

## 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)	Chartered Professional Accountants of Canada
Name(s) of person(s) responsible for this submission (or leave blank if the same as above)	Pamela Steer, Chief Executive Officer
Name(s) of contact(s) for this submission (or leave blank if the same as above)	Rosemary McGuire, Vice President, Research Guidance and Support
E-mail address(es) of contact(s)	<a href="mailto:rmguire@cpacanada.ca">rmguire@cpacanada.ca</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="#">North America</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="#">Member body and other professional organization</a>
	If “Other”, please specify
Should you choose to do so, you may include information about your organization (or yourself, as applicable).	<p>Chartered Professional Accountants of Canada (CPA Canada) is one of the largest national accounting organizations in the world, representing more than 220,000 members. It works collaboratively with the provincial, territorial and Bermudian CPA bodies, both nationally and internationally. This collaboration allows the Canadian profession to champion best practices that benefit business and society, as well as prepare its members for an ever-evolving operating environment.</p> <p>CPA Canada actively supports the independent structure of accounting, audit and assurance, and sustainability standard setting in Canada. The Canadian Auditing and Assurance Standard Board (AASB) will be adopting ISSA 5000 in Canada, subject to some potential Canadian amendments which it is currently consulting on. For example, the AASB is considering potential Canadian</p>

	<p>amendments related to consultation with Indigenous Peoples.</p> <p>CPA Canada also issues guidance and thought leadership on a variety of matters, including but not limited to audit and assurance, financial reporting and sustainability. CPA Canada is an active member of the IFRS Foundation’s Partnership for Capacity Building which is developing resources to support the high-quality implementation of IFRS Sustainability Disclosure Standards in Canada and globally.</p>
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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:**

CPA Canada appreciates the opportunity to comment on the Exposure Draft of proposed International Standard on Sustainability Assurance Engagements™ (ISSA) 5000, *General Requirements for Sustainability Assurance Engagements* (ED-5000). We commend the IAASB staff for their efforts in developing the comprehensive proposals.

In developing our response, we conducted extensive outreach with a wide variety of interested and affected parties, including but not limited to, assurance providers, preparers, users, regulators, and academics. We also consulted with CPA Canada’s Sustainability Reporting Advisory Committee and Sustainability Preparers Working Group which are comprised of experts in sustainability, financial reporting, assurance, and capital markets issues. Our outreach with non-accountant assurance practitioners was limited.

Overall feedback on ISSA ED-5000

This section of the response summarizes our key messages on ED-5000. Our responses to select consultation questions are included in Part B and Part C of the response.

*Support for ISSA 5000*

We welcome the IAASB’s proposed sustainability assurance standard. Independent assurance on sustainability disclosures enhances trust, credibility and comparability of reported sustainability information. With the movement towards the development of a global baseline for sustainability reporting standards by the International Sustainability Standards Board (ISSB), as well as impending requirements for assurance over sustainability disclosures in a number of jurisdictions, we believe there is a need for a general-purpose overarching sustainability assurance standard. In our view, the IAASB is best positioned to develop this standard.

We have outlined below a summary of the key issues we believe require closer attention from the IAASB.

### *Challenges in assessing ethical requirements and quality management standards*

It is important that sustainability assurance practitioners have expertise in both the subject matter and assurance. Professional accountants possess the expertise, professional and ethical standards, systems of quality management, and objectivity and independence to lead sustainability assurance engagements. They are also subject to robust licensing requirements and oversight by an independent regulator.

We consistently heard in our outreach that it will be very challenging to make the assessment of whether different ethical requirements and quality management systems are “at least as demanding” as the IESBA Code and International Standard on Quality Management (ISQM) 1, respectively. Additionally, different practitioners are subject to differing levels of regulation that may affect the oversight and enforcement of these assessments. These challenges increase the potential for inconsistency in practice regarding the quality of engagements.

Given these complexities, we recommend that these assessments are not left to individual practitioners. We encourage the IAASB to consult and work with audit regulators, securities regulators, and organizations whose members may conduct these engagements, to determine and agree on whether the requirements of other organizations are at least as demanding.

