



INTERNATIONAL FINANCIAL REPORTING
FOR NON PROFIT ORGANISATIONS

International Non-profit Accounting Guidance (INPAG) Exposure Draft 3

Response template

Please use this form to record your responses to the Specific Matters for Comment relating to [INPAG Exposure Draft 3](#)

Comments are most helpful if they:

- a) Address the question asked;
- b) Contain a clear explanation to support the response provided, whether this is agreeing or otherwise with any proposals made;
- c) Propose alternatives for consideration, where responses are not in agreement with the proposal made;
- d) Specify the INPAG paragraphs to which any comments relate; and
- e) Identify any wording in the proposals that might not be clear because of how they translate.

The text boxes will expand as required. There is no size limit. There are 11 question areas, according to the various sections in INPAG. You do not need to answer all questions and can choose to answer as many or as few as you wish. You may comment on any aspect of Exposure Draft, not just the specific matters identified. General comments should be added at the end of this document.

Responses must be received by **16 September 2024 and must be in English**.

Responses can be submitted to ifr4npo@cipfa.org or through the website at www.ifr4npo.org/have-your-say

Respondent information:

First name:	Álvaro	Country: (this should be the country in which you are based)	Colombia
Last name:	Fonseca Vivas PhD	Professional interest: please choose from: <ul style="list-style-type: none"> • NPO, ie preparer of financial statements, • auditor, • accounting standard setter, • professional accounting organisation, • regulator of NPOs, • donor, • academic, • civil society, • user of NPO services, • other (please state) 	NPO
Email:			
Position:	Presidente del Consejo directiva de cdr		
Organisation: (who do you work for)	Centro Colombiano de derechos reprográficos. (Colombian Center for Reprographic Rights – CDR)		
Response submitted:	<ul style="list-style-type: none"> • as an individual 		
Please indicate whether you wish to receive further information about this project and consent to being contacted at the email address provided.			Agree Disagree

This document has been designed purely to enable feedback to Exposure Draft 3. Participation is undertaken on an entirely voluntary basis. The responses will be used to shape the development of INPAG and not for any other purpose. We ask for your name and contact information to enable us to contact you if we should have any clarifications regarding your responses. Responses will be public, but personal contact information will not be disclosed. Personal information will only be held for the purposes of developing INPAG. You may withdraw your consent for us to hold any of your personal information at any time by contacting us at ifr4npo@cipfa.org.

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Specific Matters for Comment

Question 1: Fund accounting

INPAG Section 36 sets out the characteristics of a fund for the purposes of INPAG and whether a fund is presented in the financial statements as being with or without restrictions. A fund is presented as with restrictions where the use of resources is limited to a specific purpose or activity as a consequence of externally imposed legal or equivalent arrangements or where a fund is established for a fundraising campaign with an externally communicated commitment on the specific use for the funds. The guidance requires that the income, expenses, assets and liabilities associated with a fund are recorded. New disclosures are required for fund balances and movements in the year. INPAG Section 5 has been amended to remove the requirement to disclose funds with and without restrictions on the face of the Statement of Income and Expenses.

1 Fund accounting	References	Response
a) Do you agree that the ED1 requirement to present funds with restrictions and funds without restrictions on the face of the Statement of Income and Expenses should be removed? If not, why not?	G5.3, AG5.4	I do not agree, because presenting the restricted and unrestricted funds on the face of the income and expenditure statement together with the detail in the notes to the financial statements del G5.3 and AG5.4 show who the benefactors are and there would be transparency and faithfulness in the operations and transactions carried out by the non-profit entities.
b) Do you agree that the guidance in Section 36 will ensure that material funds can be identified? If not, what changes would you propose? Is there a risk that funds are not identified?	G36.3–G36.4, Figure AG36.1	Yes, I agree with the guidance the identification of material funds in particular with or without restrictions. The risk that is not identified is the one related to sustainability from the aspect of social and environmental management that has an impact on some NPOs.
c) Do you agree that income, expenses, assets and liabilities are tracked for each fund? What are the costs and benefits? What, if anything, would you change and why? What are the practical considerations?	G36.5, G36.7, AG36.3	<ul style="list-style-type: none"> . - Yes, and it is very important that all accounts or items in the financial statements are tracked, because it lends itself to money laundering, money laundering and to finance all types of terrorism or to increase corruption and impunity. . - The costs and benefits other than those presented in G36.5, G36.7, AG36.3, I would consider establishing those that are also used as donations or payments to persons other than the NPO or to the directors, which decapitalise these entities. . - I would not change the exercise; it seems to me for now a good working reference and the practical considerations is to show in detail the accounts or items in the notes which should be sufficiently clear and do not show it in the financial statements.
d) Do you agree with the two criteria for a fund to be a fund with restrictions? If not, what would you change and why?	G36.9	No, they seem fine to me.

