondary data in order to give an historical perspective. The study concludes that accounting standard is key to the quality of financial reporting globally.*

KEYWORDS: Development of Accounting Standard, Historical Perspective, Convergence of IFRS in Nigeria, Accounting standard-setting, International Accounting organizations, and Accounting Standards Clusters.

INTRODUCTION

Accounting practices (AP) and standards play an increasingly central role in intermediating information in financial markets and shaping business behavior. Accounting standard-setting, though generally thought of as a determined matter, AP is one of the most advanced attempts at managing international collective challenges of having a uniform interpretation of financial information. Many international organizations are rich with policymaking tasks. Many private-sector bodies issue technical norms which are then followed on a worldwide basis. But accounting provides a unique combination of de facto international policymaking power and of private-sector governance and funding. The significance and reputation of accounting has been questioned over the past few years as a result of notable scandals from Enron and WorldCom to AIG and Parmalat. Hank Paulson, then, United State Secretary of Treasury called accounting 'the lifeblood of capital markets'. In a world where financial operations are ever more complex and fast changing, accounting provides the foundation of trust underlying capital markets. When financial statements can no longer be relied on, the whole construct of a market is threatened. The corresponding debate is not only about whether accounting rules are properly implemented but rules that are appropriate.

Accounting standards are not just a norm for neutral measurement but they can influence economic behavior. The setting of accounting standards is a form of economic policymaking which brings to the standard-setting entity a significant degree of power-political power. In Nigeria, the history of accounting can be linked to the time before trade by barter, where kings took stock of their lands for territorial claims. Chibuike (2008) observed that the accounting profession in Nigeria received a formal reckoning in the mid-1960s. During that period, Nigerian accountants, mostly trained by professional accounting bodies in the United

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Kingdom, came together and formed a professional accounting body that is responsible of training accountants in Nigeria and fostering the development of the profession in the country. In some countries, the professional bodies formulate the financial accounting standards, while in many others, governments and regulators establish these standards.

In Nigeria, the development of accounting and accounting standards could be traced to the then Association of Accountants of Nigeria (AAN) which is now refer to the Institute of Chartered Accountants of Nigeria (ICAN). Historical studies have it that ICAN was responsible for the formation of the Nigerian Accounting Standards Board (NASB) before it was taken over by the Government (Josiah, Okoye, & Adediran, 2013; Basoglu & Goma, 2007). Upon formation of the NASB, both ICAN and ANAN nominated two members to the board in order to assist NASB in developing, publishing, and updating statements of Accounting Standards. With the globalization of economic trade, businesses, and financial markets, it has become imperative for financial information to be prepared according to accounting standard that can easily be interpreted by the accounting profession of nationals. In as much as nationals are still working tirelessly and collaboratively to harmonize the accounting standards globally, the study looks at accounting standard development from a historical perspective with focus on the international scene and Nigeria.

Methodology adopted. The study basically explores the historical approach in order to source information on how accounting standards have developed over the years. More so, the study captures various theories that have influenced the setting of accounting standard process from a historical perspective.

History of Accounting and Standards

Accounting has developed hand in hand with the capitalist system, from its origins in medieval Italy through its expansion during the Industrial Revolution to the advent of widespread equity ownership, leading to the eventual adoption of national accounting standards in all developed countries. Systems of inventory accounting developed as early as writing itself, starting in the Middle East and China about five millennia ago. Many non-capitalist systems of enterprise accounting have thrived since then, as illustrated well into the last century by the elaborate number-crunching of the late Soviet Union (Veron, 2007). Financial accounting, however, has its own history with a specific starting point from Northern Italy in the 13th-14th centuries where the practice of double-entry bookkeeping method emerged. Remarkably, this technique, which is still at the core of modern accounting, was born out of a capitalist enterprise when merchants started to assemble into companies' and entrust their operations to hired managers who had no ownership of the business.

However, some capitalist enterprises such as the Dutch East Indian Company which was active between 1602 and 1798 and whose shares were publicly listed never used the double-entry method. Nevertheless, there exist, though, a close relationship between the economic system in which the managers of an enterprise are separate from its owners, and the unrivalled system of remote control provided by the double-entry method. Indeed, the worldwide expansion of both inventions has followed a largely parallel course over the centuries ever since Luca Pacioli, a Franciscan friar and distinguished humanist, first codified double-entry accounting in a treatise published in 1494. It is not an overstatement to portray accounting as the 'operating system' of capitalism (Veron, 2007).

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The Industrial Revolution spurred entirely new types of company, in response to which accounting had to adapt and was profoundly transformed. Large companies started expanding overseas, especially British companies into India, Hong Kong, and other parts of the globe. This led to a much-increased need for reporting and supervision of operations carried out often by little-trusted managers. The introduction of limited liability for joint-stock companies in the 1860s also vastly accelerated corporate expansion and specialization. These developments explain the new breed of specialized players like the 'Big Four' firms which now dominate international accounting (Deloitte, Ernst & Young, KPMG and PricewaterhouseCoopers). These players all directly trace their origins back to firms founded between the invention of railways and the beginning of World War I. For instance, Deloitte was founded at London in 1845; Price Waterhouse Coopers 1854; the Peat (London, 1867) and Marwick (Glasgow, 1887) which became 'P' and 'M' in KPMG; Young (Chicago, 1894) and Ernst (Cleveland, 1903). Arthur Andersen, which collapsed in 2002 following the Enron scandal, had been the latest one in this series, created in 1913 in Chicago by the eponymous Norwegian immigrant (Veron, 2007).

Consequently, accounting practices became less intuitive, much more elaborate and complex. For example, the consolidated statements of mutually associated companies summarized in one single set of accounting statements which appeared in the 1890s, together with complex groupings of companies organized around a trust or a holding entity are all evidences of complexity. The move towards more public disclosure of financial information happened not in the United Kingdom (UK) but on the other side of the Atlantic. In the United State (US), the shares of many publicly-listed companies were dispersed among a large number of individual shareholders across an immense territory. This created problems of access to information which were far more pressing than in the well-informed circles of the City of London. The introduction of corporate income tax, which was pioneered by the US in 1909, was a further driver of harmonization of accounting practices and improved financial transparency. But despite the pressure from outside stakeholders, in the early decades of the 20th century, financial disclosures by publicly-listed companies were still patchy at best. Though, companies were increasingly reliant on public capital markets for their funding, managers still felt they could keep critical financial information for themselves and their close associates, bankers, and controlling shareholders (Veron, 2007).

