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Submitted electronically to www.ethicsboard.org

Brussels, 3 May 2024

Dear Ms. Dias,

Response to the International Ethics Standards Board for Accountants (IESBA) *International Ethics Standards for Sustainability Assurance (IESSA) ED*

EFAA appreciates the opportunity to provide our comments to the [*International Ethics Standards for Sustainability Assurance \(IESSA\) ED*](#), which includes revisions to the existing Code related to sustainability reporting. Our response has been prepared with input from our Assurance Expert Group.

The European Federation of Accountants and Auditors for SMEs (EFAA for SMEs) represents accountants and auditors providing professional services primarily to SMEs both within the European Union and Europe as a whole. Constituents are mainly small practitioners (SMPs), including a significant number of sole practitioners. EFAA's members, therefore, are SMEs themselves, and provide a range of professional services (e.g., audit, accounting, bookkeeping, tax, and business advice) to SMEs. EFAA currently represents 15 national accounting, auditing, and tax advisor organisations with more than 380,000 individual members.

GENERAL COMMENTS

Overarching Considerations

EFAA for SMEs would like to thank IESBA for the opportunity to comment on the IESSA-ED. We congratulate IESBA on developing a high-quality draft standard in such a short time. We believe the IESSA-ED provides an appropriate global and European baseline for sustainability assurance engagements. And we welcome the fact that the IESBA, in the same way the IAASB is doing with ISSA 5000, is 'borrowing' best practice and convention from the existing Code of Ethics and applying it to sustainability reporting and assurance.

Given our constituency is small- and medium-sized accountancy practices (SMPs) in Europe we have three main considerations. First, to ensure that the standard will be sufficiently scalable to be used by SMPs on SME sustainability reporting and assurance engagements, including those where the report and the assurance are voluntary. We strongly prefer a 'Think Small First' approach, developing straightforward regulation and standards for SMEs and SMPs and then scaling up to suit larger more complex companies and practices. Second, to ensure that there is sufficient guidance for assurance providers that have little expertise in sustainability assurance. SMPs face a huge challenge building the capacity and capability to perform high quality sustainability assurance services. And third, to ensure

that the standard serves the European public interest. In general, EFAA believes that the IESSA-ED adequately addresses these three considerations. That said, we do have comments on the specific matters in the Explanatory Memorandum as shown in the next section.

Level of Assurance

While we agree in principle that the proposals emulate those for financial statement audit - reasonable assurance, which is the dominant form of assurance engagement – we note that this tends to make the proposals more complex and that presently, and for the foreseeable future, limited assurance is likely to be the dominant form of assurance for sustainability reporting. As such the proposed Part 5 is in effect drafted in anticipation of the day that reasonable assurance prevails. Perhaps Part 5 should be written with a greater emphasis on limited assurance.

Financial Statement Audit and Sustainability Assurance

It is also vital that the Code does not create barriers to financial statement auditors providing sustainability assurance to the same client. We believe that joint provision of these services enables the leverage of the technical assurance skills and competencies of professional auditors as well as their knowledge of company strategy, governance, business model, and risks, opportunities, and performance, in due course improving quality. This will be beneficial to the public interest while any independence threats arising from providing both assurance services would be kept at an acceptably low level. Furthermore, in the case of SMEs it is important that the ethical standards allow the same firm to provide both sustainability assurance as well as the audit so that SMEs may gain from synergies.

Value Chain

We have some reservations regarding the proposed value chain provisions. We believe the requirements and guidance for interests, relationships or circumstances involving value chain entities may cause significant practical issues.

Adoption and Implementation

The effective adoption and implementation of the IESSA will demand intense communication and guidance. The IESBA will need to coordinate and lead a significant awareness raising campaign, communicating clearly and robustly, amongst other things, what is meant by ‘profession-agnostic’ and the rationale for this approach. IESBA can utilise text from the Basis for Conclusions and published articles for this purpose. The IESBA will also need to develop implementation guidance especially for assurance practitioners that are providing sustainability assurance for the first time.

In our [response](#) to the IESBA’s Proposed Strategy and Work Plan for 2024-2027 we urged IESBA to be more sensitive to the volume and number of changes going forward as SMPs are struggling with the pace of change. Specific challenges for SMPs include updating manuals and processes, providing staff training and monitoring and control of new changes. Given the volume and complexity, we are concerned that many SMPs may struggle to effectively implement Part 5.

