

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)	Belgian Institute of Registered Auditors (Institut des Réviseurs d’entreprises / Instituut van de Bedrijfsrevisoren)
Name(s) of person(s) responsible for this submission (or leave blank if the same as above)	Patrick Van Impe, President
Name(s) of contact(s) for this submission (or leave blank if the same as above)	Stéphanie Quintart, Advisor
E-mail address(es) of contact(s)	president@ibr-ire.be ; s.quintart@ibr-ire.be
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
	If “Other”, please specify
Should you choose to do so, you may include information about your organization (or yourself, as applicable).	

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 comments below](#)

Detailed comments (if any):

We agree that the draft can be applied for each of the items described in paragraph 14 of this EM, being all sustainability topics and aspects of topics, all mechanisms for reporting, any sustainability criteria, all intended users, limited and reasonable assurance engagements, all assurance practitioners. However, further specific consideration and guidance should be given to the following areas of concern (to ensure consistent application and application of the standard) :

- How to deal with information from outside the entity's organizational boundary ? The ability of an assurance practitioner to assure such information ?
- How to address issues associated with using the work of other practitioners (consolidated / aggregated information / information outside the boundary of the organization) ?
- How to define and ensure completeness of list of intended users ?

The ED 5000 is very technical and additional application guidance might be required (eg. for non-professional accounting assurance practitioners) to ensure consistent application, understanding and interpretation.

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):

See below answers to questions specifically such as question 3 on scope and question 11 on double materiality.

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: [No, with comments below](#)

Detailed comments (if any):

The fact of ISAE 3410 not being integrated in the draft ISSA 5000 can be understood in the context of the speed (i.e. timing) in which this draft had to be ready, but the matter nevertheless needs to be addressed as now having ISSA 5000 exist next to ISAE 3410 creates challenges for the preparers and the practitioners:

- in an engagement where a separate conclusion is required on a entity's GHG statement/KPI's, and another conclusion on the other sustainability matters in the same document (sustainability report), the practitioner would have to apply two different assurance standards with different requirements on different sections of the sustainability report. This will not only pose a challenge for the practitioner in formulating this in the assurance reports but also for the reader of the sustainability information, to make any sense of it;
- It would even be more complex if one report would be needed to address both the assurance on the GHG statement and the assurance on the other sustainability information in the sustainability report/statements, or if next to a separate conclusion on the GHG statement, another conclusion is needed on the other sustainability information, including the GHG KPI's, under ISSA 5000.

The incremental effort of integrating the additional requirements and explanatory notes on the procedures to be performed on GHG statements into ISSA 5000, should be relatively easily feasible, as there are already a lot of these requirements in the current ISSA 5000 draft and accordingly, it would only be those relatively few specific unique technical aspects of ISAE 3410 that would need to be additionally included.

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: [No, with comments below](#)

Detailed comments (if any):

The concept of "at least as demanding" is highly subjective and is likely to lead to divergent interpretations and applications that could mislead stakeholders. Consequently, ISQM 1 and the IESBA Code should apply to the performance of these engagements, in accordance with this standard.

International Standard on Quality Management “ISQM”-1 was developed for “firms”, which are defined in ISQM-1 as “sole practitioner, partnership of or other entity of professional accountants, or public sector equivalent”. Accordingly, ISQM-1 was not prepared with the intention of being able to be applied by assurance practitioners who are not in the audit profession. We believe that this poses a significant exposure of creating a different “level playing field” between traditional audit firms and these “independent assurance service providers” or “IASP’s”, which will be detrimental to quality with which assurance engagements on sustainability statements will be carried out. Accordingly, also the trust of the capital markets (also still one of the stakeholders as per the European Sustainability Reporting Standards (“ESRS’s”)) could be jeopardized by inconsistent firm quality standards being applied.

This means that for other assurance practitioners to be able to apply quality management standards, the Board should reflect on providing more guidance and translating some of the key concepts and definitions in ISQM-1 in a “profession” neutral manner, into the draft ISSA 5000 Standard.

In this respect, we recommend the Board also to reflect on moving some of the paragraphs in the “Application and other explanatory materials”, notably paragraphs A45 to A47 to the main body of the Standard, because these are of such fundamental importance with respect to independence.