### *Use by all assurance practitioners*

There is a need for the IAASB to provide support to practitioners using the standard to ensure a baseline knowledge of sustainability and assurance concepts. We note, for example, that the standard includes many terms and concepts that are used in the context of an assurance engagement for traditional financial statements (e.g., materiality, professional skepticism, internal controls, and risk assessments). These terms and concepts will likely not be as familiar to non-accountant assurance practitioners. To make sure the standard is accessible to all practitioners, it will be important to conduct further outreach to identify challenges with understandability. Additional field testing of the proposals may yield further insights on whether the approach of having the standard apply to accountants and non-accountants is practicable.

### *Need for timely issuance of guidance and application material*

The timely issuance of implementation support materials, with relevant examples, will be needed to support the effective application of the standard. Some specific areas where we recommend the IAASB focus its efforts include materiality assessments, estimates, forward-looking information, and fraud. We suggest the IAASB work closely with the ISSB in relation to these topics. Further clarity on the future role and commitment of the IAASB in producing and supporting the development of relevant guidance material would also be helpful. We note that significant supplemental information is included in the explanatory and application materials that accompany 5000-ED. We believe that some of this information should be brought into the standard to make the standard more useable and understandable. For example, additional detail within the actual standard on the application of materiality would be helpful. Additionally, the explanation of limited versus reasonable assurance in Appendix 3 of the IAASB's [Extended External Reporting \(EER\) Guide](#) was also noted as being relevant to the standard.

### *Scope and applicability of the standard*

We have questions regarding the scope of the proposed standard and identified a number of areas where additional clarifications are needed. For example, it is not clear when to apply ISAE 3410 versus ISSA 5000 when only greenhouse gas emissions (GHG) information included in an entity's sustainability reporting is subject to assurance. Questions were also raised about the comparability of the underlying work when assurance is provided on GHG information under ISAE 3410 versus ISSA 5000. In due course, we recommend that ISAE 3410 is revisited and moved under the ISSA 5000 series of standards to avoid confusion.

It would also be helpful for the IAASB to explain what types of assurance engagements might fall in the scope of ISAE 3000 versus ISSA 5000.

#### *Expectation gap for users of assurance reports*

We are concerned that there is an expectation gap between what users of sustainability assurance reports may think the assurance provider is doing compared what an actual assurance engagement entails. It will be important that the standard is accompanied by an education strategy for users.

We also highlight below suggestions on how the standard itself can drive further clarity for users on the difference between limited and reasonable assurance as well as how the sustainability report can more clearly identify what sustainability information has been subject to assurance.

#### *Smaller practitioners and scalability considerations*

In our outreach we heard from smaller practitioners that they had difficulty understanding the standard and how they would apply the requirements in practice. Therefore, we recommend more targeted outreach be performed with this group to understand their challenges as well as field testing of the standard with these practitioners. Further guidance and examples on where the standard allows for scalability would also be helpful.

## **PART B: Responses to Questions 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:** [Agree, with comments below](#)

**Detailed comments (if any):**

We believe that ED-5000 serves well as an overarching standard, however additional details in the standard and more guidance and field testing are needed to assist practitioners. Refer to our comments above.

### *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 \(with no further comments\)](#)

## Detailed comments (if any):

### 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:** [Neither yes/no, but see comments below](#)

## Detailed comments (if any):

The scope of the standard is very broad and there is a need for further guidance. Some clarity on the overall relationship between ISSA 5000, ISAE 3410 and ISAE 3000 (Revised) would be useful. We also note the following areas where further clarification is needed:

- Would certain environmental-related attestation engagements performed for compliance purposes fall under the scope of ISSA 5000 (e.g., recycling audits)?
- How is a “GHG statement” defined and does it make sense in the context of new sustainability disclosure and assurance requirements being introduced by regulators?
- What would the assurance report look like when the assurance practitioner is engaged to perform both an ISAE 3410 and ISSA 5000 engagement? For example, would there be one combined report that references both standards?
- Is the underlying work the same when assurance is provided on GHG information under ISAE 3410 versus ISSA 5000?

