

## RESPONSE TEMPLATE FOR EXPOSURE DRAFT OF PROPOSED ISSA 5000, *GENERAL REQUIREMENTS FOR SUSTAINABILITY ASSURANCE ENGAGEMENTS*

### Guide for Respondents

Comments are requested by **December 1, 2023**. *Note that requests for extensions of time cannot be accommodated due to the accelerated timeline for finalization of this proposed standard.*

This template is for providing comments on the Exposure Draft of proposed International Standard on Sustainability Assurance Engagements™ (ISSA) 5000, *General Requirements for Sustainability Assurance Engagements* (ED-5000), in response to the questions set out in the Explanatory Memorandum to ED-5000. It also allows for respondent details, demographics and other comments to be provided. Use of the template will facilitate the IAASB's automated collation of the responses.

You may respond to all questions or only selected questions.

To assist our consideration of your comments, please:

- For each question, start by indicating your overall response using the drop-down menu under each question. Then below that include any detailed comments, as indicated.
- When providing comments:
  - Respond directly to the questions.
  - Provide the rationale for your answers. If you disagree with the proposals in ED-5000, please provide specific reasons for your disagreement and specific suggestions for changes that may be needed to the requirements, application material or appendices. If you agree with the proposals, it will be helpful for the IAASB to be made aware of this view.
  - Identify the specific aspects of ED-5000 that your response relates to, for example, by reference to sections, headings or specific paragraphs in ED-5000.
  - Avoid inserting tables or text boxes in the template when providing your responses to the questions because this will complicate the automated collation of the responses.
- Submit your comments, using the response template only, without a covering letter or any summary of your key issues, instead identify any key issues, as far as possible, in your responses to the questions.

The response template provides the opportunity to provide details about your organization and, should you choose to do so, any other matters not raised in specific questions that you wish to place on the public record. All responses will be considered a matter of public record and will ultimately be posted on the IAASB website.

Use the "**Submit Comment**" button on the [ED-5000 webpage](#) to upload the completed template.

**Responses to IAASB’s Request for Comments in the Explanatory Memorandum for ED-5000, General Requirements for Sustainability Assurance Engagements**

**PART A: Respondent Details and Demographic information**

Your organization’s name (or your name if you are making a submission in your personal capacity)	ERM Certification and Verification Services Limited (“ERM CVS”)
Name(s) of person(s) responsible for this submission (or leave blank if the same as above)	Beth Wyke, Gareth Manning, Yakira Bahadur, Alan Dayeh, Simon Dawes and Seng Kee Wong
Name(s) of contact(s) for this submission (or leave blank if the same as above)	Beth Wyke
E-mail address(es) of contact(s)	<a href="mailto:beth.wyke@ermcvs.com">beth.wyke@ermcvs.com</a>
Geographical profile that best represents your situation (i.e., from which geographical perspective are you providing feedback on ED-5000). Select the most appropriate option.	<a href="#">Global</a>
	If “Other”, please clarify
The stakeholder group to which you belong (i.e., from which perspective are you providing feedback on ED-5000). Select the most appropriate option.	<a href="#">Assurance practitioner or firm - other profession</a>
	If “Other”, please specify
Should you choose to do so, you may include information about your organization (or yourself, as applicable).	<p>As part of the ERM Group, a global market leader in sustainability services operating in more than 40 countries, ERM CVS provides independent third-party assurance of sustainability (environmental, social, and governance) information and Certification to multi-national clients across all sectors.</p> <p>We have been supporting organizations since 1996 and conduct our independent third-party assurance work in accordance with globally accepted standards (i.e., ISAE 3000, ISAE 3410, and ISO 14064-3) with a team of sustainability subject matter experts and certified public accountants.</p>

Should you choose to do so, you may provide overall views or additional background to your submission. **Please note that this is optional.** The IAASB's preference is that you incorporate all your views in your comments to the questions (also, the last question in Part B allows for raising any other matters in relation to ED-5000).

**Information, if any, not already included in responding to the questions in Parts B and C:**

## PART B: Responses to Questions in in the Explanatory Memorandum for ED-5000

*For each question, please start with your overall response by selecting one of the items in the drop-down list under the question. Provide your detailed comments, if any, below as indicated.*

### Overall Questions

1. Do you agree that ED-5000, as an overarching standard, can be applied for each of the items described in paragraph 14 of this EM to provide a global baseline for sustainability assurance engagements? If not, please specify the item(s) from paragraph 14 to which your detailed comments, if any, relate (use a heading for each relevant item).

*(See Explanatory Memorandum Section 1-A, paragraph 14)*

**Overall response:** [Disagree, with comments below](#)

### Detailed comments (if any):

In relation to 'Use by all assurance practitioners', ERM CVS have concern around the strength of reference to sustainability competence throughout the Standard. For example, Para. 32 requires that the engagement leader have (a) Competence and capabilities in assurance skills and techniques developed through extensive training and practical application, but for subject matter competence, they are required only to have 'sufficient competence to accept responsibility for the conclusions reached AND 'sufficient competence' is a matter of professional judgement (A67). Due to the diverse and complex subject matter the engagement partner (and engagement team members) should have subject matter expertise more aligned with (a) as defined above. As such, Para. 32(c) should require the engagement leader to have 'Competence and capabilities in the subject matter developed through extensive training and practical application.' This level of understanding and competence would allow for professional judgement and skepticism and would protect the integrity of Assurance Reports (limited or reasonable) and would meet the needs of the intended users.

Without the revision to Para. 32(c) suggested above, we have concern around a solo engagement leader, with self-determined professional judgement, producing an Assurance Report (limited or reasonable). In a worst-case scenario, this could result in an Assurance Report that would appear to provide confidence to a user where no such confidence is appropriate, resulting in fraud (i.e., greenwashing).

Additionally, it is important that engagement team members have subject matter expertise such that they can use professional judgement and professional skepticism. While this is referenced in A82, it only suggests that engagement leaders 'may' take into account the ability of the team to exercise professional judgment and skepticism'. 'May' is not a strong enough reference here. Without this ability throughout the team (Para. 41 references that it is appropriate to have this 'collectively' within the team), it is possible that material misstatements will be missed. For example, for a reasonable assurance engagement, it would not be appropriate to have one person on the team with sustainability competence. To protect the integrity of Assurance Reports (limited or reasonable) and meet the need of intended users, it is critical that the engagement team have sufficient sustainability competence throughout the team to exercise professional judgement and skepticism.

