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Technical Director  
International Public Sector Accounting Standards Board  
130 King St W  
Toronto, ON M5X 1C9  
Canada  
Per electronic submission

11 December 2019

Dear John

**COMMENTS ON ED 69 - PUBLIC SECTOR SPECIFIC FINANCIAL INSTRUMENTS:  
AMENDMENTS TO IPSAS 41**

We welcome the opportunity to provide comment on ED 69. These comments have been prepared by the Secretariat of the ASB after consulting with:

- The National Treasury, which recognises subscriptions in international organisations and aspects of the special drawing rights programme with the IMF; and
- Technical experts at audit firms that specialise in financial instruments, or who are involved in the audit of the South African Reserve Bank (which recognises monetary gold, notes and coins in circulation, and special drawing rights assets and liabilities).

*Support for proposed approach*

We agree with the direction that the IPSASB has decided to take to deal with “public sector specific financial instruments”. Given that these instruments are held by central banks, most of which apply IFRS Standards, we agree with the narrow focus taken by the IPSASB to provide guidance. Because many of the instruments have similar characteristics to financial instruments, we support the amendments to IPSAS 41.

*Support for amendments*

The stakeholders we consulted agreed with the proposed amendments to IPSAS 41. The National Treasury indicated that they found some of the material on the accounting entries

Board Members: Mr V Ngobese (chair), Ms F Abba, Ms L Bodewig, Mr C Braxton, Mr K Hoosain,  
Ms I Lubbe, Mr K Makwetu, Ms P Moalusi, Ms N Themba  
Alternate: Ms M Sedikela  
Chief Executive Officer: Ms E Swart, Technical Director: Ms J Poggiolini

included in the Consultation Paper issued in July 2016 helpful. They observed that, while they are familiar with the features of the various transactions, they are not familiar with IPSAS. They requested that the information be updated to reflect the decisions in ED 69. It may be helpful if this information is published as a staff paper or FAQ on the IPSASB's website.

*Visibility of guidance*

ED 69 proposes amendments to the non-authoritative material published with IPSAS 41. This material is voluminous. Once the amendments are incorporated into IPSAS 41, it may be difficult for users of IPSAS to know where to find guidance on monetary gold, notes and coins in circulation, subscriptions to international organisations and special drawing rights.

The IPSASB should give consideration to how it ensures that there is ongoing visibility of the guidance provided through options such as a permanent project page, a staff paper, FAQs etc.

Please feel free to contact me should you have any queries on our comments.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Poggiolini', written in a cursive style.

Jeanine Poggiolini

Technical Director