



Accounting Standards Board

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The Technical Director
International Public Sector Accounting Standards Board
International Federation of Accountants
277 Wellington Street, 4th Floor
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Per e-mail

10 September 2014

Dear Stephenie,

COMMENTS ON EXPOSURE DRAFT 55: IMPROVEMENTS TO IPSASs 2014

We welcome the opportunity to provide comments on Exposure Draft 55 on *Improvements to IPSASs 2014*.

Overall, we support the biennial revision of the IPSASs to align them to IFRSs and agree with the amendments proposed in the Exposure Draft. We believe the proposed amendments will enhance and improve the principles set out in the IPSASs.

While we acknowledge the IPSASB's efforts to update the IPSASs for annual Improvements to IFRSs made to the equivalent IFRSs by the IASB, we would like to encourage the Board to undertake a future project to review existing IPSASs to ensure consistent references to other standards and use of terminology.

The views expressed in this letter are those of the Secretariat and not the Accounting Standards Board (Board).

Please do not hesitate to contact me should you wish to discuss any of our comments.

Yours sincerely

A handwritten signature in dark ink, appearing to read 'Erna Swart', with a small flourish at the end.

Erna Swart

Chief Executive Officer

Board Members: Mr V Jack (Chairperson), Mr S Badat, Ms T Coetzer, Mr B Colyvas, Ms CJ Kujenga,
Mr K Kumar, Mr G Paul, Ms N Ranchod, Ms R Rasikhinya, Mr M Sass
Alternates: Ms L Bodewig, Ms L le Roux
Chief Executive Officer: Ms E Swart



GENERAL MATTERS FOR COMMENT

Amendments to IPSAS 1 on *Presentation of Financial Statements*

We support the proposed amendment and also agree with the IPSASB for excluding those amendments that relate to presenting additional comparative information, and presenting a statement of financial position at the beginning of a preceding period for retrospective changes resulting from accounting policy changes, restatements and reclassifications.

We note that the term ~~“previous”~~ “preceding” has been left out in the proposed amendments in paragraph 53, and we propose that this paragraph should be amended as indicated below:

~~“Except when IPSAS permits or requires otherwise, an entity shall present comparative information shall be disclosed in respect of the previous period for all amounts reported in the financial statements”~~ +

We also note the inconsistent use of terminology in the proposed amendments in paragraph 53B. To be consistent with paragraphs 21, 53 and 53A, we propose that paragraph 53B, 54 and 57 should be amended by replacing ~~“previous period(s)”~~ with ~~“preceding period(s)”~~, and/or ~~“last reporting date”~~ with ~~“end of the preceding period”~~.

Amendments to IPSAS 17 on *Property, Plant and Equipment*

We support all the proposed amendments to IPSAS 17.

Amendments to IPSAS 28 on *Financial Instruments: Presentation*

We support the proposed amendments to clarify the tax effect of distributions to holders of equity instruments.

Amendments to IPSAS 28 on *Intangible Assets*

We support all the proposed amendments to IPSAS 31.

IASB Improvements considered for inclusion in ED 55

We agree with the IPSASB’s reasons for excluding certain amendments.