40 Church Square
Pretoria
0002
Tel. 011 697 0660
Fax. 011 697 0666
www.asb.co.za

TO: MEMBERS OF THE BOARD

FROM: ELIZNA VAN DER WESTHUIZEN

SUBJECT: IPSASB MID-PERIOD WORK PROGRAMME CONSULTATION

DATE: 16 MARCH 2026

FILE REF: ATTACHMENT 9(a)

BACKGROUND AND PURPOSE

1. The IPSASB committed in their 2024 – 2028 strategy that as resources became available, they would consult stakeholders to understand stakeholder needs in relation to financial reporting projects, post implementation reviews and sustainability reporting projects. The IPSASB gave effect to this by publishing a mid-period work programme consultation to determine what should be added to their future work programme. Comment is due by 4 May 2026.

2. The consultation is not published as a concurrent ED and the Secretariat will submit a staff letter to the IPSASB with information gathered from consultation on the IPSASB's 2024-2028 strategy, the ASB's 2027 – 2029 work programme consultation and other relevant information from emerging issues, trends and local discussions.

3. As background information, refer to attachment 9(b) for the IPSASB's work programme consultation and attachment 9(c) for the presentation provided to the Board at the November 2025 meeting.

4. The purpose of this memorandum is for the Board to:

   (a) note information gathered by the Secretariat to date that can inform the comment letter to the IPSASB; and

   (b) discuss views and information to be included in the letter.

KEY MESSAGES TO THE IPSASB

5. The following comments were gathered to date, which may be included in the comment letter to the IPSASB.

General comment

6. The following matters do not relate to any specific matters for comment:

   - *New ways of work*: as part of implementing the new strategy, we recommend the

IPSASB considers new ways of working to achieve its strategic objectives. With an established suite of IPSAS, the IPSASB no longer needs to follow the work of the private sector. Work can be conducted in parallel and lessons learnt shared across sectors. For example, the IPSASB staff can get involved in the IASB's current research project on intangible assets while progressing work on the IPSASB's work to consider COV for intangible assets at the same time. This applies equally for the IPSASB's Sustainability Reporting Standards, where practice in the private sector also still needs to be established. For example, the IPSASB could dedicate resources to being closely involved in the work of international sustainability standard-setters, in particular the ISSB and GRI. This can be achieved through building strong relationships with international standard-setters and being actively involved in other standard setters' projects that are relevant to the work of the IPSASB.

- *Research on reporting landscape*: We support the IPSASB undertaking research on the architecture of its existing suite of literature to determine where guidance is best situated and help stakeholders understand how to apply pronouncements. Now that the IPSASB has published IPSAS, IPSASB SRS and RPGs, there is a need for preparers to understand how to apply the requirements together, and report information that is understandable and useful to users.

  We recommend that this research be further expanded to consider the broader financial reporting landscape outside the IPSASB's own pronouncements and that guidance is developed that will support interoperability of reporting requirements and practices. This could also include work to understand existing reporting practices that fall, or may fall, under a sustainability reporting umbrella. Many entities that do not formally prepare sustainability reports may report on their achievement of sustainable development objectives assigned to them in legislation or through other binding agreements. Some report this in performance or similar reports alongside their financial statements. Preparing integrated reports is also an established practice in some jurisdictions and considering the work of The Value Reporting Foundation may be needed.

- *Due process:* We recommend that the IPSASB considers developing a due process handbook. We believe this is best practice and adds transparency and credibility to the standard-setting process.

Specific Matter for Comment 1: financial reporting projects

"Which financial reporting projects should the IPSASB prioritize? For each financial reporting project you suggest, please clearly explain the project scope and your reasoning, using the IPSASB's project prioritization criteria outlined (on the previous page), to support its priority. Respondents are encouraged to use the format in the Optional Template illustrated in the Instructions for Respondents (on the following page) for each project suggested."

7. The following key messages have been obtained to date:

Activities that support adoption and implementation of accrual accounting

- *Centralised platform*: We note that a central platform for sustainability reporting resources has been established on the IPSASB's website. This initiative clearly links with the objective of supporting adoption and implementation of SRS Standards.

Although many resources are available to support accrual adoption and implementation, these are spread across various platforms and many jurisdictions and entities may be unaware of them. We recommend that the IPSASB develops a similar resource hub to support the adoption and implementation of IPSAS (reporting in the financial statements). The resources made available could include, for example, communication on the benefits of accrual accounting, reference to Pathways to Accrual, IPSAS 33, links to the Application Group and the financial reporting implementation forum.

- *Sharing implementation stories:* Jurisdictions that adopt and implement IPSAS have information and experiences that may be useful for other jurisdictions that must still or are in the process of adopting and implementing IPSAS. For example, lessons learned. We recommend the IPSASB establish a communication pipeline or platform where these stories could be shared publicly.

- *Issues with IPSAS*: We recommend the IPSASB researches the causes of slow adoption of accrual IPSAS, focusing on regions where the decision has been made but not implemented, or implementation is taking significantly longer than expected. This research can identify if there are particular issues with IPSAS that impact adoption and implementation. If so, the IPSASB should address the issues. This research can be supported by the information obtained from jurisdictional standard-setters on the level of alignment with IPSAS pronouncements in their jurisdictions.

