ANALYSIS AND RESPONSES TO VERBAL COMMENT RECEIVED ON

EXPOSURE DRAFT ON ASB WORK PROGRAMME CONSULTATION 2027-2029

(ED 211)

ED 211

RESPONSES TO THE VERBAL COMMENT RECEIVED ON *EXPOSURE DRAFT ON ASB WORK PROGRAMME CONSULTATION 2027-2029* (ED 211)

The Accounting Standards Board (Board) approved an Exposure Draft requesting stakeholders to comment on the Exposure Draft on *ASB Work Programme Consultation 2027-2029* (ED 211) in October 2024. A Notice was published in the Government Gazette on 8 November 2024 (Notice 51526). The comment period closed on 14 March 2025.

The Secretariat consulted with preparers, auditors, consultants, users and other interested parties by way of roundtable and other discussions. An analysis of the consultations is included in the table on the next page.

The results of these consultations are summarised in this document and are analysed based on the questions outlined in the Invitation to Comment published by the Board, along with any general comments noted by respondents.

The summary of written comment received on ED 211 is included in a separate analysis.

VERBAL COMMENT RECEIVED ON *EXPOSURE DRAFT ON ASB WORK PROGRAMME CONSULTATION 2027-2029* (ED 211)

No.	Name/Organisation	Preparers	Users	Auditors	Other interested parties
1.	North-West Provincial Government (Departments and Public Entities)	X			X (provincial treasury)
2.	Public Sector Accounting Forum	X	X	X	X
3.	Public Sector Standing Committee of the IRBA			X	
4.	Preparers of financial statements: public entities	X			
5.	Western Cape Accounting Working Committee	X			X (provincial treasury)
6.	Preparers of financial statements: municipalities	X			
7.	Auditors and other technical specialists			X	X (consultant)
8.	Reserve Bank (Public Finance)		X		
9.	Members of the South African Institute of Government Auditors			X	X (consultant)
10.	Roundtable with various stakeholders	X		X	X (OAG, NSG)
11.	AGSA Product Champions			X	
	Other engagements[1]				
1.	SAICA – TechTalk	X	X	X	X
2.	All stakeholders	X		X	X (SAICA)

[1] The purpose of these engagements was to raise awareness of the ED, and no comments were received. The engagements are not included in the analysis.

SUMMARY AND ANALYSIS OF VERBAL COMMENT RECEIVED ON THE EXPOSURE DRAFT ON *ASB WORK PROGRAMME CONSULTATION 2027-2029*

NO.	COMMENT	SECRETARIAT'S PROPOSED RESPONSE
Question 1 **Are there any gaps in our literature?** **Are there any transactions or arrangements that require accounting guidance from the ASB?**		
1.1	**North-West Provincial Government (Departments and Public Entities)**	
1.1.1	There is uncertainty about the application of GRAP 24 *Presentation of Budget Information in Financial Statements.* For example, would a public entity's budget that is included in the budget of the relevant oversight department meet the criteria to apply GRAP 24?	The Improvements to the Standards of GRAP, 2023 clarified the question. The amendments are subject to the Minister of Finance determining the effective date. A Fact Sheet accompanies the clarifications to GRAP 24.
1.1.2	The application of the fair value model in GRAP 16 *Investment Property* is expensive. The Board should consider amending the requirements so that entities need to revalue investment properties every year. The requirements could be aligned to the frequency of revaluations in GRAP 17 *Property, Plant and Equipment.*	Entities have an accounting policy choice to subsequently measure investment property at the cost or fair value model. Where the fair value model is applied, it is considered necessary to provide users with information that fairly reflects the fair value at the reporting date. Materiality is applied. GRAP 17 requires entities to revalue assets on the revaluation model with sufficient regularity to ensure that the carrying amount does not differ materially from that which would be determined using fair value at the reporting date.
1.2	**Public Sector Accounting Forum**	
1.2.1	The possible regulation of the mSCOA AFS template is a concern. Should it go ahead, the ASB should contribute to ensure it is GRAP compliant.	The Secretariat is monitoring the possible regulation of the template. At present, there is no regulation in progress.
1.2.2	Guidance is needed on preparing the cash flow statement. It should ideally be automatically prepared from the system. There are also specific items that are difficult to deal with, e.g. the treatment of accrued interest and other reconciling items as entities are weary of preparing the cash flow statement to a balance that differs from the cash balance in the statement of financial position.	The Board reviewed the application of GRAP 2 *Cash Flow Statements* in 2020/2021. Access the Review Report on the outcomes of the review here. The Secretariat developed recordings on the application of GRAP 2 to address the questions about reconciling to the cash balance and what "cash" means in an accrual environment. See the ASB's YouTube Channel.
1.2.3	Sustainability reporting is gaining momentum. There is uncertainty among entities about whether they should be	The Secretariat will consider publishing a joint communication with the OAG on the local stance of sustainability reporting, and what entities may consider in the current environment.

NO.	COMMENT	SECRETARIAT'S PROPOSED RESPONSE
	preparing such reports, and guidance / communication on the stance in the public sector would be useful.	
1.3	**Public Sector Standing Committee of the IRBA**	
1.3.1	With the developing area of sustainability reporting, the private sector is developing guidance on disclosure of sustainability risks and other related matters in the financial statements. This may be a gap in the Standards of GRAP.	A project has been added to the indicative 3-year work programme on sustainability-related uncertainties in the financial statements. Any narrow scope amendments to IFRS Accounting Standards and IPSAS will be considered in the Improvements project. Further guidance may be developed by the Secretariat.
1.4	**Preparers of financial statements: public entities**	
1.4.1	The Fact Sheets are useful, but are sometimes difficult to find, e.g. entities are unsure where to find the Fact Sheets on GRAP 24 and GRAP 104.	Fact Sheets are available on the ASB website here. They are distinguished between effective and not yet effective, based on whether the related Standards of GRAP are effective or not yet effective. NB: the Fact Sheets themselves are not authoritative.
1.5	**Western Cape Accounting Working Committee**	
1.5.1	The Standards of GRAP address transactions that entities have, however, there are interpretation issues, especially with auditors. Disagreements exist on VAT and grants. Auditors often do not apply substance over form.	The Board previously determined it will include a project on revenue (including grants) in the work programme. The issue will be incorporated in the project. The Secretariat developed guidance on applying economic substance over legal form (available on the YouTube Channel) and will continue to raise awareness.
1.6	**Preparers of financial statements: municipalities**	
1.6.1	There are no gaps that they are aware of that needs to be addressed.	Noted.
1.7	**Auditors and other technical specialists**	
1.7.1	There is support for developing a Standard of GRAP on transfer expenses / non-exchange expenses. There is a need for guidance, especially on intergovernmental transfers.	The work on transfer expenses will commence in 2025/26 and is the last part of guidance on non-exchange expenses.
1.7.2	There is a need for guidance on accounting for water service arrangements. Auditors identified many issues with accounting for these arrangements of late. The guidance could be in the form of a Guideline or comprehensive FAQ.	The Secretariat will consider developing guidance on the lifecycle of assets, particularly infrastructure assets. The guidance could consider the funding (e.g. grants), construction and development of assets / work in progress, revaluations, depreciation and impairment. Guidance on types of arrangements will also be

