

## **Comments on CONSULTATION PAPER (CP), *ADVANCING PUBLIC SUSTAINABILITY REPORTING***

### **Preliminary view 1 – Chapter 1**

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

Do you agree with the IPSASBs Preliminary View?

If not, please provide your reasons

**[we agree that there is a need for a global public sector sustainability reporting guidance. We believe it is empirical that the proposed guidance addresses environment social and governance disclosures in a comprehensive and flexible approach].**

### **Preliminary View 2 – Chapter 2**

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

Do you agree with the IPSASB Preliminary View?

If not, please provide your reasons.

**[We believe that in order to develop an effective and widely adopted global public sector guidance, IPSASB will have to ensure the presence of sustainability experts who are familiar with sustainability reporting elements for public sectors].**

### **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.

**[For Saudi Arabia, we believe such guidance must take into account our nationwide vision 2030 and Saudi green initiative that emphasize infrastructure development and policy development, along with the incorporation of the circular carbon economy framework].**

### **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.

**[Further details are needed to provide feedback on the structure. Such as:**

**-What are the function specific metrics?**

**-How detailed and in depth will the financial sustainability related guidance be?].**

### **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. However, it is importance that the guidance address all methods of emission reduction. Specifically, circular carbon economy framework that highlights the reuse, recycling, removal and storage of emissions. Whether through technological or nature based solutions**

**It is also important to highlight that GHG emissions are not standardized, but varies across different economic landscapes]**

### **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.

**[Agreed. The enablers should also address the importance of comparability of the produced reports globally as well as sectorial differences ].**

### **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?

**[Our Comments].**

**Other Comments:**

**[Additional Comments].**