1 Fund accounting	References	Response
e) In order to provide transparency about the finances of an individual fund, do you agree that all the expenses should be charged against a fund with restrictions even if there are currently insufficient resources to cover these, or specific costs are not eligible under a grant arrangement? If not, what alternative would you propose and why?	G36.11–G36.12	Yes, I agree that expenses and costs are thus restricted, there are insufficient resources to cover them, or they are not subsidised under a grant agreement.
f) Do you agree with the NPO funds disclosures requirements? If not, what would you change and why?	G36.21–G36.23	Yes, I agree that all reporting requirements on NPO funds should be handled.
g) Do the Illustrative examples demonstrate the key concepts in fund accounting? If not, what would you change and why?	Implementation Guidance – Section 36	Yes, as mentioned above it is also important to include when sustainability is affected, and sustainability is reflected in the financial statements as in the case of social work and environment which are subsidised.

Question 2: Presentation of expenses, fundraising costs and related disclosures

INPAG Section 24 Part II provides guidance on the presentation of expenses. It permits an expense analysis by nature, by function, or a mixture of the two. It includes a rebuttable presumption that an analysis by nature is used unless another analysis provides information that is more relevant and reliable. Guidance is provided on the allocation and aggregation of costs where a functional or mixed presentation is used, which will be useful for calculating support costs. INPAG Section 24 Part III provides a definition of fundraising activities and identifies three categories to be disclosed: activities to generate donations, gifts and similar transfers; commercial and trading activities; and investment management. There is a pragmatic exception where costs need to be split between fundraising and other activities.

INPAG Section 33 on related party disclosures draws attention to the possibility that an NPO's financial position and/or its surplus or deficit have been affected by the existence of related parties. Disclosure is required of personnel compensation made to governing body members as well as key management personnel. INPAG Section 28 has been updated to include the disclosure of short-term employee related benefits.

2 Presentation of expenses	References	Response
a) Do you agree that there is a rebuttable presumption that a by nature classification of expenses is used unless this doesn't provide the most relevant and reliable information to the users of the financial statements? If not, why not?	G24.43–G24.47, AG24.45–AG24.47	<p>. - I do not agree on the rebuttable presumption that a classification of expenses by nature is used, because the presumption is an assumption that is not taken as certain without immediate evidence, based on indications or logic.</p> <p>. - It is used in different contexts, such as in law or in everyday situations.</p> <p>. - In the legal field, the presumption is an inference that the law establishes on certain facts until proven otherwise, therefore it must be taken into account on actual transactions, which become transactions in the financial statements contributing to the transparency and faithfulness of the transactions.</p>
b) Do you agree that the rationale for using a classification of expenses other than by nature should be disclosed? If not, why not?	G24.44	Yes, the notes to the financial statements for the reason mentioned above to prevent NPOs from being used for money laundering, money laundering and supplying terrorists as well as payments for other activities to terrorist groups.
c) Do you agree that where a functional or mixed presentation of expenses is used, a narrative description of the types of expenses incurred on each function line item is sufficient and that a requirement for these to be quantified is not necessary? If not, why not?	G24.46, AG24.48	I agree that when there is a use of a functional or mixed presentation of the expenses that were incurred in each of the items of the functions or operations carried out, quantification and clarification should be required in the notes to the financial statements precisely to avoid money laundering, money laundering and other types of operations, including salaries of civil servants. Also avoiding sumptuary expenses.
d) Do you agree with the expense disclosure requirements? If not, what would you change and why?	G24.50–G24.57, G33.7–G33.11, G28.38	Yes, I agree with the expenditure requirements and the detail of expenditure including supporting documents.
e) Do you agree with the description of direct costs, shared costs and support costs and that these allow the full cost of an activity to be identified? If not, why not?	G24.48–G24.49	Yes, I agree with the pragmatic exceptions for fundraising costs, although it is important and relevant that the description is given in the notes to the financial statements.
f) Do you agree that commercial and trading activities that are for the purposes of fundraising and investment management costs associated with a	G24.64–G24.66	I agree that the costs of each of the categories of fundraising activities should be disclosed separately and presented on a gross basis and clarification on a qualitative basis in the notes to the financial statements.