NO.	COMMENT	SECRETARIAT'S PROPOSED RESPONSE
		considered. Guidance already exists for at least parts of the lifecycle, which can be incorporated into this piece of work. The need for specific guidance on water service arrangements will be discussed with the OAG.
1.8	**Reserve Bank (Public Finance)**	
1.8.1	Guidance on non-exchange expenses is supported. There are questions about whether some transactions are exchange or non-exchange.	The work on transfer expenses will commence in 2025/26 and is the last part of guidance on non-exchange expenses.
1.8.2	There is a need for information on cash flows separately from accrual information for statistical reporting purposes. It is often difficult to get the "break-down" from the financial statements as the cash flow statement does not necessarily give the required level of detail. Information on cash salaries, wages and social contributions is needed.	The Board's work programme includes a project to research the information needs of users on short term employee benefits. The Reserve Bank will be included as a stakeholder of interest in the project. The Secretariat will consider communication material to preparers on considering user needs and the specific objectives of certain Standards of GRAP when preparing financial statements.
1.9	**Members of the South African Institute of Government Auditors**	
1.9.1	Non-financial reporting: It is important that entities report on their green transition and include information on climate, natural environment, etc. in their reports. There can't be transition targets and legislation on climate change that government passes without reporting on it.	The Secretariat will consider publishing a joint communication with the OAG on the local stance of sustainability reporting, and what entities may consider in the current environment.
1.9.2	Guidance is needed on accounting for irregular expenditure and there is a need to explain to the public what it means. It needs to be demystified. Irregular expenditure does not mean that an entity does not have controls in place. There should be reporting on the value that an entity received in exchange for what they paid, instead of reporting on expenditure being irregular.	The matter will be shared with the OAG.
1.10	**Roundtable with various stakeholders**	
1.10.1	Accounting for leases is an issue. There are interpretation differences in the environment. In particular, it is difficult to know whether a lease is an operating lease or a finance	A project on leases will be added to the work programme for 2027 to 2029.

NO.	COMMENT	SECRETARIAT'S PROPOSED RESPONSE
	lease when some of the indicators are met but not all. How to apply substance over form is also unclear.	
1.11	**AGSA Product Champions**	
1.11.1	The Board should consider giving guidance on accounting for "green-type" transactions, e.g. green energy and green bonds.	A project has been added to the indicative 3-year work programme on sustainability-related uncertainties in the financial statements. Any narrow scope amendments to IFRS Accounting Standards and IPSAS will be considered in the Improvements project. Further guidance may be developed by the Secretariat.
1.11.2	Accounting for grant funding remains an issue. Guidance is needed.	The Board previously determined it will include a project on revenue (including grants) in the work programme. The issue will be incorporated in the project.
1.11.3	There is a need for information in the financial statements that can help a user assess the sustainability of an entity's service delivery activities.	The Board amended GRAP 1 to provide more guidance on assessing going concern in the public sector and to enhance the disclosure of management's going concern assessment and material uncertainties that may cast significant doubt on the entity's ability to continue as a going concern. The Minister of Finance must still determine the effective date of the amendments. The Secretariat developed a Fact Sheet that accompanies the amendments, which provides non-exhaustive guidance on events or conditions that management may consider as part of the assessment. It is important that management discloses their significant judgements, any material uncertainties, mitigating actions and which uncertainties remain
Question 2 **What international projects should the Board undertake?** **Based on the projects listed in Table 2 – which international project do you support the Board to add to the 2027 to 2029 work programme?** **Please provide supporting rationale for the proposals.**		
2.1	**North-West Provincial Government (Departments and Public Entities)**	
2.1.1	No response	N/A
2.2	**Public Sector Accounting Forum**	
2.2.1	Leases: In considering whether to take on this project, the Board should not just consider best practice internationally,	A project on leases is included for the 2027 to 2029 work programme.

NO.	COMMENT	SECRETARIAT'S PROPOSED RESPONSE
	but also whether the information would be fair presentation for lessees.	
2.2.2	Non-current assets: Measurement of non-current assets remains a challenge. The local practice is to subsequently measure these assets at the cost method, which may differ from other jurisdictions that have a practice of using current values. The cost method should be promoted as less judgement is required. We should not align with international "best practice" in this regard.	The Board's ongoing project on measurement of assets and liabilities will consider which guidance is needed locally to apply the cost and current value measurement bases. The Board's previous research on non-current assets noted that there are entities that apply the current value model for certain non-current assets and therefore the Secretariat does not propose that the Board considers eliminating the current value as an accounting policy choice. The Secretariat will consider communication material on selecting and changing accounting policies. The *Improvements to the Standards of GRAP, 2026* (to commence in 2025/26), will consider the guidance in IPSAS 45 *Property, Plant and Equipment* on infrastructure assets.
2.2.3	Non-current assets: Directive 11 on *Changes in Measurement Bases Following the Initial Adoption of Standards of GRAP* was very useful for some who did not initially understand the implications of applying the current value model on an ongoing basis. There are still other entities who did not use Directive 11 when they had the opportunity, for various reasons, but would have benefited from its application. The Board should consider extending the period that Directive 11 can be applied or reissuing it for a period.	The Board developed Directive 11 for a particular period in time. It is not considered appropriate to extend the applicability of the Directive. The Secretariat issued an FAQ on *How should an entity apply the requirements in Directive 11 retrospectively in the absence of cost records for assets on the date of adoption of the Standards of GRAP*. The Secretariat will consider communication material on selecting and changing accounting policies.
2.2.4	Presentation of information in the financial statements: the benefits of aligning with international standards should be considered, including meeting the information needs of universal users, such as the World Bank. Departing from international requirements may lead to additional reporting outside the financial statements.	A project on presentation of financial statements will be considered in the next work programme. The IPSASB has commenced a project to consider the applicability of IFRS 18 in the public sector and to explore public sector presentation options. Given the ASB's limited resources, it is more feasible to commence a local project once the IPSAS project is finalised and prioritise resources on more urgent projects in the 2027 to 2029 period.

