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# The internationalisation of Finnish financial reporting between 1973 and 2005 – A historical analysis

#### **ABSTRACT**

This article reviews the historical process involved in the internationalisation of Finnish financial reporting between 1973 and 2005. The data consists of articles discussing the internationalisation of Finnish accounting legislation and practice in two Finnish professional magazines of accounting (Tilintarkastus/Auditing and Tilisanomat/Accounting Gazette), six interviews, material concerning the preparation of the accounting legislation, and earlier research. Finnish financial reporting underwent internationalisation in four periods. As a conclusion, it is suggested that the period between the 1970s and the late-1980s was a free phase in the internationalisation process, because local solutions in the accounting legislation were possible, but thereafter accounting harmonisation has been inevitable. Financial accounting or financial reporting consists, however, not simply of financial reporting practice and legislation but also of thoughts and discussions amongst accounting professionals. Hence, in spite of the global convergence of accounting standards, it might be argued that a local variety of financial accounting, as a culture within a particular country, may also remain local, original, and domestic.

## 1. INTRODUCTION

Since 2005, Finnish public corporations have been obliged to prepare consolidated financial statements according to International Financial Reporting Standards<sup>1</sup>. The use of the IFRSs in Finland means that Anglo-Saxon accounting practices have entered into the Finnish version of continental accounting practices<sup>2</sup>. Financial reporting is a culturally bound phenomenon. Environmental, political, geographical and societal factors have previously had, and continue to have, an influence on the development of the local accounting at a national level. The harmonisation of financial reporting changes this situation essentially as supra-local accounting standards, such as the IFRSs, become obligatory in local environments.

Financial reporting in compliance with the IFRSs, which can certainly be regarded as an implication of the internationalisation of financial reporting<sup>3</sup>, is just one part of it. Behind this, there are also the thoughts, opinions and ideas of accounting professionals. Valid accounting legislation in one country may not necessarily express all of the issues that accounting professionals consider to be positively relevant in financial accounting. There is some evidence from the Finnish context that accounting practice and legislation have existed as a compromise between different opinions and concepts of suitable accounting rules. Pirinen (1996) states in his study of the accounting legislation reform of 1992 (1572/1992) that while one camp wanted to maintain the traditions of Finnish accounting, another camp preferred the inclusion of international aspects into Finnish accounting legislation. In addition, Näsi's (1990) study implies that the expenditure-revenue theory was not accepted, or "internalised", by all Finnish accounting professionals, when the question of whether to include the theory into the Finnish Accounting Act (655/1973) was under active discussion. The discussions of accounting professionals cannot be undervalued, because a profession is often perceived as a factor that shapes the development of accounting locally<sup>4</sup>. From the viewpoint of discussions, it is also possible to make critical and/or

<sup>1</sup> In separate financial statements and in financial statements of non-listed companies, reporting in compliance with the IFRSs is voluntary. If public corporations do not have to prepare consolidated financial statements, they nevertheless have to prepare their separate financial statements according to the IFRSs.

<sup>2</sup> On the other hand, it may no longer be relevant to discuss continental and Anglo-Saxon accounting systems, since other differentiators are emerging in financial reporting systems. Sellhorn and Gornik-Tomaszewski (2006) have stated that the degree of public accountability to outside investors (the public/private criterion) is becoming more important when different accounting systems are analysed, whereas legal systems and culture remain less important. The second differentiator is the distinction between consolidated and individual financial statements, since consolidated accounting is becoming more uniform between countries, whereas intra-national differences exist in individual accounting.

<sup>3</sup> It has to be remembered that because accounting concepts, thoughts and ideas undergo diffusion through space and with time, the accounting culture of a particular nation is generally the product of different ideas accumulated from different places through different times (Carnegie & Napier 2002). Accounting is always, to some extent, international.

**<sup>4</sup>** As examples, Borbély and Evans (2006) emphasise the role of professionals in the development of accounting thought. The attitude of the profession has been one of the impediments slowing down the development of Hungarian accounting; in addition to the close connection between accounting and taxation. Delvaille, Ebbers and Saccon (2005) state that the profession has an influence on the development of accounting.

interpretive accounting research in financial accounting issues, something that, for instance, Armstrong (2008) and Hopwood (2000) have called for.

In 1973 Finnish accounting legislation remained extremely Finnish, largely because the new Accounting Act of 1973 (655/1973) was based on the expenditure-revenue theory devised by Martti Saario. In subsequent years Finnish business life became more international than it had been in the 1970s and 1980s. The collapse of the Soviet Union at the end of the 1980s led to the closer political integration of Finland into Western Europe, and Finland joined the EU in 1995. Finnish accounting legislation was affected by the consequent economic and political internationalisation. (Pirinen 2005.) As a result of Finnish membership of the EU, Finland's accounting legislation has followed the relevant EU directives, which were incorporated into the Finnish Accounting Act in 1992 and 1997. A true and fair view became the overriding rule in the accounting legislation in 1992. Thus, the period from 1973 to 2005 meant a huge step away from the purely Finnish accounting to the use of the IFRSs. The year 1973 was also remarkable from an international perspective, when the International Accounting Standards Committee (IASC) issuing the International Accounting Standards was established. For these various reasons, therefore, 1973 has been taken as the starting point for the present study. The objective of this interpretative<sup>5</sup> historical study is to generate an interpretation of the way in which Finnish financial reporting has become international, and the principal research questions are: What kind of process was involved in the internationalisation of Finnish financial reporting in 1973-2005 and how it was discussed in the professional journals?

