



Paris La Defense, 19 April 2023

International Federation of Accountants
International Auditing and Assurance Standards Board
Mr. Seidenstein, Chairman of IAASB
545 Fifth Avenue - 14th Floor
New York NY 10017 USA

Re: IAASB Proposed Strategy and Work Plan for 2024 - 2027.

Dear Mr. Seidenstein,

Mazars is pleased to submit this letter in response to the invitation to comment from the IFAC International Auditing and Assurance Standards Board (IAASB), Proposed Strategy and Work Plan for 2024 - 2027.

Mazars is a leading international audit, tax and advisory organisation, operating as a united partnership,. Founded in Europe, we have grown into a global, connected partnership of over 47,000 professionals - 30,000 in our integrated partnership, 17,000 via the Mazars North America Alliance - with a presence in over 95 countries and territories, working seamlessly as one integrated team across borders, services and sectors..

MAZARS is a member of the IFAC Forum of Firms, and thus fully supports, for more than 16 years, the initiatives of IFAC IAASB, IESBA, Forum of Firms and Transnational Auditors Committee, as well as those of the regulators in these areas of common concern for public interest, in promoting high quality standards as part of the international roll-out of audit engagements. All MAZARS firms and correspondents are committed to support and apply those initiatives.

We are dedicated to contributing to society in the best possible way, whether through providing quality services to our clients to help them achieve sustainable growth, enabling our talented people to reach their highest potential, or contributing to the public debate with positive insights for the future.

Should you want to get further information, you can refer to our Group Transparency 2021-2022 report [Group transparency report 2021/2022 - Mazars Group](#)

We would be pleased to discuss our detailed comments submitted hereafter with you and remain at your disposal, should you require further clarification or additional information.

Yours sincerely,

A handwritten signature in black ink, appearing to read "J. Barlet".

Jean-Luc Barlet
Mazars Quality & Risk Management Leader
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Overall comments

Overall, we support the Proposed Strategy and Work Plan for 2024 – 2027 and we appreciate the balance between revising the existing standards and working on new topics.

Request for comments

Questions

1. Do you agree with Our Proposed Goal, and Our Proposed Keys to Success and Stakeholder Value Proposition (see pages 5–6)?

We agree with the Proposed Goal and the Value proposition.

Regarding the “coordination with other standard setters”, it is paramount that the Statement of Membership Obligations (SMOs) are regularly updated within IFAC.

2. Do you agree with Our Proposed Strategic Drivers as the key environmental factors that drive the opportunities and challenges impacting our ability to achieve our goal (see pages 7–9)?

We agree with the Proposed Strategic Drivers.

More priority should be given to “Supporting the implementation of our standards”. As a matter of fact, we believe that priority should be given to specific detailed guidance on the findings of the regulator. Addressing the findings require sometimes to revise the standard either fully or through narrow scope but also sometimes the standard does not require to be changed. Instead, practitioners need more guidance and examples to implement the standard effectively.

3. Do you agree with Our Proposed Strategic Objectives and Our Proposed Strategic Actions (see pages 10–14)?

We agree with the Proposed Strategic Objectives and Actions.

As time is crucial parameter, we believe IAASB should rather prioritize narrow scope amendments and guidance to address specific findings of the regulators instead of re-open standards as it takes around 4-5 years until the effective application.

4. Do you support the identified possible new standard-setting projects as set out in Table B (see pages 20–22) within the area of audits and reviews (numbered A. to K.)? Please share your views on the individual topics, including, if relevant, why certain topics may be relatively more important to you, your organization or within your jurisdiction.

Yes. We are supporting in priority the following projects as they are both key for quality audit.

- The joint audit (point K)

On the list of the candidate topics, we believe setting a new standard on joint audit (K) should be a higher priority. Joint audit is neither a new nor a local practice: it has been tested on 3 continents for almost a century and is currently performed in more than 55 jurisdictions ([IFAC](#)). In the EU, joint audit is mandatory in France, Croatia, Bulgaria and carry out on a voluntary basis in other Member States. Since such a regime is meaningful for international entities and getting increasing attention from them, it would be extremely useful for all stakeholders to have an international reference standard, including notably the cross-review process – which is specific to joint audit.

At Mazars, we have developed a guidance and we will be happy to comment it and share it when there will be a dedicated working group on this topic.

- The technology omnibus project proposed in point G

Technology is a very large topic from automated tools and techniques until intelligence artificial. It is key to grant it a high priority as

- it is a driver for quality to be able to address more and more volumes of transactions,
- it is also a factor to retain auditors but also to attract new talents with diverse expertise and background that can be also helpful to enhance quality audits.

We believe there is a momentum to accelerate and producing use cases and more guidance on this topic.

5. Do you support the identified possible new standard-setting projects as set out in Table B (see pages 20–22) within the area of sustainability and other assurance engagements (numbered L. and M.)? Topic L., Further Standards for Assurance on Sustainability Reporting, would involve addressing multiple topics (as part of possible multiple projects). Please provide your views about likely candidate topics for further standards.

We fully support the topic L Further Standards for Assurance on Sustainability Reporting and we believe it should take priority.

For topic M XBRL, we believe that tagging is key but we should be careful to be principles based and not developing a standard based on a technology that could be maybe replaced very soon by another one.

6. Are there other topics that we should consider as new standard-setting projects? If so, please indicate whether any such topics are more important than the topics identified in Table B (see pages 20–22), and the needs and interests that would be served by undertaking work on such topic(s).

None

7. Our proposed Strategy and Work Plan emphasizes the importance of close coordination with our sister-Board, IESBA. What are your views about whether and, if so, how coordination could be enhanced in terms of opportunities for joint or complementary actions that would better serve the public interest? Suggestions could entail standard-setting work, engagement with stakeholder groups, and improved ways of working, among others.

Coordination is key to make sure there is consistency in the definitions and work programs. For example, while ISA 600R has been already issued in April 2022, the IESBA has issued in February 2023. [Final Pronouncement: Revisions to The Code Relating to The Definition of Engagement Team and Group Audits | Ethics Board](#)

Same for [Quality Management and Group Audits: Highlighting Certain Aspects of Interaction Between ISA 220 \(Revised\) and ISA 600 | IAASB](#) issued in December 2022.

8. Are there any other matters that we should consider in finalizing our Strategy and Work Plan?

We suggest including systematic post-implementation reviews and releasing implementation toolkit at the same time as the standard. For example, the [ISA 315 First-Time Implementation Guide | IAASB](#) has been issued end of July 2022 compared to the release of the standard itself.