NO.	COMMENT	SECRETARIAT'S PROPOSED RESPONSE
2.2.5	Non-current assets: Entities make errors in accounting for investment property and land on which the property is built. The application of IGRAP 18 *Recognition and Derecognition of Land* requires attention and should be improved.	The Secretariat developed a recording that explains the application of IGRAP 18, available on the ASB's YouTube channel. The Secretariat also developed FAQs on *Do land invasions affect whether an entity recognises land*? and *Should assets on land be accounted for separately from the land?* The Secretariat will consider developing further guidance for preparers in the 2025/26 year.
2.3	**Public Sector Standing Committee of the IRBA**	
2.3.1	Presentation of Financial Statements will be an important project for the public sector, which the Board should consider when feasible. Ideally the Board would develop a 100-series Standard (should the IPSASB conclude with an IPSAS that is aligned to IFRS 18 *Presentation and Disclosure in Financial Statements*).	A project on presentation of financial statements will be considered in the next work programme. The IPSASB has commenced a project to consider the applicability of IFRS 18 in the public sector and to explore public sector presentation options. Given the ASB's limited resources, it is more feasible to commence a local project once the IPSAS project is finalised and prioritise resources on more urgent projects in the 2027 to 2029 period.
2.3.2	It is agreed that IFRS 19 *Subsidiaries without Public Accountability* is not applicable to the public sector and need not be considered by the Board.	Noted.
2.4	**Preparers of financial statements: public entities**	
2.4.1	Leases: The project is supported.	A project on leases is included for the 2027 to 2029 work programme.
2.5	**Western Cape Accounting Working Committee**	
2.5.1	Leases: The project is supported. Guidance is needed on operating leases and straight-lining of the lease payments.	A project on leases is included for the 2027 to 2029 work programme.
2.5.2	Conceptual Framework: There is uncertainty about how the Conceptual Framework links with standard-level guidance and the impact of it on preparers.	The Secretariat developed guidance on the use of the Conceptual Framework in the form of FAQs and a video on the ASB YouTube Channel. A project to update the Conceptual Framework will be considered in the next work programme.

NO.	COMMENT	SECRETARIAT'S PROPOSED RESPONSE
2.6	**Preparers of financial statements: municipalities**	
2.6.1	Revenue: It is important to carefully consider how IFRS 15 *Revenue from Contracts with Customers* could apply to the public sector. For example, it does not address services in-kind, which is important for the public sector. Also, much of public sector revenue does not arise from contracts with customers.	The Board previously determined it will include a project on revenue in the work programme. The issue will be incorporated in the project.
2.7	**Auditors and other technical specialists**	
2.7.1	Leases: There is a need for guidance on concessionary leases and ideally the project should only consider the second part of the IPSASB's guidance. The Board should first research whether there is a need to amend the existing guidance on leases and changes should not be made without a need.	A project on leases is included for the 2027 to 2029 work programme.
2.7.2	There is support for doing initial work on revenue. However, it is expected that the Board will receive diverse feedback and the research may indicate that aligning with international standards is not the right answer for the local environment.	The Board previously determined it will include a project on revenue in the work programme. The issue will be incorporated in the project.
2.8	**Reserve Bank (Public Finance)**	
2.8.1	The approach to first research the environment and potential impact of aligning with international requirements is supported. This is an important step as the international requirements are developed to cater for a broad range of events and circumstances, some of which may not apply or may not be appropriate locally.	Noted.
2.9	**Members of the South African Institute of Government Auditors**	
2.9.1	A consideration for deciding whether or not to align with international requirements should be what the impact would be from a sovereign perspective. We may otherwise be criticized internationally (e.g. by donors) for not aligning. A project could be communicating publicly (in a registry or	The Secretariat will consider communication material on how the Standards of GRAP compare with the international frameworks. Each Standard of GRAP based on an international Standard contains a comparison statement. The Secretariat will also consider if the comparisons could be improved.

NO.	COMMENT	SECRETARIAT'S PROPOSED RESPONSE
	database) areas where we need to align for this reason and if we assess alignment as inappropriate, state why.	
2.10	**Roundtable with various stakeholders**	
2.10.1	As noted in response to question 1, there is an issue with distinguishing operating from finance leases. The need may not be to align with the international requirements, but rather to provide more guidance that assists entities with the classification. It may assist to linking a finance lease to ownership control. It an entity concludes it owns a leased asset, it is a finance lease.	A project on leases is included for the 2027 to 2029 work programme. The OAG developed a recording on leases, which is available on the Knowledge Hub.
2.10.2	The ASB should consider developing sustainability reporting standards. This would soon need to be implemented and considered urgent.	The Secretariat will consider publishing a joint communication with the OAG on the local stance of sustainability reporting, and what entities may consider in the current environment.
2.11	**AGSA Product Champions**	
2.11.1	An alignment project for leases is supported, for the reasons that the IASB changed the approach to leases. Extensive support would, however need to be provided to municipalities to be able to implement such a change.	A project on leases is included for the 2027 to 2029 work programme.
Question 3 **Are there any enhancements or amendments needed to the Standards of GRAP?** **In your response, provide the name of the Standard, a description of the issue and how it could be resolved.**		
3.1	**North-West Provincial Government (Departments and Public Entities)**	
3.1.1	See response to question 1.	As per response to question 1.
3.2	**Public Sector Accounting Forum**	
3.2.1	Going concern: the guidance in GRAP 1 on *Presentation of Financial Statements* refers to an entity's rights to levy rates, tariffs, service charges, etc. This does, however, not consider whether an entity is able to deliver services through its infrastructure assets to be able to earn revenue. The infrastructure assets should be in a good, working condition	The Board amended GRAP 1 to provide more guidance on assessing going concern in the public sector and to enhance the disclosure of management's going concern assessment and material uncertainties that may cast significant doubt on the entity's ability to continue as a going concern. The Minister of Finance must still determine the effective date of the amendments.

