



Consultation Paper: IAASB's Proposed Strategy and Work Plan for
2024-2027

Response from the Public Accountants and Auditors Board (PAAB), Zimbabwe

11 April 2023

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Further information about PAAB can be obtained at www.paab.org.zw

Any questions arising from this submission should be directed to:

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6 April 2023

PAAB ZIMBABWE COMMENT LETTER TO THE IAASB'S PROPOSED STRATEGY AND WORK PLAN FOR 2024-2027

Dear Chairman,

We are writing on behalf of the Public Accountants and Auditors Board Zimbabwe to comment on the IAASB's consultation paper on proposed strategy and work plan for 2024–2027. The PAAB is pleased to present its comments on this Exposure Draft. In coming up with these comments the PAAB consulted various stakeholders from auditors, preparers, academia, and professional accountancy organisations.

General Comment on the Consultation paper

The PAAB followed a due process. Under the due process the PAAB technical staff conducted research, consulted key stakeholders and drafted this comment letter. The PAAB is in support of the IAASB proposed goal, and our proposed keys to success and stakeholder value proposition. The PAAB is in support of the areas identified as possible new standard projects especially in the space of sustainability assurance. Therefore, the PAAB has not identified any possible new standard setting projects that may be more important than those already identified by the IAASB.

Response to Specific Matters for Comment

Detailed comments on the Specific Matters for Comment are provided in the attached Annex.

We hope this is a helpful contribution to IAASB's work in this area.

Admire Ndurunduru

Secretary, PAAB

Nicholas Mudhima

Standards, PAAB

PROPOSED STRATEGY AND WORK PLAN FOR 2024–2027

Question 1

Do you agree with Our Proposed Goal, and Our Proposed Keys to Success and Stakeholder Value Proposition (see pages 5–64).

We agree.

We are of the view that developing the globally accepted and leading audit, assurance, and related services standards will enable the performance of high-quality engagements that enhance trust in markets and evolve in a timely manner to meet rapidly changing public interest demands. On the keys to success, we also believe that the IAASB’s commitment to engage, listen and learn is of paramount importance in protecting the public interest.

Developing standards for audit, assurance and related services will create uniformity, consistency in application of acceptable criteria to obtain engagements of acceptable high quality and ultimately enhance market confidence and trust.

Question 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.

We are of the view that regulators and oversight bodies are key players in the external reporting ecosystem and that disruptive technologies are potentially transforming these engagements and may require new or revised standards. We also realise the need for assurance and a growing, urgent call to develop international standards on sustainability assurance.

Consultations with Zimbabwean practitioners have indicated that regulation is required which need to be proportionate, fair and exercisable to maintain the quality and enforceability of standard thus underscoring the vitality of regulators and oversight bodies.

On disruptive transformation, stakeholders highlighted that each disruptive transformation needs to be examined on its own merits and that standard setters have to be proactive in their approach to dealing with such matters.

Question 3

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

We agree.

We are of the view that the strategic objectives are in line with the IAASB's goal to serve the public interest by developing the globally accepted and leading audit, assurance, and related services standards enabling the performance of high-quality engagements that enhance trust in markets and evolve in a timely manner to meet rapidly changing public interest demands.

Question 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.

We support the topics as identified in the table. We are of the view that these are broadly in line with current market requirements and business operating environment requirements. The various ISAs, sustainability standard, and assurance on XBRL all represent areas that require amendment either due to the demands of users of these reports, regulator and oversight bodies concerns (deficiency in audit quality) and the pervasive impact that technology has had on all aspects.

Question 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 support the possible new standard-setting projects as set out in Table B within the area of sustainability and other assurance engagements. We are of the view that since the ISSB is developing sustainability standards, there is need to develop standards for assurance on sustainability reporting as this will provide clarity, uniformity, consistency, faithful representation, and other qualitative and quantitative basis for reporting in this area. This is because soon, the auditors will be auditing and reviewing financial reports that are prepared in line with ISSB standards.

Some of the stakeholders in Zimbabwe are however not yet clear on whether there will be a separate auditor's report on the monetary amounts and another on the sustainability aspects of the business.

Question 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).

We currently do not have any other topics that we think the IAASB should consider as new standard-setting projects.

Question 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.

We support co-ordination with the sister-Board IESBA.

Question 8

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

We currently do not have any other matters that we believe the IAASB should consider in finalizing its strategy and work plan.