### *Public Interest Responsiveness*

2. Do you agree that the proposals in ED-5000 are responsive to the public interest, considering the qualitative standard-setting characteristics and standard-setting action in the project proposal? If not, why not?

*(See Explanatory Memorandum Sections 1-B, and Appendix)*

**Overall response:** [Agree, with comments below](#)

#### **Detailed comments (if any):**

ERM CVS have comments in relation to the following qualitative standard-setting characteristics:

- **Relevance:** See ERM CVS' comments for Question 7 in relation to the Limited Assurance requirements.
- **Enforceability:** See ERM CVS' comments for Question 1 in relation to the requirement for Subject Matter Expert (SME) expertise, and Question 25 (1 – 7).

### **Specific Questions**

#### *Applicability of ED-5000 and the Relationship with ISAE 3410*

3. Is the scope and applicability of ED-5000 clear, including when ISAE 3410 should be applied rather than ED-5000? If not, how could the scope be made clearer?

*(See Explanatory Memorandum Section 1-C)*

**Overall response:** [No, with comments below](#)

#### **Detailed comments (if any):**

In current practice, if an assurance engagement includes multiple scopes of work including GHG and other sustainability information and matters, the engagement is usually conducted under ISAE 3000 (other sustainability information) and ISAE 3410 (GHG emissions). Given this, I would expect that we would likely use a combination of ISSA 5000 (other sustainability information) and ISAE 3410 for combined work as opposed to using ISAE 3000 as the referenced assurance standard.

### *Relevant Ethical Requirements and Quality Management Standards*

4. Is ED-5000 sufficiently clear about the concept of “at least as demanding” as the IESBA Code regarding relevant ethical requirements for assurance engagements, and ISQM 1 regarding a firm’s responsibility for its system of quality management? If not, what suggestions do you have for additional application material to make it clearer?

*(See Explanatory Memorandum Section 1-D)*

**Overall response:** [Yes, with comments below](#)

#### **Detailed comments (if any):**

ERM CVS strongly supports the requirements for adherence to independence and ethics requirements set out in ED-5000, as they are in ISAE 3000, and believe that ethics and quality should not be compromised

in the interest of having additional practitioners in the market. It is possible for non-audit firms to meet these requirements, and this should remain a requirement of application of the Standard.

Without this adherence, there may be practitioners who provide their service 'in alignment with' with ISSA 5000 (i.e., not meeting independence and ethics requirements) as opposed to 'in accordance with' ISSA 5000 which demonstrates adherence to the independence and ethics equivalent to audit engagements. Users are not likely to appreciate the implications of this distinction which could result in Assurance Reports issued as 'in alignment' providing false confidence to users (i.e., fraud or greenwashing).

We suggest that the Standard make clear that use 'in accordance' references are the only acceptable reference for use of ISSA 5000.

#### *Definitions of Sustainability Information and Sustainability Matters*

5. Do you support the definitions of sustainability information and sustainability matters in ED-5000? If not, what suggestions do you have to make the definitions clearer?

*(See Explanatory Memorandum Section 1-E, paras. 27-32)*

**Overall response:** [Yes, with comments below](#)

#### **Detailed comments (if any):**

The current definitions of sustainability information and sustainability matters should be more specific in relation to the information included within the scope of the assurance engagement, as the reporting entity typically discloses more sustainability information than is included within the scope of the engagement. While this is explained in Para. 4 of the Introduction, it would be useful to have this concept continued clearly through the definitions as opposed to through reference. ERM CVS suggest the following **additional wording** to clarify:

17 (uu). Sustainability information – Information about sustainability matters **subject to the assurance engagement**. Sustainability information results from measuring or evaluating sustainability matters against the applicable criteria. For purposes of the ISSAs, sustainability information is the equivalent of “subject matter information” in other IAASB assurance standards. (Ref: Para. A32)

17 (vv). Sustainability matters – Environmental, social, economic and cultural matters **subject to the assurance engagement**, including:

- (i) The impacts of an entity's activities, products and services on the environment, society, economy or culture, or the impacts on the entity, and
- (ii) The entity's policies, performance, plans, goals and governance relating to such matters.

For purposes of the ISSAs, sustainability matters being measured or evaluated in accordance with the applicable criteria are the equivalent of “underlying subject matter” in other IAASB assurance standards.

6. Is the relationship between sustainability matters, sustainability information and disclosures clear? If not, what suggestions do you have for making it clearer?

(See Explanatory Memorandum Section 1-E, paras. 35-36)

**Overall response:** Yes (with no further comments)

**Detailed comments (if any):**

None.

#### *Differentiation of Limited Assurance and Reasonable Assurance*

7. Does ED-5000 provide an appropriate basis for performing both limited assurance and reasonable assurance engagements by appropriately addressing and differentiating the work effort between limited and reasonable assurance for relevant elements of the assurance engagement? If not, what do you propose and why?

(See Explanatory Memorandum Section 1-F, paras. 45-48)

**Overall response:** No, with comments below

**Detailed comments (if any):**

1. The currently proposed activities required for a Limited Assurance in ED-5000 is well below the baseline of activities currently performed and expected in the market. As written Limited Assurance will have no 'rational purpose' as defined in Para 74. The ED-5000 has based the activities on an example of the most simple and non-complex engagement as described in the IAASB's Non-Authoritative Guidance on Applying ISAE 3000 (Revised) to Sustainability and Other Extended External Reporting (EER) Assurance Engagements, published in April 2021. Retaining the Limited Assurance effort as written undermines the value of assurance engagements, resulting in unsubstantiated confidence in a Limited Assurance Report by the user resulting in fraud (i.e., greenwashing).

Current and pending legislation uses Limited Assurance as a step towards achieving Reasonable Assurance. The current version of the ED-5000 will not ready clients for Reasonable Assurance as an assurance 'phase in' as intended by legislation. If implemented as allowed under ED-5000, Assurance Reports for Limited Assurance will not allow for comparability across Limited Assurance engagements, except through the description of activities in the Assurance Report – which will not be well understood by users of the information. As written, this will be confusing to those who have undergone Limited Assurance historically (some for over 10 years) and for those looking to compare the meaning of Assurance Reports.