NO.	COMMENT	SECRETARIAT'S PROPOSED RESPONSE
	and be able to continue providing services in the next 12 months. If awareness could be raised earlier about entities' declining infrastructure assets, government can redirect funding earlier, to avoid entities getting into the situation of being unable to deliver services as a result of the poor condition of infrastructure asset. Many municipalities struggle with capacity and skills and are unable to adequately assess going concern and provide the required disclosures. The AGSA's report on going concern in the general report is more useful.	The Secretariat developed a Fact Sheet that accompanies the amendments, which provides non-exhaustive guidance on events or conditions that management may consider as part of the assessment. It is important that management discloses their significant judgements, any material uncertainties, mitigating actions and which uncertainties remain. The Secretariat will consider developing further material for preparers once the Minister has determined the effective date for the amendments to GRAP 1.
3.2.2	The outcomes of the Board's review of GRAP 20 on *Related Party Disclosures* should be communicated. Entities have difficulty disclosing related parties and related transactions and balances.	The Review Report on GRAP 20, communicating the outcomes of the review and next steps, is available on the ASB website here. The Secretariat published FAQs as an outcome of the review. The Standard will be amended to add guidance with the *Improvements to the Standards of GRAP, 2026*.
3.2.3	The requirements on revenue recognition in the statement of financial performance should be reconsidered as it can create a mismatch with expenses in surplus / deficit. For example, revenue received for capital expenditure creates a false surplus.	The Board previously determined it will include a project on revenue in the work programme. The issue will be incorporated in the project.
3.3	**Public Sector Standing Committee of the IRBA**	
3.3.1	The latest general report of the AGSA indicated that 81% of public entities achieved an unqualified audit. This may indicate stability reached in the application of the Standards of GRAP.	Noted.
3.4	**Preparers of financial statements: public entities**	
3.4.1	No comment.	Noted.
3.5	**Western Cape Accounting Working Committee**	
3.5.1	The issues mostly relate with audit disputes and not the requirements in the Standards themselves.	Noted.

NO.	COMMENT	SECRETARIAT'S PROPOSED RESPONSE
3.6	**Preparers of financial statements: municipalities**	
3.6.1	None that they are aware of.	Noted.
3.7	**Auditors and other technical specialists**	
3.7.1	Preparers have noted that some of the disclosure requirements are onerous and the information is not used. A useful project for the Board may be to consider all the disclosure requirements across the Standard and understand the cost (how difficult the information is to provide) and the benefit (usefulness of the information for users) to assess if some of the requirements could be eliminated.	Base on the pervasiveness of issues and capacity to undertake projects in the 2027-2029 work programme, such a project will be reconsidered in a future work programme. The Board will continue to consider the cost versus benefit of information in each project.
3.7.2	The Secretariat should consider establishing a pipeline for feedback on the material developed, where stakeholders can submit requests for content on an ongoing basis. For example, a log that is maintained on the ASB website. Stakeholders may be hesitant to share issues in public forums.	The Secretariat will share the recommendation with the OAG for the Knowledge Hub. The Knowledge Hub includes a space for registered users to openly ask questions and share their experiences. Any queries related to the application of the Standards of GRAP may also be submitted on the Knowledge Hub.
3.8	**Reserve Bank (Public Finance)**	
3.8.1	No inputs as they are not users of the Standards.	Noted.
3.9	**Members of the South African Institute of Government Auditors**	
3.9.1	No comments.	Noted.
3.10	**Roundtable with various stakeholders**	
3.10.1	There should be a programme established to assess entities' financial statements for compliance with the Standards. From there, the "real" issues can be identified on an ongoing basis. If the Standards are clear, guidance should be developed to support the application.	This is the objective of the Board's reviews of the effective Standards of GRAP. Feedback from this consultation will inform whether any reviews are necessary, and if so, which Standards.
3.10.2	The Secretariat should consider the way in which guidance is provided. The guidance often does not give a clear answer and just provides points for consideration (e.g. the FAQs).	The application of judgement and materiality is part of preparing financial statements. FAQs are intended to explain the principles but are unable to provide answers to transaction or event specific questions. The ASB communicates issues relating to

NO.	COMMENT	SECRETARIAT'S PROPOSED RESPONSE
	This is not helpful and it is difficult to apply judgement and materiality.	specific transactions or events to the OAG for consideration. The GRAP Accounting Guidelines and other material on the OAG's GRAP Knowledge Hub contain practical guidance and examples. The comment will be shared with the OAG.
3.11	**AGSA Product Champions**	
3.11.1	GRAP 109 remains an issue and guidance is needed on applying the requirements.	The Secretariat published FAQs as an outcome of the review in March 2025, and a review report communicating the findings from the review is available on the ASB website. The Secretariat is developing an Exposure Draft to amend GRAP 109 to assist stakeholders with assessing whether an arrangement is a principal-agent arrangement. The ASB, OAG and AGSA are considering whether practical guidance and examples could be developed.
3.11.2	Although there is a Guideline on *Accounting for Arrangements Undertaken in terms of the National Housing Programme,* it is not always used correctly and there remains issues.	The Secretariat will seek opportunities to raise awareness of the Housing Guideline, e.g. social media and other communication activities.
3.11.3	Accounting for grants remains an issue, especially INEP and RBIG grants related to electricity infrastructure.	The OAG issued Guidelines on accounting for INEP and RBIG grants, available on their website here. The Board previously determined it will include a project on revenue in the work programme. Any remaining issues will be considered in the project on revenue.
3.11.4	IGRAP 18: there are questions about accounting for structures on land when an entity is not the legal title deed holder of the land.	The Secretariat developed a recording that explains the application of IGRAP 18, available on the ASB's YouTube channel. The Secretariat also developed FAQs on *Do land invasions affect whether an entity recognises land*? and *Should assets on land be accounted for separately from the land?* The Secretariat will consider developing further guidance for preparers in the 2025/26 year.
3.11.5	GRAP 108 *Statutory Receivables:* There are issues with identifying statutory receivables and distinguishing a contractual arrangement from one that arises from legislation.	The Board is analysing feedback from the post-implementation review of GRAP 108 and will decide appropriate actions to address the issues identified.

NO.	COMMENT	SECRETARIAT'S PROPOSED RESPONSE
3.11.6	IFRS 17 *Insurance Contracts* is applicable in the private sector, but not in the Standards of GRAP. It is unclear when and how IFRS 17 should be considered.	The status of IFRS 17 in the GRAP Reporting Framework is explained in Directive 5 on *Determining the GRAP Reporting Framework*. See the basis for conclusions. The Secretariat developed an FAQ that explains the impact of recently issued IPSAS and IFRS Accounting Standards on the GRAP Reporting Framework.
3.11.7	Disclosure of repairs and maintenance expenses: In several instances the information is not presented per class of asset. There is a need to review entities' compliance with the requirements.	The Secretariat will consider developing guidance on the lifecycle of assets, particularly infrastructure assets. The guidance could consider the funding (e.g. grants), construction and development of assets / work in progress, revaluations, depreciation and impairment. Guidance on types of arrangements will also be considered. Guidance already exists for at least parts of the lifecycle, which can be incorporated into this piece of work. The requirements to disclose information on repairs and maintenance of assets can be incorporated in the work. The Secretariat will consider developing further guidance for preparers in the 2025/26 year.
Question 4 **Review of the Standards** **(a) On which Standard should the Board undertake a post-implementation review and why?** **(b) On which Standard should the Board undertake a desktop review and why?** **(c) Is a review of the Materiality Guideline needed, and why?**		
4.1	**North-West Provincial Government (Departments and Public Entities)**	
4.1.1	No response	N/A
4.2	**Public Sector Accounting Forum**	
4.2.1	Non-current assets: More guidance is needed on measurement of Property, Plant and Equipment and impairment.	The Board's ongoing project on measurement of assets and liabilities will consider which guidance is needed locally to measure assets and impairment. The Secretariat will consider developing guidance on the lifecycle of assets, particularly infrastructure assets. The guidance could consider the funding (e.g. grants), construction and development of assets / work in progress, revaluations, depreciation and impairment. Guidance on types of arrangements will also be considered. Guidance already exists for at least parts of the lifecycle, which can be incorporated into this piece of work.