## 2. DATA AND METHODOLOGY

In this study the main data consists of articles discussing the internationalisation of Finnish accounting legislation and practice contained in two professional journals produced for Finnish accountants in 1973–2005: Tilintarkastus (Auditing) and Tilisanomat (Accounting Gazette). The number of articles used in the present study totalled 213. Tilintarkastus and Tilisanomat are important forums for the discussion of contemporary issues in accounting by Finnish accounting professionals. Both journals include articles dealing with accounting, auditing and taxation, and they are widely read among Finnish accounting professionals, while the material published in the journals is written by researchers, specialists, auditors and representatives of corporations. The use of articles published in professional journals is intended to provide examples of discussions

<sup>5</sup> Previts, Parker and Coffman (1990a; 1990b) have distinguished between interpretive and narrative accounting historical research. Narrative historical research aims at telling a story about what has happened in a non-analytical way: broadly speaking, the events are identified. Interpretive historical research, for its part, is more analytical and more like the other social sciences: explanations are sought and scientific methods are used.

linked with the internationalisation of accounting and with reforms in accounting legislation. The following table shows the number of articles per year.



TABLE 1. The number of articles dealing with the internationalisation of financial reporting in Tilintarkastus and Tilisanomat between 1973 and 2005.

In addition to the article data, both material concerning the development of the accounting legislation and earlier research have been used, and this material has been supplemented by six interviews conducted in 2007. The interviewees were selected on the basis of their having written articles published in the journals during the period, apart from one interviewee, who had contributed none of the articles but had contributed significantly to the process of change in the field of accounting in Finland. Further material was also needed to provide crosschecks between the article data and all of the other data, and so oral history was used to provide this (see e.g. Collins & Bloom 1991). Table 2 provides outline information about the individuals interviewed.

The data analysis was based on an inductive content analysis (Tuomi & Sarajärvi 2004, 105, 107, 115). First, the article data was reduced. This meant that findings related to the aim of the research were written up as a narrative in which the content of the articles was explained year by year. Secondly, these findings were compacted into themes summing up the findings, a phase normally referred to as classifying. Separate clauses and findings in the data were not adopted as themes, but only findings that emerged repetitively. Once the themes had been worked out and the number of articles and events in the context (such as events occurring in the EU) had been

14

4

TABLE 2. Interviewee information.

Interviewee code and interview date	Interviewees' professional occupations
Interviewee 1 25.4.2007	Professor, specialist
Interviewee 2 26.4.2007	Specialist
Interviewee 3 13.6.2007	Ex-professor
Interviewee 4 18.6.2007	Specialist
Interviewee 5 19.6.2007	Specialist, ex-professor
Interviewee 6 19.6.2007	Ex-professor

examined, it was possible to distinguish four distinct periods. The final phase of the data analysis and interpretation was then that of abstraction, involving the interpretation of themes and periods en bloc. Sections 3–6 below present the four phases of the process of internationalisation of Finnish financial reporting, and, finally, the seventh section spells out the conclusions that may be drawn from the analysis.

## 3. THE FIRST PHASE – THE GROWING INTERNATIONALISATION

The first phase of internationalisation of Finnish financial reporting started in 1973 and went on till 1983. During this time, only five articles concerning the internationalisation of financial reporting were published, and hence this period may be regarded as only initial with regard to the topic under examination. Despite this, a number of interesting themes started to emerge in the articles, themes that continued in later phases, which tends to indicate their relative significance.

The starting point of this study consists of the expenditure-revenue theory constituting the theoretical base of the Accounting Act (655/1973). The expenditure-revenue theory also provided a theoretical framework for the Finnish Company Income Tax Act of 1968 (360/1968). In brief, the expenditure-revenue theory stresses the profit and loss statement, whereas the balance sheet is required only in matching expenditures. The balance sheet is kind of a store of activated expenditures awaiting to be matched into the profit and loss statement. The most important function of financial reporting is the calculation of profit. The expenditure-revenue theory stresses prudence and historical costs in valuation, and a close linkage between the profit and loss statement and taxation. The profit and loss statement was in fact a calculation made for taxation purposes. (Lehtovuori 1972; Kettunen 1993; Majala 1994, 71–73; Lukka & Pihlanto 1994; Virtanen 2007, 72–73.) In Saario's opinion, accounting based on the balance sheet equation and the calculation of assets and debts was inadequate, and he considered that the calculation of an income was the most important function of financial reporting. Emphasising the profit and loss statement was a

dynamic approach compared with the static balance sheet approach that held sway in Finland in the 1940s and 1950s. (Virtanen 2007, 72-73.) <sup>6</sup>

In the 1970s emerged discussions about the harmonisation of accounting practices between the Nordic countries, but it was finally decided that it was neither possible nor necessary to bring about a convergence of Nordic accounting legislation (Majala 1994, 75; Pirinen 1996, 25; The government proposal to parliament concerning new accounting legislation. Parliamentary sessions of 1972, No 120). Thus, the supporters of the expenditure-revenue theory defeated the supporters of the legislation aimed at a convergence of Nordic accounting (Majala 1994, 75–76). Internationalism in the field had already come under discussion in the 1970s, while the new Accounting Act of 1973 (655/1973) was under construction, but to achieve harmonisation of accounting internationally was considered to be too difficult (The report of the law committee No 4 concerning the government proposal for the new accounting legislation. Parliamentary sessions of 1973).