2 Presentation of expenses	References	Response
fund whose purpose is to generate future returns are included as fundraising activities? If not, why not?		
g) Do you agree with the pragmatic exception that fundraising costs do not need to be split from other costs where the cost of doing so would exceed the information benefit to stakeholders? If not, what would you change and why?	G24.72	No, I agree that costs should be segregated because they should be disclosed in compliance with the principles or conceptual framework, as a result of the operations and transactions carried out by the NPO, precisely as discussed in the previous points, and not as a result of money laundering, money laundering, terrorist financing or a way to pay high expenses and/or costs to the officials of the entity.
h) Do you agree that the costs for each of the three categories of fundraising activity should be separately disclosed and presented gross? If not, what should be disclosed and why?	G24.74	Yes, I agree by including their description or qualitative relationship in the notes to the financial statements.
i) Do you agree that grants or donations made in arm's-length transactions with governing body members and any services they receive on the same terms as other eligible service recipients need not be disclosed as a related party transaction? If not, why not?	G33.18 a)- G33.18 b)	do agree that grants or donations received by NPOs and these should be reflected on an arm's length basis with the governing bodies and services on the same terms as they were received, because in many jurisdictions these are exempt from taxation and would lend themselves to avoidance and avoidance of taxation, as well as of operating income.

Question 3: Supplementary information and INPAG Practice Guide 1 – Supplementary statements

INPAG Section 37 requires additional information to be disclosed when an NPO produces one or more supplementary statements using INPAG Practice Guide 1. NPOs may choose to prepare a single note to meet the requirements or disclose only the additional information. INPAG Practice Guide 1 – Supplementary Statements enables the presentation of key financial information about a specified activity, project or grant, in a prescribed statement format, which can be included as an Annex to the financial statements. The Practice Guide provides templates for different variants of reporting that includes comparison to budget, multiple grants, multiple time periods and different currencies.

3 INPAG Practice Guide 1	References	Response
a) Do you agree that the requirements of Section 37 do not have to be met unless Supplementary statements are prepared in accordance with INPAG Practice Guide 1- Supplementary statements? If not, why not?	G37.1-G37.2	I disagree with the notion that the requirements of Section 37 should not be mandatory, as these are important and fundamental when presented. Therefore, they should be disclosed as supplementary statements in accordance with the INPAG Practice Guide 1 – Supplementary Statements. As I have already mentioned in previous responses, it is essential to ensure transparency in the information provided, and to ensure that it does not relate to operations of illicit origin.
b) Do you agree that a whole of NPO supplementary statement need not be presented if the additional information is already in the financial statements and/or notes? If not, why not?	G37.3, G37.10-G37.12	I disagree with the notion that a complete supplementary statement of the organisation should not be required, as this would once again fail to demonstrate the transparency of the transactions resulting from its operations. Therefore, they must be reflected both qualitatively and quantitatively in a detailed manner.
c) Do you agree with the format of the Supplementary statement? If not, what would you change and why?	SS.5	I agree with the format. Moreover, as the transactions resulting from operations are presented, they will be adjusted based on needs, and each jurisdiction would adapt them according to its informational requirements. Unfortunately, it is understood that many state officials misuse these NPOs for their own benefit, engaging in corruption and impunity, and gaining tax advantages in their favour.
d) Do you agree with the options for the disclosure of capital and inventory related costs? If not, what would you change and why?	SS.18-SS.21	Yes, I agree, and I would include aspects of sustainability, as I have mentioned previously.
e) Do you agree that the Supplementary statements are not part of the general-purpose financial report but can be published as an annex? If not, why not?	SS.25-SS.26	I disagree. The supplementary statements should be an integral part of the financial statements and their notes, as they could otherwise be lost or their relevance unclear. They must be included as an integral part of the statements, not as an annex. These experiences were already encountered in past decades, and it is not advisable to repeat them.

Question 4: Illustrative financial statements

INPAG Implementation Guidance Annex A includes Illustrative financial statements. The templates have been populated with data to cover the most common NPO transactions. The illustrative financial statements focus on new INPAG requirements.

4 Illustrative financial statements	References	Response
a) Do you agree that the illustrative financial statements cover the transactions that are prevalent for NPOs? If not, which prevalent transactions are missing and why do these need to be covered?	Illustrative financial statements	Yes, I agree that the illustrative financial statements should cover the transactions that are common for and within NPOs, with a strengthening of the notes to the financial statements.