The ED-5000 should rely more on the guidance provided for the more moderately complex to complex Limited Assurance definitions, activities, practices, and examples which were developed over a period of years and adopted by current practitioners (both Audit and non-Audit): IAASB's Non-Authoritative Guidance on Applying ISAE 3000 (Revised) to Sustainability and Other Extended External Reporting (EER) Assurance Engagements, published in April 2021 which are more similar to ISAE 3410. These are the practices currently used in the market and are expected by clients.

We recognize that the IAASB is interested in receiving global regulatory uptake of the new Standard; and that uptake may be more likely with reduced requirements; however, allowing the development of Limited Assurance Reports with a 'light touch' will mislead users and devalue the current value of Limited Assurance (already closer to Reasonable Assurance than what is proposed in the current draft). This should not be considered an acceptable compromise. **It is critical that the integrity of Limited Assurance is held at the current market standard.**

2. ERM CVS disagrees with the following part of the definition for 'Limited assurance engagement':

Definitions – 17(d)(ii) Limited assurance engagement – '... The **nature**, timing and extent of procedures performed in a limited assurance engagement is limited compared with that necessary in a reasonable assurance engagement but is planned to obtain a level of assurance that is, in the practitioner's professional judgment, meaningful...'

As stated in the IAASB's Non-Authoritative Guidance on Applying ISAE 3000 (Revised) to Sustainability and Other Extended External Reporting (EER) Assurance Engagements, published in April 2021, the **nature** of the procedures is NOT automatically different between a Limited and Reasonable assurance engagement. Limited Assurance tests for the same things, in the same way as Reasonable Assurance, but draws conclusions based on more limited sampling. The EER specifically notes that 'for a less complex, small engagement, inquiries MAY be sufficient to identify where a material misstatement is likely to arise.' It appears that the ED-5000 has taken the phrase 'where material misstatement is likely to arise' and used that to define the approach to Limited Assurance, which was not the intention of the EER. To retain the current value of Limited Assurance and reduce the potential for a Limited Assurance Report to be called into question for greenwashing (fraud), please revise the Limited Assurance definition to be in closer alignment to the EER for moderately or more complex engagements, and more aligned with ISAE 3410.

3. In relation to 'Identifying Disclosures where Material Misstatements are Likely to Arise (Limited Assurance) or Identifying and Assessing the Risks of Material Misstatement (Reasonable Assurance)', the following is appropriate only for the least complex and small engagements (of which most multi-nationals are not) and should not be considered good practice for Limited Assurance as a whole. A354L indicates that testing at the assertion level may be apply for Limited Assurance, at the decision of the practitioner; however, because this is common practice, and a market expectation, please consider the following revision to align with current practice more closely, and market expectations and to protect the existing value of Limited Assurance:

Limited Assurance

110L.The practitioner shall identify disclosures where material misstatements are likely to arise **which may be at the assertion level**. (Ref: Para. A352L, A354L-A355)

Reasonable Assurance

110R.The practitioner shall identify and assess risks of material misstatement at the assertion level for the disclosures. (Ref: Para. A349R-A351R, A353R, A355)

4. In relation to 'Meaningful Level of Assurance in a Limited Assurance Engagement', the standard of care for this as currently written in ED-5000 is 'more than inconsequential' (i.e., just above nothing'); however, provided that the change in user expectations, the regulatory climate and market has changed sufficiently since even 2021, that this should no longer be considered the lowest



acceptable level of Limited Assurance as it does not meet current user needs. The suggested addition is **bolded** as follows:

A194L. Across the range of all limited assurance engagements, what is meaningful assurance can vary from just above assurance that is likely to enhance the intended users' confidence about the sustainability information to a degree that is clearly **substantially** more than inconsequential to just below reasonable assurance. What is meaningful in a particular engagement represents a judgment within a range from **substantially** more than inconsequential but less than reasonable assurance that depends on the engagement circumstances, including the information needs of intended users as a group, the criteria, and the sustainability matters of the engagement.

5. In relation to 'Meaningful Level of Assurance in a Limited Assurance Engagement', the following phrasing may lead a practitioner to believe that there are no 'generally accepted practices' in Limited Assurance; however, limited assurance of sustainability information has been on-going for over two decades. Please remove the **bolded** language:

A195L. Some of the factors that may be relevant in determining what constitutes meaningful assurance in a specific engagement include:

- Generally accepted practice, **if it exists**, with respect to assurance engagements for sustainability information.

*Preliminary Knowledge of the Engagement Circumstances, Including the Scope of the Engagement*

8. Is ED-5000 sufficiently clear about the practitioner's responsibility to obtain a preliminary knowledge about the sustainability information expected to be reported and the scope of the proposed assurance engagement? If not, how could the requirements be made clearer?

*(See Explanatory Memorandum Section 1-F, para. 51)*

**Overall response:** [Yes, with comments below](#)

**Detailed comments (if any):**

1. The context of time, geography, politics, etc. of the reported information can be critical when assuring sustainability-related information; therefore, the practitioner's responsibility should include factors potentially external to the engagement party. ERM CVS suggest adding the following **bolded** language (as written in the EER) to the definition of 'Engagement Circumstances':

17(j) Engagement circumstances – The broad context defining the particular assurance engagement, which includes: the terms of the engagement; the scope of the engagement and whether it is a reasonable assurance engagement or a limited assurance engagement; the characteristics of the sustainability matters; the applicable criteria; the information needs of the intended users; relevant characteristics of the entity and its reporting boundary; the characteristics of the entity's management and those charged with governance; and other matters, **internal or potentially external (e.g., the entity's suppliers, customers, service organizations, competitors, and the political, geographical, social and economic environment in which the entity operates)**, matters that may have a significant effect on the engagement.

9. Does ED-5000 appropriately address the practitioner's consideration of the entity's "materiality process" to identify topics and aspects of topics to be reported? If not, what approach do you suggest and why?

(See *Explanatory Memorandum Section 1-F, paras. 52-55*)

**Overall response:** [Yes, with comments below](#)

**Detailed comments (if any):**

In direct response to the question, 'yes' with no comments; however, we have a comment regarding A272 as referenced under Materiality Para 91. Usually, the sustainability information subject to the assurance engagement addresses the information needs of various users and stakeholders. Sustainability information that is subject to assurance is usually within the public domain, and there are intended and unintended users of the sustainability information. As such, one should consider the broadest set of users. For example, section 2.4 of GRI 1: Foundation 2021 describes stakeholders as 'individuals or groups that have interests that are affected or could be affected by an organization's activities.' The GRI Standard expects organizations to prepare their disclosures covering material topics that have been determined through a specific materiality determination process. Examples of stakeholders (intended users) of ONE disclosure and Assurance Report include: customers, suppliers, employees, prospective employees, community/society, regulators, shareholders/investors.