This was changed forever by the stock market crash of October 1929. The ensuing scandals and outcry resulted in a vigorous call for legislation to improve the quality and reliability of the financials provided by companies to individual investors. Shortly after Franklin D. Roosevelt's election, the landmark US securities legislation of 1933 and 1934 set up the Securities and Exchange Commission (SEC) as the regulator of all national capital markets; made independent external audit compulsory for all publicly-listed companies; and paved the way for the emergence of a formally identified set of 'Generally Accepted Accounting Principles' (GAAP). The SEC, however, soon decided to rely on the US accounting profession's expertise for the preparation of standards. It recognized that accounting standards were ambiguous in nature through publicly-enforced rules prepared by private-sector players on the grounds that private practitioners are more aware of market practices and better equipped to master their more technically than civil servants (Veron,2007).

By the mid-1950s, US GAAP had been constituted as a full body of rules, which have since then been constantly updated. The accounting profession kept charge of standard-setting until 1973 when the task was entrusted to the Financial Accounting Standards Board (FASB)-a

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newly-created private-sector body by the SEC as a representative of the government and by the mandate of investors. The FASB's formal governance framework as well as its working processes was established as an autonomous body with influence from all major stakeholders in capital markets and listed companies and major audit firms provided most of its funding.

The purpose of accounting standards is to ensure that financial disclosures provide clear and relevant information on corporate performance; they also reflect compromises between these various stakeholders, whose interests may converge on some issues but diverge on others. Accounting standards have real-world effects on economic behavior. Therefore, their preparation is not a purely academic exercise, but embedded in the fabric of society and subject to pressures from all kinds of interest groups. This explains why accounting standard-setting has long remained markedly different from one country to another, reflecting wider differences in economic systems. In the US the size, diversity, and pervasive culture of litigation made accounting a heavily 'rules-based'. By contrast, accounting in the UK, though sharing with the US a primary orientation towards the needs of market participants rather than of government, has been more 'principles-based', with fewer and less all-encompassing rules, and a stronger emphasis on accountants' professional judgment.

In a related vein, Germany, France and other developed countries globally developed hybrid systems that incorporate many features of UK accounting practices and American standards. But their standard-setting processes have retained specifications linked to their respective economic models. In France, accounting standard-setting has been directed by the state and heavily influenced by state needs such as tax collection, the production of national statistics, and banking and insurance supervision. In Germany, standard-setting has been dominated by creditors' concerns, and thus overseen by the justice ministry in charge of bankruptcy law. Developments in Asia and other parts of the world have tended to follow those in Europe and the US. In Japan, a US-style accounting framework for listed companies was created in 1949 following the introduction of new securities legislation, and the standard-setting function was transferred to an independent entity known as the Accounting Standards Board of Japan, in 2001. In Malaysia, Singapore and Hong Kong, followed the UK-style accounting standards developments. Following the opening of China to capitalist enterprise, a financial accounting framework was set up as well and likewise in Russia and other post-Communist countries after the fall of the Berlin Wall.

In Nigeria, record keeping has antecedents in the ancient kings and empire, where periodic contributions by subjects were recorded on the wall. According to Wintoki (1997) and Coker (1990) the development of accounting in Nigeria can be traced to the time when the Companies Ordinance of 1922 was enacted. Just after the country's independence the idea of establishing a professional body of accountants in the country became a burning issue in the minds of a few accountants. This led to the establishment of 'The Association of Accountant of Nigeria' which was incorporated under the Companies Act of 1958. The main objectives of the Association were to provide a central organization for accountants in the country; to maintain a strict standard of professional ethics; and to provide for the training, examination and local qualification of students in accounting (Ofoibike, 1992; Maduka & Adebowale, 2009). The establishment of the Institute of Chartered Accountants of Nigeria (ICAN) in 1965 by the Act of Parliament paved the way for the formation of the Nigerian Accounting Standards Board (NASB) in 1982 before it was taken over by government (Josiah, Okoye, and Adediran, 2013; Basoglu and Goma, 2007). In Nigeria, the development of accounting standards remains the

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responsibility of NASB before its repeals and replacement by the Financial Reporting Council of Nigeria in 2011.

Theoretical perspective influencing the Development of Accounting Standard Setting Process. An important function of accounting standards is to reduce the economy-wide transaction costs of communicating information among various stakeholders by allowing them to make more effective and efficient tangible decisions and undertake transactions within, outside, and between organizations. At the same time, accounting standards impose regulatory and compliance costs, and could increase the barriers to entry into public capital markets. Accounting standard-setting process has attracted researchers' attention over the years and a lot of studies have been undertaken on national levels (Susela, 1999; Hope & Gray, 1982; McKinnon & Harrison, 1985; Hussein & Ketz, 1991; Miller et al.1998) as well as international level (Kwok & Sharp, 2005; Cortese, 2006; Cortese & Irvene, 2010). Many authors identify that international standard-setting process has two dimensions: first, it is a technical dimension and second, it is political nature (Demski, 1973; Gerboth, 1973; Horngren, 1973; Cushing, 1977; Bromwich, 1980). The theories supporting the accounting standard setting process have been examined from a range of perspectives which include issue network theory (Heclo,1978), a political perspective (Zeff 2005), public interest theory, regulatory capture theory, private interest theory, and process theory (see Hossain et al. 2008). These theories add important information to our understanding of how accounting standards arise; however, they do not provide an expansive theory to the triggers of the standard-setting process.

Issue Network Theory. Heclo's (1978) issue network (also called a policy network) approach provides a theory of participation that can be applied to the standard setting process. In such application, it argues that there are individuals and organizations that have long-running interests (intellectual, economic, ideological and political) in the development and characteristics of new accounting standards. The interactions between these groups and individuals, and their ability to capture the allegiance of the standard setters themselves for their preferences, determine the contents of the new standards produced. The outcome of these standards then can be seen as the outcome of negotiations between sometimes competing groups with different interests and ideologies. All the groups involved face negotiations within themselves in order to arrive at a position, and then seek to foster negotiations with interested parties in order to achieve their preferred outcome.