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):

The definition of sustainability matters in paragraph 17(vv) of ED-5000 refers to environmental, social, economic and cultural matters, including the impacts of an entity’s activities, products and services on the environment, economy or culture, or the impacts on the entity, and the entity’s policies, performance, plans, goals and governance relating to such matters. We are unclear on what the ‘**cultural matters**’ are referring to and we believe there should be **additional clarity** added in the application material.

We believe it may be beneficial to categorize the example topics listed in paragraph A32 of ED-5000 into the categories of sustainability matters listed in paragraph 17(vv), which may also help clarify what is meant by ‘cultural matters’.

In addition, we suggest **adding governance as a category** of matters to the definition of sustainability matters. We want to be sure that all aspects of governance topics get included, such as composition of the board, shareholder rights, integration of sustainability within the governance structure, corporate performance metrics, management structure, company policies and values, information disclosure, link between sustainability performance and variable remuneration, corporate compliance and assurance and data security and cyber risk.

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):

Appendix 1, in particular, the diagram, was helpful in understanding the relationship between sustainability matters, sustainability information and disclosures.

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: [No, with comments below](#)

Detailed comments (if any):

IAASB must assess the opportunity to have two separate sections for limited and reasonable assurance (with appropriate guidance), if not two separate standards.

Further guidance, educational materials is needed to further explain what is the difference between limited and reasonable assurance. How to traduce the theory from ISSA 5000 (on this difference) in the practice remains a challenge.

We would expect additional guidance to explain the minimal procedures for each type of assurance (with practice examples based on sustainable reports) and the scoping of the limited assurance, in view of the various profile of professionals and to enhance comparability.

It is important to indicate consistently that the assurance approach should be a risk based approach.

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):

In general, it is required that the practitioner obtains a preliminary knowledge about a lot of matters without being clear about the extent.

The extent of the following consideration “obtaining a preliminary knowledge about the sustainability information expected to be reported” is not clear (refer to A156). There is additionally the possibility that this information is not available yet in the stage of obtaining a preliminary knowledge, therefore more detailed guidance is necessary.

Concerning the scope of the proposed assurance engagement, we suggest to stipulate more explicitly that at the preliminary stage it is necessary to have a good understanding of what information is subject to the assurance reporting.

We also suggest to add the following clarifications:

- What are the consequences if the practitioner determines there is a likely expected limitation of scope?
- A clearer definition of a ‘rational purpose’.

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: [No, with comments below](#)

Detailed comments (if any):

The standard does not sufficiently address the concept of entity’s materiality. We propose to add more (practical) guidance to address the practitioner’s consideration of the entity’s materiality:

- Concerning the concept of double materiality, we suggest additional guidance with examples on how to consider and evaluate the entity’s process of identifying materiality.
- on the entity’s materiality process, we suggest additional guidance to identify topics and aspects of topics to be reported on if the criteria is internally developed.

We also find that more guidance on the type of questions to ask to the client on the entity’s double materiality assessment process is needed.

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, with comments below](#)

Detailed comments (if any):

In order to facilitate a proper conduct by the practitioner to evaluate the criteria it is essential (and in particular in case of entity developed criteria) that 72 (c) is formally assessed and documented by the entity.

In respect to d) namely how the criteria will be made available to the intended users, we believe that b) is to be disclosed by the entity in their reporting and that at least in the case of entity developed criteria, assessment of c) being the characteristics is to be disclosed as well.

We believe that more guidance on forward-looking information is needed to give assurance (criteria and methodology to come to forward-looking 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 comments below](#)

Detailed comments (if any):

Whereas the practitioner is familiar with the materiality principles relating to the “impact on the entity”, it seems much more complicated to establish (or consider) materiality relating to the “impacts of the entity on sustainability matters”. There is probably a tendency towards minimization in the latter case and therefore a greater risk of greenwashing.

More guidance (for example from ISA 540) should be incorporated.

General comments:

- The readers (stakeholders) are various and their interest is so large while the standard is theoretical and in function of who reads the report, the interpretation of what is material is different.
- Template reports (including non-standard reports) should be provided.

