



MALAYSIAN INSTITUTE
OF ACCOUNTANTS

31 May 2024

Mr Ross Smith
Program and Technical Director
International Public Sector Accounting Standards Board
International Federation of Accountants
277 Wellington Street West
Toronto, Ontario M5V 3H2
CANADA

Dear Ross,

EXPOSURE DRAFT 88, ARRANGEMENTS CONVEYING RIGHTS OVER ASSETS

The Malaysian Institute of Accountants (“MIA”) is pleased to provide comments on the International Public Sector Accounting Standards Board (“IPSASB”) Exposure Draft 88, *Arrangements Conveying Rights Over Assets* 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 Sustainability, Digital Economy, and Reporting 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

Specific Matter for Comment 1:

The IPSASB decided to carry over the proposals in ED 84 in IPSAS 23, Revenue from Non-Exchange Transaction (Taxes and Transfer) related to the concession in concessionary leases to IPSAS 47 (see paragraph IPSAS 47.BC141 - BC145). Do you agree with the proposed amendment to IPSAS 47? If not, please explain your reasons. If you agree, please provide any additional reasons not already discussed in the Basis for Conclusions

We agree with the IPSASB's proposal.

Under the amendments proposed to IPSAS 43, *Leases*, paragraph 71A of ED 84 states that "at the commencement date, a lessor shall recognize assets under a concessionary finance lease applying the requirements in this Standard". We wish to reiterate our earlier comment on our proposal for the IPSASB to provide illustrative examples on concessionary finance leases from the lessor's perspective.

Specific Matter for Comment 2:

The IPSASB decided to propose non-authoritative guidance for arrangement conveying rights over assets in IPSAS 47 (see paragraph IPSAS 47.BC146 – BC 150). Do you agree with the proposed non-authoritative amendment to IPSAS 47? If not, please explain your reasons. If you agree, please provide any additional reasons not already discussed in the Basis for Conclusions

We agree with the IPSASB's proposal. However, we propose for the IPSASB to expand the illustrative decision tree in Appendix B of IPSAS 43 *Leases* to include concessionary leases and other arrangements that are not a lease as identified in Request for Information, *Concessionary Leases and Other Arrangements Similar to Leases*. This will provide a clear guidance on the accounting for those situations.

Specific Matter for Comment 3:

The IPSASB decided to propose non-authoritative guidance for arrangement conveying rights over assets without consideration in IPSAS 48 (see paragraph IPSAS 48.BC41 – BC44). Do you agree with the proposed non-authoritative amendment to IPSAS 48? If not, please explain your reasons. If you agree, please provide any additional reasons not already discussed in the Basis for Conclusions.

We agree with the IPSASB's proposal.