Political Perspective. Under this view, standard-setting process suggests that politics can have a first order effect on how accounting standards is set. Watts (1977) and Watts & Zimmerman (1978) have sought to develop and test economics-based theories of standard-setting that capture these political forces. They see political influence over standard-setting as a "purposeful intervention" in the standard-setting process by an economic entity with the goal of affecting the outcome of that process and to increase that entity's economic value or wealth. It can also be said that political influence occurs when it shifts the standard setters' position away from what they see as the "right answer," meaning a standard that achieves its objectives. This gives rise to the question of the objectives of standard setting (Kothari et al., 2010). Assuming a pragmatic approach of the consistent with the Financial Accounting Standard Board mission which states the following: (a) move accounting to a position that is more consistent with conventionally-accepted definitions of financial statement items based on economics; (b) improve transparency; and (c) eliminate accounting alternatives that provide managers with additional flexibility in reporting; the SEC being a government regulatory agency can face political pressures that force it to take positions inconsistent with those of the

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FASB. More so, accounting firms, although, with objectives that are less clear and likely to be complex may likely participate in the process of accounting standard setting to improve the quality of financial reporting. For example, specifying accounting in an area of reporting that has become ambiguous.

Public Interest. Typically, under public interest theory, regulation develops in response to a market failure crisis that is seen to be capable of resolution in the public interest. For example, government intervention in the financial accounting standard setting process has been regarded as necessary because of failures in the market for accounting information. Similarly, the US Securities and Exchange Commission was established in 1934 following the 1929 stock market crash; likewise, the Sarbanes Oxley reform bill on accounting and corporate governance which was passed in 2002 following the corporate scandals that led to the collapse of Enron and WorldCom caused by earnings manipulation (Ijiri, 2005). In the UK, the Institute of Chartered Accountants in England and Wales responded to criticism of the accounting profession, following what was regarded as misleading annual reporting, by establishing an Accounting Standards Steering Committee, later renamed the Accounting Standards Committee (Nobes & Parker, 2010). In Australia, market issues were blamed on poor accounting standards and low levels of compliance and this necessitated the establishment of the Accounting Standards Review Board in 1984 by the Australian Government. Similarly, there has been a world-wide call for harmonization of financial accounting in order to serve the public interest through increasing capital market efficiency, reducing the cost of capital for domestic firms listed internationally, and reducing the cost of national standard setting (Collett et al., 2001).

Regulatory Capture Theory. The Regulatory capture theory explains situations where regulatory agencies are captured by the industry they are supposed to be regulating (Uche, 2002). In other words, regulatory capture is the domination (capture) of a regulatory agency by the industry it seeks to regulate, thus rendering it unable to balance competing interests when making social decision choices. In this case, the industry can then direct topics for possible legislation and reject others, which are not seen as important or in the interests of the industry. The application of this theory has focused on the relationship between an industry and the state. Regulatory capture explains the predisposition of regulated industries to capture the regulatory body, in this case the International Accounting Standard Committee (IASC)/International Accounting Standard Board (IASB) (Mitnick, 1980; Walker, 1987). Regulatory capture theory was derived from economic theories of regulation, which sought to explain the pattern of regulation by governments (Posner, 1974). Developed by "an odd mixture of welfare state liberals, muckrakers, Marxists, and free market economists", regulatory capture theory was used to argue that regulation was supplied in response to the demands of particular interest groups (Posner, 1974). Mitnick's (1980) conception of regulatory capture focused specifically on the relationship between regulatory bodies and the industries they were intended to regulate. It considered how aspects of this relationship can promote, capture and result in the regulatory body making decisions and taking actions consistent with the preferences of the regulated industry (Mitnick, 1980).

A study by Walker (1987), a former member of the Accounting Standards Review Board (ARSB) in Australia, who provided a personal account of the Australian accounting standard setting process used Mitnick's (1980) theory of regulatory capture to argue that the accounting standard setting process in Australia had been captured by the interest groups it was established to regulate. In developing his argument, Walker (1987) traced the early history of the ASRB and noted the lobbying power of the accountancy bodies in the early stages of the ASRB's

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formation, which ensured that the ASRB would not have independent research capabilities. He also argued that the profession had "managed to influence the procedures, priorities, and output of the Board", and further, that it had influenced appointments to the Board so that "virtually all members of the Board might reasonably be expected to have some community of interests with the profession" (Walker, 1987). Having provided a convincing argument for the regulatory capture of the ASRB, Walker (1987) concluded by stressing the importance of highlighting the process of accounting standard setting and examining the political arrangements surrounding the process.

Private Interest. In contrast to public interest theory, private interest theory predicts that those parties who are likely to be adversely affected by legislation exert political influence and lobby for outcomes that benefit them. The decision to lobby on a proposed financial accounting standard depends on a lobbyist's cost/benefit assessment and ultimately the effect of the accounting change on their interests (Brown and Tarca, 2001). For example, French banks vigorously opposed changes to International Accounting Standard (IAS) 39 Financial Instruments: Recognition and Measurement in 2003 that could have induced volatility to their financial statements. Pressure, which included a written submission from the French President, resulted in the European Commission granting banks exemptions from particular requirements in IAS 39 (Zeff, 2008). Applying private interest theory, Watts and Zimmerman (1979) explain that accounting procedures are a means of wealth transfer, and it follows that organizations expend resources to influence the accounting standard-setting process and secure a position that will enhance the organization's wealth (or power or other private benefits).

Process Theory. A process perspective allows for a comprehensive analysis of standards' progressions and standardization. Inferring on discussions of transnational law-making (Halliday & Carruthers, 2007; Quack, 2007) argue that standardization instead occurs in repeated cycles. In such cycles, different actors may be involved in different phases, or the same actors may contribute to several phases of standardization (Quack, 2007). The cyclical process model of standardization considers organizational change and institution-building as contextualized processes (Pettigrew, 1990). The analytical distinction between rule making and diffusion being a cyclical perspective allows us to unveil each dimension and to tease out the constitutive nature of different forms of legitimacy in transnational standardization. The first dimension is to distinguish between inclusive and exclusive standard formation while the second dimension is to explain standard diffusion. An exclusive formation is characterized by proprietary market standards developed unilaterally by a single organization, e.g. today's Microsoft Windows desktop software (Campbell-Kelly, 2001). In this case, a sole actor, whose primary objective is to develop a standard, proposes its adoption. Therefore, if this exclusively developed rules it may eventually become accepted standards. In contrast, inclusive formation is a relatively open, collaborative procedure, usually characterized by negotiations among a number of interested parties, creating input legitimacy-multi-stake-holder standardization (Fransen & Kolk, 2007; Tamm Hallström & Boström, 2010).

