

Specific Matter for Comment 7: Conceptual foundations (paragraphs B2–B15)

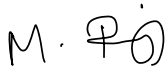
This Exposure Draft includes conceptual foundations aligned with the IPSASB Conceptual Framework including the definition of materiality (see paragraphs B8–B10) and primary users of public sector general purpose financial reports (see paragraphs B.AG28–B.AG33).

Do you agree that the proposed definition of materiality based on the IPSASB Conceptual Framework meets the information needs of primary users for climate-related disclosures? If not, what alternative approach would you propose and why?

Comment

We do not agree with the proposed definition of materiality. EU-CSR and GRI Standards emphasize the concept of Double materiality. IPSASB chose to follow the path similar to that of ISSB for IFRS Sustainability standards. Public sector entities have a much broader roles related to sustainability topics compared to that of private entities. Therefore, we suggest IPSASB to also consider the impact materiality when framing the public sector sustainability standards.

For **EEE Sustainability Advisors Limited**



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