Professional Accountancy Organisations (PAOs) are also struggling with the adoption and implementation of new and revised standards because of the pace of change to the Code. The

proposals in the ED will create additional enforcement challenges for PAOs to contend with when undertaking quality reviews and professional conduct activities, as well the level of support that will be required to support education and training for SMPs.

Translations

A necessary prerequisite for timely and effective adoption and implementation is the availability of high quality translations. To facilitate high quality translations, standards need to be drafted using plain English principles. Furthermore, plain English drafting principles will help improve the understandability of the Code to SMPs.

SPECIFIC COMMENTS

Sustainability Assurance

Main Objectives of the IESSA

1. Do you agree that the proposals in Chapter 1 of the ED are:

(a) Equivalent to the ethics and independence standards for audit engagements in the extant Code? [See paragraphs 19 and 20 of this document]

We agree that the proposals are equivalent to the ethics and independence standards for audit engagements in the extant Code.

We believe that the proposed IESSA is equivalent to Parts 1 to 4A of the Code, with certain exceptions as explained in paragraphs 45 to 50 that are fully justified.

While we agree in principle that the proposals emulate those for financial statement audit - reasonable assurance, which is the dominant form of assurance engagement – we note that this tends to make the proposals more complex and that presently, and for the foreseeable future, limited assurance is likely to be the dominant form of assurance for sustainability reporting. As such the proposed Part 5 is in effect drafted in anticipation of the day that reasonable assurance prevails. Perhaps Part 5 should be written with a greater emphasis on limited assurance.

(b) Profession-agnostic and framework-neutral? [See paragraphs 21 and 22 of this document]

We agree that the proposals are profession agnostic and framework neutral.

In the European Union (EU) we anticipate that some Member States may take up the option afforded them in the CSRD to open-up the sustainability assurance market to allow small- and medium- sized accounting practices (SMPs) that do not presently conduct audits to perform sustainability assurance engagements. These SMPs may be unfamiliar with some of the fundamental terminology and concepts in those parts of the Code relating to audit engagements. EFAA, therefore, recommends IESBA consider developing non-authoritative guidance for SMPs offering assurance for the first time.

We trust that the standard can be used for assurance engagements on sustainability reports prepared in accordance with the [SME sustainability reporting standard for voluntary use by non-listed SMEs \(VSME\) under development by EFRAG](#) (for the European Commission).

2. Do you agree that the proposals in Chapter 1 of the ED are responsive to the public interest, considering the Public Interest Framework’s qualitative characteristics? [See paragraph 23 of this document]

We agree that the proposals in Chapter 1 of the ED are responsive to the public interest.

The Basis for Conclusions fails to mention the PIF’s qualitative characteristic of scalability that is defined as:

“Scalability, including the proportionality to the standard’s relative impact on different stakeholders, e.g., how a standard addresses the audit or assurance needs of small and medium sized enterprises (SMEs) as well the needs of complex, listed entities.”

We believe this to be fundamental. While we believe on balance that the proposed standard is responsive to this characteristic, we encourage the IESBA to carefully consider whether it thinks this characteristic has been sufficiently considered in the development of the standard. As noted above we have some concerns regarding the emphasis on reasonable as opposed to limited assurance.

Definition of Sustainability Information

3. Do you support the definition of “sustainability information” in Chapter 2 of the ED? [See paragraphs 24 to 26 of this document]

We support the definition of “sustainability information”.

We believe it is vital that the IESBA and the IAASB work closely together to ensure consistency of definitions and where there is any divergence of opinion that the IESBA one prevails since the Code is the overarching standard.

We note that the definition starts with “Information about the opportunities, risks or impacts” and wonder whether this is better formulated as “Information about the impacts, risks and opportunities” since this is the more common formulation. We also suggest that in place of or as well as “governance”, that the definition includes “business conduct” as this term is widely used and more readily understood by laypersons.

We welcome reference to “voluntary disclosure” as this will encompass information prepared in accordance with the SME sustainability reporting standard for voluntary use by non-listed SMEs (VSME) under development by EFRAG (for the European Commission).

Scope of Proposed IESSA in Part 5

4. The IESBA is proposing that the ethics standards in the new Part 5 (Chapter 1 of the ED) cover not only all sustainability assurance engagements provided to sustainability assurance clients but also all other services provided to the same sustainability assurance clients. Do you agree with the proposed scope for the ethics standards in Part 5? [See paragraphs 30 to 36 of this document]

We agree with the proposed scope for the ethics standards.