The Birth and Development of International Standards. In June 1966, Henry Benson was elected President of the Institute of Chartered Accountants of England and Wales. Later in 1981 he was made Lord Benson of Drovers in the County of West Sussex. He was the grandson of one of four brothers who founded the accounting firm Coopers (now part of PricewaterhouseCoopers) in 1854. By the 1960s, he was already one of the most prominent figures in the accounting profession in the UK and internationally, following distinguished public service during the war and the spectacular development of his family's firm into a worldwide leader (Veron, 2007). When elected, Benson gave a short address to the Institute's Council, in which he mentioned invitations he had received to visit his counterparts at the Canadian Institute of Chartered Accountants and the American Institute of Certified Public Accountants. He then added: 'I have had the feeling for a long time that our relations with those Institutes were very friendly but somewhat remote and, with the Council's approval, I shall see whether I can perhaps get them on to a more intimate basis'. These following words of Benson marked the beginning of international accounting standard-setting. Benson recalls the moment in his autobiography, published in 1989 under the title "accounting for life". It reads: ***'My private but unstated ambition at that stage was to make it, as I think it turned to be, a turning point in the history of the accountancy profession. The United Kingdom, America and Canada were the three most important countries at that time in the world of accountancy, but there was very little dialogue between them. No attempt had been made to make them closer together to advance the interests of the profession as a whole or to get a common approach to accountancy and audit problems. The Canadian institute was closer to the American institute than we were because of their geographical position but each of the three pursued its own policies without reference or collaboration with the other two. I hoped to change this'.***

Following Benson's visits, the three bodies jointly established an Accountants International Study Group in February 1967, which soon published papers on accounting topics and gradually developed its own doctrinal framework. This eventually formed the basis for the creation of the International Accounting Standards Committee (IASC) in 1973 by an extended array of accounting bodies from Australia, France, Germany, Japan, Mexico and the Netherlands, in addition to Canada, the United Kingdom (plus Ireland associated with it), and the United States. The IASC's stated aim was to issue international standards of reference which would guide the convergence of national standards over time. Benson was duly elected the IASC's first chairman, and opened its offices in London.

Arguably, the most successful body involved in harmonization has been the International Accounting Standards Committee (IASC) and its successor, the International Accounting Standards Board (IASB). These two bodies and some others are looked at in this and the following sections. The IASC was founded in 1973 by the accountancy bodies of nine countries: Australia, Canada, France, Japan, Mexico, the Netherlands, and the United Kingdom with Ireland, the United States and West Germany (Benson, 1979). The preliminary discussions towards setting up the IASC were held at meetings arranged in the margins of the Congress in Sydney in 1972. Another background factor was that the UK joined the Common Market (later European Union (EU)) in 1973. The IASC operated until 2001, when it was succeeded by the International Accounting Standards Committee Foundation (IASCF), whose operating arm is the IASB, although, the IASC set up the IASCF. The IASC was independent from all other bodies, but from 1983 a close connection was established with the International Federation of Accountants (IFAC). The membership of IFAC and the IASC was identical, with over 150 accountancy bodies from over 110 countries by 2001. IFAC concentrates on such matters as auditing, management accounting, and the International Congresses of Accountants. The IASC was concerned only with international accounting standards. Its aim was to formulate and publish in the public interest accounting standards to be observed in the presentation of financial statements and to promote their worldwide acceptance and observance'(IASC, 1992).

From 1983 to 2001, the IASC's Constitution provided a Board of up to 17 members which consist of nine (9) or ten (10) from developed countries; three (3) or four (4) from developing

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countries and up to four other organizations, generally drawn from the IASC's consultative group (which included such bodies as the World Bank, the International Confederation of Trades Unions and the International Federation of Stock Exchanges). The members as at 31 March 2001, after which the IASC was reformed, as shown (please, see **Table 1** in appendix) see were never more than 16 members. Board members of the IASC contributed much of its budget. The remaining members of the IFAC/IASC paid their subscriptions to the IFAC, which then funded another element of the IASC budget. Publication revenue and donations were also important (Nobes & Parker, 2008).

A list of the standards of the IASC shown (in **Table 2)** were adopted by IASB en bloc in 2001, but made major amendments and additions from 2003. Standards were preceded by exposure drafts and for it to be published it has to be approved by a two-thirds majority of the IASC's Board; a subsequent standard by a three-quarters majority. A relevant development emerged in 1996 with the IASC's decision to set up a Standing Interpretations Committee (SIC) which set out the IASC's view on certain issues that were not dealt with in sufficient detail or clarity by the International Accounting Standard (IAS). The work of the SIC further tightened up the IASC's requirements. The SIC has been replaced by the International Financial Reporting Interpretations Committee (IFRIC). In the following years, the IASC prepared and published a growing number of documents constituting an increasingly comprehensive body of rules, eventually completed in 1998 as a set of 39 so-called 'core' International Accounting Standards (IAS). Simultaneously, its governance evolved constantly to accommodate a growing and increasingly diverse stakeholder base. Belgium, India, Israel, New Zealand, Pakistan and Zimbabwe joined as associate members as early as 1974, and many other countries later followed suit. In 1981, the IASC's Consultative Group was formed with representatives of the World Bank, United Nations, Organization for Economic Co-operation and Development (OECD), and various market participants. This group was joined in 1987 by the International Organization of Securities Commissions (IOSCO), which brings together the SEC and its national counterparts around the world and in 1990 by the European Commission and Financial Accounting Standard Board (FASB).

