



April 4, 2016

**Technical Director
International Public Sector Accounting Standards Board
International Federation of Accountants
277 Welling Street West
Toronto, ON M5V 3H2 Canada**

Re: Exposure Draft 59 “Amendments to IPSAS 25, Employee Benefits”

Thank you for the opportunity to comment on the proposed amendments to IPSAS 25.

We support the proposed revisions to IPSAS 25 to converge with IAS 19, Employee Benefits. We agree that there is no public sector reason for deviation from the amendments made to IAS 19 up to December 31, 2015.

We believe that the IPSASB’s approach of highlighting the differences between IPSAS 25 and the Government Finance Statistics reporting guidelines in the Basis for Conclusions is appropriate.

We also support deletion of the current Composite Social Security Programs section in IPSAS 25 because it is not necessary. The definition of “employee benefits” already scoped “in” composite social security programs that provide benefits that are consideration in exchange for service rendered by employees. The accounting treatment of the “in-scope” programs, same as the state plans, would be covered without a section of its own by deleting the phrase “other than composite social security programs” in the definition of state plans.

Please note that these are views of staff and do not represent the views of the Public Sector Accounting Board.

Sincerely,

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