We believe it is appropriate that the ethics standards in the new Part 5 cover sustainability assurance engagements and all other services provided to the same sustainability assurance clients. We welcome the diagrams in Appendix 1 for the inter-relationship between ethics and independence standards for sustainability assurance practitioners (PAs and non-PAs) as this helps clarify the scope of the standard.

That said, we believe the wording in this section may create some confusion. Paragraph 5100.2(a) states: “Sections 5100 to 5390 which set out ethics standards for sustainability assurance engagements and other professional services performed for sustainability assurance clients”. This implies that sections 5100 to 5390 would be applicable for all services performed for sustainability assurance clients by both PAs and non-PAs. For PAs, this conflicts with what is presented in 5100.2b and 5400.16a. This apparent contradiction needs to be resolved.

5. The IESBA is proposing that the International Independence Standards in Part 5 apply to sustainability assurance engagements that have the same level of public interest as audits of financial statements. Do you agree with the proposed criteria for such engagements in paragraph 5400.3a? [See paragraphs 38 to 43 of this document]

We agree with the proposed criteria for such engagements.

We believe that the IIS in Part 5 applies to sustainability assurance engagements that have the same level of public interest as audits of financial statements and concur with the proposed criteria for such engagements in paragraph 5400.3a.

We understand that sustainability information prepared in accordance with the SME sustainability reporting standard for voluntary use by non-listed SMEs (VSME) under development by EFRAG (for the European Commission) will satisfy the proposed criteria and so IIS in Part 5 will apply to sustainability assurance engagements performed on reports prepared using the VSME.

Structure of Part 5

6. Do you support including Section 5270 in Chapter 1 of the ED? [See paragraphs 46 to 48 of this document]

We support the inclusion of Section 5270.

We support its inclusion since pressure to breach the fundamental principles might compromise the performance of sustainability assurance engagements and consequently impair the public trust in it.

In 2017 EFAA published the report “Accounting and Ethics: Pressure Experienced by the Professional Accountant” which demonstrated the extent to which professional accountants find themselves under pressure to behave in an unethical manner.

NOCLAR

7. Do you support the provisions added in extant Section 360 (paragraphs R360.18a to 360.18a A2 in Chapter 3 of the ED) and in Section 5360 (paragraphs R5360.18a to 5360.18a A2 in Chapter 1 of the ED) for the auditor and the sustainability assurance practitioner to consider communicating (actual or suspected) NOCLAR to each other? [See paragraphs 56 to 67 of this document]

We support the provisions added in extant Section 360 and in Section 5360 (paragraphs R5360.18a to 5360.18a A2 in Chapter 1 of the ED) for the auditor and the sustainability assurance practitioner to consider communicating (actual or suspected) NOCLAR to each other.

We believe it is vital that the auditor and sustainability assurance practitioner assist one another in the detection and reporting of actual or suspected NOCLAR.

We welcome the fact that Section 5360 does not extend to situations where the NOCLAR has been committed by entities in the sustainability assurance client's value chain. This limitation is logical, pragmatic, and analogous to extant Section 360, where the NOCLAR provisions do not apply to situations where the NOCLAR has been committed by a third party.

8. Do you support expanding the scope of the extant requirement for PAIBs? (See paragraphs R260.15 and 260.15 A1 in Chapter 3 of the ED) [See paragraph 68 of this document]

We support expanding the scope of the extant requirement for PAIBs.

Determination of PIEs

9. For sustainability assurance engagements addressed by Part 5, do you agree with the proposal to use the determination of a PIE for purposes of the audit of the entity's financial statements? [See paragraphs 80 to 85 of this document]

We agree with the proposal to use the determination of a PIE for purposes of the audit of the entity's financial statements.

We concur with the IESBA that, as a first step, Part 5 should rely on the revised definition of PIE recently finalized by the IESBA in the context of audits of financial statements. However, since the extent of public interest is likely to extend well beyond an entity's financial condition, we suggest IESBA should start to consider how it might prescribe which entities are PIEs in the context of sustainability assurance engagements. This may demand significant adaptation and expansion of the determination of a PIE for the purposes of the audit. When developing the Corporate Sustainability Reporting Directive (CSRD) EU lawmakers decided to expand the scope of mandatory non-financial reporting (NFR) from the extant NFRD to include all large and listed undertakings. We presume this expanded scope was predicated on an expanded notion of the public interest.