One of the underlying factors of the new Accounting Act of 1973 (655/1973) was that the financial markets were not regarded as effective. It was argued that capital was not moving efficiently and, in consequence, company equities remained scarce. One of the reasons for such inefficiency was the tax legislation, since the taxation was not applied equally to equity claims and liabilities. Hence, the accounting legislation reform aimed at improving the information contained in financial statements so that the financial markets could develop. Taxation at that time was closely linked to financial reporting so that the deductible items in taxation should also be presented in financial statements, something that is also the case nowadays. The tax rates were considerably higher before the tax reform of 1992: they could be as high as 40 per cent. (Virtanen 2007, 76, 78–79.) Finnish taxation practice was one reason for the expenditure-revenue theory receiving strong support (Näsi 1990, 188).

"He (Saario) had income calculation in mind. He considered that it was not worth paying too much tax. He termed fiscal administration a 'fiscus'. It was important that too large an income should not be reported, and hence excessively high taxes needed to be avoided. He possessed an almost emotional attitude to taxes and the 'fiscus'. In his opinion, the state steals the money of the entrepreneur." (Interviewee 6)

Martti Saario was a strong and charismatic individual. This was another reason why the expenditure-revenue theory gained such a position in Finnish accounting. It must be acknowledged, however, that the theory did not receive support from every Finnish accounting professional, and the theory came in for considerable criticism (Näsi 1990).

"He (Saario) was quite jovial when he was older but he was also very outspoken. My older colleagues, who either enjoyed or suffered from his teaching, have said that he was devilish when he was younger, but maybe age made him more genial ... I think that it was a case of brainwashing when the expenditure-revenue theory was introduced by him to students in the first year of studying accounting." (Interviewee 6)

The expenditure-revenue theory enjoyed a strong position in Finland in the 1970s, and at that time it was the answer to capital market demands, since the fast development of globalisation had not yet started in Finland. The theory was suitable for its own time.

During the first period there were only five articles in the data discussing the internationalisation of the Finnish financial reporting. It is, however, striking that a desire for internationalisation was already being expressed by some chartered accountants. The Finnish style of financial reporting was criticised and this theme is named as *criticism of Finnish financial reporting*. Information about the IASC soon came to the attention, in 1974, of Finnish accounting professionals. A noteworthy detail is that chartered accountants started to emphasise their role as developers of Finnish accounting practice. In addition, the fact that the Finnish Institute of Authorised Public Accountants joined the IASC in 1976 says a lot about the interest of chartered accountants in developing a more international Finnish accounting practice (see also Pirinen 2005). This particular theme was referred to as *emphasising auditors' know-how*. *Optimism* was expressed concerning a rapid harmonisation of financial reporting and it was believed that the harmonisation of accounting practices could come about quite swiftly. The themes discussed during the first period are presented in the following table.

TABLE 3. Themes discussed during the first period.

Theme	Quotes
Criticism of Finnish financial reporting.	"Even if Finnish accounting practice has clearly developed in recent times, we still have a lot of accounting practices that are unacceptable. We need to admit frankly that the concept of good accounting practice is too free and loosely-defined." (Helenius 1977:6 Au.)
Emphasising auditors' know-how.	"The KHT-yhdistys cannot exist outside the framework of international developments in harmonisation." (Koskelainen 1977:1 Au.)
Optimism.	"It is evident that in the next few years the harmonisation process will start to bear concrete results. These results are already on the horizon and the pace is accelerating." (Helenius 1977:6 Au.)

If the new Accounting Act (655/1973) had been passed in Finland later than in 1973, the content of the accounting legislation might have been more international, since the IASC standards might then have become more influential in the legislation process. This can be deduced, because internationality had already become a topic in discussions amongst Finnish accountants in the 1970s, immediately following the establishment of the IASC. In addition, the fact that internationality was under discussion when the contents of the Accounting Act of 1973 (655/1973) were being planned gives support to this interpretation. According to Virtanen (2005), the first phase in the process through which the IFRSs became rooted in Finland started in 1976, when the Finnish Institute of Authorised Public Accountants joined the IASC. The influence of the IFRSs started to take effect in Finland as a result of the actions of chartered accountants. However, during the first period no changes were made to accounting legislation that could be interpreted as part of the internationalisation of financial reporting, although the Institute of Chartered Accountants issued a statement according to which depreciations should be based on a scripted plan. This statement was based on IAS 4. (Haglund 1984: 1 Au.) During the first period, the internationalisation of financial reporting went on mostly in the minds of some accounting professionals.

## 4. THE SECOND PERIOD – THE FIRST APPEARANCE OF THE IASS

The incipient and emerging situation changed essentially in 1984, as a result of which the change could be interpreted as the start of a new era. As many as five articles about the internationalisation of financial reporting were published in Tilintarkastus in 1984, whereas in 1981–1983 none at all appeared in either journal. If the number of articles is considered in light of the broader picture, 1984 may be considered a clear turning point, and during the second period, which lasted until the turn of the 1990s, the discussion became very lively in the pages of both Tilintarkastus and Tilisanomat.

The larger Finnish corporations started to raise financing in the foreign markets in the 1980s. As a result, their secondary financial statements were prepared increasingly in compliance with the IASs or US GAAP. (Blomquist 1987:6 Au; Räty 1988:3 Ac; Tuominen 1989:6 Au; Hyytiäinen 1990:2 Au.) By 1987 nine listed Finnish corporations presented financial statements in their annual reports according to the IASs, in addition to their usual Finnish financial reporting, and one Finnish company prepared its financial statements according to the US GAAP (Blomquist 1987:6 Au). Then, in the mid-1980s, the auditors and directors of some of the larger corporations started to criticise vehemently the normal Finnish accounting practice and legislation because they considered that the Finnish financial statements were generally prepared from the perspective of taxation. According to the contemporary critique, financial statements did not provide a true and fair view of the financial performance because the linkage between accounting and taxation was

too close. The real profit remained unreported, said the critics. Poor profits were seen as an obstacle to receiving equity from outside investors, and the flexible depreciation system also came in for criticism. (See also Pirinen 1996.) Thus, the question of getting equity was again under discussion, but the context surrounding accounting legislation had changed.