NO.	COMMENT	SECRETARIAT'S PROPOSED RESPONSE
4.2.2	Materiality: The issues are: • Preparers are overly conservative in their application of materiality and sometimes do not apply it at all, because they are fearful of auditors concluding an item is material that management assessed as immaterial. • The guidance in the *Guideline on The Application of Materiality to Financial Statements* is sufficient and clear. • A change in behaviour and thinking is needed.	Based on the pervasiveness of issues and capacity to undertake projects in the 2027-2029 work programme, a project on materiality will be reconsidered in a future work programme.
4.2.3	GRAP 109 *Accounting by Principals and Agents:* the issues identified in the post-implementation review remain. More awareness should be raised of the outcomes.	The Secretariat published FAQs as an outcome of the review in March 2025, and a review report communicating the findings from the review is available on the ASB website. The Secretariat is developing an Exposure Draft to amend GRAP 109 to assist stakeholders with assessing whether an arrangement is a principal-agent arrangement. The ASB, OAG and AGSA are considering whether practical guidance and examples could be developed.
4.2.4	GRAP 3 *Accounting Policies, Changes in Accounting Estimates and Errors*: Entities are unsure when they can change their accounting policies and how to do this so that it is not considered an error by the auditors.	The Secretariat will consider guidance for preparers on how entities should select appropriate accounting policies, and what the considerations are for entities to change accounting policies.
4.2.5	Revenue: The guidance on revenue should be reconsidered. For some transactions, it is clear from the initial recognition that the amount would not be recoverable, but in accordance with IGRAP 1 on *Applying the Probability Test on Initial Recognition of Revenue* entities are still required to recognise the full amount, with a certain subsequent write-off. This is not considered good practice.	The Board previously determined it will include a project on revenue in the work programme. The issue will be incorporated in the project.
4.2.6	Statutory Receivables: The receivables are sometimes difficult to collect as entities do not have the same controls in place. Sometimes the debtor should not be recognised as it is an indigent account, but the entities does not have the information to know this.	The Board is analysing feedback from the post-implementation review of GRAP 108 and will decide appropriate actions to address the issues identified.

NO.	COMMENT	SECRETARIAT'S PROPOSED RESPONSE
4.2.7	GRAP 104 *Financial Instruments* (revised): The Board may need to do a post-implementation review soon after the effective date of the revised Standard as there are likely to be many challenges with applying the revised requirements.	The GRAP 104 Reference Group will continue to consider the practical application of the requirements, and the implementation of the Standard will be monitored. The Secretariat will assess the feasibility of extending the work of the Reference Group until 2028.
4.3	**Public Sector Standing Committee of the IRBA**	
4.3.1	Materiality: The project is supported; however, the Board should be clear upfront about the objective of the project and what the scope is. There is otherwise a risk of resources being spent in vain as the issues are likely not with the Board's guidance and may not be within the Board's ambit to resolve. The environment is not ready for authoritative guidance and the application is still evolving. It was noted that the issues are not unique to the public sector.	Based on the pervasiveness of issues and capacity to undertake projects in the 2027-2029 work programme, a project on materiality will be reconsidered in a future work programme.
4.3.2	The AGSA will provide input from the audit perspective. Audit materiality will be important to consider in the project. The application of materiality by auditors is also sometimes overly conservative as auditors fear adverse quality review findings. Practical guidance, e.g. case studies, may be most helpful.	Based on the pervasiveness of issues and capacity to undertake projects in the 2027-2029 work programme, a project on materiality will be reconsidered in a future work programme.
4.4	**Preparers of financial statements: public entities**	
4.4.1	GRAP 109: the application of the Standard remains an issue, and more guidance is needed.	The Secretariat published FAQs as an outcome of the review in March 2025, and a review report communicating the findings from the review is available on the ASB website. The Secretariat is developing an Exposure Draft to amend GRAP 109 to assist stakeholders with assessing whether an arrangement is a principal-agent arrangement. The ASB, OAG and AGSA are considering whether practical guidance and examples could be developed.

NO.	COMMENT	SECRETARIAT'S PROPOSED RESPONSE
4.4.2	GRAP 19 *Provisions, Contingent Liabilities and Contingent Assets*: Guidance is needed on distinguishing between provisions and contingent liabilities. This is a difficult area that often leads to disagreements with auditors	Standards-level guidance on GRAP 19 could be considered in future once the IASB finalised their amendments to IAS 37. The Secretariat will consider developing guidance for preparers in the 2025/26 year.
4.4.3	GRAP 104: The definitions are sometimes unclear and difficult to know when an item is in the scope of the Standard. Also, the application of the new Standard should be closely monitored as there continues to be issues in the private sector and entities need to be supported in the first few years after the amendments become effective.	Guidance on the amended GRAP 104 is available on a dedicated page on the ASB website here. The GRAP 104 Reference Group will continue to consider the practical application of the requirements, and the implementation of the Standard will be monitored. The Secretariat will assess the feasibility of extending the work of the Reference Group until 2028.
4.4.4	Revenue: Difficulties remain with applying the Standard, such as distinguishing between exchange and non-exchange, the treatment of grants with conditions and identifying conditions, etc.	The Board previously determined it will include a project on revenue in the work programme. The issue will be incorporated in the project.
4.5	**Western Cape Accounting Working Committee**	
4.5.1	Materiality: The project is supported. There are often differences of opinion between preparers and auditors.	Based on the pervasiveness of issues and capacity to undertake projects in the 2027-2029 work programme, a project on materiality will be reconsidered in a future work programme.
4.5.2	Revenue: The recognition of revenue from grants, such as library grants, is problematic as it is unclear whether the grant is in the scope of GRAP 9 or GRAP 23.	The Board previously determined it will include a project on revenue in the work programme. The issue will be incorporated in the project.
4.5.3	IGRAP 20 on *Accounting for Adjustments to Revenue*: There is a specific example in the IGRAP on traffic fines which illustrates a change in estimate, but this may be incorrect, and some disagree that it is a change in estimate.	The Board previously determined it will include a project on revenue in the work programme. The issue will be incorporated in the project.
4.6	**Preparers of financial statements: municipalities**	
4.6.1	GRAP 109: concerns remain that entities are unable to correctly apply the Standard, and there are many entities with principal-agent arrangements who do not apply the	The Secretariat published FAQs as an outcome of the review in March 2025, and a review report communicating the findings from the review is available on the ASB website.