Group Sustainability Assurance Engagements

10. The IESBA is proposing that the International Independence Standards in Part 5 specifically address the independence considerations applicable to group sustainability assurance engagements. [See paragraphs 86 to 92 of this document]

(a) Do you support the IIS in Part 5 specifically addressing group sustainability assurance engagements? Considering how practice might develop with respect to group sustainability assurance engagements, what practical issues or challenges do you anticipate regarding the application of proposed Section 5405?

We support the IIS in Part 5 specifically addressing group sustainability assurance engagements.

We welcome the inclusion of provisions addressing group sustainability assurance engagements, not least because in the EU the reporting framework requires reporting on a consolidated basis. Furthermore, the VSME ED recommends that undertakings that are the parent of small and medium sized groups prepare consolidated sustainability reports.

We believe that explicitly addressing group sustainability assurance engagements in Part 5 reinforces the premise that the independence standards in Part 5 are equivalent to those for audit engagements in Part 4A and, moreover, that sustainability reporting and assurance is of equal importance to financial reporting and audit.

We believe that sustainability assurance practitioners that are unfamiliar with ISA 600 (Revised), which will include SMPs, will find it especially challenging to fully understand and effectively implement the provisions. The terminology and the concepts will be new to them. Hence, we are encouraged to read that IESBA will consider what implementation support resources, if any, it might commission to facilitate effective implementation of the provisions and will also coordinate closely with the IAASB regarding the IAASB's future considerations in relation to addressing group sustainability assurance engagements.

(b) If you support addressing group sustainability assurance engagements in the IIS in Part 5:

(i) Do you support that the independence provisions applicable to group sustainability assurance engagements be at the same level, and achieve the same objectives, as those applicable to a group audit engagement (see Section 5405)?

We support that the independence provisions applicable to group sustainability assurance engagements be at the same level, and achieve the same objectives, as those applicable to a group audit engagement.

(ii) Do you agree with the proposed requirements regarding communication between the group sustainability assurance firm and component sustainability assurance firms regarding the relevant ethics, including independence, provisions applicable to the group sustainability assurance engagement? [See paragraph 88 of this document]

We agree with the proposed requirements regarding communication between the group sustainability assurance firm and component sustainability assurance firms regarding the relevant ethics, including independence, provisions applicable to the group sustainability assurance engagement.

(iii) Do you agree with the proposed defined terms in the context of group sustainability assurance engagements (for example, “group sustainability assurance engagement” and “component”)?

We agree with the proposed defined terms in the context of group sustainability assurance engagements.

Using the Work of Another Practitioner

11. Section 5406 addresses the independence considerations applicable when the sustainability assurance practitioner plans to use the work of another practitioner who is not under the former's direction, supervision, and review but who carries out assurance work at a sustainability assurance

client. Do you agree with the proposed independence provisions set out in Section 5406? [See paragraphs 93 to 101 of this document]

While we agree with the proposed independence provisions set out in Section 5406, we note that the provisions do not extend to assessing the competency of the other practitioner. Requirements and guidance for considering competency would be useful.

Assurance at, or With Respect to, a Value Chain Entity

12. Do you support the proposed definition of “value chain” in the context of sustainability assurance engagements? [See paragraphs 102 and 103 of this document]

We support the proposed definition of “value chain” in the context of sustainability assurance engagements.

In the EU value chain reporting will be a key aspect of sustainability reporting. Considerable numbers of non-listed SMEs across the EU, while outside the direct scope of the CSRD, stand to be impacted. Given the challenges presented by value chain reporting EFRAG is developing [Value Chain Implementation Guidance](#).

The value chain provisions in the proposed standard are welcome and suitably accommodate value chain reporting under the CSRD. We also welcome the explicit statement that the value chain does not include components as defined for the purposes of a group sustainability assurance engagement.

13. Do you support the provisions in Section 5407 addressing the independence considerations when assurance work is performed at, or with respect to, a value chain entity? [See paragraphs 104 to 110 of this document]

We have some reservations about the provisions in Section 5407.

While we welcome the desire to be flexible and pragmatic through the provision of three options for gaining assurance in relation to value chain entities within the application guidance, we believe these options may often prove impractical.

Performing work at the value chain entity (5407.2 A1 (a)) will be impractical in many cases, especially where the value chain entity transacts with many companies and may receive similar requests from their assurance providers. It would not be possible or likely for access to be allowed to complete work in such instances.