The criticism gradually led to action. A working group focusing on reform of the Accounting Act was set up in 1989. Its purpose was to change accounting legislation so that secondary financial statements would no longer be required. Initially, the IASs were regarded as guidelines for the reform, but then the fourth and seventh EU directives began to play a more important role in the reform process. Finland intended to become a member state of the EU and in consequence the implementation of the EU directives became necessary. (Räty 1998:2 Ac.) The international issues came under discussion on the Accounting Board in the mid-1980s.

"I was an assistant secretary on the Accounting Board from 1978 on.... The work of the Accounting Board changed in the 1980s so that there was a lot to do with accounting legislation and financial reporting practices. In Finland the EU directives became part of the debate in the 1980s... and the international aspect became part of my work at the same time... and the EU and the IASs formed a part of my job. In the mid-1980s the IASs came under discussion, when it was mainly a question of the larger, listed corporations - corporations that were listed on the London Stock Exchange, for instance. They started to prepare their secondary financial statements according to the IAS regulations at the end of the 1980s. The cat was really out of the bag at the stage of the committee discussions of accounting legislation reform in 1989.... The committee included some powerful voices representing the large, listed corporations. It soon became very apparent that the differences between Finnish accounting practices and those of the IAS would need to be eliminated. This was the way in which the dilemma could have been overcome in which two separate financial reports were prepared. That was the hope. I think we started with a "clean slate" when we started to consider the issues involved.... But when the committee work started in 1989, the ETA negotiations were also underway. Even so, it became clear that we were not in a position to define for ourselves the direction in which we would move with our accounting legislation: it was the EU directives that would prevail." (Interviewee 4)

The committee was chaired by Bror Wahlroos, who was a strong personality and represented the interests of the large corporations very powerfully.

"Bror Wahlroos (the head of the accounting legislation reform committee) was a very strong personality. He stressed that we had to choose the international route... he was like

a steam-engine: he was pulling the sledge at full speed, and he could see that it was beneficial for Finland." (Interviewee 3)

Criticism began to emerge in 1985 of the internationalisation of financial reporting practices. Some authors tried to defend Finnish accounting traditions against the ongoing internationalisation, especially against the introduction of the IASs. Saario's expenditure-revenue theory was often used as a weapon in these debates. Its logic was used as an argument against the IASs, which were not based on any specific theory. The counterblow would not have emerged if the Finnish accounting traditions had not been regarded as under a threat. Accountants in Finland seemed to be divided into two groups that argued over the direction in which Finnish accounting practice should be developed. One group, consisting mainly of chartered accountants and managers of big corporations, wanted to develop Finnish accounting practice in the direction of the IASs, while the other group preferred to keep accounting practices as Finnish as possible. (See also Pirinen 1996.)

In contrast to this account, however, Interviewee 1 reported that there was no general fight going on, but there were simply a few writers and other individuals who happened to be extremely critical of the international issues in the Finnish accounting system. Generally, the struggle was a search for compromises between domestic and international, and local and supra-local issues. Based on the interviews, it can be concluded that the expenditure-revenue theory had – and still has – some passionate supporters in Finland. This is one of the reasons for the existence of some very critical writings about the internationalisation of Finnish accounting as well as some that are very supportive of the expenditure-revenue theory. The financial manager of Nokia criticised the expenditure-revenue theory by saying that it was too schematic and internationally unknown (Haavisto 1984:6 Au). On the other hand, Professor Pertti Kettunen (1988:5 Ac) wrote that the same theory was well defined and that it was also valuable from an international point of view. Whether there was a big fight going on at the time depends on the perspective from which the issue is viewed. A big fight would simply have meant that some very powerful opinions were being expressed.

"I thought in the 1980s that we should not give up our own system, and that internationality would not relate to all Finnish corporations. Most of the corporations were then functioning only within Finland and in the domestic markets.... When I was on the committee for accounting legislation reform, I thought that this internationality was going to be very complicated, but it turned out to be very important, which is why we went along with it (including international aspects in the Finnish accounting legislation).... Dissenting opinions did not emerge, and all of the committee members accepted it. But, even so, there were endless discussions and debates." (Interviewee 3)

During the second period, a sustained criticism of Finnish financial reporting and Finnish financial statements began to appear in the data. This theme has been classified as criticism of Finnish financial reporting. It tended to appear in the articles in the form of a critical listing of the "black spots" in Finnish financial statements. Many of the articles published at that time consisted almost entirely of lists of the problems inherent in Finnish financial accounting practice. The expenditure-revenue theory was criticised under this theme: "A Finnish profit and loss statement is too much prepared for taxation purposes in mind, and Finnish financial statements are based on the expenditure-revenue theory, which is not well-known internationally. In addition, it is too formal and stiff." (Haavisto 1984:6 Au). This theme also found expression in a very colourful way of arguing and writing. The articles aimed at influencing Finnish accounting legislation, but because of the strong criticism of Finnish financial reporting that it occasioned, a counterblow was also launched against an internationalisation of accounting. The defenders of Finnish accounting traditions began arguing in defence of Finnish accounting and against excessive internationalisation. This theme has been labelled criticism of internationalisation. In this a vivid and persuasive style of language was also observable. The expenditure-revenue theory was regarded as worth saving. Accounting professionals seemed to be polarised into two contrasting camps. Optimism as a theme, which emerged also during the first period, continued in the second period for a while. Writers believed that accounting harmonisation would happen quite fast if there existed a favourable attitude. A fourth theme was unclarity of internationality. Internationality in financial reporting was often regarded as a better option than sticking to Finnish accounting. However, it was not always so clear what 'international' in accounting, after all, meant. A fifth theme, then, was emphasising the know-how of auditors. The role of auditors was regarded as important in the process of accounting harmonisation. This theme was also present during the first period.