In 2000, IOSCO recommended the use of IAS for cross-border offerings or listings. By the same time, a number of developing countries had taken the habit of using them as the reference for drafting their own national standards. These countries include Lebanon and Zimbabwe. They made it a requirement for banks or publicly-listed companies to adopt. Several developed countries, such as Belgium, France, Italy and Germany, had also adopted laws allowing large listed companies to publish consolidated accounts using IAS or standards very similar to them, without having to 'reconcile' them with national standards. Following the Asian crisis of the late 1990s, international accounting standards were also endorsed by the G7 Group of industrialized countries and by the Financial Stability Forum, a group of financial regulators hosted by the Bank for International Settlements in Basel (Nobes & Parker, 2008). In the late 1990s, it became clear that the IASC's somewhat rudimentary governance framework, which was dominated by accounting firms and national organizations representing the accounting profession, were not appropriate given its high ambitions of having its standards adopted by major companies and jurisdictions. Therefore, the standard-setting organization's governance was extensively overhauled to increase its independence from the accounting profession. Also, this same concern led the US to the creation of FASB in 1973 with a new governance framework enshrined in a statutory 'Constitution' adopted in 2000 which was closely modeled on FASB's. However, this approach ignored the specifics of the international standard-setting

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organization, though; it did not draw its legitimacy from a public authority unlike the FASB whose endorsement was done by the SEC.

In 2000, IASC member bodies approved the restructuring of IASC's foundation and in March 2001, the new IASB took over the responsibility of setting the international accounting standards from IASC. The new IASB became operational on 1 April, 2001 though still headed by the International Accounting Standards Committee Foundation (IASCF) (legally registered in the United States) who promised to operate in the public interest. The IASB and its secretariat were based in London. The IASB adopted all the old IAS and then began its work in 2001 in three main areas which include a new improvement project; continuing projects; and major reforms. The new improvements project led to exposure drafts in May and June 2002 designed to amend 14 standards and to withdraw IAS 15 (table 2). In the resulting revised standards of 2003 and new standards of 2004, a number of options were removed such as LIFO (IAS 2) (table 3) and correction of errors through income (IAS 8). The IASB continued to develop new standards afterward and eventually called them the International Financial Reporting Standard (IFRS).This initiative was a part to strengthen the EU capital markets by establishing a standardized accounting system.

International Bodies Relevant to the Formation of Accounting Standards

The following bodies played prominent roles in the development of accounting standards over the years. They are discussed below.

International Federation of Accountants (IFAC). This body came into being in 1977 after the Eleventh World Congress of Accountants. Its aim was to develop a coordinated international accountancy profession. A predecessor body, called the International Coordination Committee for the Accountancy Profession (ICCAP), which had been formed in 1972 after the Tenth Congress, was wound up in favor of the IFAC. The IFAC represents over 150 member accountancy bodies from around the world. It has a full-time secretariat in New York. Its work includes the setting of international standards for auditing (via the International Auditing and Assurance Standards Board), ethics, education and management accounting; involvement in education and technical research; and organizing the international congress every four to five years. Loft et al. (2006) in their study of examining the changing structure and growing importance of IFAC suggested that IFAC was more influenced by experts and multinational audit firms than by national accountancy bodies.

The G4+1. This group was formed in 1966 and comprised members from professional bodies in Canada, the United Kingdom and the United States. Its purpose was to study and report on accounting practices in the three countries. The G4+1 group comprised the standard setters of Australia, Canada, the UK and the US, with the IASC secretariat as observer (hence the '+1'). Later, the New Zealand standard-setter joined. From 1995 onwards, the G4+1 issued a number of discussion papers on some subjects which include lease accounting and the measurement of performance. The members of the G4+1 shared similar conceptual framework with the Board of the IASC. In February 2001, after the new IASB had been appointed, the G4+1 were wound up because so many former Anglo-Saxon standard-setters (United Kingdom and the Ireland, the Netherlands, the United States) became IASB members. Street (2005) suggests that the work of the G4+1 had a major impact on the IASC and the IASB.

The International Organization of Securities Commissions (IOSCO). The International Organization of Securities Commissions was founded in 1983. It is an association of

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governmental securities regulators, such as the Securities and Exchange Commission of the United States. Such regulators decide whether foreign or 'international' accounting standards are acceptable for the financial reporting of domestic or foreign listed companies. In the late 1980s, IOSCO and the IASC reached an agreement whereby IASC would improve its standards and IOSCO would consider recommending them to all their exchanges. IASC's work of the 1990s was mostly designed to satisfy IOSCO which also attend the IASC Board meetings as an official observer. In 2000, IOSCO endorsed the IASC's standards, particularly for use by foreign registrants. Many regulators do accept international standards for foreign companies even if domestic standards are required for domestic companies. In 2007, the SEC also accepted international standards. A body that co-ordinates the European members of IOSCO was founded in 2001 and called CESR (the Committee of European Securities Regulators) saddled with the responsibility of promoting enforcement agencies for the monitoring of the use of IFRS by listed companies in Europe.

European Union (EU). The European Union played a role concerning its requirement to use IFRS for the consolidated statements of listed companies from 2005, and its efforts for the harmonization of national accounting rules in Europe since the 1970s. In both capacities the EU has been a major player in the harmonization of accounting.

Fédération des Experts Comptables Européens (FEE). FEE started work at the beginning of 1987, taking over from two earlier European bodies: the Groupe d'Etudes-formed in 1966 and the Union Européenne des Experts Comptables (UEC)-formed in 1951 (McDougall, 1979). FEE is based in Brussels and has member accountancy bodies throughout Europe. Its interests include auditing, accounting and taxation. Much of its work is connected with the EU, and it advises the European Commission on company law and accounting harmonization. In 2001, FEE was the driving force behind the creation of the European Financial Reporting Advisory Group (EFRAG), which advises the EU Commission on the acceptability of new and amended IASB standards.

Other Regional Accounting Bodies. Some notable regional accounting bodies also contributed to the development of accounting standards globally. One of them is the Inter-American Accounting Association (IAA) which covers the accountancy bodies of the two American continents of North America and South America. In Asia, the existence of Confederation of Asian and Pacific Accountants (CAPA) which created in 1957 but formally organized in 1976 had many countries in her membership (Choi, 1981). More so, the body had in its affiliation the ASEAN Federation of Accountants (AFA) formed in Bangkok in 1977 (Choi, 1979). Choi (1981) opined that one function of the AFA 'is to buffer individual Asian countries against the wholesale adoption of international accounting pronouncements that may not be suitable to local circumstances. However, neither CAPA nor AFA seem to have had any effect on harmonization or the reduction of IASC. In Africa, the Eastern, Central and Southern Africa Federation of Accountants (ECSAFA) was formed in 1990. It encourages the formation and development of accountancy bodies in the Africa Continent. It holds congresses and communicates with IFAC, and occasionally carries out other joint activities.

