

## **Comment on Consultation Paper, *Advancing Public Sector Sustainability Reporting.***

### **Preliminary view 1**

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

Do you agree with the IPSASB's Preliminary view?

If not, please provide your reasons?

We agree that there should be global reporting guidance on sustainability in the public sector. However, we have some points we believe they should be taken into consideration

- ✓ Consider integrated framework that confirms the Sustainable Development Goals (SDGs).
- ✓ Taking into account other essential aspects such as cultural, regional, micro, and macro-economic factors.
- ✓ It should be comprehensive reports based on some factors like the broader dimensions of environment, social, and governance.
- ✓ It should distinguish between developed and developing countries.
- ✓ Consider Paris Agreement.
- ✓ The reports should be comparable with other entities within the same industry.

### **Preliminary view 2**

The IPSASB's experience, processes and relationships would enable it to develop public sector specific sustainability reporting guidance effectively?

Do you agree with the IPSASB's Preliminary view ?

Partially agree. We believe that the IPSASB needs experts who are more familiar with the elements of the sustainability report related to the public sectors. We believe it is important to create a committee within the board that is specialized in producing and monitoring

subjects related to sustainability, as there is a need to clarify the differences and consider the national priorities and directives that will fit with future directives.

### **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.

KSA is planning to achieve Net Zero Emissions by 2060. This is consistent with the larger goals of KSA Vision 2030 which include accelerating the energy transition, achieving sustainability targets, and spurring fresh investment through several initiatives and projects such as: Green Saudi Initiative, NEOM and The Line NEOM. These initiatives are designed to address such following concerns: reducing reliance on non-renewables and shifting to renewable, atomic, and other environment-friendly sources of energy, efficiency of energy consumption, tackling climate change also with drought surviving tree planting, handling water resources in the face of water scarcity and desertification, etc.).

### **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?

We agree with proposed framework. However, considering the simplicity of the concept of Figure 5 may not be that helpful in understanding the IPSASB objectives and providing more detailed implementation plans and clear KPIs to measure progress would be recommended .

#### **Preliminary view 4— Chapter 4**

If the IPSASB were to develop global public sector specific sustainability reporting guidance. It would address general requirements for sustainability – related information and climate-related disclosures as its first topics. Subsequent priority topics would be determined in the light of response to this consultation paper as part of the development of its 2023-2028 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.

Partially agree. Climate change is one among many issues that comprise sustainability. As such, the proposal to start with sustainability and climate change would either lead to duplication or an uneven consideration of sustainability, while climate change is a crucial global issue, other issues may be more urgent, at least in some regions, such as hunger, disease, and poverty.

Starting with sustainability alone would be more equitable as far as the consideration of issues and offers an opportunity to inform future considerations of additional issues, otherwise all issues would require dedicated guidance.

#### **Preliminary view 5- Chapter 4**

The Key enablers identified in paragraph 4.2 are needed in order for 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 initial view of the International Public Sector Accounting Standards Board. While we support the creation of a comprehensive public sector report proposed by the International Public Sector Accounting Standards Board, there are some challenges to include such as:

- ✓ Considering the differences between public sector entities.
- ✓ Comparability of the sustainability reports.
- ✓ Auditability of these reports, as they're expected to be subjective.

#### **Specific Matter for Comment 2—Chapter 4 - Key Enablers**

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 are willing to support the IPSASB members with any type of consultations they need.