IAASB

ED-5000: RESPONSE TEMPLATE

August 2023

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 Comme**nt" 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)	European Federation of Financial Analysts Societies
Name(s) of person(s) responsible for this submission (or leave blank if the same as above)	Javier de Frutos
Name(s) of contact(s) for this submission (or leave blank if the same as above)	Raquel Zaragoza
E-mail address(es) of contact(s)	Raquel.zaragoza@effas.com
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.	Europe
	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.	Member body and other professional organization
	Investors and Financial Analysts
Should you choose to do so, you may include information about your organization (or yourself, as applicable).	Founded in 1962, EFFAS is a not-for-profit organisation. Its mission is to set the required standards for investment professionals, to act as a think tank and centre for discussion and be a European reference in Training & Qualifications. EFFAS is the umbrella organisation of 14 national, local societies of investment professionals in Europe. EFFAS represents more than 18,000 Financial Analysts, Asset Managers, Pension Fund Managers, Corporate Finance Specialists, Risk Managers, Treasurers, and other professional profiles in the investment professions. EFFAS promotes the development and dissemination of a European Code of Ethics and Professional Conduct. EFFAS recognizes and respects regional and local market characteristics.

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: Agree (with no further comments)

Detailed comments (if any):

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):

The ED proposal is responsive and specific to the potential needs of users.

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: Yes, with comments below

Detailed comments (if any):

Based on the opinion of our team of experts in different relevant fields, if necessary, the practitioner should provide assurance on ISAE 3410. The scope considered should be based on the standards when an opinion on whether the GHG statement has been prepared, in all material respects, in accordance with the applicable criteria.

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):

1. The ED is clear regarding the requirements of the IESBA. -This should be a key aspect for the practitioner as reliability and trust in the assurance process is indispensable.

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 no further comments)**

Detailed comments (if any):

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 comments below**

Detailed comments (if any):

The IAASB standard is clear in how to address the sustainability matters, information, and disclosures. Regarding disclosures particularly, the standards should be clear in what is considered disclosure and what is "location" within the scope of the reporting information.

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):

EEFAS supports the approach presented in the ED. EFFAS also understands some reluctancy from preparers to use reasonable assurance. However, we consider that the standard should maintain the appropriate basis for performing both limited and reasonable assurance as presented in the ED.

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):

The practitioner and the engagement team should have sufficient knowledge of the sustainability issues and obviously the standards. It is clear about the practitioners' responsibility to obtain preliminary knowledge about the information to be reported.

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 no further comments)**

Detailed comments (if any):

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 comments below**

Detailed comments (if any):

An important point is the practitioner's evaluation judgment of the information provided regarding the entity's criteria applied to the sustainability information.

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):

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):

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: **Agree (with no further comments)**

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: **Yes, with comments below**

Detailed comments (if any):

The engagement team's leader should decide whether external experts should participate in the assurance as part of the process.

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):

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):

The forward-looking information provided by the entity should be reviewed and discussed by the engagement team and practitioner. For investors and financial analysts it is very important that this information is as accurate as possible and based on a realistically achievable scenario.

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

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: **Agree, with comments below**

Detailed comments (if any):

Assurance principle-based standards will be aligned with the current IFRS standards.

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: **Agree, with comments below**

Detailed comments (if any):

If the intention of the management is to present misstatements it should be considered as fraud. As noted in the ED, the misstatement can be made by error or fraud, qualitative or quantitative, and include omitted information.

EFFAS supports that the practitioner states whether there are material misstatements in compliance with the law.

***For Further Background**: Survey background to Q6; Explanatory Memorandum paragraphs 108-110*

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):

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):

We consider the ED to be very complete addressing this issue and covers all aspects of sustainability reporting. For investors, reporting the level of assurance will be very helpful and consistency will contribute to comparability, always welcomed by investors.

We also agreed that the name of the engagement leader is disclosed in the assurance report on sustainability. Additionally, establishing a communication channel with the practitioner of the financial reporting will be very helpful. This communication will contribute to present a more comprehensive view of the reliability of the entity's approach to reporting.

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):

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 no further comments)**

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: **Agree, with comments below**

Detailed comments (if any):

As users, we would like to have the effective date aligned with the effective date of the sustainability standards. We understand that for entities it might be in certain cases more complicated. We would suggest that the practitioner works closely with entities to try to align both effective dates.