

Ouagadougou, June 3, 2024

**Ross Smith**  
**Program & Technical Director**  
**International Public Sector Accounting**  
**Standards Board**  
227 Wellington Street  
West Toronto, ON M5V 3H2  
Canada

**Subject: ED 88 – Arrangements**  
**Conveying Rights over Assets**  
**(Amendments to IPSAS 47 and IPSAS 48)**

Dear Ross:

We appreciate the opportunity to comment on **International Public Sector Accounting Standards Board (IPSASB)** Exposure Draft on Exploration and Evaluation for Mineral Resources (the “Exposure Draft”).

We have read the draft with interest and have greatly appreciated that any stakeholder is given chance to express his view.

This letter and the bellow appendix represent the views of ONECCA-BF on the subjected matter.

If you have any questions regarding its content, please do not hesitate to contact us at [j.traore@oneccbf.org](mailto:j.traore@oneccbf.org); [y.traore@oneccabf.org](mailto:y.traore@oneccabf.org) our [secretariat@oneccabf.org](mailto:secretariat@oneccabf.org)

Sincerely yours

**ONECCA-BF**

## Appendix Responses to questions included in the Exposure Draft (ED)

### Preface

ONECCA-BF (Ordre National des Experts Comptables et des Comptables Agréés du Burkina Faso) is the National Professional Accountancy organization (PAO) dedicated to serve the public interest by strengthening the profession and contributing to the development of a strong economy in Burkina Faso, the region and beyond. ONECCA-BF has 185 members broken-up as following: 129 Individuals and 56 Accounting firms, serving all industries, public or private in Burkina Faso and abroad. ONECCA-BF is a full member of ABWA, PAFA, FIDEF and FAC.

Presented below is ONECCA-BF's responses to the Specific Matters for Comment raised in the Exposure Draft (ED) 88 *Arrangements Conveying Rights over Assets* (Amendments to IPSAS 47 and IPSAS 48), developed by the International Public Sector Accounting Standards Board (IPSASB). The responses detailed below have been prepared in consultation with our teams and constituents.

### Specific Matter for Comment 1:

*The IPSASB decided to carry over the proposals in ED 84 in IPSAS 23, Revenue from Non-Exchange Transactions (Taxes and Transfers) related to the concession in concessionary leases to IPSAS 47 (see paragraphs IPSAS 47. BC141 – BC145). Do you agree with the proposed amendments 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.*

### Response

ONECCA-BF agrees with the proposed amendments to IPSAS 47 and welcomes guidelines on the measurement and recognition of concessionary leases. No additional reasons different from those discussed in the BCs.

### **Specific Matter for Comment 2:**

*The IPSASB decided to propose non-authoritative guidance for arrangements conveying rights over assets in IPSAS 47 (see paragraphs IPSAS 47. BC146 – BC150). Do you agree with the proposed non-authoritative amendments 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.*

#### **Response**

ONECCA-BF agrees with the proposed non-authoritative amendments to IPSAS 47 and below are additional reasons supporting this position:

- IPSASB non-authoritative guidance are largely awaited in our jurisdictions that usually rely on other sources and struggle with implementation;
- Non-authoritative guidance are helpful in obtaining a more complete and standalone standard for our jurisdictions where IPSASB guidance are often expected and where other non IPSASB guidance often in use. In our view that will contribute to a consistent implementation of the standard.

### **Specific Matter for Comment 3:**

*The IPSASB decided to propose non-authoritative guidance for arrangements conveying rights over assets without considerations in IPSAS 48 (see paragraph IPSAS 48. BC41 – BC44). Do you agree with the proposed non-authoritative amendments 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.*

#### **Response**

ONECCA-BF agrees with the IPSASB's decision to propose non-authoritative guidance for arrangements conveying rights over assets without considerations in IPSAS 48. The additional rational is as following:

- Non-authoritative guidance can assist users in addressing ambiguities and grey areas in the standard that might not have been fully covered in the authoritative text;



- As stated above in SMC 2, IPSASB non-authoritative guidance are awaited in our jurisdictions that usually rely on other sources and struggle with implementation;
- Non-authoritative guidance assist in obtaining a more complete and standalone standard in our jurisdictions where IPSASB guidance are often awaited and other non IPSASB guidance are sometimes in use.