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 comments below](#)

Detailed comments (if any):

We suggest to include further guidance to understand the practitioner’s responsibilities in “considering” materiality, especially also in view of qualitative disclosures.

We suggest also to include further guidance on the topic of accumulating identified misstatements, including when sustainability topics or aspects of topics are measured using different measurement bases and/or when misstatements are identified in qualitative disclosures.

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 comments below](#)

Detailed comments (if any):

We suggest to further clarify with examples the difference between limited and reasonable assurance to avoid different interpretations. We also refer to our comment on question 7.

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, with comments below](#)

Detailed comments (if any):

Currently, "practitioner" and "other practitioner" do not seem to be specifically defined in the Exposure Draft. Throughout the text, "engagement leader" and "practitioner" are referred to, but only "engagement leader" seem to be specifically defined. Also "expert" seems not to be specifically defined.

As the evaluation of the division between the "engagement team members" and "using the work of Another practitioner" as per figure 2 in the Explanatory Memorandum Section 1-G, depends on the fact if the practitioner is able to sufficiently and appropriately be involved in the work of the other practitioner, it is key to provide additional guidance on what would be the level of involvement needed to assess this as sufficient and appropriate. In this respect, should the aspects included in A59, A63 and A459 in ED-5000 be taken into account to evaluate sufficient and appropriate involvement?

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: [No, with comments below](#)

Detailed comments (if any):

Given the various types of practitioners, experts,..., the various types of organisations and regulations, the current requirements are not sufficiently clear to ensure a consistent application.

We refer to the comment in relation to question 14 with regard to additional guidance on what would be the level of involvement needed to assess this involvement as sufficient and appropriate. This comment also applies to question 15, as the practitioner would be required to be sufficiently and appropriately involved in the work of the external expert.

For the engagement team and the practitioner, reference is made to the fact that they are subject to the IESBA Code and the ISQM 1. It is unclear in the current Exposure Draft whether similar requirements apply for external experts or other practitioners, as they are not part of the Engagement Team based on figure 2 Explanatory Memorandum Section 1-G.

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: [Agree, with comments below](#)

Detailed comments (if any):

In a limited assurance engagement we would expect, to enable the practitioner to evaluate whether changes in reported estimates or forward-looking information are appropriate in the circumstances, that this should be performed by assessing the disclosures included in the sustainability report. This is currently missing in the exposure draft.

Next, it would be welcome to provide more guidance as to “consider whether additional procedures are necessary in the circumstances” by means of providing examples.

The level of assurance /type of assurance to give on forward looking-information (on the process or the outcome?) should be clarified and more guidance should be provided (eg. Assurance over the outcome of forward looking information versus assurance on the process how forward looking information has been developed).

Given the various types of practitioners and to avoid various interpretation, more guidance should be provided on the tasks to be executed regarding estimates in a reasonable assurance vs limited assurance.

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, with comments below](#)

Detailed comments (if any):

We disagree with the proposed approach. Primarily we object to the focus on areas 'where misstatements are likely', simply because we would hope that misstatements are unlikely as the company should put effort in the preparation of a proper sustainability report. We think that the ISAE3000 approach may work there, due to the wide variation in ISAE3000 engagements but that more consistency is required here.

Further we think that the spectrum of risk needs more explanation (it is briefly mentioned in 115R but not really explained).

Finally we think that the notion in 115R(c) that the higher the risk, the more persuasive evidence is required, should also apply to limited assurance, although the level of evidence needed indeed is different.

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: [Disagree, with comments below](#)

Detailed comments (if any):

The concept of ISA 600 should be here developed.

The requirements can be applied, practitioners will recognize the principles with respect to engagement resources, the direction, supervision and review of the engagement team and the use of the work of externals. In view of the specificity of sustainability information however, more specific considerations relating to the sustainability information of groups should be provided.

More concrete examples or guidelines in the Application section would help.

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):

The topic of fraud is included in all phases of the assurance engagement covered in ED-5000. However, the concrete interpretation of fraud in the context of sustainability information, and greenwashing in particular, is not sufficiently addressed. More concrete examples should be provided in the section Application of ED-5000. The topic of Fraud and in particular greenwashing, is a hot topic for the stakeholders.