During the second period, the theme of the *polarisation of large and smaller companies* emerged. This theme found expression in the conclusion that the internationalisation process concerned only large corporations and, in consequence, few of the Finnish companies. The discussion of the direction in which accounting legislation should be developed was indeed present, but it was also pointed out that there were quite different financial reporting practices used in the various different companies. Optimism over rapid harmonisation continued during the second period for a while, but by the end of the period optimism had undoubtedly started to disappear. Therefore, one theme to emerge during the second period was the *disappearance of optimism*. Table 4 shows the themes detected during the second period.

During the second period the IASs tried to construct themselves within Finnish financial reporting, but this progress was interrupted when Finland started to turn towards the EU. This indicates that decisions made with regard to the development of accounting were no longer a local matter. Rather, the second period was one of an active discussion. The opinions and con-

TABLE 4. Themes discussed during the second period.

Theme	Quotes
Criticism of Finnish financial reporting.	"It is very difficult to get foreigners to understand Finnish accounting practice. It would be easier to prepare financial statements according to international rules." (Helenius 1984:1 Au.) "In some cases missing legislation has imposed excessively manipulative solutions on financial statements, of a kind that remind us of the Wild West. We can't allow this kind of manipulative practice any more." (Hallbäck 1986:1 Au.) We are remote from the financial reporting demand of more developed countries vis-à-vis the financial information requirements of the stock markets. We are also remote from Swedish and Anglo-Saxon accounting practices. (Haglund 1986:1 Au.)
Criticism of internationalisation.	"Since the theoretical foundation of Anglo-Saxon accounting is very thin, it is no wonder that in the USA and in the UK much more detailed instruction: about how to do accounting are needed." (Prepula 1986:6 Au.)  "The IAS is like a 1000-page cookery-book containing a myriad of recipes." (Väyrynen 1990:1 Ac.)  "The IAS is a patchwork where you can sew your own patch if you shout with a loud enough voice." (Väyrynen 1990:1 Ac.)
Optimism.	"It seems that the inclination to develop financial reporting practice and financial information exists. (Haavisto 1984:6 Au.)
Unclarity of internationality.	"In fact, there is not a practice of international financial reporting." (Viljanen 1987:6 Au.)
Emphasising the know-how of auditors.	"One of the tasks of auditors is to supervise the reliability of financial information. I'm worried if even auditors cannot ensure that every company's information is reliable and comparable." (Haglund 1986:1 Au.)
Polarisation of large and smaller companies.	"A small business in Nastola (a small Finnish town) does not need financial reports prepared according to the international accounting principles, not even in the next millennium." (Väyrynen 1990:1 Ac.)
Disappearance of optimism.	"In response to the question of whether the harmonising project will continue on the basis of the IASs, Eero Prepula says: No. The IASs, now that the are tightening things up, would mean that every country would have to accept the accounting principles of the Anglo-Saxon world, and that is not going to happen! The Germans won't accept that, nor will the Japanese." (Väyrynen 1990:1 Ac.) "The context of financial reporting is quite differentiated globally. It is not realistic to aim at producing financial statements with the same content globally." (Räty 1988:3 Ac.)

cepts held by accounting professionals seem to have differed a lot. Theses and antitheses concerning the internationalisation of financial reporting found expression. In the course of this second period changes were made to the accounting legislation that could be interpreted as a part of the process of internationalisation. For example, the regulation of depreciation according to plan was included in the Accounting Order and the concept of true and fair view was included in the Criminal Code (1889/39). (The Government Proposal concerning the Reform of the Accounting Act, the 11<sup>th</sup> and 12<sup>th</sup> chapter of the Companies Act and The Cooperative Act 111/1992).

## 5. THE THIRD PERIOD – THE DOMINANCE OF EU DIRECTIVES

"At the end of the 1980s I became acquainted with the IASs. On the Accounting Board they were under constant discussion. By the start of the 1990s it was obvious that Finland was going to integrate into the global economy. We joined the EU a few years later." (Interviewee 3)

The third period started at the turn of the 1990s and went on until the mid-1990s. During this period the IASs were no longer discussed so frequently in the pages of Tilintarkastus and Tilisanomat, where the discussion was concentrating, instead, on the EU directives.

The Accounting Act was reformed in 1992 (1572/1992). It was a legislative reform that maintained the expenditure-revenue theory as its theoretical basis.

