

## 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)	Accountancy Europe
Name(s) of person(s) responsible for this submission (or leave blank if the same as above)	Vitali Groholski
Name(s) of contact(s) for this submission (or leave blank if the same as above)	
E-mail address(es) of contact(s)	<a href="mailto:vitali@accountancyeurope.eu">vitali@accountancyeurope.eu</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>Europe</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>Professional accountancy or other professional organization (PAO or similar)</u>
	If "Other", please specify
Should you choose to do so, you may include information about your organization (or yourself, as applicable).	Accountancy Europe unites 49 professional organisations from 35 countries that represent 1 million qualified accountants, auditors and advisors.

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:

## 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:** Neither agree/disagree, but see comments below

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

Accountancy Europe does not believe that the proposed amendments are responsive to the public interest.

We maintain our position, as stated in our previous response to the IESBA's amendments on the use of external experts, that it is not in the public interest to restrict the use of the work of experts in an increasingly complex world where expertise is essential to deliver high-quality audits and assurance engagements.

While we acknowledge that the final version of the IESBA Code reflects some improvements and incorporates certain points raised in our response to the Exposure Draft, several concerns remain unaddressed.

That said, we recognise that inconsistency between the IAASB standards and the IESBA Code is also not in the public interest. Practitioners are expected to comply with both the IESBA Code of Ethics (or national equivalents) and the relevant IAASB standards, and misalignment would lead to confusion, inefficiency, and implementation challenges.

Therefore, while we do not consider the underlying project and approach to be in the public interest, we accept that, given the IESBA's decisions, alignment of the IAASB standards with the Code has become necessary to maintain consistency across frameworks.

We emphasise that such alignment should not set a precedent for future standard-setting projects. Instead, a holistic, practical, and proportionate approach should be pursued to best serve the public interest in the development of global audit and assurance standards.

**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):**

Accountancy Europe appreciates the objective to maintain interoperability between the IAASB's ISA 620 and the IESBA Code. However, we do not agree with the context and underlying direction of the proposed changes.

We have previously responded to IESBA's Exposure Draft on the use of external experts, expressing concerns, among others to undermine the practical and proportionate use of experts, particularly in smaller practices. We refer to [our previous response to IESBA](#) for a detailed overview of these concerns.

While we do not agree with the context of the changes proposed by IESBA, we recognise the importance of maintaining alignment between the IESBA Code and the IAASB standards to avoid confusion in practice. We consider that, overall, the proposed amendments to ISA 620 achieve consistency with the corresponding sections of the IESBA Code.

We therefore acknowledge that the proposed narrow-scope changes to ISA 620 are aligned with the IESBA Using the Work of an External Expert project; however, we strongly encourage both the IAASB and IESBA to reconsider the underlying approach to ensure that alignment is achieved on a position that is practicable and operational, supporting the effective use of external experts in a manner that enhances audit quality. This might necessitate re-opening the recently changed IESBA Code of Ethics.

We note that the IESBA Code provides more detailed guidance on ethical requirements, including specific factors relevant to evaluating an expert's competence, capabilities, and objectivity (CCO). By contrast, ISA 620 makes only high-level references to these factors. We believe the IAASB could strengthen its standard by incorporating more detailed guidance to support more consistent and effective application in practice. Furthermore, auditors applying ISAs are already required to adhere to the relevant ethical requirements so that the proposed requirement in ISA 620.8(f) appears redundant. We further note it would also apply to paragraphs 12 and 13 of ISA 620, which the IESBA Code does not cover.

We also draw your attention that the issue of sectors where there are very few experts (e.g. extractive industry) remains unaddressed. It is very difficult to find an external expert with the necessary objectivity, since objectivity, as defined by the Code, is more akin to the notion of independence.

We agree with the wording of §A19 but have identified inconsistencies between §A19A and §A31A. §A19A should be reworded to be sufficiently clear to help practitioners.