Another example is within Corporate Sustainability Reporting Directive (CSRD), where organizations are required to undertake a 'double materiality' assessment process to determine which reporting standards, disclosures and data points should be included in their sustainability reporting.

As such, please remove the following inaccurate statement which is found at the end of A272:

**'Unless the engagement has been designed to meet the particular information needs of specific users, the possible effect of misstatements on specific users, whose information needs may vary widely, is not ordinarily considered.'**

We also suggest a correction to A273. Related to the above, current and accepted practice in conducting a materiality assessment process includes management as ONE of the many stakeholders in the process (please see comment above):

As such, please **remove the bolded language** and **add the green** language:

A273. The applicable criteria may include principles to assist the entity in identifying information relevant to users, which may include terms that refer to materiality. Such principles or terms, if present in the applicable criteria, may provide a frame of reference to the practitioner in considering or determining materiality for the engagement. **However, t** The process applied by the entity to determine the sustainability matters to be reported, **are** often referred to as the entity's "process to identify reporting topics," "materiality assessment," or "materiality process," **and** relates to management's determination of **to** the topics and aspects of topics that may be relevant for intended users.

*Suitability and Availability of Criteria*

10. Does ED-5000 appropriately address the practitioner’s evaluation of the suitability and availability of the criteria used by the entity in preparing the sustainability information? If not, what do you propose and why?

*(See Explanatory Memorandum Section 1-F, paras. 56-58)*

**Overall response:** [Yes \(with no further comments\)](#)

**Detailed comments (if any):**

None.

11. Does ED-5000 appropriately address the notion of “double materiality” in a framework-neutral way, including how this differs from the practitioner’s consideration or determination of materiality? If not, what do you propose and why?

*(See Explanatory Memorandum Section 1-F, paras. 59-60 and 68)*

**Overall response:** [Yes \(with no further comments\)](#)

**Detailed comments (if any):**

None.

*Materiality*

12. Do you agree with the approach in ED-5000 for the practitioner to consider materiality for qualitative disclosures and determine materiality (including performance materiality) for quantitative disclosures? If not, what do you propose and why?

*(See Explanatory Memorandum Section 1-F, paras. 65-74)*

**Overall response:** [Agree \(with no further comments\)](#)

**Detailed comments (if any):**

None.

*Understanding the Entity’s System of Internal Control*

13. Do you agree with the differentiation in the approach in ED-5000 for obtaining an understanding of the entity’s system of internal control for limited and reasonable assurance engagements? If not, what suggestions do you have for making the differentiation clearer and why?

*(See Explanatory Memorandum Section 1-F, paras. 75-81)*

**Overall response:** [Disagree, with comments below](#)

**Detailed comments (if any):**

If the changes suggested in Question 25 1 – 9 are addressed, we would limit the suggested changes below to only the difference between Limited and Reasonable Assurance and would not suggest the changes related to professional judgement.

In relation to A315L, ERM CVS do not agree with the following (**bolded**) parts of the Limited Assurance requirements for ‘Understanding Components of the Entity’s System of Internal Control (Ref: Para. 102L, 102R)’:

A315L. In a limited assurance engagement, the practitioner is not required to obtain an understanding of all the components of the entity’s system of internal control relevant to the preparation of the sustainability information as required in a reasonable assurance engagement. In addition, the practitioner is not required to evaluate the design of controls and determine whether they have been implemented unless the practitioner plans to test the operating effectiveness of controls. **The practitioner uses professional judgment to determine the extent of understanding that is necessary to identify disclosures where material misstatements are likely to arise and to provide a basis for designing procedures to focus on those disclosures.** It will often not be necessary to obtain a detailed understanding of the components and the procedures to obtain the understanding may be less in extent, and of a different nature than those required in a reasonable assurance engagement. **For example, the practitioner may obtain a sufficient understanding of the information system through inquiry in a limited assurance engagement but may need to perform a walk-through in a reasonable assurance engagement.**

The practitioner is expected to use professional judgement, although the requirement does not make mention of subject matter expertise. The Limited Assurance requirements cannot be reduced to inquiry to obtain a sufficient understanding of the information system and the current market practice for Limited Assurance includes both a walk-through AND selected testing of components of the entity’s system of internal control relevant to the preparation of the sustainability information (please see responses to Question 7).

The suggested addition is **bolded** as follows:

A315L. In a limited assurance engagement, the practitioner is not required to obtain an understanding of all the components of the entity’s system of internal control relevant to the preparation of the sustainability information as required in a reasonable assurance engagement. In addition, the practitioner is not required to evaluate the design of controls and determine whether they have been implemented unless the practitioner plans to test the operating effectiveness of controls. The practitioner uses professional judgment **and subject matter expertise** to determine the extent of understanding that is necessary to identify disclosures where material misstatements are likely to arise and to provide a basis for designing procedures to focus on those disclosures. It will often not be necessary to obtain a detailed understanding of the components and the procedures to obtain the understanding may be less in extent, and of a different nature than those required in a reasonable assurance engagement. **For example, the practitioner may not be able to obtain a sufficient understanding of the information system through inquiry only and may need to perform a walk-through, as well as selected testing of components of the entity’s system of internal control relevant to the preparation of the sustainability information.**

*Using the Work of Practitioner's Experts or Other Practitioners*

14. When the practitioner decides that it is necessary to use the work of a firm other than the practitioner's firm, is ED-5000 clear about when such firm(s) and the individuals from that firm(s) are members of the engagement team, or are "another practitioner" and not members of the engagement team? If not, what suggestions do you have for making this clearer?

*(See Explanatory Memorandum Section 1-G, paras. 82-87)*

**Overall response:** [Yes, with comments below](#)

**Detailed comments (if any):**

As noted throughout the comments, it is important to reference subject matter expertise/technical understanding within the body of ED-5000.

As such, please revise the text of Para. 85 as follows (additions proposed in **bold**):

As explained in paragraph A86 of ED-5000, the more complex the engagement, including its geographical spread, **the level of subject matter and technical understanding required** and the extent to which information is derived from the entity's value chain, the more necessary it may be to consider how the work of practitioner's experts or other practitioner(s) is to be integrated across the engagement.