"The proposal does not bring any change to the fact that the expenditure-revenue theory forms the basis of the Accounting Act, but the proposals that have been made, are based on the old theoretical foundation." (The government proposal concerning the reform of the Accounting Act, the 11<sup>th</sup> and 12<sup>th</sup> chapter of the Companies Act and the Cooperative Act 111/1992)

"The starting point for bookkeeping and financial reporting is the calculation of income. The prevailing expenditure-revenue theory forms the basis of the legislation. A logical, consistent, realistic, straightforward, and theoretical model will assist in the finding of solutions to practical problems. The theory used as the basis of the legislation will simplify and improve the construction of concepts." (The government proposal concerning the reform of the Accounting Act, the 11<sup>th</sup> and 12<sup>th</sup> chapter of the Companies Act and the Cooperative Act 111/1992)

The reform of the Accounting Act of 1992 (1572/1992) not only maintained some of the traditional Finnish features but also included certain international aspects. The reform of 1992 can be inter-

preted as a synthesis of these two lines. Pirinen's (1996) study also demonstrates that, of the accounting camps, nobody "won" and nobody "lost": the new legislation was a compromise. Immediately after the publication of the reform proposal, there was some expressions of dissatisfaction with it. It was regarded as too cautious and conservative by some, while others thought that it was good precisely because it maintained Finnish traditions. This says a lot about the polarisation of Finnish accountants into their different camps.

The situation in Finland was not immediately stabilised after the reform of 1992. The Commission of the European Union issued a clarification of the differences between the Finnish accounting legislation and the requirements of the directives. According to this report, the EU directives had not been completely incorporated into the Finnish accounting legislation, and so, in 1995, a new committee on accounting legislation reform was set up. Its express task was to explore ways in which accounting legislation should be further developed so that all of the requirements of the EU directives could be included in the Finnish law. (Räty 1998:2 Ac.)

The EU directives came into the discussion as an important theme during the third period. They were regarded as the most important guidelines in the accounting harmonisation project. The reform proposal and the final reform of the accounting legislation of 1992 (1572/1992) formed another very important issue as a theme referred to as the reform of accounting legislation of 1992. This theme had three aspects. The first consisted of the expression of satisfaction with the moderation of the reform. Supporters of the traditions of Finnish accounting were pleased because the reform was moderate and because it maintained the expenditure-revenue theory as the basis of Finnish accounting legislation. Secondly, strong dissatisfaction was also expressed vis-à-vis the moderation of the reform: some accounting professionals would have preferred a more radical reform. Thirdly, the theme of the reform proposal and the final reform had been made transparent, with the result that the contents of the reformed legislation could be examined in the articles. In addition, what was meant by a "true and fair view" came under discussion. Within this theme it was occasionally stated that there had recently been numerous changes in the legislation that would involve smaller companies in a large amount of work if they were going to attempt to keep track of developments. The third theme during the third period was, then, the need for a new Accounting Act caused by the EU announcement that the reform had been incomplete. Not all of the requirements of the EU directives had been implemented in the reform of 1992. The fourth theme is classified as the criticism of internationalisation that had also come into existence during the second period. The discussion for and against the Finnish traditions and international aspects of accounting continued throughout the third period. The following table shows the themes that came under discussion during the third period.

TABLE 5. Themes discussed during the third period.

Theme	Quotes
EU directives.	"The EU directives will be important when the Accounting Act is renewed." (Haglund 1991:2 Au.) "Even if we could not have influenced the content of EU directives, we have to be in the front line when these directives are implemented. We cannot miss this train." (Saari 1989:2 Au.)
Reform of accounting legislation.	"We could have taken a few further steps." (Haglund 1991:2 Au.) "The committee set up a calm, EU-based examination where the various needs of different companies were taken into account." (Partanen 1990:5 Ac.)
Need for a new Accounting Act.	"When the reform of accounting legislation remains insufficient, it is a risk that further reform is needed, he says" (Jarmo Leppiniemi). "A reform conducted in a single stroke would be better, because we know that our financial reporting practice should be developed so that it will resemble that of other countries." (Väyrynen 1992:3 Ac.)
Criticism of internationalisation.	"In Finland accounting has a good theoretical base.  Expenditures, revenues and money items form a well-defined starting-point for accounting. This is better than in many other countries or cultures." (Kettunen 1991:1 Au.)

The reform of the Accounting Act of 1992 (1572/1992) represents a large step in the internationalisation of Finnish financial accounting (see e.g. Troberg 1992). According to Virtanen (2005), the second phase, in which the IASs/IFRSs took root in Finland, started in the 1990s, when Finnish accounting legislation started to undergo a significant change. Despite this, the reform also represented the continued existence of domestic accounting ideas, since the status of the expenditure-revenue theory remained in the accounting legislation.

# 6. THE FOURTH PERIOD - THE SECOND COMING OF THE IFRSs

The fourth period of internationalisation Finnish financial reporting started in the mid-1990s and continued up to the end of the research period. During this period the IASs/IFRSs re-entered the discussion, while the role and the meaning of the EU directives declined.

The year 1995 proved remarkable in the harmonisation politics of the EU. The Commission stated that the existing accounting rules based on the directives did not meet the requirements of those preparing financial statements, nor those of the users of accounts or of the standard setters. Instead of revising the directives or setting up an institution to formulate European standards, the Commission decided to participate in the creation of internationally accepted standards of ac-

counting with the co-operation of the IASC. (Haller 2002.) In 2000 the IOSCO (International Organisation of Securities Commissions) had recommended that its members should use the IASS in cross-border offers and listings. This meant that the work of the IASC was accepted internationally. During the same year the European Commission announced its intention to require International Accounting Standards for use in drawing up the group accounts of all corporations listed at stock exchanges within the European Union from the beginning of 2005. In 2003 this proposal was formally approved. (Whittington 2005.) From 2005 on, listed corporations in the European Union have been required to publish their consolidated annual financial statements to be in accordance with International Accounting Standards and/or International Financial Reporting Standards (IAS/IFRS).