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

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):**

*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 comments below

**Detailed comments (if any):**

Accountancy Europe appreciates the objective to maintain interoperability across ISRE 2400 (Revised), ISAE 3000 (Revised), and ISRS 4400 (Revised) with the IESBA Code and the proposed amendments to ISA 620.

Consistent with our comments under Question 2, we do not agree with the underlying context and direction of these amendments as derived from the IESBA proposals. We refer to our previous response to IESBA for a detailed explanation of these concerns.

In relation to the proposed amendments under these standards:

We acknowledge that the proposed amendments across ISRE 2400 (Revised), ISAE 3000 (Revised), and ISRS 4400 (Revised) are consistent with the changes proposed to ISA 620, ensuring alignment with the IESBA Code.

However, we remain concerned that aligning with an approach that lacks sufficient flexibility and adaptability may not be practical in various assurance and related services engagements.

Though ISRE 2400 (Revised) provides only limited assurance and involves procedures that are less extensive than an audit, enhancing consistency with ISA 620 could still be beneficial. Specifically, we suggest clarifying the sequential logic of the evaluation when using an external expert—first assessing their CCO, then the adequacy of their work. Unlike ISA 620, which sets this out clearly, ISRE 2400 refers to these matters more generally as “significant.” Introducing clearer guidance on this structure would support better alignment and improve application in practice. It should be noted, however, that

<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*

these steps can, in practice, be addressed in parallel if time is limited. In any case, it is important to avoid the impression that the final evaluation of the CCO is necessarily required upfront, as this could reduce planning flexibility and further limit availability to qualified experts for high-quality engagements.

While we do not agree with the overall context of the proposed changes driven by the IESBA Code, we recognise the importance of maintaining consistency and alignment across the IAASB standards to avoid confusion and fragmentation in practice.

We therefore acknowledge that the proposed amendments to ISRE 2400 (Revised), ISAE 3000 (Revised), and ISRS 4400 (Revised) are aligned and consistent with the amendments to ISA 620 and the IESBA Code. However, we reiterate our call for alignment on positions that are practicable, adaptable to different contexts, and support high-quality engagements while maintaining proportionality.

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):**

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?

(See EM, Section 1-E)

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

**Detailed comments (if any):**

Accountancy Europe appreciates the objective to maintain interoperability across ISRE 2400 (Revised), ISAE 3000 (Revised), and ISRS 4400 (Revised) with the IESBA Code and the proposed amendments to ISA 620.

Consistent with our comments under Question 2, we do not agree with the underlying context and direction of these amendments as derived from the IESBA proposals. We refer to our previous response to IESBA for a detailed explanation of these concerns.

In relation to the proposed amendments under these standards:

We acknowledge that the proposed amendments across ISRE 2400 (Revised), ISAE 3000 (Revised), and ISRS 4400 (Revised) are consistent with the changes proposed to ISA 620, ensuring alignment with the IESBA Code.

However, we remain concerned that aligning with an approach that lacks sufficient flexibility and adaptability may not be practical in various assurance and related services engagements.

Regarding the consistency within ISAE 3000 revised, we agree with the wording of §A128 but have identified inconsistencies between §A128A and §A133A. §A128A should be reworded to be sufficiently clear to help practitioners.

While we do not agree with the overall context of the proposed changes driven by the IESBA Code, we recognise the importance of maintaining consistency and alignment across the IAASB standards to avoid confusion and fragmentation in practice.

We therefore acknowledge that the proposed amendments to ISRE 2400 (Revised), ISAE 3000 (Revised), and ISRS 4400 (Revised) are aligned and consistent with the amendments to ISA 620 and the IESBA Code. However, we reiterate our call for alignment on positions that are practicable, adaptable to different contexts, and support high-quality engagements while maintaining proportionality.

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):**

3.3 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?

(See EM, Section 1-F)

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

**Detailed comments (if any):**

Accountancy Europe appreciates the objective to maintain interoperability across ISRE 2400 (Revised), ISAE 3000 (Revised), and ISRS 4400 (Revised) with the IESBA Code and the proposed amendments to ISA 620.