Other Non-Accounting Bodies. Among the factors that drive accountants and their professional bodies towards better national and international standards is the possibility that governmental bodies will intervene or gain the initiative. At present, with the regional exception of the EU, such international bodies have influence rather than power.

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One of them is the Organization for Economic Co-operation and Development (OECD).One of its function is to research and adopt recommendations for accounting practice on the guidelines for Multinational Enterprises (OECD, 1986). However, this mainly concerns disclosure requirements that may influence the behavior of large and politically sensitive corporations. It is very evident that the aim of OECD's aim is to protect developed countries from any extreme proposals that might affect the regulation of multinational business especially when it is sponsored by the United Nations (UN). For instance, in 1977, the UN published a report that proposed a very substantial increase in the disclosure of financial and non-financial items by transnational corporations. In a similar vein, the UN set up an Intergovernmental Group of Experts on International Standards of Accounting and Reporting (ISAR) in 1979 to publish some standards on disclosures by multinationals.

Emergence of International Financial Reporting Standard (IFRS)

The International Financial Reporting Standard (IFRS) is a set of accounting standards that is rapidly gaining worldwide acceptance. The drive to international standards progressed slowly until the reorganization of the committee into the International Accounting Standards Board (IASB) in 2001. The IASB is an independent standard setting body that includes representation from major countries, including the United States. Article 2 of the Constitution of IASB requires the body to carry out the following mandates:

(a) To develop in the public interest, a single set of high quality, understandable and enforceable global accounting standards that require high quality, transparent and comparable information in financial statements and other financial reporting that will help participants in the world's capital markets and other users make economic decisions;

(b) To promote the use and rigorous application of those standards;

(c) In fulfilling the objectives associated with (a) and (b) and to take account of, as appropriate, the special needs of small and medium-sized entities and emerging economies;

(d) To bring about convergence of National Accounting Standards, International Accounting Standards, and International Financial Reporting Standards to high quality solutions.'

In 2001, the IASB replaced IAS with IFRS. Since that time, the IASB has amended some IASs; replaced other IASs with new IFRSs, and has adopted new IFRSs on topics for which there was no previous IAS. The IASB has no powers of its own but can only promote the use and rigorous application of IFRS. As at 2000 no significant jurisdiction made the use of IFRS compulsory (Nobes and Parker,2008). Indeed, only a few had allowed their use for public financial statements as an alternative to national standards. With the objective to harmonize financial reporting globally, in 2007, almost all publicly-listed companies in the European Union report their financial statements using IFRS10 (Nobes and Parker, 2008). The use of IFRS is beginning to increasingly receive acceptance in countries beyond the EU. For instance, Australia mirrored their national standards to IFRS. The adoption and convergence of IFRS is becoming an important discuss. The adoption of IFRS means that national rules are set aside and replaced by a requirement or permission to use IFRS directly. The word 'adoption' could also be used when a particular company chooses to use a set of accounting rules other than the national one. The increased momentum for the adoption of IFRS likely traces its roots to factors such as the globalization of capital markets, exemplified by the increased integration of the EU economies (who adopted a common currency on January 1, 2002), and increasing doubts about

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the superiority of US GAAP over IFRS after the widely publicized US corporate accounting scandals.

The global acceptance of IFRS has given credibility to financial reports of many corporate bodies. The adoption has rendered the publishing of consolidated financials of national accounting standards of various countries less significant. The adoption of IFRS in the EU has triggered a series of similar moves all around the world, including in major developed economies, though some of these jurisdictions were systematically harmonizing their accounting standards with IFRS creating an avenue for complete convergence. A country like Turkey requires IFRS use for all companies listed on the Istanbul Stock Exchange. Israel is eliminating its national standards in favor of IFRS. In Russia, Finance Minister Alexei Kudrin announced in early 2003 a plan to require all companies publicly listed in Russia to publish their consolidated financial statements using IFRS, starting with the disclosures for the financial year 2004. The corresponding legislation was given preliminary approval by the Duma (parliament) on 29 October 2004, even though the move was later delayed. Furthermore, many of Russia's large companies already report financial statements using either IFRS or US GAAP: for example, Gazprom, Russia's largest listed firm by market capitalization, reports financial statements in accordance with IFRS.

In Asia, Hong Kong Financial Reporting Standards are also identical to IFRS for all practical purposes since the end of 2004. The Singaporean standards still keep some insignificant differences with IFRS. Japan's approach to the Global Accounting Experiment has been more cautious than that of Europe, Australia and Canada, but it now also seems to be engaged in an unambiguous, if gradual, process of convergence towards IFRS. In early 2005, the Accounting Standards Board of Japan (ASBJ) started a formal process of discussion with the IASB, with simultaneous work on several standards and regular meetings between the two bodies and this process is likely to result in a pattern of adoption similar to that of the EU. Other major Asian economies, such as Taiwan or South Korea, have increasingly taken IFRS as a source of inspiration for their national standards after the 1997 crisis. On 16 March 2007, South Korea announced its own roadmap towards full IFRS adoption, with completion scheduled for 2011.

In India, Prime Minister Manmohan Singh announced in March 2006 that his government would introduce comprehensive new company legislation that will include aligning Indian accounting standards with IFRS. In October 2006, a working group was set up to this end by the Institute of Chartered Accountants of India. China has now also adopted IFRS. By the early 1990s, accounting standards were mainly determined by the needs of state planning for most enterprises, except joint ventures involving foreign partners. However, financial reporting standards were gradually developed with many references to IFRS, since 1998 under the direction of a new body, the China Accounting Standards Committee. In November 2005, this committee decided to eliminate most of the remaining differences, and adopted the corresponding standards in February 2006. As a result, the standards applicable, from January 2007 on, to some 1,200 companies listed in Shanghai and Shenzhen can be considered near-identical to IFRS.

Canada is now taking a similar route. In September 2004, the Accounting Standards Board of Canada started a consultation process on the possible convergence of its standards towards IFRS, and in January 2006 it ratified a strategic plan that confirms the objective with the conviction that accounting standards will become identical to IFRS and will cease to exist as a separate set of rules. The year 2011 is currently envisaged as the date by which Canadian standards will have completed their gradual convergence towards IFRS (Nobes &

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Parker,2008). In South America, Brazil is adopting IFRS for its banks, I, f not at this point for the rest of its listed companies12. In March 2006, the Board of Directors of the Central Bank of Brazil decided to require that all Brazilian banks, as well as other financial institutions including leasing companies and savings and loan institutions, fully comply with IFRS beginning with the financial statements for the year ending 31 December 2010.