As noted in our comments above, we believe ISAE 3410 should be brought within the ISSA 5000 suite of sustainability assurance standards in due course to eliminate confusion. It would be helpful for the IAASB to communicate what its plans and timeline are for this.

#### *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:** [Neither yes/no, but see comments below](#)

## Detailed comments (if any):

The concept itself is clear, and we agree in theory with the requirements, but there are practical implementation concerns as outlined in our comments above. While we acknowledge that there are similar requirements currently in ISAE 3000, we consistently heard in our outreach that it will be very challenging to make the determination of whether different ethical requirements and quality management systems are at least as demanding as the IESBA Code and ISQM 1 respectively.

As a result, we recommend that these assessments are not left to individual practitioners and that the IAASB do further work with relevant parties to determine whether the requirements of other organizations

are “at least as demanding”. To provide transparency for users, we also suggest including a provision in the standard to require disclosure of the professional code of ethics and quality management framework the practitioner uses.

We also note that some relevant guidance on the topic of quality management has been issued by the IAASB (e.g. [IAASB: A framework for audit quality](#)). It would be beneficial to make these resources more prominently accessible and available for all practitioners that are conducting engagements under 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):**

We encourage the IAASB to align to greatest extent possible with definitions used by the ISSB.

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:** [Not Applicable](#)

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

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

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

We believe that more specificity is needed in the standard on the nature and extent of work to be performed for each assurance level, as well as practical guidance and examples.

This topic was consistently raised in our outreach activities. We heard from assurance providers that there is a lot of room for judgement and the nature and extent of work that needs to be performed for limited and reasonable assurance engagements in practice is not clear. We encourage the IAASB to consider repurposing Appendix 3 of [the Extended External Reporting \(EER\) Assurance Non-authoritative Guidance](#),

as guidance to ISSA 5000. This was a helpful resource that gave examples of limited and reasonable assurance procedures throughout the engagement.

Education for users of sustainability assurance reports on the distinctions between limited and reasonable assurance would also be helpful. For example, CPA Canada issued the following guide to help CPAs educate their clients in understanding reports on financial statements and the different levels of service a CPA can provide (i.e., audit, review or compilation): [Understanding reports on financial statements: Audit, review and compilations | CPA Canada](#). It would be helpful for similar materials to be developed in the context of sustainability assurance engagements.

*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:** [Not Applicable](#)

**Detailed comments (if any):**

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 our outreach there were a number of questions related to materiality determinations that will be conducted both by the entity and the practitioner, across the standard. We believe this is an area where education is needed for preparers, as well as related guidance for practitioners. We also think there is a need for further field testing in this area to determine challenges faced by practitioners. See comments included in question 12 below.

*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:** [No response](#)

**Detailed comments (if any):**



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:** [No response](#)

**Detailed comments (if any):**

*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:** [Neither agree/disagree, but see comments below](#)

**Detailed comments (if any):**

We believe additional guidance is needed on how to apply the requirements for materiality in practice. It would also be helpful to include information from the IAASB’s FAQs on [“The Application of Materiality by the Entity and the Assurance Practitioner”](#) in the application material accompanying the standard.

Common concerns we heard included what “consider materiality” means for qualitative disclosures and whether such considerations are always required. In addition, there are practical challenges with having different materiality levels and approaches for different types of information. In our view, the differing materiality approaches for qualitative and quantitative disclosures is confusing and creates an additional level of complexity that we do not think is necessary. We also note that this distinction is not made in ISAE 3000.

In financial reporting, there are both quantitative and qualitative disclosures and there is not generally a distinction made in the practitioner’s materiality assessments. In practice, sustainability reporting also involves both qualitative and quantitative disclosures and the considerations outlined in paragraph A278 are relevant to both qualitative and quantitative disclosures. We caution against giving the impression that the concept of materiality is distinct for qualitative and quantitative disclosures.