NO.	COMMENT	SECRETARIAT'S PROPOSED RESPONSE
	Standard. This makes it further difficult to see examples of how the disclosure should be provided.	The Secretariat is developing an Exposure Draft to amend GRAP 109 to assist stakeholders with assessing whether an arrangement is a principal-agent arrangement. The ASB, OAG and AGSA are considering whether practical guidance and examples could be developed.
4.6.2	GRAP 20: The Standard is difficult to apply in the public sector as there are many related parties by virtue of how government is structured. The AGSA requires unnecessary disclosure and want the same information to be provided across entities, leading to boilerplate disclosure. It is unclear to what extent entities need to disclose the information, e.g. is it required when entities report to the same Minister, or all entities under Parliament nationally and the legislature in each province? If, for example, all national departments are considered related parties, the disclosure is too onerous.	The Review Report on GRAP 20, communicating the outcomes of the review and next steps, is available on the ASB website here. The Secretariat published FAQs as an outcome of the review. The Standard will be amended to add guidance with the *Improvements to the Standards of GRAP, 2026*.
4.6.3	Materiality: Entities do not use the Guideline and there is a need for awareness. The AGSA may start disclosing their materiality in their strategy. This helps entities manage their risk that management's materiality differs significantly to the auditor's materiality, however, the practice should not be for management to follow the auditor's assessment. Management should first do their own assessment.	Based on the pervasiveness of issues and capacity to undertake projects in the 2027-2029 work programme, a project on materiality will be reconsidered in a future work programme.
4.7	**Auditors and other technical specialists**	
4.7.1	Revenue: There are issues with accounting for revenue, especially grants, and the application of GRAP 11 on *Construction Contracts.* A review of the revenue Standards could be beneficial to resolve the existing issues, while at the same time providing information for the Board's revenue project.	The Board previously determined it will include a project on revenue in the work programme. The recommendation will be considered in the project.
4.7.2	GRAP 110 *Living and Non-living Resources*: The guidance is not well understood and the objective of what the Standard aims to achieve is unclear, especially for living animals in wildlife conservation areas. Guidance on other resources, such as rainwater, would also be useful.	The Secretariat will consider communication activities to enhance entities' understanding of GRAP 110. The Secretariat developed a FAQ on *How does an entity account for naturally occurring non-purchased water?*

NO.	COMMENT	SECRETARIAT'S PROPOSED RESPONSE
4.7.3	Presentation in the statement of financial position: A project similar to the work previously done on presentation in the statement of financial performance could be useful.	A project on presentation of financial statements will be considered in the next work programme. The IPSASB has commenced a project to consider the applicability of IFRS 18 in the public sector and to explore public sector presentation options. Given the ASB's limited resources, it is more feasible to commence a local project once the IPSAS project is finalised and prioritise resources on more urgent projects in the 2027 to 2029 period.
4.7.4	GRAP 3: There is often uncertainty about whether a change is a change in estimate, a change in accounting policy or an error. Guidance to clarify the distinction and related implications would be useful.	The Secretariat will consider guidance for preparers in 2025/26 on accounting policies, changes in estimates and errors.
4.7.5	GRAP 104 (revised): There may be a need to review the application of GRAP 104 (revised) within a short period after implementation, especially to assess whether the disclosure requirements are being complied with and providing users with the information they need.	Guidance on the amended GRAP 104 is available on a dedicated page on the ASB website here. The GRAP 104 Reference Group will continue to consider the practical application of the requirements, and the implementation of the Standard will be monitored. The Secretariat will assess the feasibility of extending the work of the Reference Group until 2028.
4.7.6	Non-current assets: Entities are not always complying with the disclosure required on maintenance of non-current assets and the requirements are sometimes not well understood.	The Secretariat will consider developing guidance on the lifecycle of assets, particularly infrastructure assets. The guidance could consider the funding (e.g. grants), construction and development of assets / work in progress, revaluations, depreciation and impairment. Guidance on types of arrangements will also be considered. Guidance already exists for at least parts of the lifecycle, which can be incorporated into this piece of work. The requirements to disclose information on repairs and maintenance of assets can be incorporated in the work. The Secretariat will consider developing further guidance for preparers in the 2025/26 year.
4.7.7	Materiality: The Board may receive varied feedback but there is support for the project.	Based on the pervasiveness of issues and capacity to undertake projects in the 2027-2029 work programme, a project on materiality will be reconsidered in a future work programme.

NO.	COMMENT	SECRETARIAT'S PROPOSED RESPONSE
4.8	**Reserve Bank (Public Finance)**	
4.8.1	GRAP 20: The information they need on related party transactions and balances is not always provided in the financial statements. In some instances, the entity is seemingly exempt from providing the information, or aggregated information is provided. They need the information per each related party.	Some of the information required may be outside the scope of information provided in general purpose financial statements that meets the needs of a broad range of users. The Board recently concluded a review of GRAP 20. The Review Report on GRAP 20, communicating the outcomes of the review and next steps, is available on the ASB website here. The Secretariat published FAQs as an outcome of the review. The Standard will be amended to add guidance with the *Improvements to the Standards of GRAP, 2026*. The Secretariat will consider developing further guidance for preparers on meeting user needs when preparing financial statements in the 2025/26 year.
4.9	**Members of the South African Institute of Government Auditors**	
4.9.1	Materiality: The SASB Standards could be a useful resource to consider in the Board's project as they contain sector-specific guidance on materiality, e.g. on transport and logistics.	Based on the pervasiveness of issues and capacity to undertake projects in the 2027-2029 work programme, a project on materiality will be reconsidered in a future work programme.
4.10	**Roundtable with various stakeholders**	
4.10.1	See comments above regarding leases.	See responses above.
4.11	**AGSA Product Champions**	
4.11.1	Non-current assets: Linked to responses in questions 1 and 3 on information on sustainability of service delivery and repairs and maintenance, information on water and electricity infrastructure, and any losses, is needed to enable better asset management. IMFO previously required disclosure of sources of funding, particularly for infrastructure projects, which could be considered for GRAP 17. A project on infrastructure assets would be useful. The project could consider multiple Standards that apply to the	The Secretariat will consider developing guidance on the lifecycle of assets, particularly infrastructure assets. The guidance could consider the funding (e.g. grants), construction and development of assets / work in progress, revaluations, depreciation and impairment. Guidance on types of arrangements will also be considered. Guidance already exists for at least parts of the lifecycle, which can be incorporated into this piece of work. The requirements to disclose information on repairs and maintenance of assets can be incorporated in the work. The Secretariat will consider developing further guidance for preparers in the 2025/26 year.