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):

Although we agree with the proposed approach we would recommend to give more specific guidance with concrete list of overview of key matters to be communicated to those charged with governance.

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):

Whether or not the requirements in ED-5000 will drive assurance reporting that meets the information needs of users is a complex question. On the one hand, the proposed standard is a significant step forward from the current patchwork of guidance on sustainability assurance. It provides a comprehensive and rigorous framework for assurance practitioners to follow, and it is aligned with the needs of a wide range of users.

On the other hand, ED-5000 is still under development, and it is possible that some of the requirements may need to be refined to ensure that assurance reports are truly useful to users. We would suggest that the following matters be considered:

- Limitations relating to intended users: Given the wide ranging use of sustainability reports, ED-5000 should recognise the fact that in certain circumstances, reports should be written for certain specific users and that more guidance should be given on the circumstances in which this should be limited. This could be strengthened by requiring practitioners to explicitly state the purpose of the assurance engagement and the specific needs of the users that the report is intended to meet. This would help to ensure that users understand the limitations of the report and how it can be used.
- Clarity about what information has been assured: Assurance reports should clearly state what information has and has not been assured and what constitute “other information”. This could be further enhanced by requiring practitioners to provide a more detailed overview of the scope of the assurance engagement. This would help users to understand what information they can rely on and what information they should use with caution.

- More illustrative examples: The illustrative reports in ED-5000 are a helpful resource for practitioners. However, they could be further enhanced by providing more examples of the "summary of work performed." This would help to understand the types of procedures that are typically performed in a sustainability assurance engagement.

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 comments below](#)

Detailed comments (if any):

It is important to consider the maturity of sustainability reporting when making decisions about the requirements for sustainability assurance engagements. The Corporate Sustainability Reporting Directive (CSRD) is a significant step forward for sustainability reporting in the European Union, but it is important to note that the CSRD is starting with limited assurance. This means that it is unlikely that reasonable assurance will be provided for sustainability assurance engagements for a few years.

In the future, it may be appropriate to introduce a standard on KAMs for sustainability assurance engagements, if it is scoped properly to apply only to Listed/Public Interest Entities and to Reasonable Assurance engagements. (same scope as ISA 701). As financial and non-financial information are connected, it should be avoided that, in the context of ISSA 5000, KAMs are used for other types of assurance and entities than the scope of ISA 701.

It is important to take a phased approach to the introduction of KAMs for sustainability assurance engagements. We should start by developing a comprehensive understanding of how to apply KAMs to sustainability assurance engagements. Once we have developed this understanding, we can then consider whether it is appropriate to introduce a standard on KAMs for sustainability assurance engagements, and if so, how it should be scoped.

This would also help to ensure that the concept is properly implemented and that the benefits outweigh the costs.

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, with comments below](#)

Detailed comments (if any):

While the explanation is appropriate for an assurance standard and is understood by auditors, it is possible that the user may not understand what it is saying. For this reason, it is important to reconsider the location of the statement so that it is more prominent and easier for users to understand.

One suggestion is to include the statement in the Limited Assurance Conclusion itself. This would ensure that users are aware of the limitations of the assurance engagement before they read the rest of the report. Another suggestion is to include the statement in the summary of work performed. This would help users to understand the scope of the assurance engagement and the procedures that were performed.

Examples should be provided.

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, with comments below](#)

Detailed comments (if any):

We refer to INTOSAI and their efforts with regard to sustainable development.

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

Overall response: [Yes, as further explained below](#)

Detailed comments (if any):

We refer to our answer to question 4 (required application of IESBA Code) and believe that more guidance for non-practitioners should be developed for the implementation of this engagement.

The standard allows unassured comparative information (para. 189), which is unhelpful, as the information will be compared anyway. Trends over several years will be extrapolated. The expectation should be that all information in a report is of the same quality/ reliability. In any case, greater transparency as to what is not assured is required.

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: [See comments on translation below](#)

Detailed comments (if any):

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

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 ISA. If not, what do you propose and why?

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

Detailed comments (if any):

It is important that all necessary elements for assurance engagements are available for all (i.e. criteria defined and stable) and that high-quality information is available, which will potentially be a challenge for entities to prepare for this additional reporting and the audit requirements accordingly).