Gaining assurance from another practitioner (5407.2 A1 (b)) may also be challenging as those practitioners may not understand independence requirements nor be able to confirm independence in some cases.

Performing the assurance work on the sustainability information of the value chain entity provided by the sustainability assurance client without carrying out assurance work at that entity (5407.2 A1 (c)) will often be required. This section creates no requirement for members of the sustainability assurance team to be independent of the value chain entity.

Accordingly, we urge IESBA to consider further the appropriate provisions in Section 5407.

14. Where a firm uses the work of a sustainability assurance practitioner who performs the assurance work at a value chain entity but retains sole responsibility for the assurance report on the sustainability information of the sustainability assurance client:

(a) Do you agree that certain interests, relationships or circumstances between the firm, a network firm or a member of the sustainability assurance team and a value chain entity might create threats to the firm’s independence?

We agree that where a firm uses the work of a sustainability assurance practitioner certain interests, relationships or circumstances between the firm, a network firm or a member of the sustainability assurance team and a value chain entity might create threats to the firm’s independence.

We believe that the level of these threats will generally be lower than those arising directly from a client.

(b) If yes, do you support the approach and guidance proposed for identifying, evaluating, and addressing the threats that might be created by interests, relationships, or circumstances with a value chain entity in Section 5700? What other guidance, if any, might Part 5 provide? [See paragraphs 111 to 114 of this document]

We support the approach and guidance proposed for identifying, evaluating, and addressing the threats.

We concur with the IESBA that the level of the threats to independence that might be created by interests, relationships or circumstances involving a value chain entity will generally be lower. We therefore support the proposal that such threats be addressed on a “knows or has reason to believe” principle basis. This principle is a well-established concept in the extant Code and proportionate.

Providing NAS to Sustainability Assurance Clients

15. The International Independence Standards in Part 5 set out requirements and application material addressing the provision of NAS by a sustainability assurance practitioner to a sustainability assurance client. Do you agree with the provisions in Section 5600 (for example, the “self-review threat prohibition,” determination of materiality as a factor, and communication with TCWG)? [See paragraphs 115 and 116 of this document]

We agree with the provisions in Section 5600.

We concur with the IESBA that in the context of a sustainability assurance engagement it is appropriate to adopt an equivalent approach to the independence standards for audit engagement.

16. Subsections 5601 to 5610 address specific types of NAS. [See paragraphs 118 to 120 of this document]

(a) Do you agree with the coverage of such services and the provisions in the Subsections?

We agree with the coverage of such services and the provisions in the Subsections.

We concur with IESBA that the IESSA, instead of including accounting and bookkeeping services, focuses more broadly on the provision of sustainability data and information services to a sustainability assurance client and consider the provisions to be well articulated and appropriate.

(b) Are there any other NAS that Part 5 should specifically address in the context of sustainability assurance engagements?

We do not believe there are any other NAS that should be addressed.

Independence Matters Arising When a Firm Performs Both Audit and Sustainability Assurance

Engagements for the Same Client

17. Do you agree with, or have other views regarding, the proposed approach in Part 5 to address the independence issues that could arise when the sustainability assurance practitioner also audits the client's financial statements (with special regard to the proportion of fees for the audit and sustainability assurance engagements, and long association with the client)? [See paragraphs 123 to 131 of this document]

We agree with the proposed approach in Part 5 to address the independence issues that could arise when the sustainability assurance practitioner also audits the client's financial statements.

In the EU a combination of prevailing practice, as reported in IFAC's State of Play publication, and the way in which most Member States appear to be transposing the CSRD, means that many, if not most, companies will use the same accountancy firm to provide sustainability assurance and the audit of their financial statements.

It is vital that the Code does not create barriers to financial statement auditors providing sustainability assurance to the same client. We believe that joint provision of these services enables the leverage of the technical assurance skills and competencies of professional auditors as well as their knowledge of company strategy, governance, business model, and risks, opportunities, and performance, in due course improving quality. This will be beneficial to the public interest while any independence threats arising from providing both assurance services would be kept at an acceptably low level. Furthermore, in the case of SMEs it is important that the ethical standards allow the same firm to provide both sustainability assurance as well as the audit so that SMEs may gain from synergies.

Other Matters

18. Do you believe that the additional guidance from a sustainability assurance perspective (including sustainability-specific examples of matters such as threats) in Chapter 1 of the ED is adequate and clear? If not, what suggestions for improvement do you have?