As countries are making effort to adopt IFRS for some or all accounting purposes, some are deciding to gradually change their national accounting rules towards IFRS. This is commonly referred to as convergence. In other words, it is a particular form of harmonization or standardization. An interesting example of convergence is that of Australia. By 2005, all IASs and IFRSs have been turned into Australian standards. For instance, IFRS 1 is called AASB 1, and IAS 1 is called AASB 101, and so on. Also, China closely followed IFRS for its listed companies.

Accounting Standards in Nigeria

Before the emergence of Federal Reporting Council of Nigeria (FRCN), financial statements prepared for reporting in Nigeria were guided by the Statement of Accounting Standards (SAS) issued by NASB. The Nigeria Accounting Standard Board (NASB) was established in 1982 as a private sector initiative. The NASB first became a government parastatal in 1992 as a component of the then Federal Ministry of Trade and Tourism and has issued a total of 32 Statement of Accounting Standards (SAS) before the Senate passed the Financial Reporting Council of Nigeria Bill on 18th May 2011 that eventually repealed and replaced it with a new set of rules. The Nigerian Accounting Standards Board Act of 2003 provided the legal framework under which NASB set accounting standards. Membership includes representatives of government and other interest groups. The primary functions as defined in the Act were to develop, publish and update Statements of Accounting Standards (SAS) to be adopted by companies in the preparation of their financial statement, and to promote and enforce compliance with the standards. These statements requirements were based on pronouncements issued in the past by the IASB.

The attention and eventual adoption of IFRS globally triggered Nigerian reporting entities to use the same reporting framework as their peers worldwide to enhance the relevance of their reports in the international circle (Josiah et al, 2013). The Nigerian Federal Executive Council (FEC) approved in January 2012 as the effective date for the convergence of accounting standards in Nigeria (SAS) to International Financial Reporting Standards (IFRS). Though, the adoption of IFRS in Nigeria was launched in September 2010 by the Honorable Minister, Federal Ministry of Commerce and Industry, Senator Jubril Martins-Kuye (OFR). More so, the adoption necessitated the compliance of stakeholders to applying IFRS by January, 2014 with Public listed entities and significant public interest entities to adopt by January, 2012 (Madawaki, 2011). The Financial Reporting Council Act, 2011 (FRC Act) which was signed into law in July, 2011 established the Financial Reporting Council of Nigeria (the FRC). Amongst its functions, it was charged with the responsibility to: develop and publish accounting and financial reporting standards to be observed in the preparation of financial statements of public interest entities in Nigeria; review, promote and enforce compliance with the accounting and financial reporting standards adopted by it; Enforce compliance with the Act and its rules on registered professionals and the affected public interest entities (Obazee, 2011; FRCN Act, 2011).

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The enactment of the Financial Reporting Council Act, 2011 in Nigeria and the adoption of IFRS by over 122 countries supported the need to adopt and converge to IFRS. This was corroborated in the study Asein (2011) where he opined that it was expedient and in the best interest of the nation to raise and benchmark the quality of its financial reporting on current global best practices by adopting IFRS in order to achieve its goal of becoming one of the twenty largest economies of the world by year 2020. In a similar vein, Obazee (2011) opined that the move towards adopting the IFRS was majorly triggered by the nation's objective to realize the full gains of cross border listing of indigenous companies.

Adoption of International Financial Reporting Standard in Nigeria. The emergence of global business and the expansion of our local businesses internationally justified the need to have global financial reporting benchmarks. It is evident that Nigerian businesses are making more international transactions with cross border listing and accounting firms are beginning to follow their growing corporate clients into other countries in order to maintain services. More so, governments are engaging in wide range reviews that recognize the importance of reassuring the markets and the public at large that corporate reporting and governance frameworks are sufficiently robust (Josiah et al, 2013). The rapid growth of international trade and internationalization of firms, developments of new communication technologies, and the emergence of international competitive forces have disturbed the financial environment largely. Therefore, it can be explained of the need for a common accounting language that should be spoken by all businesses across the globe. A financial reporting system of global standard is a prerequisite for attracting foreign as well as present and prospective investors at home alike that should be achieved through convergence of accounting standards. Only by talking the same language one can understand each other across borders (Hati and Rakshit, 2002; Nikhil, Bhagaban, and Alok, 2009).

The adoption of IFRS in many countries required standard setters to understand the different regulatory and commercial environments in existence in which Nigeria was not an exception. A roadmap on the adoption of IFRS (Issued by the International Accounting Standards Board) was used as a guideline for the preparation of statutory financial statements in Nigeria. The roadmap was specified in accordance to entities existing in Nigeria. The first set of entities comprises public listed entities and significant public interest entities and this set of entities were to adopt IFRS by 2012. This set consists of companies that are quoted on the Nigeria Stock Exchange with a minimum of N500 Million in Shareholders' funds. The second set of entities comprises other public interest entities and this set of entities was to commence implementation by January, 2013. This set consists of companies quoted on the Nigeria Stock Exchange but with shareholders' funds below N500 Million. The third set of entities comprises all small and medium scale enterprises (SMEs) and this set of entities was to adopt IFRS by January, 2014 (Olamide & Ajibade, 2016).

The adoption of IFRS has created several benefits as evidenced by several studies. These benefits include decreased cost of capital (Bushman & Piotroski, 2006); efficiency of capital allocation (Young and Guenther, 2008); international capital mobility (Ahmed, 2011); capital market development (Adekoya, 2011); increased market liquidity and value (Okere, 2009); enhanced comparability (Bhattacharjee & Hossain, 2010); improved transparency of results. According to (Madawaki,2011) the potential benefits that Nigeria stands to gain after IFRS adoption are enumerated in the light of the following: Promotion of the compilation of meaningful data on the performance of various reporting entities at both public and private levels in Nigeria thereby encouraging comparability, transparency, efficiency and reliability of

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financial reporting in Nigeria. Assurance of useful and meaningful decisions on investment portfolio in Nigeria. Investors can easily compare financial results of corporation and make investment decisions. Attraction of direct foreign investment. Countries attract investment through greater transparency and a lower cost of capital for potential investors. For example, cross border listing is greatly facilitated by the use of IFRS. Assurance of easier access to external capital for local companies. Reduction of the cost of doing business across borders by eliminating the need for supplementary information from Nigerian companies. Facilitation or easy consolidation of financial information of the same company with offices in different countries. Multinationals companies avoid the hassle of restating their accounts in local GAAPs to meet the requirements of national stock exchange and regulators, making the consolidation of accounts of foreign subsidiaries easier and lowering overall cost of financial reporting. Easier regulation of financial information of entities in Nigeria. Lastly, Better quality financial information for shareholders and supervisory authorities.