In Finland, the reform process of the Finnish accounting legislation continued in 1997, when the new Accounting Act (1336/1997) was passed. In this reform the EU directives were fully implemented in the Finnish accounting legislation. According to Interviewee 1, the actual internationalisation happened in 1997, and after this reform the expenditure-revenue theory no longer officially formed the theoretical base of the Accounting Act. "The good old expenditure-revenue theory has withdrawn as a result of European influences" (Rekola-Nieminen 1997:5 Ac). In the report of 1996 issued by the committee of the accounting legislation reform it was concluded that

"The expenditure-revenue theory can be maintained in explaining book-keeping and calculating income. But not all of the principles of the theory can always be used, because international principles and directives may demand deviations." (The 1995 report of the reform committee of the Accounting Act, 41)

In the proposal for the new Accounting Act of 1997 it was stated that:

"The primary aim of this proposal is to implement the demands of the EU directives. The aim is that financial information is convergent and comparable. Financial reports issued by Finnish companies have to correspond to the requirements of foreign users." (The government proposal concerning the reform of the Accounting Act, the 11<sup>th</sup> and 12<sup>th</sup> chapter of the Companies Act and the 79c§ of the Cooperative Act 173/1997)

The Accounting Act was reformed once more in 2004 (The 2004 reform of Accounting Act 1304/2004), when the use of the IASs/IFRSs was included in the national legislation, and their use also became possible for non-listed corporations. In addition, many details in the Accounting Act were changed to comply with the IASs/IFRSs. For instance, cash flow statements now became a part of financial reports, and the activation of foundation and research expenses was prohibited. The use of the IASs/IFRSs was regarded as a good option in the new millennium:

"Information that is based on the IASs improves financial reporting. In addition, interest groups reduce the risk premium linked to the credibility of financial information. The profit requirements of creditors also lessen. On a social level, economic activity will start to grow." (The government proposal concerning the reform of the Accounting Act and some laws connected to accounting legislation 126/2004)

During the fourth period the published articles show that the EU directives were no longer regarded as appropriate for the harmonisation of accounting. This finds expression in the theme of farewell to EU directives. In their place, the IFRSs were now regarded as more important as a result of EU harmonisation policies. The accounting legislation reforms, the new Accounting Act of 1997 (1336/1997), and the reform of the Accounting Act of 2004 (1304/2004) were discussed as a theme referred to as accounting legislation reforms in 1997 and in 2004, and the meaning and content of true and fair view was under discussion. At the start of the fourth period it seemed that the true and fair view had not yet become a part of Finnish financial reporting because its meaning remained unclear. However, by the end of the fourth period this was no longer the case: it seemed to have become a well-integrated component of Finnish accounting. During this period the expenditure-revenue theory constituted a clear theme. It seems that as the demands to change accounting legislation drew closer there also emerged discussions over the excellence of this particular theory. On the other hand, when the actual content of the new Accounting Act (1336/1997) became clear it was claimed that the good old theory had had to retreat under the impact of international pressures. The discussion of the expenditure-revenue theory was both positive but also, in part, negative. Linked to this theme, the criticism of internationalisation of accounting again became a distinctive theme during the fourth period. This theme was linked to the accounting legislation changes and the approaching use of the IFRSs.

The IFRSs became a major theme of the fourth period. It had many dimensions. First, when the first step towards the introduction of the IFRSs was taken, the task of the accounting professionals was to convince everyone that the chosen direction was a rational one. In consequence, these articles were not as dramatic and colourful in style as those published about the IFRSs during the second period. This theme has been labelled the meaning of the IFRSs. Another theme was also connected with the IFRSs: the content and demanding nature of the IFRSs. This one includes articles where the contents of the IFRSs were taught to the readers of the professional journals. They emphasise the complex and difficult nature of the IFRSs and the fact that the IFRSs would require a considerable amount of expertise. Very often, they emphasise that the role of auditors is important in the process of training Finnish accounting professionals to use the IFRSs. This theme includes also writings that claim that the use of the IFRSs would mean a huge leap into a brand-new world of accounting. Linked with this theme, it was again stressed that the use

of the IFRSs would mean that two different accounting worlds would emerge between the listed companies and the SMEs under the theme of *polarisation of large and smaller companies*.

TABLE 6. Themes discussed during the fourth period.

Theme	Quotes
Farewell to EU directives.	"The road of the EU directives has wandered to its end. (Mönkäre 2002:4 Au.)
Accounting legislation reforms in 1997 and 2004.	"The new Accounting Act is coming – Are you ready?" (Riistama 1997:6 Ac.)
True and fair view.	"It is striking that even if the concept of true and fair view has not been rejected in the past few centuries, it has still not been able to generate an unambiguous definition of itself." (Riistama 1996:1 Au.)
Expenditure-revenue theory.	"If the expenditure-revenue theory had been developed in a large country within the EU, the situation of this theory would be different. Professor Saario knew that his theory was the best. He strongly criticised American accounting thought and said that we had a much better theory than the Americans did, even if they did not know that themselves. Foreign accounting researchers have recently been very enthusiastic about Saario's ideas." (Pihlanto 2003:5 Au.)
Criticism of internationalisation.	"The heaviest book has emerged from a publishing house. In future, the bestseller of bookkeepers will be a translation of the IAS standards – a 1400-page monster. Numerous consultants have said that this has been the biggest change in bookkeeping in the past 30 years. Well, at least it is king-sized." (Vahtera 2001:6 Ac.)
The meaning of the IFRSs.	"The use of IAS standards in Finnish accounting practice is welcome because it places enterprises on the same starting line and makes financial reports both comparable and interesting for the purposes of investors." (Riihimäki 2001:7 Au.)
The contents and demanding nature of the IFRSs.	"Bringing IAS 36 into a financial department is a revolution. The old rules are no longer valid and the tools used to achieve aims are unknown to the bookkeeper." (Blumme 2002:3 Au.)
Polarisation of large and smaller companies.	Applying the IFRSs is not sensible or useful in the case of small businesses. (Horsmanheimo 2003:6 Au.)