- *Implementation groups:* We remain of the view that there is a need for implementation groups to consider the impact of specific IPSAS recently approved that are not yet effective, i.e. IPSAS 43 on *Leases* to IPSAS 48 on *Transfer Expenses*. Many of these IPSAS are complex and require not only accounting policy changes, but also system changes. Such groups are tried and tested in the private sector (financial instruments, revenue and insurance contracts) and have assisted with the implementation of complex Standards. Such groups would further support adoption and implementation of IPSAS as a framework and reduce the risk of jurisdictions feeling overwhelmed by implementing complex new IPSAS at the same time as their initial adoption of IPSAS.

Specific financial reporting projects

- *No significant new projects*: We recommend that the IPSASB does not undertake any significant new financial reporting projects in the next period. A significant number of IPSAS were issued in the last work programme. Many entities are in the process of implementing those. It is important to allow entities sufficient time for their reporting processes to stabilise and for quality information to be reported.

- *IPSAS 31 Intangible Assets*: As noted in paragraph 6 above, we recommend that the IPSASB considers progressing the work on assessing COV in the context of IPSAS 31 in parallel with the IASB project. Even though COV is a public sector specific measurement basis, the IASB's discussions and research may include information that is relevant to the public sector. The IPSASB's work should incorporate the latest thinking. We therefore recommend the IPSASB staff keep in close contact with the IASB staff to track their work and monitor the public sector impact.

- *Review of IPSAS 19 Provisions, Contingent Liabilities and Contingent Assets:* Similar to the recommendation for IPSAS 31 above, we recommend the IPSASB works closely with the IASB on their project to make targeted improvements to IAS 37 *Provisions, Contingent Liabilities and Contingent Assets* and to consider amendments to IPSAS 19 in parallel.

- *IPSAS 42 Social Benefits:* We recommend the IPSASB assesses how jurisdictions have implemented IPSAS 42, whether adaptations were made and if so, why. The assessment should also include understanding which approach (insurance or general) entities are applying and whether those that meet the criteria for the insurance approach have opted not to apply it. The work on IPSAS 19 above could be linked to this and may provide information on the need for guidance in IPSAS from IFRS 17 *Insurance Contracts*.
- *Accounting for tax expenditures*: There may be a link between this project and (fiscal) sustainability information. The project could also be linked to the ongoing work of the International Monetary Fund on fiscal transparency. We recommend that the project be considered in this light.
- *IPSAS taxonomy*: We recommend that the IPSASB considers dedicating resources to develop an IPSAS taxonomy as the digitisation of IPSAS may be an increasingly important mechanism to support adoption and implementation of IPSAS.

Specific Matter for Comment 2: post implementation reviews

"Which IPSAS Standards do you think are the highest priority for the IPSASB to undertake a post implementation review? For each post implementation review you suggest, please clearly explain the issues with the existing IPSAS Standard and your priority reasoning using the IPSASB's project prioritization criteria (outlined on the previous page). Respondents are encouraged to use the format in the Optional Template illustrated in the Instructions for Respondents (on the following page) for each PIR suggested."

8. The key messages obtained to date include the following:

- *Accounting for infrastructure assets:* A key area of concern in our jurisdiction is accounting for infrastructure assets. In most jurisdictions, a significant proportion of government spending is earmarked for infrastructure development and maintenance. This spending should be properly accounted for. There is furthermore a link with sustainability reporting as maintenance of infrastructure assets and planning for future infrastructure asset needs are key to ensuring governments can continue providing basic human services and to sustain economic growth. This includes infrastructure related to clean water, electricity, education and transportation. We note that practice should first be established before a review is undertaken so that the feedback from the review has substance. For this reason, we recommend that the IPSASB dedicates resources to support the adoption of IPSAS 45 *Property, Plant and Equipment* and IPSAS 46 *Measurement*. This may be linked to the recommendation in paragraph 7 above to establish implementation groups.

Specific Matter for Comment 3: sustainability reporting projects

"Which sustainability reporting projects should the IPSASB prioritize? For each sustainability reporting project you suggest, please clearly explain the project scope and your reasoning, using the IPSASB's project prioritization criteria outlined

on the previous page, to support its priority. Respondents are encouraged to use the format in the Optional Template illustrated in the Instructions for Respondents on the following page for each project suggested.”

9. The key messages obtained to date include the following:

- *General requirements:* Jurisdictions have different priorities in terms of their sustainability concerns and some jurisdictions may not view reporting on climate as their highest priority. For example, Africa contributes the least carbon emissions when compared to other continents and may rather want to focus on reporting on other Sustainable Development Goals (SDGs). A separate standard on the general requirements and conceptual foundations of sustainability reporting would help constituents disclose information on other sustainability topics where they have different SDG priorities in their jurisdiction. We therefore recommend that the IPSASB considers a project on general requirements next.
- *Consider international or multilateral agreements*: Governments have made various sustainable development commitments through, for example, member bodies or multilateral agreements. Guidance for standardised reporting on governments’ progress towards achieving these commitments is needed. We recommend the IPSASB consult on what these transversal commitments are and engage the relevant bodies to whom these commitments were made to understand the existing reporting requirements and identify the guidance that is needed.

ACTIONS REQUESTED
The Board is requested to DISCUSS the matters relating to the IPSASB’s work programme that should be included in the comment letter.