
**EXPOSURE DRAFT 83,
REPORTING SUSTAINABILITY PROGRAM INFORMATION - RPGs 1 AND 3: ADDITIONAL NON-AUTHORITATIVE
GUIDANCE**

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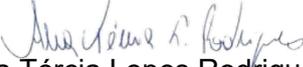
Dear Mr. Ross Smith,

The *Conselho Federal de Contabilidade* (CFC) of Brazil welcomes the opportunity to collaborate with the consultation on IPSASB, *Exposure Draft (ED) 83, Reporting Sustainability Program Information—RPGs 1 and 3: Additional Non-Authoritative Guidance*. CFC, alongside with its regional arms - Regional Accounting Councils or *Conselhos Regionais de Contabilidade* (CRCs), is the Professional Accountancy Organization that carries out regulatory activities for overseeing the accountancy profession throughout the country.

Our points of view and comments can be found on the Appendix of this document that was prepared by the Permanent Committee for Public Sector Accounting Standards linked to Conselho Federal de Contabilidade (CP CASP – acronym in Portuguese).

If you have any questions or require clarification of any matters in this submission, please contact: tecnica@cfc.org.br.

Regards,


Ana Tércia Lopes Rodrigues
Technical Vice-President
Conselho Federal de Contabilidade

CONTEXT AND GENERAL COMMENTS

The Brazilian Federation is composed by 26 states, the Federal District and 5,569 municipalities governments. These levels of governments are responsible for formulating, implementing, and evaluating public policies in cooperative and/or competitive arrangements.

The sustainability theme is relevant for Brazil, considering the abundance of natural resources, internationally recognized as one of the largest "assets/stocks" of the humanity, and relevant social and economic problems. In this regard, we strongly support the sustainability reporting project.

In the next section, we present our comments and answers on the specific matters for comment of the public consultation.

APPENDIX

General Comments:

The additional implementation guidance and illustrative examples are helpful for the application of requirements in RPG 1 and RPG 3. However, the interface with natural resources project and the Sustainability Developed Goals (SDG) might be clarified with the objective to establish the relationship with the sustainability reporting major project. Also, our suggestion would be to monitor the implementation of RPG 1 and RPG 3 by jurisdictions aiming to obtain inputs for the next stage for sustainability reporting project.

It is difficult to find the last version of the Recommended Practice Guideline (RPG's) in the IPSASB website. For example, the website <https://www.ipsasb.org/support-resources> does not present a filter which could facilitate the search. Therefore, it is unclear if the documents available at the page are its most updated version. In RPG 1, paragraph 5 was deleted, and paragraph 6 was amended in 2016. In RPG 3¹, paragraph 3, BC 8, BC 9 and BC 43 were amended in 2016. However, these amendments are not reflected in RPG 1 and RPG 3 available on the website where ED 83 was published (<https://www.ipsasb.org/publications/exposure-draft-ed-83-reporting-sustainability-program-information>). Also, it appears that the new BCs are not correctly numbered.

Specific Matter for Comment 1

Do you agree with the proposed additional implementation guidance for RPG 1? If not, what changes would you make?

Answer:

CP CASP/CFC agrees with the proposed additional implementation guidance for RPG 1.

Specific Matter for Comment 2

Do you agree with the proposed additional implementation guidance and illustrative examples for RPG 3? If not, what changes would you make?

Answer:

CP CASP/CFC partially agrees with the proposed additional implementation guidance and illustrative examples for RPG 3. The four examples contribute for promoting the disclosure about sustainability based on RPG 3, since the definitions are clearly applied for the sustainability programs. However, the terms “Green Bond”, “Sustainability Program” and “Carbon Tax” should be defined/described for better understanding.

¹ https://www.ifac.org/system/files/publications/files/IPSASB-The-Applicability-of-IPSASs-Final-Pronouncement_0.pdf