

Sustainability Assurance – Respondents’ Detailed Comments to EM Question 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.

26.1 Yes with Comments

5. National Auditing Standard Setters

American Institute of Certified Public Accountants (AICPA)

See our response to question 25, which includes suggested editorial revisions that may make translations easier.

7. Accounting Firms

BDO International Limited

We continue to support the IAASB’s efforts to make ISSA 5000, and other pronouncements issued by the International Standard Setting Boards, accessible to users through effective and timely translation. Many of the terms and concepts in ED-5000 are present in the ISAs or defined in the ED. However, there are some new terms that are specifically defined in the exposure draft that do not have definitions in the ISAs or the glossary, such as reporting boundary, sustainability competence, sustainability information and sustainability matters, which may introduce some issues in respect of translation. To aid accessibility, we would continue to ask the IAASB to make their package of professional standards as accessible as possible through the e-International Standards online tool as soon as possible.

ETY sas

We found some sentences in our view so long that we recommend the IAASB shortens or reword them to ease translation:

Para 5 (a) “The members of the engagement team and the engagement quality reviewer (for those engagements where one has been appointed) are subject to the provisions of the International Ethics Standards Board for Accountants’ International Code of Ethics for Professional Accountants (including International Independence Standards) (IESBA Code) related to assurance engagements, or other professional requirements, or requirements in law or regulation, that are at least as demanding; and (Ref: Para. A4–A5, A44–A49)”

Para 17 (d) (ii) “Limited assurance engagement – An assurance engagement in which the practitioner reduces engagement risk to a level that is acceptable in the circumstances of the engagement but where that risk is greater than for a reasonable assurance engagement as the basis for expressing a conclusion in a form that conveys whether, based on the procedures performed and evidence obtained, a matter(s) has come to the practitioner’s attention to cause the practitioner to believe the sustainability information is materially misstated.”

Par 17 (d) (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 that may have a significant effect on the engagement.”

Mo Chartered Accountants (Zimbabwe)

No translation issues are foreseen since this will be the first-time adoption of new standard so the starting base will be that of ISSA 5000.

Sustainability reporting and assurance is a new sphere of reporting and assurance. It will be expected that it may take time to fully grasp and the IAASB should provide periodic and regular guidance, examples, best practice and implementation methodology for all types of sector specific matters.

8. Assurance Practitioner or Firm - Other Profession

ERM Certification and Verification Services Limited

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.

10. Member Bodies and Other Professional Organizations

Accountancy Europe

We believe the similarities in wording between “other practitioner” and “another practitioner” may be difficult to translate. Some sentences are also difficult to read due to the number of times the terms “another practitioner”, “other practitioner” and “practitioner” are mentioned. For example, paragraph A119 uses “another practitioner” five times, “other practitioner” twice and “practitioner” twice. We suggest that the IAASB review ED-5000 and use the defined term “another practitioner” consistently throughout the standard.

Belgian Institute of Registered Auditors

Several countries, including Belgium, are working on the translation of the exposure drafts. Therefore there is an urgent need for a stable text.

Consiglio Nazionale dei Dottori Commercialisti e degli Esperti Contabili (CNDCEC)

Translation of the standard is of paramount importance as it facilitates its widespread adoption among practitioners globally. However, it is essential to recognize that technical nuances in the content may pose unique challenges in translation across various languages.

CPA Australia

We suggest the IAASB focuses on providing a final standard along with supporting material in English initially and consider developing translations subsequently as required.

Instituto de Auditoria Independente do Brasil - Ibracon

Although many of the terms and concepts in ED-5000 are already present in other IAASB's standards or defined in the ED, some new terms defined explicitly in the exposure draft do not have definitions in the ISAs or the glossary. Terms such as reporting boundary, sustainability competence, sustainability information, and sustainability matters, may introduce some issues concerning translation.

Instituto de Censores Jurados de Cuentas de España (ICJCE)

As a translating body of IAASB and IESBA International Standards, we use translation memories and terminological databases that support the use of unique translations for key terms. In this regard, when the standard uses terms with a different meaning in ISAs or in other international standards, for example, disclosures or practitioner, the effect described in our answer to question 6 above, is transposed to the translations and the final standard adopted in the jurisdiction. In our opinion this could be avoided by using different terms in English.

New York State Society of Certified Public Accountants (NYSSCPA)

It is desirable that interoperability with both the United States' Public Company Accounting Oversight Board (PCAOB) Audit Standards and the American Institute of Certified Public Accountants' (AICPA) Auditing Standards Board (ASB) be considered and addressed, where possible.

Ordre National des Experts Comptables et des Comptables Agréés du Burkina Faso (ONECCA-BF)

It is recommended the IAASB shortens or reword the following sentences to ease translation:

Para 5 (a) "The members of the engagement team and the engagement quality reviewer (for those engagements where one has been appointed) are subject to the provisions of the International Ethics Standards Board for Accountants' International Code of Ethics for Professional Accountants (including International Independence Standards) (IESBA Code) related to assurance engagements, or other professional requirements, or requirements in law or regulation, that are at least as demanding; and (Ref: Para. A4–A5, A44–A49)"

Para 17 (d) (ii) "Limited assurance engagement – An assurance engagement in which the practitioner reduces engagement risk to a level that is acceptable in the circumstances of the engagement but where that risk is greater than for a reasonable assurance engagement as the basis for expressing a conclusion in a form that conveys whether, based on the procedures performed and evidence obtained, a matter(s) has come to the practitioner's attention to cause the practitioner to believe the sustainability information is materially misstated."

Par 17 (d) (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 that may have a significant effect on the engagement."

Saudi Organization for Chartered and Professional Accountants (SOCPA)

ED-5000 introduces a number of technical terms and phrases (e.g. "engagement leader", "reporting boundary", "at least as demanding") that may be difficult to accurately translate. It is advisable to reduce technical assurance terms or redefine well-known technical terms to avoid the misconception of certain concepts or practices.

11. Academics

Monash University

Ensuring an appropriate translation is important for the effective adoption of the final ISSA. Official translation may be required with the IAASB reviewing the final document to ensure consistency.