Question 5: Equity

INPAG Section 2 provides the concepts and principles on which INPAG is based. Amendments are proposed to equity and net assets as a result of feedback. Net assets is a new element defined as the residual amount of an NPO's assets and liabilities available to achieve its objectives. The term equity claim is introduced to describe equity type instruments, which is a subset of net assets. INPAG Section 22 has the principles for classifying financial instruments as either liabilities or equity claims. As INPAG does not use the term equity, consequential amendments reflect the expected nature of NPO equity claims.

5 Equity	References	Response
a) Do you agree with the revised description of net assets and its inclusion as an element? If not, what would you change and why?	G2.73	I agree
b) Do you agree with the use of the term equity claims in Sections 2 and 22 and that equity claims are a subset of net assets? If not, what would you change and why?	G2.74, AG2.6, AG2.7, Section 22	I agree
c) Do you agree that the paragraphs relating to the sale of options, rights and warrants, extinguishing financial liabilities with equity claim instruments and treasury shares are removed from and that the paragraphs relating to capitalisation or bonus issues of shares and share splits and convertible debt or	G22.12–G22.15	I agree

5 Equity	References	Response
similar compound financial instruments are retained? If not, why not?		

Question 6: Transition to INPAG

INPAG Section 38 describes the requirements for recognising and measuring assets and liabilities to create a Statement of Financial Position when INPAG is adopted for the first time. Accumulated funds that contain historic surpluses and deficits must be split between funds with restrictions and funds without restrictions. Compliance with just the financial statements can be asserted ahead of full compliance. The narrative reporting requirements must be completed within a two-year period to be able to continue to express compliance with INPAG.

6 Transition to INPAG	References	Response
a) Do you agree with the pragmatic approaches proposed for the first time adoption of INPAG? If not, what are the practical challenges that are likely to be experienced?	G38.11–G38.12	Yes, I agree with the pragmatic approaches proposed for the initial adoption of INPAG, provided that the aspects considered for such adoption, adaptation, or convergence are disclosed in the notes to the financial statements.
b) Do you agree that compliance with INPAG can be expressed in relation to the financial statements only for a two-year transitional period? If not, why not?	G38.5–G38.6	Yes, I agree that compliance with INPAG can be expressed in relation to the financial statements only for a transitional period of two years.

Question 7: Application of fair value

INPAG Section 12 describes how to measure assets and liabilities using fair value. The use of fair value to determine the deemed cost of donated assets is reflected in INPAG Section 16, for investments in land or buildings that are held to earn rentals or for their capital appreciation, INPAG Section 17, for property, plant and equipment, including capitalisation and depreciation and INPAG Section 18, for identifiable non-monetary assets that does not have a physical substance (eg licenses). The cost model in Section 17 applies to all tangible assets that are held for use in the activities of the NPO and are expected to be used during more than one period as well as to property held to deliver an NPO's missional objectives, eg social housing. There are no exceptions for assets that are funded by grants or donations.

7 Application of fair value	References	Responses
a) Is the Section 12 application guidance that sets out how the fair value hierarchy applies to NPO assets and liabilities and the illustrative examples of fair valuing donations in-kind useful? If not, how could it be improved?	AG12.1– AG12.11	Yes, the application guidelines in Section 12, which outline how the fair value hierarchy applies to the assets and liabilities of NPOs along with illustrative examples of fair value of in-kind donations, are useful.
b) Do you agree with the additional guidance provided for donated: i) investment property (Section 16)? ii) property, plant and equipment (Section 17)? iii) intangible assets (Section 18)? If not, why not?	G16.7 G17.10 G18.14	Yes, I agree with the additional guidance provided for donations based on the following sections: i) Investment properties (Section 16)? ii) Property, plant and equipment (Section 17)? iii) Intangible assets (Section 18). However, it is important to consider the details in the notes to the financial statements.

Question 8: Impairments

INPAG Section 27 requires that the carrying amount of an asset is reduced to the recoverable amount, where its carrying amount is higher than its recoverable amount. The new measurement base for inventories held for distribution at no or nominal cost has been added. The Section refers to an NPO's 'operating units' to encompass assets that are held for missional purposes rather than purely cash-generation.

8 Impairments	References	Responses
a) Do you agree that inventory held for distribution is measured for impairment using cost adjusted for any loss of service potential? If not, what would you change and why?	G27.2–G27.4	Yes, I agree that inventory held for distribution should be measured for impairment and obsolescence, even if not explicitly mentioned, using the cost adjusted for any loss of potential service.
b) Do you agree that the term operating unit better reflects the nature of an NPO's operations and with its proposed definition? If not, what alternative term would you use and why?	G27.8	I agree that the term "operating unit" better reflects the nature of an NPO's operations and its proposed definition.
c) Do you agree that impairments to assets that form an operating unit can take	G27.15	I agree that impairments of assets forming an operating unit should take into account other economic benefits and potential service, for the benefit of the NPO.

