

Ross Smith
Technical Director
International Public Sector
Accounting Standards Board
International Federation of Accountants
277 Wellington Street, 4th Floor
Toronto, Ontario M5V 3H2
CANADA

Lausanne, November 5, 2024

Swiss Comment to

ED 91 Amendments to IPSAS 33

Dear Ross,

With reference to the request for comments on the proposed Consultation Paper, we are pleased to present the Swiss Comments to the Exposure Draft 91 Amendments to IPSAS 33. We thank you for giving us the opportunity to put forward our views and suggestions. You will find our comments for the ED in the attached document.

Should you have any questions, please do not hesitate to contact us.

Yours sincerely,

SRS-CSPCP



Prof Nils Soguel, President



Evelyn Munier, Secretary

Comments to the Exposure Draft 91 Amendments to IPSAS 33

Swiss Comment to

ED 91 Amendments to IPSAS 33

Table of Content	Page
1. Introduction.....	3
2. General Remarks.....	3
3. Specific Matter for Comment 1	3
4. Specific Matter for Comment 2.....	3

1. Introduction

The Swiss Public Sector Financial Reporting Advisory Committee (SRS-CSPCP) was established in 2008 by the Swiss Federal Ministry of Finance together with the cantonal Ministers of Finance. One of its aims is to provide the IPSAS Board with a consolidated statement for all three Swiss levels of government (municipalities, cantons and Confederation).

The SRS-CSPCP has discussed ED 91 Amendments to IPSAS 33.

2. General Remarks

IPSAS 33 applies primarily to governments that are transitioning from cash accounting to accrual accounting. Swiss local authorities have been using accrual accounting for many years. Therefore, this standard is of little relevance to Switzerland.

3. 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 elect 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.

The SRS-CSPCP agrees to amend the Application Guidance (AG) of IPSAS 33. It supports the reorganisation of the existing authoritative guidance into a more understandable and user-friendly structure in order to better assist first-time adopters in applying IPSAS 33. In this sense, the structure by topic is certainly also conducive to comprehensibility.

4. 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

Normally, definitions are listed in only one standard. Deemed cost is currently defined in IPSAS 46. Repetition of a definition is technically inconsistent. However due to the stand-alone nature of IPSAS 33, the SRS-CSPCP believes that repeating the same definition in this standard is justified.