As benefits are envisaged there are challenges also that accompany adoption of IFRS. Some of them include knowledge gap in the application of the standards (Li & Meeks, 2006); legal system effect (Shleifer & Vishny, 2003); tax system effect (Irvine &Lucas, 2006). These challenges are evidential as accounting practices in Nigeria are governed by the Companies and Allied Matters Act 1990; Statement of Accounting Standard issued by the Nigerian Accounting Standards Board (NASB); Nigerian Stock Exchange Act 1961; Nigerian Deposit Insurance Act 2006; Banks and Other Financial Institution Act 1991, Investment and Securities Act 2007, Companies Income Tax Act 2004; Federal Inland Revenue Service Act 2007. All these acts affect the guidelines on preparation of financial statements in Nigeria. IFRS does not recognize the presence of these laws. However, some entities like the financial institutions have been able to pattern their financial reports in line with IFRS requirements.

CONCLUSION

Business activities in countries have made it relevant for the development and issuance of accounting standards in order to compliment accounting practices. More so the emergence of globalization and international trade have created the need for a standardized and harmonious accounting rules that will guide trading activities as well as quality accounting information and reporting. The development of accounting standards globally by the IASB has been critically examined. Its constant improvement towards producing a quality and harmonized standards resulted to the emergence of International Financial Reporting Standards (IFRS). Though, these standards have its own unique characteristics which created the need for adoption and convergence. The IASC/IASB’s international accounting standard setting process, while rhetorically open and transparent, has the potential to be influenced by powerful interest groups. While it is widely acknowledged that the accounting standard setting process is political, this study has provided details of their nature and effect on the development of international accounting standard.

Accounting standards in Nigeria has developed through the critical role played by the accounting profession such as ICAN. Its relevant role on the creation of accounting standards in Nigeria gave rise to the need for a board that will coordinate this standard. It is therefore not by accident that the Nigeria Accounting Standard Board was formed to issue Statements of Accounting Standards.

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Nigeria as an entity has also joined the bandwagon of countries that have agreed to adopt IFRS in order to strengthen the quality of their financial statements globally.

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APPENDICES

Table 1. Board members of IASC (at 31 March 2001)

Australia	The Netherlands
Canada	Nordic Federations of Accountants
France	South Africa (with Zimbabwe)
Germany	United Kingdom
India(with Srilanka)	United States
Japan	Federation of Swiss Industrial Holding Companies
Malaysia	International Council of Investment Associations
Mexico	International Association of Financial Executives Institutes

Source: Nobes and Parker (Comparative International Accounting, 2008)

Table 2. IASC standards (late 2007)

IAS	Topic
1	Presentation of financial statements
2	Inventories
3	Consolidated financial statements (superseded by IAS 27 and IAS 28).
4	Depreciation accounting (withdrawn in 1999)
5	Information to be disclosed in financial statements (superseded by revised IAS 1)
6	Accounting responses to changing prices (superseded by IAS 15)
7	Cash flow statements
8	Accounting policies, changes in accounting estimates and errors
9	Research and development costs (superseded by IAS 38).
10	Events after the balance sheet date
11	Construction contracts
12	Income taxes
13	Presentation of current assets and current liabilities (superseded by revised IAS 1).
14	Segment reporting (superseded by IFRS 8)
15	Information reflecting the effects of changing prices (withdrawn in 2003)
16	Property, plant and equipment
17	Leases.
18	Revenue
19	Employee benefits
20	Accounting for government grants and disclosure of government assistance
21	The effects of changes in foreign exchange rates
22	Business combinations (superseded by IFRS 3)
23	Borrowing costs
24	Related party disclosures
25	Accounting for investments (superseded by IAS 39 and IAS 40)
26	Accounting and reporting by retirement benefit plans
27	Consolidated and separate financial statements
28	Investments in associates

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29	Financial reporting in hyper inflationary economies
30	Disclosures in the financial statements of banks and similar financial institutions (superseded by IFRS 7)
31	Interests in joint ventures
32	Financial instruments: presentation
33	Earnings per share
34	Interim financial reporting
35	Discontinuing operations (superseded by IFRS 5)
36	Impairment of assets
37	Provisions, contingent liabilities and contingent assets
38	Intangible assets.
39	Financial instruments: recognition and measurement
40	Investment property
41	Agriculture

Note: Square brackets denote standards superseded or withdrawn

Source: Nobes and Parker (Comparative International Accounting, 2008)

Table 3. Some international standards compared to US and UK rules (pre-1993 to 2008)

Topic	US	UK	IAS (before 1993 revisions, effective 1995)	IAS (revised)
Inventories (IAS 2)	LIFO allowed, with disclosure of FIFO.	LIFO not allowed.	LIFO allowed	From 1995 to 2004: LIFO allowed, with disclosure of FIFO. From 2005: LIFO not allowed.
R&D (IAS 9;IAS 38)	All expensed	Research expensed; certain development can be capitalized.	Research expensed; certain development can be capitalized.	From 1995: research expensed; certain development must be capitalized.
Goodwill (IAS 22)	To 2001: amortized over up to 40 years. From 2001: not amortized but tested for impairment.	To 1998: amortized over useful life; or (normally) written off against reserves immediately.	Amortized over useful life; or written off against reserves immediately	From 1995 to 1998: amortized over up to 20 years. From 1999 to 2004: amortized over up to 20 years

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		From 1998: amortized over up to 20 years (rebuttable presumption).		(rebuttable presumption). From 2005: as United States.
Deferred Tax (IAS 12)	From 1992: full allocation; liability method; balance sheet basis.	Liability method; profit and loss basis. To 2001: partial allocation. From 2001: full allocation.	Partial or full allocation; deferral or liability method; profit and loss basis.	From 1998: as United States.

Source: Nobes and Parker (Comparative International Accounting, 2008)

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