We believe that the additional guidance from a sustainability assurance perspective is sufficient.

19. Are there any other matters you would like to raise concerning the remaining proposals in Chapters 1 to 3 of the ED?

We do not have any other matters to raise concerning the remaining proposals in Chapters 1 to 3.

Sustainability Reporting

Scope of Sustainability Reporting Revisions and Responsiveness to the Public Interest

20. Do you have any views on how the IESBA could approach its new strategic work stream on expanding the scope of the Code to all preparers of sustainability information? [See paragraphs 133 to 135 of this document]

We support the IESBA's decision to restrict the scope of the current Sustainability project to developing ethics standards for sustainability reporting by PAs at this time. This is a pragmatic approach. We also support IESBA's ultimate objective to develop ethics standards for sustainability reporting to apply to all preparers of sustainability information (i.e., profession-agnostic) as it is highly desirable that all preparers of sustainability reporting being subject to the same robust ethics standards.

We have a preliminary view on how the IESBA should approach its new strategic work stream on expanding the scope of the Code to all preparers of sustainability information. We suggest that the IESBA recognise that it may have to be willing to surrender some sovereignty over that part of the Code that applies to all preparers. Perhaps the IESBA should start by forging, preferably leading, an alliance of the relevant international organisations, underpinned by a memorandum of understanding (MOU), that commits to the shared development of some overarching principles. These principles might need to be separate from the Code but then integrated into it.

21. Do you agree that the proposals in Chapter 4 of the ED are responsive to the public interest, considering the Public Interest Framework's qualitative characteristics? [See paragraph 138 of this document]

We agree that the proposals in Chapter 4 of the ED are responsive to the public interest.

We reiterate similar sentiments to those expressed in our response to Q2. The Basis for Conclusions fails to mention the PIF's qualitative characteristic of scalability that is defined as:

"Scalability, including the proportionality to the standard's relative impact on different stakeholders, e.g., how a standard addresses the audit or assurance needs of small and medium sized enterprises (SMEs) as well the needs of complex, listed entities."

We believe this to be fundamental. While we believe on balance that the proposed standard is responsive to this characteristic, we encourage the IESBA to carefully consider whether it thinks this characteristic has been sufficiently considered in the development of the standard.

Proposed Revisions to the Extant Code

22. Do you agree that the proposed revisions to Parts 1 to 3 of the extant Code in Chapter 4 of the ED are clear and adequate from a sustainability reporting perspective, including:

(a) Proposed revisions to Section 220? [See paragraphs 139 to 141 of this document]

We agree that the proposed revisions to Section 220 are clear and adequate from a sustainability reporting perspective.

(b) Proposed examples on conduct to mislead in sustainability reporting, value chain and forward-looking information? [See paragraphs 143 to 153 of this document]

We agree that the proposed examples on conduct to mislead in sustainability reporting, value chain and forward-looking information are clear and adequate from a sustainability reporting perspective.

As the practice of mandatory assurance over sustainability reporting is in its (relative) infancy, and yet the gains from greenwashing and greenhushing are significant, there is an acute risk that companies will engage in greenwashing or greenhushing. We welcome, therefore, the proposed examples on conduct to mislead in sustainability reporting. However, we welcome the IESBA intensifying its communication efforts around how the IESSA addresses the risk of greenwashing and greenhushing and the need for sustainability practitioners and other stakeholders to be especially vigilant.

(c) Other proposed revisions? [See paragraph 155 of this document]

We agree with the other proposed revisions.

23. Are there any other matters you would like to raise concerning the proposals in Chapter 4 of the ED?

We do not have any other matters to raise concerning the proposals in Chapter 4.

Effective Date

24. Do you support the IESBA's proposal to align the effective date of the final provisions with the effective date of ISSA 5000 on the assumption that the IESBA will approve the final pronouncement by December 2024?

We support the IESBA's proposal to align the effective date of the final provisions with the effective date of ISSA 5000.

In Europe, in accordance with the CSRD, many thousands of companies are getting ready to prepare and publish sustainability reports, and have these reports subject to limited assurance, in 2025 for their 2024 financial year. Hence, we urge the timely completion of this project and alignment of effective dates with those of the ISSA 5000.

CONCLUDING COMMENTS

We trust that the above is clear but if you have any questions, please do not hesitate to contact us.

Yours faithfully,

Salvador Marin
President

Paul Thompson
Technical Director