



भारतीय सनदी लेखाकार संस्थान
(संसदीय अधिनियम द्वारा स्थापित)
THE INSTITUTE OF CHARTERED ACCOUNTANTS OF INDIA
(Set up by an Act of Parliament)

27th November 2024

Mr. Ian Carruthers
Chairman,
International Public Sector Accounting Standards Board,
The International Federation of Accountants,
277 Wellington Street West,
Toronto, Ontario M5V 3H2 CANADA

Dear Ian Carruthers,

Sub: Comment on IPSASB Exposure Draft 91, Limited-scope Updates to First-time Adoption of Accrual Basis International Public Sector Accounting Standards (IPSAS) (Amendments to IPSAS 33)

We are pleased to provide comments on the Exposure Draft 91, Limited-scope Updates to First-time Adoption of Accrual Basis International Public Sector Accounting Standards (IPSAS) (Amendments to IPSAS 33), issued by the International Public Sector Accounting Standards Board (IPSASB) of the International Federation of Accountants (IFAC). Our comments on the Consultation are enclosed with this letter.

Please feel free to contact us, in case any further clarification in this regard is required.

Thanking you,

Yours sincerely,

CA. Kemisha Soni
Chairperson
Committee on Public and Government Financial Management
The Institute of Chartered Accountants of India
CPGFM Secretariat: 0120-3045985
E-mail: cpf.aslb@icai.in; cpf_ga@icai.in
CPGFM Portal: <https://cpgfm.icai.org/>
CPGFM Twitter Handle: @cpgfmicai

Encl: as above



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Exposure Draft 91, Limited-scope Updates to First-time Adoption of Accrual Basis International Public Sector Accounting Standards (IPSAS) (Amendments to IPSAS 33)

Specific Matter for Comment 1

The IPSASB agreed to undertake this limited scope project to address stakeholder concerns in the application of IPSAS 33, to improve its effectiveness and user-friendliness. In response, the IPSASB propose to amend IPSAS 33 as follows:

- (a) To revise authoritative text and Basis for Conclusions by rearranging the guidance by topic;
- (b) To revise guidance to improve understandability and reduce duplication;
- (c) To revise relevant guidance to encourage the first-time adopter to apply IPSAS incrementally and as soon as possible by emphasizing the choice to apply or not apply the available exemptions;
- (d) To add non-authoritative guidance (particularly under implementation guidance) to support the understanding and application of IPSAS 33; and
- (e) To add non-authoritative guidance on the pre-adoption planning and preparation phase of the transition to accrual basis IPSAS.

Do you agree with the proposed amendments? If not, please explain your reasons.

ICAI's views:

We agree with the IPSASB's approach of making limited scope updates to IPSAS 33, as the primary purpose of IPSAS 33 is to provide transitional exemptions related to recognition and measurement principles in other IPSAS, rather than establishing a separate set of recognition and measurement requirements in IPSAS 33.

Specific Matter for Comment 2

The definition of "deemed cost" was previously deleted from the IPSAS 33 as a consequential amendment through IPSAS 46, *Measurement*. The IPSASB agreed that the definition of "deemed cost" is important for the understanding of the exemptions in the Standard relating to the use of deemed cost, and therefore propose to include a copy of the IPSAS 46 definition of deemed cost in IPSAS 33.

Do you agree with the inclusion of the definition of "deemed cost"? If not, please explain your reasons.



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ICAI's views:

We agree with the IPSASB's approach to include the definition of 'deemed cost' from IPSAS 46 in IPSAS 33 because 'deemed cost' is important for applying the exemptions in IPSAS 33, and IPSAS 33 precedes IPSAS 46.