

Comments on Consultation Paper, *Advancing Public Sector 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 global public sector specific sustainability reporting guidance. However, if it is agreed that there should be a global consideration to prepare a report on sustainability in the public sector, the following points are suggested:

- There should be an integrated framework that emphasizes the Sustainable Development Goals (SDGs) and its related indicators, and sub-goals.
- There are some aspects should include the report such as environmental, social, economic, cultural, welfare, regional micro, and macro factors.
- The reports should be more comprehensive based on impacts of elements, such as focusing on the dimensions of the environment, social, and governance.
- There should be guidelines or an explanatory framework that distinguishes between developed and developing countries so that it does not obstruct developing countries from development and is based on the principle of common and differentiated responsibility of countries, this can help the board to achieve its goals.
- The consideration of the environmental agreements, such as the principles of The UN Framework Convention on Climate Change - biodiversity agreements - the United Nations Convention to Combat Desertification and other relevant international agreements and bodies.
- It is significant to consider the foundations and principles of the Twenty-First century agenda on sustainability when setting the criteria for the report, as well as the national conditions of countries and capacities.

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 partially agree with preliminary view 2. The IPSASB's with their experience, process and relationships can produce sustainability reporting guidance effectively but we believe it very important to form a specialized committee within the board that includes members who are experts in the fields of environment, climate change and energy to give the required dimension by linking science to policies, and then, translating this into the standards that will be reflected in the reporting. Nevertheless, considering the differences, priorities and national trends of all countries and in line with their future directions to develop indicators and guiding models to prepare reports.

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.

The kingdom of Saudi Arabia has paid a great attention to sustainability, this can be noted in Vision 2030 where there are several initiatives emphasize the sustainability such as the target to achieve ZERO emission by 2060. There are huge projects that concentrate on sustainability and considered to be environment-friendly such as NEOM, THE LINE, Green Saudi Initiative, Environmental Afforestation Initiative, King Salman Renewable Energy Initiative and some other projects and initiatives. Climate change is another important topic that is addressed in our region and therefore Saudi Arabia has been a member of Paris agreement.

However, it would be good to reinforce the science and policy interface within the context of developing policies and investment. Additionally, we recommend considering that any international guidelines or reports on sustainability should not limit the ability of the developing countries to achieve (continuity of development in all sectors - diversification of sources of income - preservation of the environment and natural resources - achieving prosperity)

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.

We partially agree with the proposed framework; we believe it is very unclear and simple to the extent it makes hard to perceive the objective of this framework. Hence, more details should be provided.

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 partially agree; however, focusing on one of the environmental challenges only does not serve the orientation and represents a special orientation for some industrialized countries and can harm the interests of the oil-producing countries. It is better to consider all the challenges facing sustainable development and environmental systems at the economic, environmental and social levels.

- It is important to include adaptation with co-benefit mitigation as one of the disclosure requirements as well. On the other hand, addressing climate change is not limited to mitigation, but adaptation is a top necessity and a very important for developing countries, and many of these countries have adopted the concept of adaptation and this requires inclusion in the formulation of standards.

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.

We agree with the preliminary view 5 about the key enablers. Furthermore, we believe IPSASB seeks for support from other countries that have national standards and addressed sustainability issues so the IPSASB can exploit their experience for the aspects related to sustainability reporting. Consulting experts from different regions and backgrounds can lead to build a solid foundation of sustainability reporting.

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?

We would be more than happy to provide our comments and consultations regarding this topic.