



Office of the
Auditor General
of Canada

Bureau du
vérificateur général
du Canada

3 September 2022

International Public Sector Accounting Standards Board

International Federation of Accountants
277 Wellington Street West
Toronto, ON M5V 3H2

Re: Consultation Paper – Advancing Public Sector Sustainability Reporting

Thank you for the opportunity to comment on the above Consultation Paper. I am responding on behalf of the Office of the Auditor General of Canada.

We are pleased to submit to the Board our response below to the specific questions posed in the Consultation Paper.

Sincerely,

A handwritten signature in cursive script that reads "Lissa Lamarche".

Lissa Lamarche, CPA, CA

Assistant Auditor General
Office of the Auditor General of Canada

Preliminary View 1 – Chapter 1. The IPSASB’s view is that there is a need for a global public sector specific sustainability reporting guidance.

Do you agree with the IPSASB’s Preliminary View?

If not, please provide your reasons.

We agree there is a need for public sector specific sustainability reporting guidance.

Preliminary View 2 – Chapter 2. The IPSASB’s experience, processes and relationships would enable it to develop global public sector specific sustainability reporting guidance effectively.

Do you agree with the IPSASB’s Preliminary View?

If not, please provide your reasons.

We agree the IPSASB’s experience, processes and relationships enable it to develop global public sector specific sustainability reporting guidance effectively.

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 most pressing topics for our jurisdiction are:

- Sustainable Development Goals (SDGs) – the Canadian federal public sector is already reporting on SDGs, primarily using GRI standards, therefore the prioritization of guidance in this area would be beneficial.
- Materiality – guidance defining materiality for disclosure of sustainability-related financial information developed in other existing frameworks may not be directly applicable to the public sector.

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 agree with IPSASB’s preliminary view.

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 with the IPSASB's preliminary view.

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, explaining which of the proposed key enablers you disagree with, and why.

We agree with the IPSASB's preliminary view. We encourage coordination with other international sustainability standard setters and the International Auditing and Assurance Standards Board (IAASB) as the IAASB will need to ensure current auditing standards are adequate for providing assurance on 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

The Office of the Auditor General of Canada has contributed to standard setting in various ways in Canada and internationally – we provide regular contributions to due process via solicitations for comment as well as directly participate in standard setting through task force and board membership. We would be willing to consider contributing professional time to IPSASB task forces developing global public sector sustainability reporting guidance should our competencies and capacity align with the standard setting work plan.