International Auditing
and Assurance
Standards Board

Submitted via Website

Subject: The IAASB`s Proposed Strategy and Work Plan for 2024-2027 – Stakeholder Questionnaire

Dear Sir or Madam,

the Austrian Chamber of Tax Advisors and Public Accountants is pleased to provide you with its comments on the IAASB´s Proposed Strategy and Work Plan for 2024-2027.

We thank you for the opportunity to comment. For further information on this letter, please contact our Technical Advisor: Mag. Gerhard Prachner (gerhard@prachner.at).

Sincerely,

Dr. Aslan Milla   Dr. Gerald Klement
(Chair of the KSW Expert   (Secretary General)
Committee on Auditing & Assurance)

digitally signed

Austrian Chamber of Tax Advisors and Public Accountants

The Austrian Chamber of Tax Advisors and Public Accountants, KSW is the statutory and regulatory authority of tax advisors and public accountants in Austria. KSW represents more than 10,000 members, making tax advisors and public accountants the second-largest group within the liberal professions. For 70 years now, KSW has been a reliable partner for its members and an important point of contact for the business sector and politics in Austria in all matters relating to tax advising and auditing. KSW works with the Austrian legislative bodies on bills of law and provides expert advice to its members.

The Austrian Chamber of Tax Advisors and Public Accountants is in the EU Transparency Register (No 533887237765-96).

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Appendix 1: Stakeholder Questionnaire

1. Do you agree with Our Proposed Goal, and Our Proposed Keys to Success and Stakeholder Value Proposition?

> (1)   We agree with the proposed goal which refers to performance of high-quality engagements. The focus is now on quality management based on ISQM. Hence, we believe that IAASB's Goal should include a reference to quality management.

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?

> (2)   We agree.

3. Do you agree with Our Proposed Strategic Objectives and Our Proposed Strategic Actions?

> (3)   Focus should be where the impact of the enhanced or new standards is most effective. Recent revisions (ISA 315 and 540, ISQM 1 and 2, ISA 220) have added length and complexity to several key standards, which is not easily aligned with a principle-based approach. Once the two projects on fraud and going concern are finished the IAASB should ensure a stable platform to allow audit firms and other affected parties such as regulators sufficient time for implementation. Not all requests by specific stakeholders should be addressed as such requests do not always lead to increased audit quality.

> (4)   Issuing a new or revised standard is time consuming and requires considerable resources to be achieved. The workload to implement the standards into practice requires even more resources on the part of audit firms and networks, resulting in a higher cost of audits. The cost benefit of revising existing standards further needs to be taken into consideration when planning future projects. The Board should consider initiating revision projects only to address obvious deficiencies in application of standards like the lack of technology aspects (e.g. ISA 500 series).

> (5)   Priority should be given to the ISSA 5000 standard.

> (6)   Implementation guidance needs to be addressed already in the project proposal and as such be part of the project. This means that the project cannot be finalized before the implementation guidance is issued.

4. Do you support the identified possible new standard-setting projects as set out in Table B 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.

> (7)   For ISA 501 there is an urgent need to modernisation of the requirement to attend a physical stock-take. This includes application guidance allowing to attend remote or to perform other procedures addressing the risk of material misstatement. Also segment reporting should be deleted, as segment reporting is part of the disclosures in the notes and needs no special attention in audit procedures.

(8)   ISA 520 is a very short standard with only three paragraphs of requirements and therefore not very practicable. In addition, technology developments should be addressed in the application material.

(9)   Regarding ISSA 5000, using the work of an auditor's expert should be a focus since recourse to subject-matter experts will be needed in assurance of sustainability information. This includes both focus on ISSA 5000 and other sustainability assurance that will trickle down to SME/LCE as part of supply chain reporting involving smaller audit firms (SMP).

(10)   We also support the revision of ISA 330 to better align the requirements with the changes to ISA 315. This should include revisions of the definition of substantive audit procedures in particular in relation to technology.

(11)   We also consider G. Technology targeted or omnibus projects for the impact of technology as very important.

5. Do you support the identified possible new standard-setting projects as set out in Table B 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?

(12)   Focus on sustainability ISSA 5000 is of most importance. We need a robust and easily applicable standard for the limited assurance aspect of sustainability reporting (i.e., CSRD in Europe), but also for sustainability data reported from suppliers in the supply chain to those reporting on "full sustainability requirements".

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, and the needs and interests that would be served by undertaking work on such topic(s).

(13)   We are supportive of L. Further Standards for Assurance on Sustainability see (9).

(14)   As reporting and assuring XBRL generated reports will increase in the future (e.g. CSRD requirement in Europe) we do support to explore the need for an assurance standard on XBRL.

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.

(15)   No comments.

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

(16)   With respect to a possible timeline of adding new projects to the Work Plan (see page 18 of the Consultation Paper) we want to propose the following:

- 2024: ISA 330

- 2025: ISA 500 series, Assurance on XBRL

- 2026: Further Standards for Assurance on Sustainability Reporting

(17)   We want to stress again the importance of technology aspects (e.g. AI, robotics, process mining, etc.) in drafting new standards or revising existing ones.