NO.	COMMENT	SECRETARIAT'S PROPOSED RESPONSE
	"lifecycle" of the assets, including the budget, revenue, repairs and maintenance, segment reporting, etc.	
Question 5 **Facilitating and encouraging stakeholder engagement and support** **(a) What are the specific themes or issues that should be addressed in the Enhancing the Application of Standards of GRAP project? Please provide details.** **(b) What content do you believe will be useful to include on the GRAP Knowledge Hub? Please provide details.** **(c) Keeping the mandate of the ASB in mind, are there any other activities that we could undertake to better facilitate and encourage stakeholder engagement and support?**		
5.1	**North-West Provincial Government (Departments and Public Entities)**	
5.1.1	No comment.	Noted.
5.2	**Public Sector Accounting Forum**	
5.2.1	See issues raised with question 4 above.	Responses are noted in question 4.
5.3	**Public Sector Standing Committee of the IRBA**	
5.3.1	No comment.	Noted.
5.4	**Preparers of financial statements: public entities**	
5.4.1	No comment.	Noted.
5.5	**Western Cape Accounting Working Committee**	
5.5.1	The Secretariat should develop a short introduction on what each of the Standards of GRAP are about and which transactions are related, as well as the areas in the financial statements these transactions are accounted for. It would be helpful if such guidance is practical and use real examples.	The OAG developed summaries on a page for each Standard of GRAP. These are available on the ASB website here and the GRAP Knowledge Hub. A project commenced in 2024/25 to develop education material for users (which will also be made available to preparers and other stakeholders). The material will provide the recommended guidance.
5.5.2	There should be a national consolidated database for audit findings, including management's responses and the lessons learned. This will be a useful resource to entities to safe time during the audit so that each entity need not	The recommendation will be shared with the OAG.

NO.	COMMENT	SECRETARIAT'S PROPOSED RESPONSE
	prepare a response to similar queries from scratch. It will also assist entities with the actions needed to respond to the issues.	
5.6	**Preparers of financial statements: municipalities**	
5.6.1	The ASB is doing a great job to support entities. They appreciate the Secretariat's responsiveness to their communication.	Noted, thank you.
5.7	**Auditors and other technical specialists**	
5.7.1	Guidance is needed on developing appropriate and quality accounting policies.	The Secretariat developed an FAQ on *When and how do entities develop and disclose accounting policies?* The Secretariat also developed a recording on *How to develop appropriate accounting policies and what information to disclose*, available on the ASB's YouTube Channel.
5.7.2	Infrastructure assets and impairment remains a challenge. Guidance on GRAP 17, and the impairment Standards (GRAP 21 and GRAP 26) would be useful. There may be guidance in IPSAS that could be referred to.	The Secretariat will consider developing guidance on the lifecycle of assets, particularly infrastructure assets. The guidance could consider the funding (e.g. grants), construction and development of assets / work in progress, revaluations, depreciation and impairment. Guidance on types of arrangements will also be considered. Guidance already exists for at least parts of the lifecycle, which can be incorporated into this piece of work. The requirements to disclose information on repairs and maintenance of assets can be incorporated in the work. The amendments to IPSAS 17 on infrastructure assets will be considered in the Improvements to the Standards of GRAP, 2026 project.
5.7.3	The ASB produces large volumes of useful (good technical) material for social media, e.g. LinkedIn. Stakeholders that are not on the platform on a frequent basis may miss some of the content and the content is difficult to find again afterwards. The Secretariat should find a way of making the content easily accessible at any time.	The recommendation will be considered by the Secretariat.
5.7.4	The IPSASB is establishing an Application Panel. There is a need for a similar platform locally to support stakeholders with using the Standards. The GRAP Knowledge Hub could potentially meet – at least some – of the needs.	The Board's focus for 2027 – 2029 will be stakeholder engagement and support, through increased communication activities. The Knowledge Hub has space for stakeholders to ask questions and share practice. Technical queries may also be submitted on the Hub.

NO.	COMMENT	SECRETARIAT'S PROPOSED RESPONSE
5.8	**Reserve Bank (Public Finance)**	
5.8.1	The work by the Secretariat is supported and resources should be dedicated to continuing the work in the next work programme.	Noted.
5.9	**Members of the South African Institute of Government Auditors**	
5.9.1	No comment.	Noted.
5.10	**Roundtable with various stakeholders**	
5.10.1	Guidance to distinguish operating from finance leases is needed.	A project on leases is included in the 2027 – 2029 work programme. The OAG included a recording on the classification of leases on the GRAP Knowledge Hub
5.10.2	GRAP 109: Guidance is necessary on what constitutes a binding arrangement in a principal-agent arrangement. There is sometimes no binding arrangement, but a relationship may be informed by legislation. GRAP 109 is unclear in this regard.	The Secretariat published FAQs as an outcome of the review in March 2025, and a review report communicating the findings from the review is available on the ASB website. The Secretariat is developing an Exposure Draft to amend GRAP 109 to assist stakeholders with assessing whether an arrangement is a principal-agent arrangement. The ASB, OAG and AGSA are considering whether practical guidance and examples could be developed.
5.10.3	The Secretariat should consider ways in which it can involve preparers in its processes. They are often not involved (which may indicate the preparation of financial statements is outsourced) but they should be.	The Secretariat will focus on awareness raising and communication activities in the 2027 – 2029 period. The Secretariat will develop specific communication material to inform stakeholders of upcoming projects and how they can get involved, e.g. through social media including the YouTube Channel.
5.11	**AGSA Product Champions**	
5.11.1	No comment.	Noted.
Question 6 **Emerging issues** **(a) Are you aware of specific local stakeholders or groups that we should consult on the IPSASB SRS?** **(b) Are there any other emerging issues the Board should consider? Please provide an indication of what the Board should do, e.g. research, publish a paper, etc.**		