8 Impairments	References	Responses
account of other economic benefits and service potential? If not, what would you change and why?		

Question 9: Combinations of entities

INPAG Section 19 applies to the combining of entities, (including NPOs) that meet the definition of a business. The term business has been broadened to include the types of activities carried out by NPOs. It provides guidance on the recognition and measurement of the assets and liabilities acquired in a combination and includes a simplification where there is a combination of two NPOs that both have positive net assets.

9 Combinations of entities	References	Responses
a) Do you agree that the term 'business' can be applied by NPOs when taken alongside the amendments proposed, (including the expansion of examples of control)? If not, why not? What practical issues are experienced?	G19.4, G19.5, AG19.1–AG19.2	<p>Yes, I agree that NPOs should be able to apply the term "business" when considered alongside the proposed amendments (including the expansion of control examples), because the term "business" is in the context of financial reports or regulatory guidance, the term may refer to the entity or activities involved in generating income and managing resources, but it generally refers to:</p> <ul style="list-style-type: none"> i) Commercial Activity: A set of activities carried out with the aim of generating profit through the buying and selling of goods or services. For example, a shop, a service company, or an industry are businesses in this sense. ii) Work Environment: The space or realm in which these commercial activities take place. For example, the "business world" refers to the commercial sector in general. iii) Agreement or Transaction: An agreement or transaction in which goods, services, or money are exchanged. For instance, "doing business" can mean finalising a purchase or sale agreement. iv) Company or Firm: The entity that carries out the commercial activity. For example, a company can be described as a business. v) Matter or Activity: In a more general sense, it can refer to any matter or activity that a person or entity is managing. For example, "it's a business matter" can refer to an issue that needs to be resolved within a professional context.
b) Do you agree with the proposed exemption for two NPOs that have net assets and that it should not apply where	G19.24	I don't see any issue with it for now; it seems fine to me.

9 Combinations of entities	References	Responses
one NPO has net liabilities? If not, describe the practical and accounting issues that arise?		

Question 10: Other topics in Exposure Draft 3

INPAG Section 14 and INPAG Section 15 provide guidance on accounting for associates and joint arrangements in consolidated and separate financial statements respectively. INPAG Section 20 covers the accounting for all leases and INPAG Section 34 provides guidance on three types of specialised activities: agriculture, extractive activities and service concessions. None of these Sections have been amended other than for terminology changes.

10 Other topics in ED3	References	Response
a) Do you agree that no further alignment changes are needed to: i) Section 14 Investment in associates? ii) Section 15 Joint arrangements? iii) Section 20 Leases? If not, why not?	Section 14 Section 15 Section 20	Yes, as the financial statements and their notes are presented, they should continue to be reviewed and updated according to the needs of the jurisdictions.
b) Is any of the guidance in Section 34 needed by NPOs? If yes, which elements of the section are needed and why?	Section 34	Yes, I agree that NPOs need to apply all the relevant guidance from Section 34, not just some of it.

Question 11: IFRS for SMEs Addendum

INPAG Section 7 and INPAG Section 30 (published in ED1 and ED2 respectively) have been updated as a consequence of additional text proposed in the Addendum to the draft Third edition of the IFRS for SMEs Accounting Standard issued by the International Accounting Standards Board on 28 March 2024. There is additional text on supplier finance arrangements in Section 7 and lack of exchangeability in Section 30.

11 Addendum	References	Responses
a) Do you agree that the guidance for supplier finance arrangements is useful and relevant to NPOs? If not, what would you change and why?	G7.20A– G7.20B,	I agree that the guidance on funding agreements from suppliers is useful and relevant for NPOs, as it helps to improve cash flow aspects when needed.

b) Do you agree that the guidance on lack of exchangeability is useful and relevant to NPOs? If not, what would you change and why?	G30.5A, G30-31-32, AG30.26-AG30.43	I agree that the guidance on the lack of interchangeability is useful and relevant for NPOs, as the financial statements can be adjusted as they are presented, and jurisdictions will require them as needed.
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General Feedback

Please share any other comments that you wish to raise on Exposure Draft 3. When providing additional feedback please reference the paragraph numbers, where possible and provide a short explanation to support your comments.

Reference	Comment