



MALAYSIAN INSTITUTE
OF ACCOUNTANTS

9 September 2022

Mr John Stanford
Technical Director
International Public Sector Accounting Standards Board
International Federation of Accountants
277 Wellington Street West
Toronto, Ontario M5V 3H2
CANADA

Dear John,

CONSULTATION PAPER, ADVANCING PUBLIC SECTOR SUSTAINABILITY REPORTING

The Malaysian Institute of Accountants (“MIA”) is pleased to provide comments on the International Public Sector Accounting Standards Board (“IPSASB”) Consultation Paper, *Advancing Public Sector Sustainability Reporting* as attached in Appendix 1 to this letter.

We hope our comments would contribute to the IPSASB’s deliberation in finalising the matter. If you have any queries or require clarification of this submission, please contact Rasmimi Ramli, Executive Director of Digital Economy, Reporting and Risk at +603 2722 9277 or by email at rasmimi@mia.org.my.

Yours sincerely,

MALAYSIAN INSTITUTE OF ACCOUNTANTS

DR WAN AHMAD RUDIRMAN WAN RAZAK
Chief Executive Officer

Preliminary View 1 - Chapter 1

The IPSASB's view is that there is a need for global public sector specific sustainability reporting guidance.

Do you agree with the IPSASB's preliminary view?

If not, please provide your reasons.

We agree with the IPSASB's preliminary view on the need for global public sector specific sustainability reporting guidance.

Preliminary View 2 – Chapter 2

The IPSASB's experience, processes and relationships would enable it to develop global public sector specific sustainability reporting guidance effectively.

Do you agree with the IPSASB's preliminary view?

If not, please provide your reasons.

We agree that the IPSASB's experience, processes and relationships would enable it to develop global public sector specific sustainability reporting guidance effectively.

We noted the proposal on getting a Sustainability Reference Group (comprising a range of stakeholders including sustainability experts) to advise the IPSASB on the development of sustainability guidance. However, we propose that the composition of the IPSASB to also include sustainability experts and other relevant areas in order to strike a balance between reporting and sustainability viewpoints.

Specific Matter for Comment 1 – Chapter 3

If the IPSASB were to develop global public sector specific sustainability reporting guidance, please tell us what topics you see as most pressing in your jurisdiction and why these should be prioritized by the IPSASB.

We believe that topics related to environmental and social be given higher priority in developing the sustainability guidance.

Preliminary View 3- Chapter 3

If the IPSASB were to develop global public sector-specific sustainability reporting guidance it proposes applying the framework in Figure 5.

In developing such guidance, the IPSASB would work in collaboration with other international bodies, where appropriate, through the application of its current processes.

Do you agree with the IPSASB's Preliminary View?

If not, please provide your reasons, explaining what alternatives you would propose, and why.

We agree on the IPSASB approach to work in collaboration with other international bodies, where appropriate, through the application of its current processes.

Preliminary View 4- Chapter 3

If the IPSASB were to develop global public sector specific sustainability reporting guidance, it would address general sustainability-related information and climate-related disclosures as its first topics. Subsequent priority topics would be determined in the light of responses to this Consultation Paper as part of the development of its 2024-2028 Strategy.

Do you agree with the IPSASB's Preliminary View?

If not, please provide your reasons, explaining which topics the IPSASB should prioritize instead, and why.

We agree with the first topics proposed by the IPSASB which are general sustainability-related information and climate-related disclosures.

Preliminary View 5 - Chapter 4

The key enablers identified in paragraph 4.2 are needed in order for the IPSASB to take forward the development of global public sector specific sustainability reporting guidance.

Do you agree with the IPSASB's Preliminary View?

If not, please provide your reasons, identifying which of the proposed key enablers you disagree with, and why.

Except for our response in Preliminary View 2, we agree with all the key enablers identified especially on the qualified and dedicated technical staff team to lead the guidance development.

Specific Matter for Comment 2 - Chapter 4

To what extent would you be willing to contribute financial or other support to the IPSASB for the development of global public sector specific sustainability reporting guidance?

We will provide continuous support to the IPSASB by providing feedback and inputs in relation to the guidance development.