The same additions in **bold** would apply to Para. A86 of ED-5000:

A86. The more complex the engagement, including its geographical spread, **the level of subject matter and technical understanding required** and the extent to which information is derived from the entity's value chain, the more necessary it may be to consider how the work of practitioner's experts or other practitioner(s) is to be integrated across the engagement.

15. Are the requirements in ED-5000 for using the work of a practitioner's external expert or another practitioner clear and capable of consistent implementation? If not, how could the requirements be made clearer?

*(See Explanatory Memorandum Section 1-G, paras. 88-93)*

**Overall response:** [Yes \(with no further comments\)](#)

**Detailed comments (if any):**

None.

*Estimates and Forward-Looking Information*

16. Do you agree with the approach to the requirements in ED-5000 related to estimates and forward-looking information? If not, what do you propose and why?

*(See Explanatory Memorandum Section 1-G, paras. 94-97)*

**Overall response:** [Disagree, with comments below](#)

### Detailed comments (if any):

The practitioner is expected to only 'evaluate' the aspects listed in 134L related to designing and performing further procedures on estimates and forward-looking information for Limited Assurance, whereas for Reasonable Assurance the practitioner is expected to also test the aspects listed in 134R. As noted in our response to Question 7, Limited Assurance requirements cannot be reduced to evaluation without testing, this is especially relevant when a substantial part of sustainability information is based on estimates. Given the prevalence of estimates in the calculation and reporting of sustainability information, 134L should reference the same Ref Para. as 134R to better align with current practices. **As such, please remove the R reference from A393R, A394R, A395R (to refer to both Limited and Reasonable Assurance), and then reference the A393 – A396 (already applicable to both levels) in 134L.**

Note – potential nomenclature error in 134R (a)(ii) A394R – A388R. We could not find a reference to A388R within ED-5000. If the intended A388R reference also refers to R, and is applicable to the above comment, the updated reference should also have the R removed, and should be included in the reference list above.

#### *Risk Procedures for a Limited Assurance Engagement*

17. Do you support the approach in ED-5000 to require the practitioner to design and perform risk procedures in a limited assurance engagement sufficient to identify disclosures where material misstatements are likely to arise, rather than to identify and assess the risks of material misstatement as is done for a reasonable assurance engagement? If not, what approach would you suggest and why?

*(See Explanatory Memorandum Section 1-G, paras. 98-101)*

**Overall response:** [No, with comments below](#)

### Detailed comments (if any):

1. ERM CVS strongly disagrees with this approach as it does not align with the current practice of Limited Assurance engagements.

This definition of 'risk procedures' as for Limited Assurance is insufficient and does not meet the needs of the intended users. Limited Assurance of all material types of disclosures should be assessed for risks of material misstatement at the assertion level. This is current practice in sustainability assurance and should not be reduced to 'the disclosures where material misstatements are likely to arise'. Entities must move towards reasonable assurance for regulatory purposes and reducing the expectations on Limited Assurance below what is provided as current practice across a wide range of sustainability information (beyond GHG emissions) is not in the best interest of the engaging entities or the users of the information.

To better align with current practice in Limited Assurance, please revise the risk procedures to be the same for both Limited and Reasonable Assurance. The suggested revision is **bolded** as follows:

17(qq) Risk procedures – The procedures designed and performed to **identify and assess the risks of material misstatement, whether due to fraud or error, of the disclosures at the assertion level.**

2. Furthermore, ERM CVS strongly disagrees with the following statements in relation to the table on 'Designing and Performing Risk Procedures', in that Limited Assurance requires the practitioner

only to **identify** disclosures where material misstatements are likely to arise, and the practitioner is not required to **assess** this. Furthermore, this seems to only apply at the disclosure level and not the assertion level for the disclosures. Again, the design and performance requirements should be the same for Limited and Reasonable Assurance. The suggested revision includes the removal of the (L and R) references and adopting 94R as the appropriate design and risk procedures for both levels of assurance, **bolded** as follows:

**94. The practitioner shall design and perform risk procedures sufficient to: (Ref: Para. A286-A289, A291, A353R)**

**(a) Identify and assess risks of material misstatement, whether due to fraud or error, at the assertion level for the disclosures; and**

**(b) Design and perform further procedures.**

As stated in our Response to Question 7, the currently proposed activities required for a Limited Assurance effort as written undermines the value of assurance engagements, resulting in unsubstantiated confidence in future Limited Assurance Reports by the user, resulting in fraud (i.e., greenwashing).

Current and pending legislation uses Limited Assurance as a step towards achieving Reasonable Assurance. The current version of the ED-5000 will not ready clients for Reasonable Assurance as an assurance 'phase in' as intended by legislation. If implemented as allowed under ED-5000, Assurance Reports for Limited Assurance will not allow for comparability across Limited Assurance engagements, except through the description of activities in the Assurance Report – which will not be well understood by users of the information. As written, this will be confusing to those who have undergone Limited Assurance historically (some for over 10 years) and for those looking to compare the meaning of Assurance Reports.

The ED-5000 should rely more on the guidance provided for the more moderately complex to complex Limited Assurance definitions, activities, practices, and examples which were developed over a period of years and adopted by current practitioners (both Audit and non-Audit): IAASB's Non-Authoritative Guidance on Applying ISAE 3000 (Revised) to Sustainability and Other Extended External Reporting (EER) Assurance Engagements, published in April 2021 and on ISAE 3410. These are the practices currently used in the market and are expected by engaging entities. If we reference the most simple example for Limited Assurance and apply that approach (as a starting point) for complex engagements, this will confuse both those seeking assurance and those with experience reviewing Assurance Reports.

We recognize that the IAASB is interested in receiving global regulatory uptake of the new Standard; and that uptake may be more likely with reduced requirements; however, allowing the development of Limited Assurance Reports with a 'light touch' will mislead users and devalue the current value of Limited Assurance (already closer to Reasonable Assurance than what is proposed in the current draft). This should not be considered an acceptable compromise. **It is critical that the integrity of Limited Assurance is held at the current market standard.**

3. ERM CVS disagrees with the following part of the definition for 'Limited assurance engagement':

Definitions – 17(d)(ii) Limited assurance engagement – '... The **nature**, timing and extent of procedures performed in a limited assurance engagement is limited compared with that necessary in a reasonable assurance engagement but is planned to obtain a level of assurance that is, in the practitioner's professional judgment, meaningful...'

