

# ED-EXPERTS: RESPONSE TEMPLATE

April 2025

## RESPONSE TEMPLATE FOR THE ED OF PROPOSED NARROW-SCOPE AMENDMENTS TO IAASB STANDARDS ARISING FROM THE IESBA'S USING THE WORK OF AN EXTERNAL EXPERT PROJECT

### Guide for Respondents

Comments are requested by **July 24, 2025**.

This template is for providing comments on the Exposure Draft (ED) of proposed Narrow-Scope Amendments to International Auditing and Assurance Standards Board® (IAASB®) Standards Arising from the International Ethics Standards Board for Accountants' (IESBA) Using the Work of an External Expert project, in response to the questions set out in the Explanatory Memorandum (EM) to the ED. 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 the ED, 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 the ED that your response relates to, for example, by reference to sections, headings or specific paragraphs in the ED.
  - 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 [web page](#) to upload the completed template.

**Responses to IAASB's Request for Comments in the EM for the ED, Proposed Narrow-Scope Amendments to IAASB Standards Arising from the IESBA's Using the Work of an External Expert Project**

**PART A: Respondent Details and Demographic information**

Your organization's name (or your name if you are making a submission in your personal capacity)	PricewaterhouseCoopers International Limited
Name(s) of person(s) responsible for this submission (or leave blank if the same as above)	Wes Bricker
Name(s) of contact(s) for this submission (or leave blank if the same as above)	Wes Bricker and Gilly Lord
E-mail address(es) of contact(s)	<a href="mailto:wesley.bricker@pwc.com">wesley.bricker@pwc.com</a> <a href="mailto:gillian.lord@pwc.com">gillian.lord@pwc.com</a>
Geographical profile that best represents your situation (i.e., from which geographical perspective are you providing feedback on the ED). Select the most appropriate option.	<u>Global</u>
	If "Other", please clarify
The stakeholder group to which you belong (i.e., from which perspective are you providing feedback on the ED). Select the most appropriate option.	<u>Firm (audit or assurance practitioners)</u>
	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 the ED).

Information, if any, not already included in responding to the questions in Parts B and C:

N/A

**PART B: Responses to Questions in the EM for the ED**

*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 Question***Public Interest Responsiveness*

1. Do you agree that the proposed narrow-scope amendments are responsive to the public interest, considering the qualitative standard-setting characteristics and standard-setting actions in the project proposal? If not, why not?

(See EM, Section 1-A)

**Overall response:** Agree, with comments below

**Detailed comments (if any):**

While we continue to have concerns regarding the operability of the recently approved IESBA 'using the work of an external expert' provisions, and the consequences that may have for audit quality, which would not be in the public interest, we recognise that these changes are outside the remit of the IAASB and the scope of this exposure draft. In that context, we are supportive of the proposed narrow-scope amendments to the IAASB's standards and believe they achieve the overall project objective of maintaining interoperability of the IAASB standards and the new provisions of the Code.

While supportive of the limited extent of the proposed amendments in achieving the Board's stated project objective, we continue to emphasise the importance of proactive collaboration between the IAASB and the IESBA on projects that have consequential impacts for both Boards' pronouncements. As noted, the wider implications for an audit, and audit quality, of the IESBA provisions are a matter that is directly relevant to the IAASB's public interest mandate. Consequently, earlier and more fulsome debate by both Boards of the potential unintended consequences of those proposals would have been appropriate.

**Specific Questions***Proposed Narrow-Scope Amendments to ISA 620<sup>1</sup>*

2. Do you agree that the proposed narrow-scope amendments to ISA 620 are appropriate to maintain interoperability with the new provisions in the Code related to using the work of an external expert?

(See EM, Section 1-C)

**Overall response:** Agree, with comments below

**Detailed comments (if any):**

<sup>1</sup> International Standard on Auditing (ISA) 620, *Using the Work of an Auditor's Expert*

We agree that the proposed narrow-scope amendments to ISA 620 are appropriate to maintain the interoperability with the new provisions in the Code, subject to our overall comments in response to question 1.

If you do not agree, what alternatives do you suggest (please identify the specific paragraphs and be specific as to why you believe the proposals are not appropriate, and why you believe your alternatives would be more appropriate)?