Consistent with our comments under Question 2, we do not agree with the underlying context and direction of these amendments as derived from the IESBA proposals. We refer to our previous response to IESBA for a detailed explanation of these concerns.

In relation to the proposed amendments under these standards:

We acknowledge that the proposed amendments across ISRE 2400 (Revised), ISAE 3000 (Revised), and ISRS 4400 (Revised) are consistent with the changes proposed to ISA 620, ensuring alignment with the IESBA Code.

However, we remain concerned that aligning with an approach that lacks sufficient flexibility and adaptability may not be practical in various assurance and related services engagements.



While we do not agree with the overall context of the proposed changes driven by the IESBA Code, we recognise the importance of maintaining consistency and alignment across the IAASB standards to avoid confusion and fragmentation in practice.

We therefore acknowledge that the proposed amendments to ISRE 2400 (Revised), ISAE 3000 (Revised), and ISRS 4400 (Revised) are aligned and consistent with the amendments to ISA 620 and the IESBA Code. However, we reiterate our call for alignment on positions that are practicable, adaptable to different contexts, and support high-quality engagements while maintaining proportionality.

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):**

#### *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:** Yes, with comments below

**Detailed comments (if any):**

Accountancy Europe would like to raise a high-level point regarding the standard-setting process underlying these amendments.

We recognise that the current Exposure Draft follows changes already finalised by the IESBA Code and that the IAASB is now seeking to maintain consistency across its standards, including ISA 620, ISRE 2400 (Revised), ISAE 3000 (Revised), and ISRS 4400 (Revised).

We note that addressing the changes in two separate phases has limited the opportunity to consider the implications of these amendments in a holistic manner. This sequential approach may present practical challenges for practitioners, particularly smaller firms, as well as for regulators and inspectors, who may encounter interpretative and implementation questions.

Looking ahead, we believe there would be benefits in exploring closer coordination between the IAASB and the IESBA on projects with interconnected implications, allowing for a more comprehensive consideration of independence, ethics, assurance, and audit requirements together. Such a coordinated approach could enable stakeholders to assess the broader public interest impacts and operational consequences in a more integrated manner, while supporting consistent application in practice.



## 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:** [See comments on translation below](#)

**Detailed comments (if any):**

In reviewing the Exposure Draft, we observe that the proposed implementation period of 12 months may present challenges for translations, national adoption processes, and effective application in practice. Translating the amendments accurately, ensuring alignment with existing standards, and updating related guidance and materials require careful planning and sufficient time to support quality and consistency in implementation.

Additionally, national regulators and oversight bodies may need additional time to incorporate these amendments within their frameworks.

We also note that, as these amendments follow the IESBA revisions, the timeline for implementation and translation is necessarily linked to those earlier decisions, which can result in a tight implementation schedule for many jurisdictions.

Looking ahead, we believe there may be benefit in exploring closer coordination on timelines for future projects where amendments to the IESBA Code and IAASB standards are closely related, supporting timely and consistent translation, adoption, and implementation while preserving quality.

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:** [See comments on effective date below](#)

**Detailed comments (if any):**

Accountancy Europe appreciates the IAASB's intention to align the effective date of these narrow-scope amendments with the effective date of the related IESBA Code provisions.

In this specific case, as the proposed changes primarily reference requirements already established in the IESBA Code, we acknowledge that the practical consequences of the amendments may be limited. The additions appear explanatory, which may support the view that a 12-month implementation period is adequate.

However, we caution that even for explanatory changes, the implementation period may still be challenging for many stakeholders, including firms, regulators, and national standard-setters. Translating the amendments, ensuring consistency with existing standards and regulatory frameworks, updating methodologies and related guidance, and incorporating the amendments into national oversight systems require careful planning and coordination.

Looking ahead, we strongly encourage IESBA and IAASB to adopt a more coordinated and integrated approach for future projects. A joint development process, from project initiation and drafting to finalisation and implementation, would facilitate better alignment of requirements and timelines. This would support smoother adoption and promote more effective and consistent implementation across jurisdictions.