As stated in the IAASB's Non-Authoritative Guidance on Applying ISAE 3000 (Revised) to Sustainability and Other Extended External Reporting (EER) Assurance Engagements, published in April 2021, the **nature** of the procedures is NOT automatically different between a Limited and Reasonable assurance engagement. Limited Assurance tests for the same things, in the same way as Reasonable Assurance, but draws conclusions based on more limited sampling. The EER specifically notes that 'for a less complex, small engagement, inquiries MAY be sufficient to identify where a material misstatement is likely to arise.' It appears that the ED-5000 has taken the phrase 'where material misstatement is likely to arise' and used that to define the approach to Limited Assurance, which was not the intention of the EER. To retain the current value of Limited Assurance and reduce the potential for a Limited Assurance Report to be called into question for greenwashing (fraud), please revise the Limited Assurance definition to be in closer alignment to the EER for moderately or more complex engagements, and more aligned with ISAE 3410.

4. In relation to 'Identifying Disclosures where Material Misstatements are Likely to Arise (Limited Assurance) or Identifying and Assessing the Risks of Material Misstatement (Reasonable Assurance)', the following is appropriate only for the least complex and small engagements (of which most multi-nationals are not) and should not be considered good practice for Limited Assurance as a whole. A354L indicates that testing at the assertion level may be apply for Limited Assurance, at the decision of the practitioner; however, because this is common practice, and a market expectation, please consider the following revision, as **bolded**, to more closely align with current practice, and market expectations and to protect the existing value of Limited Assurance:

Limited Assurance

110L.The practitioner shall identify disclosures where material misstatements are likely to arise **which may be at the assertion level**. (Ref: Para. A352L, A354L-A355)

Reasonable Assurance

110R.The practitioner shall identify and assess risks of material misstatement at the assertion level for the disclosures. (Ref: Para. A349R-A351R, A353R, A355)

5. In relation to 'Meaningful Level of Assurance in a Limited Assurance Engagement', The standard of care for this as currently written in ED-5000 is 'more than inconsequential' (i.e., just above nothing'); however, provided that the change in user expectations, the regulatory climate and market has changed sufficiently since even 2021, that this should no longer be considered the lowest acceptable level of Limited Assurance as it does not meet current user needs. The suggested revision is **bolded** as follows:

A194L. Across the range of all limited assurance engagements, what is meaningful assurance can vary from just above assurance that is likely to enhance the intended users' confidence about the sustainability information to a degree that is clearly **substantially**



more than inconsequential to just below reasonable assurance. What is meaningful in a particular engagement represents a judgment within a range from **substantially** more than inconsequential but less than reasonable assurance that depends on the engagement circumstances, including the information needs of intended users as a group, the criteria, and the sustainability matters of the engagement.

6. In relation to 'Meaningful Level of Assurance in a Limited Assurance Engagement', the following phrasing may lead a practitioner to believe that there are no 'generally accepted practices' in Limited Assurance; however, limited assurance of sustainability information has been on-going for over two decades. Please remove the **bolded** language:

A195L. Some of the factors that may be relevant in determining what constitutes meaningful assurance in a specific engagement include:

- Generally accepted practice, **if it exists**, with respect to assurance engagements for sustainability information.

#### *Groups and "Consolidated" Sustainability Information*

18. Recognizing that ED-5000 is an overarching standard, do you agree that the principles-based requirements in ED-5000 can be applied for assurance engagements on the sustainability information of groups or in other circumstances when "consolidated" sustainability information is presented by the entity? If not, what do you propose and why?

*(See Explanatory Memorandum Section 1-G, paras. 102-107)*

**Overall response:** [Agree \(with no further comments\)](#)

**Detailed comments (if any):**

None.

#### *Fraud*

19. Do you agree that ED-5000 appropriately addresses the topic of fraud (including "greenwashing") by focusing on the susceptibility of the sustainability information to material misstatement, whether due to fraud or error? If not, what suggestions do you have for increasing the focus on fraud and why?

*(See Explanatory Memorandum Section 1-G, paras. 108-110)*

**Overall response:** [Disagree, with comments below](#)

**Detailed comments (if any):**

1. In relation to 'Sufficiency and Appropriateness of Evidence', management inquiry alone is not sufficient evidence for Limited Assurance. As previously stated, Limited Assurance cannot be reduced in activity to the level currently stated in ED-5000 and retain the intended purpose of increasing user confidence. In instances of potential fraud, inquiry of management is not likely to be suitable evidence. Please revise A223, **bolded** as follows:

A223. The procedures designed and performed by the practitioner may also affect the persuasiveness of the evidence obtained. For example, in a reasonable assurance engagement, evaluating the design and implementation of controls relating to processes in the entity's information system that support the preparation of the sustainability information, or external confirmation procedures to obtain evidence about information used by management in preparing the sustainability information, **may provide more persuasive evidence than inquiry of management. Inquiry alone ordinarily does not provide sufficient appropriate evidence.**

*Communication with Those Charged with Governance*

20. Do you support the high-level requirement in ED-5000 regarding communication with management, those charged with governance and others, with the related application material on matters that may be appropriate to communicate? If not, what do you propose and why?

*(See Explanatory Memorandum Section 1-G, paras. 111-112)*

**Overall response:** [Yes \(with no further comments\)](#)

**Detailed comments (if any):**

None.

*Reporting Requirements and the Assurance Report*

21. Will the requirements in ED-5000 drive assurance reporting that meets the information needs of users? If not, please be specific about any matters that should not be required to be included in the assurance report, or any additional matters that should be included.

*(See Explanatory Memorandum Section 1-G, paras. 116-120, 124-130)*

**Overall response:** [Yes, with comments below](#)

**Detailed comments (if any):**

It depends on the intended user; however, brevity is what is desired by most users. The ISAE 3000 Assurance Report can fit on one page and is explicitly clear regarding critical components of the engagement. Perhaps we keep the short form but move the information around within that form to highlight the conclusion/opinions at the top of the page. There is more practitioner value in the long form Reports than user value.

22. Do you agree with the approach in ED-5000 of not addressing the concept of “key audit matters” for a sustainability assurance engagement, and instead having the IAASB consider addressing this in a future ISSA? If not, what do you propose and why?

*(See Explanatory Memorandum Section 1-G, paras. 121-123)*

**Overall response:** [Agree \(with no further comments\)](#)

**Detailed comments (if any):**

None.