We found that the application guidance related to materiality is helpful and should be brought into the standard itself (e.g., paragraphs A271, A278, A277, A276). It would also be helpful to elaborate on the existing application materials in certain areas, for example aggregation of misstatements. We also note that some of the terminology related to materiality is not clear in the standard. For example, performance materiality is not intuitive and may require further explanation in the standard and related guidance material.

Within the context of sustainability reporting standards (e.g., as part of ISSB consultation on IFRS S1 and IFRS S2 and the EU Corporate Sustainability Reporting Directive), materiality has been flagged as a key area where guidance is needed. The IAASB should closely monitor the standards and guidance for sustainability reporting to determine how it may affect the related sustainability assurance requirements and guidance.

*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:** [No response](#)

**Detailed comments (if any):**

*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:** [No response](#)

**Detailed comments (if any):**

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:** [Neither yes/no, but see comments below](#)

**Detailed comments (if any):**

The assurance practitioner will likely receive information from the entity's value chain that has been prepared outside of the entity and potentially assured by another practitioner. It would be beneficial for ISSA 5000 to provide more clarity on how information from work carried out by other assurance providers in the value chain can be used in the engagement. There are similar concerns where entities outsource to a third-party certain data collection and other activities relevant to the preparation of sustainability information (i.e., service organization).

*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:** [Neither agree/disagree, but see comments below](#)

**Detailed comments (if any):**

There is a need for further details in the standard and guidance to help develop a common understanding of the risks and related work to be performed. Sustainability information often involves more forward-looking information (FLI) and use of estimates than traditional financial reporting and it is typically more susceptible to uncertainty (e.g., may have longer time frames for FLI spanning 10 or 20 years under scenarios analysis and transition plans). FLI and estimates in this context could also be susceptible to higher risk of fraud.

We suggest the IAASB consider separating what would be relevant for estimates and FLI as we believe there may be different considerations relevant for each. We also question the procedures required for estimates and FLI for both limited and reasonable assurance engagements in a few instances. For example, in paragraph 134L, it is unclear whether practitioners would be required to evaluate the assumptions used in a scenario analysis for a limited assurance engagement.

We also note that there are important concepts in ISA 540 (Revised), *Auditing Accounting Estimates and Related Disclosures* (ISA 540) that should be referenced or brought into ISSA 5000. For example, would the assurance provider be expected to develop their own expectation for the estimate in all cases?

*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 response](#)

**Detailed comments (if any):**

*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:** [No response](#)

**Detailed comments (if any):**

*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):**

We believe ISSA 5000 should be enhanced to provide examples of sustainability-related fraud risk factors and guidance on how to respond to such risks. Some areas of focus include greenwashing risk as well as potential bias inherent in scenario analysis given that it involves many judgements, estimates and assumptions. It may be challenging for assurance providers to distinguish between ambitious long-term goals and intentionally misleading FLI. It would also be useful to provide practical guidance on how to apply professional skepticism in this context.

We note that there are existing standards and guidance that can be leveraged and brought into the standard or application material, such as ISA 540 and IESBA’s publication on [Ethics Considerations in Sustainability Reporting | Ethics Board](#).

We also heard that more is needed on requirements for discussion of fraud with those charged with governance.

*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 comments below](#)

**Detailed comments (if any):**

Refer to our comments in question 19.

In addition, we encourage the IAASB to consider the potential need for communication and interactions between the financial statement auditor and the sustainability assurance practitioner (either within the same firms or in different firms) and in which circumstances this communication would be required.

*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:** [Neither yes/no, but see comments below](#)

**Detailed comments (if any):**

We heard concerns about the understandability of the report under mixed assurance engagements.

In our outreach, several comments were also raised regarding whether there is a need to distinguish in the underlying entity-prepared sustainability report between information that has been subject to assurance or not.

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:** [No response](#)

**Detailed comments (if any):**

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:** [No response](#)

**Detailed comments (if any):**

*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 response](#)

**Detailed comments (if any):**

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

**Overall response:** [No other matters to raise](#)

**Detailed comments (if any):**

### **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:** [No response](#)

**Detailed comments (if any):**

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:** [No response](#)

**Detailed comments (if any):**