**Detailed comments (if any):**

N/A

*Proposed Narrow-Scope Amendments to ISRE 2400 (Revised),<sup>2</sup> ISAE 3000 (Revised)<sup>3</sup> and ISRS 4400 (Revised)<sup>4</sup>*

3.1 Do you agree that the proposed narrow-scope amendments to ISRE 2400 (Revised) are consistent with the proposed amendments to ISA 620, and are appropriate to maintain interoperability with the new provisions in the Code related to using the work of an external expert?

(See EM, Section 1-D)

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

**Detailed comments (if any):**

If you do not agree, what alternatives do you suggest (please identify the specific paragraphs and be specific as to why you believe the proposals are not appropriate, and why you believe your alternatives would be more appropriate)?

**Detailed comments (if any):**

N/A

3.2 Do you agree that the proposed narrow-scope amendments to ISAE 3000 (Revised) are consistent with the proposed amendments to ISA 620, and are appropriate to maintain interoperability with the new provisions in the Code related to using the work of an external expert?

<sup>2</sup> International Standard on Review Engagements (ISRE) 2400 (Revised), *Engagements to Review Historical Financial Statements*

<sup>3</sup> International Standard on Assurance Engagements (ISAE) 3000 (Revised), *Assurance Engagements Other than Audits or Reviews of Historical Financial Information*

<sup>4</sup> International Standards on Related Services (ISRS) 4400 (Revised), *Agreed-upon Procedures Engagements*

(See EM, Section 1-E)
<p><b>Overall response:</b> <u>Agree, with comments below</u></p> <p><b>Detailed comments (if any):</b></p> <p>While we agree that the proposed narrow-scope amendments to ISAE 3000 (Revised) are broadly consistent with those proposed to ISA 620 and are appropriate to maintain interoperability with the new provisions in the Code, we note that ISSA 5000 (paragraph 50) includes a requirement to comply with relevant ethical requirements that apply to using the work of another practitioner. For consistency in the performance of assurance engagements and the principle set by ISSA 5000, we suggest that the IAASB considers enhancing paragraph 52 of ISAE 3000 (Revised) to incorporate reference to relevant ethical requirements related to using the work of an expert, consistent with proposed ISA 620 paragraph 8(f):</p> <p><i>52. When the work of a practitioner's expert is to be used, the practitioner shall also:</i></p> <p><i>(a) Consider provisions of relevant ethical requirements related to using the work of an expert;</i></p> <p><i>(b) Evaluate whether the practitioner's expert has the necessary competence, capabilities and objectivity for the practitioner's purposes. In the case of a practitioner's external expert, the evaluation of objectivity shall include inquiry regarding interests and relationships that may create a threat to that expert's objectivity;</i></p> <p><i>[....]</i></p>
<p>If you do not agree, what alternatives do you suggest (please identify the specific paragraphs and be specific as to why you believe the proposals are not appropriate, and why you believe your alternatives would be more appropriate)?</p>
<p><b>Detailed comments (if any):</b></p> <p>N/A</p>

<p><b>3.3</b> Do you agree that the proposed narrow-scope amendments to ISRS 4400 (Revised) are consistent with the proposed amendments to ISA 620, and are appropriate to maintain interoperability with the new provisions in the Code related to using the work of an external expert?</p> <p>(See EM, Section 1-F)</p>
<p><b>Overall response:</b> <u>Agree (with no further comments)</u></p> <p><b>Detailed comments (if any):</b></p>
<p>If you do not agree, what alternatives do you suggest (please identify the specific paragraphs and be specific as to why you believe the proposals are not appropriate, and why you believe your alternatives would be more appropriate)?</p>

**Detailed comments (if any):**

N/A

***Other Matters***

4. Are there any other matters you would like to raise in relation to the ED? If so, please clearly indicate the standard(s), and the specific requirement(s) or application material, to which your comment(s) relate.

**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:

5. Translations—Recognizing that many respondents may intend to translate the final narrow-scope amendments for adoption in their own environments, the IAASB welcomes comment on potential translation issues respondents note in reviewing the ED.

Overall response: No response

Detailed comments (if any):

6. Effective Date—Given the public interest benefit of aligning the effective date of these proposed narrow-scope amendments with the effective date of the revised Code provisions related to using the work of an external expert, the IAASB believes that an appropriate implementation period would be approximately 12 months after the PIOB's process of certification of the final narrow-scope amendments. The IAASB welcomes comments on whether this would provide a sufficient period to support effective implementation of the narrow-scope amendments.

(See EM, Section 1-G)

Overall response: No response

Detailed comments (if any):