23. For limited assurance engagements, is the explanation in the Basis for Conclusion section of the assurance report that the scope and nature of work performed is substantially less than for a reasonable assurance engagement sufficiently prominent? If not, what do you propose and why?  
*(See Explanatory Memorandum Section 1-G, para. 131)*

**Overall response:** [Yes, with comments below](#)

**Detailed comments (if any):**

We have no comment on the location of the statement within the Assurance Report. It is appropriate to indicate that the procedures performed vary from and are less in extent than for a Reasonable Assurance engagement and that the level of assurance obtained is lower. If the suggested changes to the approach to Limited Assurance are made (i.e., the bar as defined in ED-5000 is raised to meet current practice) the word 'substantially' could be removed from the disclaimer.

*Other Matters*

24. Are there any public sector considerations that need to be addressed in ED-5000?  
*(See Explanatory Memorandum Section 1-I, para. 135)*

**Overall response:** [No \(with no further comments\)](#)

**Detailed comments (if any):**

None.

25. Are there any other matters you would like to raise in relation to ED-5000?

**Overall response:** [Yes, as further explained below](#)

**Detailed comments (if any):**

An overarching concern is that without more explicit reference to subject matter expertise and increasing the bar on the Limited Assurance expectations, Assurance Reports provided under ISSA 5000 could be called into question for greenwashing (i.e., fraud). With the increasing level of stakeholder understanding and skepticism related to environmental, climate, and social data, we suggest more purposefully acknowledging the need for subject matter expertise throughout the Standard. We have highlighted several locations where additional clarification on this point would be critical to ensuring the engagement quality and protecting the reputation of all practitioners.

Additional suggestions (unrelated to the above) are provided below the set of suggested subject matter expert references:

1. **Added reference for Subject Matter Expertise:** The definition of ‘Professional judgement’ is insufficient in protecting recipients of inaccurate assurance of sustainability information due to lack of professional skepticism as it does not consider relevant training in the subject matter, other than assurance and ethical standards.

The suggested revision is **bolded** as follows:

17(kk). Professional judgment – The application of relevant training, knowledge, and experience, within the context provided by **the subject matter expertise and training**, assurance and ethical standards, in making informed decisions about the courses of action that are appropriate in the circumstances of the engagement.

2. **Added reference for Subject Matter Expertise:** Without direct reference to practitioner’s competence in the subject matter, the practitioner may not have the subject matter competence to apply the required professional skepticism in assessing the Management’s Expertise as such a new paragraph reflecting the same experience required by the Management’s Expert (Para 85) should apply to the practitioner).

To address this concern the following, as **bolded**, should be added into ISSA 5000:  
**A25X. Matters relevant to the practitioner’s understanding of the subject matter of the engagement:**

- **The relevant field of expertise;**
- **The nature, scope and objectives of disclosed information;**
- **Whether there are professional or other standards, and regulatory or legal requirements that apply in preparing the information;**
- **Understanding of assumptions and methods used within development of the disclosed information (subject matter), and whether they are generally accepted and appropriate within the relevant subject matter and appropriate in the context of the applicable criteria and the sustainability matters;**

3. **Added reference for Subject Matter Expertise:** Relatedly, please update A75 to specifically reference a critical impediment to exercising of professional skepticism. The suggested language is **bolded** as follows:

- **Insufficient understanding of subject matter.**

4. **Clarification of acceptance requirements added references to audit and Subject Matter Expertise:** In relation to ‘Acceptance and Continuance of the Assurance Engagement’, ‘competence’ has not been defined. As noted earlier it is important that both audit and subject matter expertise and addressed equally throughout the Standard.

Please either:

**Add Ref A25X to 25(b) - preferred**

OR revise the language, **bolded** as follows:

25(b). The practitioner has determined that those persons who are to perform the engagement collectively have the appropriate competence **in relevant subject matter** and **audit** capabilities, including having sufficient time, to perform the engagement;

5. **Added reference for Subject Matter Expertise:** In relation to ‘Assurance Skills and Techniques, Professional Skepticism and Professional Judgment’, the following needs to have some basis in subject matter expertise.

The suggested revision is **bolded** as follows:

37. The practitioner shall apply **subject matter understanding**, assurance skills and techniques as part of an iterative, systematic engagement process.

38. The practitioner shall plan and perform an engagement with **subject matter and assurance-based** professional skepticism, recognizing that circumstances may exist that cause the sustainability information to be materially misstated. (Ref: Para. A71-A76 **OR reference to A25X**).

6. **Clarification related to Subject Matter Expertise:** In relation to Para 96 ‘Designing and Performing Risk Procedures’, we assert that such a Team Meeting should only be applicable if the Engagement Leader does not have the necessary subject matter expertise to design and perform the risk procedures without input from an expert.

7. **Assertion related to Subject Matter Expertise and sole practitioners:** In relation to Para. A294, we assert that an engagement should not be carried out by a single individual unless they have subject matter expertise developed through extensive training and practical application (proposed revision to Para 32 referenced below and in our response to Question 1). As a sole practitioner without sufficient subject matter expertise, the sole practitioner does not have sufficient applicable knowledge to employ professional skepticism throughout the engagement. Limited Assurance, if retained as written, would present the most likely case for use of a sole practitioner. If that sole practitioner cannot use professional judgement or skepticism to identify the need for additional testing as referenced in A190L, an opinion provided by a sole practitioner, without subject matter expertise, would constitute greenwashing.

Further explanation regarding our proposed change and reasoning for the proposed change to Para 32 is as follows. Para 32 requires that the engagement leader have (a) Competence and capabilities in assurance skills and techniques *developed through extensive training and practical application*, but for subject matter competence, they are required only to have ‘sufficient competence to accept responsibility for the conclusions reached AND ‘sufficient competence’ is a matter of professional judgement (A67). Due to the diverse and complex subject matter the engagement partner (and engagement team members) should have subject matter expertise with a depth aligned with (a) as defined above.

As such, Para 32(c) should require the engagement leader have ‘Competence and capabilities in the subject matter **developed through extensive training and practical application**.’ This level of understanding and competence would allow for professional judgement and skepticism and

would protect the integrity of Assurance Reports (limited or reasonable) and would meet the needs of the intended users.

Without the revision to Para. 32(c) suggested above, we have concern around a solo engagement leader, with self-determined professional judgement, producing an Assurance Report (limited or reasonable). In a worst-case scenario this could result in an Assurance Report that would appear to provide confidence to a user where no such confidence is appropriate resulting in fraud (i.e., greenwashing).