NO.	COMMENT	SECRETARIAT'S PROPOSED RESPONSE
6.1	**North-West Provincial Government (Departments and Public Entities)**	
6.1.1	No comment.	Noted
6.2	**Public Sector Accounting Forum**	
6.2.1	Specific stakeholders to include in the consultation on the IPSASB SRS were noted, including SALGA's sustainability unit and the Office of the Presidency.	The Secretariat reached out to the stakeholders noted in consulting on the IPSASB SRS ED and will include these stakeholders in future consultations on IPSASB SRS EDs.
6.2.2	Sustainability reporting: some municipalities considered sustainability reporting. They mostly found that it would repeat information they are already reporting through the budget process and performance reporting, etc. For example, the impact of climate (and other matters) on the entity is already addressed in the budget and in the going concern assessment as well as the integrated development plan. The reporting is distinguished from financial reporting and developing the requirements should not be with the ASB.	The Secretariat will consider publishing a joint communication with the OAG on the local stance of sustainability reporting, and what entities may consider in the current environment.
6.3	**Public Sector Standing Committee of the IRBA**	
6.3.1	The Board could consider developing a standard on non-financial information in the financial statements, such as performance reporting.	The framework for reporting service performance information is the responsibility of the Department of Performance Monitoring and Evaluation. The Secretariat will continue to promote coherency and integration of information across entities' general purpose financial reports.
6.4	**Preparers of financial statements: public entities**	
6.4.1	No emerging issues or contacts were identified.	Noted.
6.5	**Western Cape Accounting Working Committee**	
6.5.1	An emerging issue is accounting for INEP grants. The Provincial Treasury will consider addressing the training through e.g. training in 2025.	The OAG issued Guidelines on accounting for INEP and RBIG grants, available on their website here. The Board previously determined it will include a project on revenue in the work programme.

NO.	COMMENT	SECRETARIAT'S PROPOSED RESPONSE
		Any remaining issues will be incorporated in the project on revenue.
6.6	**Preparers of financial statements: municipalities**	
6.6.1	There is a concern about reporting on water inventory. Clean water is critical and reporting thereon is important, however, the information that the National Treasury requires to be reported is not possible.	The Secretariat is monitoring the possible regulation of the template for reporting on water accounts. The comment will be shared with the OAG.
6.7	**Auditors and other technical specialists**	
6.7.1	No specific comment.	Noted
6.8	**Reserve Bank (Public Finance)**	
6.8.1	The International Monetary Fund is reviewing the Government Finance Statistics Manual. The Secretariat will be approached for inputs, if needed.	Noted.
6.9	**Members of the South African Institute of Government Auditors**	
6.9.1	Biodiversity should be dealt with. Reporting on biodiversity requires a different skillset to reporting on climate. In general, there is a need to consider the experience, skills and other resources of entities in the public sector – the Standards should be developed in a way that can bridge the gap. The standard-setter should consider benchmark reporting and enable oversight.	The Secretariat will consider publishing a joint communication with the OAG on the local stance of sustainability reporting, and what entities may consider in the current environment. The comment will be consider for potential work in the future, and for inputs to the IPSASB.
6.9.2	Disclosure on employee benefits is an issue. Information needed by citizens, such as the pay gap between chief directors and the lowest employee, is not available. This is needed for accountability purposes.	The Board's work programme includes a project to research the information needs of users on short term employee benefits. The Secretariat will consider communication material to preparers on considering user needs and the specific objectives of certain Standards of GRAP when preparing financial statements.
6.9.3	An emerging issue is carbon counting and carbon credits, and how these impact the public sector. Entities should consider how to use these to optimise their balance sheets. There is firstly a need to identify these resources in the public	A project has been added to the indicative 3-year work programme on sustainability-related uncertainties in the financial statements, which could consider any sustainability-related guidance for reporting in the financial statements.

NO.	COMMENT	SECRETARIAT'S PROPOSED RESPONSE
	sector, and "register" them. The next step is to assess how they can be accounted for.	Any narrow scope amendments to IFRS Accounting Standards and IPSAS will be considered in the Improvements project. Further guidance may be developed by the Secretariat.
6.10	**Roundtable with various stakeholders**	
6.10.1	No comment.	Noted
6.11	**AGSA Product Champions**	
6.11.1	No comment.	Noted
Question 7 **Other feedback** **Is there any other feedback you wish to provide the Board that is relevant to its standard-setting activities for the 2027 – 2029 work programme? Please provide details and suggestions.**		
7.1	**North-West Provincial Government (Departments and Public Entities)**	
7.1.1	No response	N/A
7.2	**Public Sector Accounting Forum**	
7.2.1	No comment.	Noted.
7.3	**Public Sector Standing Committee of the IRBA**	
7.3.1	The IRBA applies criteria for selecting and prioritising projects for its work programme. A similar approach by the Board may be useful.	The Board applies the criteria for selecting and prioritising projects in the ASB's Due Process Handbook.
7.4	**Preparers of financial statements: public entities**	
7.4.1	The GRAP disclosure checklist is unhelpful as it is just a list. More detailed guidance is needed, such as "model financial statements" that illustrate how the disclosures are provided.	The comment will be shared with the OAG.
7.4.2	It is unclear how entities can comment on the OAG Accounting Guidelines when entities disagree with the guidance.	The comment will be shared with the OAG.
7.5	**Western Cape Accounting Working Committee**	

NO.	COMMENT	SECRETARIAT'S PROPOSED RESPONSE
7.5.1	The theme of the work programme is supported. There is a need for stability in the Standards of GRAP, which would be achieved by prioritising the application of the Standards rather than developing new requirements.	Noted.
7.5.2	The Provincial Treasury runs various support initiatives, which assists the province in maturing. Preparers get the basics right and the support they require is mostly on complex and unique transactions. The Secretariat's communication does not necessarily apply to them.	Noted.
7.6	**Preparers of financial statements: municipalities**	
7.6.1	No comment.	Noted.
7.7	**Auditors and other technical specialists**	
7.7.1	No specific comment.	Noted.
7.8	**Reserve Bank (Public Finance)**	
7.8.1	No comment.	Noted.
7.9	**Members of the South African Institute of Government Auditors**	
7.9.1	No comment.	Noted.
7.10	**Roundtable with various stakeholders**	
7.10.1	Subscribing to the ASB's newsletter has informed the individual of this engagement and is a useful way for stakeholders to be involved. The ASB's communication channels should be promoted more.	The Secretariat will look for ways to enhance and promote the ASB's communication activities.
7.11	**AGSA Product Champions**	
7.11.1	No comment.	Noted.