Following the fourth period the expenditure-revenue theory, the EU directives, and the IFRSs were now all, at least to some extent, present in the Finnish financial reporting vis-à-vis the reformed accounting rules. In the course of the fourth phase, Finnish accounting had become far more internationalised in relation to accounting rules, which meant that both the EU directives

and the IFRSs were now an integral part of the accounting rules. The fact that listed companies used the IFRSs is a very visible sign of the internationalisation of Finnish financial reporting. The article data also shows that the attitudes of Finnish accounting professionals had become quite diverse with regard to the internationalisation of accounting, and hence it may justly be claimed that the psychological atmosphere was by no means uniform.

## 7. CONCLUSIONS

The period from the 1970s to the late-1980s appears to constitute a free phase in the internationalisation of Finnish financial reporting. The situation prevailing prior to the important year of 1973 indicates that Finnish accounting legislation and practice could potentially have taken any one of many directions. But at the level of regulation, only one direction could have been chosen even if the ensuing discussion reveals many shades of opinions. In 1973 the supporters of the expenditure-revenue theory overcame the supporters of Nordic accounting harmonisation. The Finnish direction was chosen. Market forces and taxation questions also had an influence on the decision to use the expenditure-revenue theory. If the passing of the new Accounting Act (655/1973) had happened later than 1973, the content of the legislation might have been more international. The Accounting Act (655/1973) would not necessarily have been based on the expenditure-revenue theory, because the theory had also come in for negative criticism of its own (Näsi 1990) and the impact of the IASC might have had an influence on the contents of the legislation, as the emerging internationalisation of the first phase seems to show. Market forces later persuaded Finnish listed companies to start preparing parallel financial statements aimed at listings on foreign stock exchanges. Prior to the Finnish decision to join the EU, free choices were possible. The lively discussion ongoing between 1984 and the end of the decade is an indication that individuals seemed to recognise that by participating actively and convincingly in the discussion they would be able to influence the future direction of Finnish accounting practice.

The situation changed after the collapse of the Soviet Union and once the prospect of Finland's joining the EU had become topical. Thereafter, Finland had no real options concerning the direction it could take as far as its accounting legislation was concerned. The influence of the EU directives and the IASs/IFRSs could not be avoided but the pace of internationalisation was slowed by some individuals arguing strongly on behalf of the expenditure-revenue theory and Finnish accounting traditions. Immediately after the reform of the Accounting Act in 1992 (1572/1992) it was realised that the EU directives had not been fully implemented in the Finnish accounting legislation and the new Accounting Act (1336/1997) passed in 1997. The fact that the expenditure-revenue theory remained as the theoretical basis of the Accounting Act in the reform of 1992 indicates that the resistance to internationalisation was powerful. Without such resistance, the

expenditure-revenue theory would have faded away as early as in 1992. In the Accounting Act of 1997 (1336/1997) a real element of internationalisation became a part of the Finnish accounting legislation, and the expenditure-revenue theory was officially rejected. Later in the new millennium, as a member of the EU, Finland, along with other European nations, adopted the IASs/IFRSs. There were no longer any free choices to be made at the level of regulation and practice. It is possible that the outcome of accounting harmonisation in many other countries belonging to the continental accounting cluster has been similar to that in Finland, but the differences have been in a process in which the situation inevitably changes.

On the other hand, financial accounting does not consist solely of legislation and practice but also of opinions and thoughts, all of which mean that accounting professionals can continue to think freely in spite of what exists in law. Finnish accounting professionals hold diverse opinions and ideas about financial reporting issues because the discussion remains polarised even in the new millennium. Ideas that accounting professionals regard as good in financial reporting may not be visible in the legislation. The expenditure-revenue theory is still somehow alive because it was still under discussion, both in negative and positive ways, after 2000, and the discussion, even with its negative shades, proves that, in some ways, the theory has not completely disappeared.

Between 1973 and 2005 Finnish financial reporting has become highly international. The use of the IASs/IFRSs means that a huge step forward has been taken towards an international way of working. This could be interpreted as explicit internationalisation, since this kind of development can easily be observed. Even small changes in the accounting legislation may relate to the process of internationalisation, at least as an implicit internationalisation, since they may not always be easily remembered or seen in the everyday practice of accounting. The demand for a true and fair view, for example, is nowadays regarded as a Finnish trait in accounting even if it was in fact a new and foreign trait when the accounting legislation reform of 1992 became topical. An international issue becomes domestic in the course of time. Although Finnish financial reporting has become highly international and the method of accounting harmonisation has been selected on a global scale, local financial accounting has also been able to remain original and local in the ideas and discussions of accounting professionals. Accounting is not only a practical tool for handling financial reporting but it also has cultural and emotional ramifications for some of the accounting professionals it affects. Accounting not only reflects changes in the environment but also lives as a cultural issue in the minds of accounting professionals as a part of their financial accounting. Hence, in spite of the global convergence of accounting standards, a local form of financial accounting, in some countries, may also remain original and domestic. There may even be room for a retro style of accounting, and this may even be recommendable within some of the cultural dimensions of accounting, even though on a practical and political scale such a style is unreasonable to follow. ■

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32

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