## Comments on topics un-related to subject matter expertise

### Clarification on reporter responsibilities:

8. In relation to 78(c)(v)(a) of 'Agreeing the Terms of the Assurance Engagement', it would be helpful to have additional clarity around this expectation. In practice, client Management teams routinely request to change the language provided in 78(c)(v)(a) to 'preparation of the sustainability information included in the scope of the assurance engagement'. As a result, please see the suggested revision **bolded** as follows:

78. The practitioner shall agree the terms of the assurance engagement with the engaging party. The agreed terms shall be specified in sufficient detail in an engagement letter or other suitable form of written agreement, written confirmation, or in law or regulation, and shall include: (Ref: Para. A203-A206):

(c) The responsibilities of management or those charged with governance, as appropriate for:

(v) Providing the practitioner with:

a. Access to all information of which management is aware that is relevant to the preparation of the sustainability information **within the scope of the engagement**

**OR**

a. Access to all information of which management is aware that is relevant to the preparation of the sustainability information **regardless of the scope of the engagement**

9. **Request for clarification:** In relation to 'Understanding the Legal and Regulatory Framework', Para 100, it is unclear whether the suggestion is that for each assertion/key performance metric, the practitioner would need to assess ALL regulations associated with that particular assertion/key performance metric. Individual facilities will have air, water, waste permits with regulatory requirements at the federal, state and sometimes local level. These are generally held at an entity level as opposed to a group level, and the key performance metrics are often not directly aligned with the broader corporate disclosures. For a multi-national company, it would be challenging to understand ALL of the regulations and their method of compliance related to every topic/aspect at every entity within. Additionally, not all non-compliances are created equal (e.g., a report submitted late has a very different impact than a large chemical spill to a water way). Alternatively, is the context here intended to understand governance at a higher level related to how an organization manages compliance? OR does it only relate to finance-related regulatory disclosures (SEC/CSRD)? Please clarify:

100. The practitioner shall obtain an understanding of: (Ref: Para. A307-A309)

- (a) The legal and regulatory framework applicable to the entity and the industry or sector in which the entity operates, in the context of the entity's sustainability information; and
- (b) How the entity is complying with that framework.

12. **Consider removal:** In relation to A244 'Factors That Affect the Practitioner's Professional Judgment Regarding the Attributes of Relevance and Reliability', **please consider removing A244 due to the potential for creating authority bias.**

There are some assumptions within this section that require additional professional judgement and skepticism. In many/most cases, information that is pulled from an 'information system' will always start with a human entering information into that system. Reliability should be tested and not assumed. Another assumption that is often made is that if data/information is provided for regulatory purposes, that the data/information is correct. While the goal of companies is to report accurate data to regulatory bodies, control systems around the data are not substantial enough to make an assumption of accuracy completeness and reliability.

13. **Consider revision:** In relation to 'Nature, Timing and Extent of Planned Procedures (Ref: Para. 89)', A269 assurance is typically conducted at the assertion level for both limited and reasonable assurance. Assurance of the higher-level groupings below is currently uncommon.

Please consider revising as **bolded** as follows:

A269. **Using professional judgement**, the practitioner may group the sustainability information in various ways for purposes of planning and performing the assurance engagement:

Examples:

- By topics: All disclosures on climate; all disclosures on labor practices.
- By aspects of topics: All disclosures regarding risks and opportunities (regardless of the topic); all disclosures regarding targets.
- By topic and aspect of topic: All disclosures regarding target s for climate; all disclosures regarding scenario analysis for climate.
- By characteristics: All disclosures that are qualitative; all disclosures that are forward-looking; all disclosures that are historical.
- By characteristics by aspect of topic: All disclosures regarding targets that are judgmental; all disclosures regarding targets that are historical.

14. **Suggested wording change for clarity:** Given the context of the Standard, it would be better to select different words for 'reasonable assurance' at the following part of the definition of 'System of Internal Control'.

The suggested revision is **bolded** as follows:

17(ww) System of internal control – The system designed, implemented and maintained by those charged with governance, management and other entity personnel to provide **increased**

**confidence** about the achievement of an entity's objectives with regard to sustainable business activities and the reliability of sustainability reporting, effectiveness and efficiency of operations, and compliance with applicable laws and regulations related to sustainability matters.

15. **Improve completeness of definition:** The definition of 'Evidence' does not consider the concept of completeness which is a critical component of evidence. The suggested language is **bolded** as follows:

17(r). Evidence – Information, to which procedures have been applied, that the practitioner uses to draw conclusions that form the basis for the practitioner's assurance conclusion and report. Sufficiency of evidence is the measure of the quantity of evidence. Appropriateness of evidence is the measure of the quality of evidence. **Completeness of evidence is the presence of any contributing information relevant to the reported information within the reporting boundary.**

The concept of completeness is appropriately addressed in Para. 84(a) of 'Information Intended to be Used as Evidence'.

16. **Suggestion to enhance completeness:** In relation to the following point under 'Doubts About the Relevance and Reliability of Information Intended to be Used as Evidence', the result could also be a lower rate of deviation. The suggested revision is **bolded** as follows:

A256. Factors or circumstances that may give rise to doubts about the reliability of information intended to be used as evidence include:

When procedures performed on a population result in a **higher or lower** rate of deviation than expected.

17. **Request for clarification:** In relation to A106: it is unclear what the definition of 'Remediation' is in this context. This is not a phrase routinely used by non-audit practitioners. Please define this for ease of use by multiple practitioner types.



## Part C: Request for General Comments

The IAASB is also seeking comments on the matters set out below:

26. Translations—Recognizing that many respondents may intend to translate the final ISSA for adoption in their own environments, the IAASB welcomes comment on potential translation issues respondents note in reviewing ED-5000.

**Overall response:** [See comments on translation below](#)

**Detailed comments (if any):**

ERM CVS strongly suggests that the IAASB should plan to make available the final ISSA in other languages to minimize the risk of requirements being unintentionally amended during ‘unofficial’ translation processes by practitioners or other parties.

27. Effective Date—As explained in paragraph 138 of Section 1-I – Other Matters, the IAASB believes that an appropriate effective date for the standard would be for assurance engagements on sustainability information reported for periods beginning or as at a specific date approximately 18 months after approval of the final standard. Earlier application would be permitted and encouraged. Do you agree that this would provide a sufficient period to support effective implementation of the ISSA. If not, what do you propose and why?

**Overall response:** [Agree \(with no further comments\)](#)

**Detailed comments (if any):**

None.