

!! Not for Submission !!

The document below includes the *Word* version of the International Auditing and Assurance Standards Board's (IAASB) and the International Ethics Standards Board for Accountants' (IESBA) online joint survey.

It aims to facilitate *stakeholders' internal outreach or information-gathering activities, and drafting and review of responses prior to completing the online survey.*

Please provide your input by using the [online survey](#).

About this Joint Stakeholder Survey

This joint survey is the first step in the IAASB's and the IESBA's (together referred to as the Standard Setting Boards (SSBs)) process to develop their respective Strategies and Work Plans (SWPs) for 2028–2031. It seeks stakeholders' views on specific matters that will help inform the SSBs as they develop their respective Consultation Papers (targeted for the end of 2026) for their SWPs.

This survey was developed with a broad range of stakeholders in mind as the input from a diverse group of stakeholders will help the SSBs better understand the role of professional accountants in the environment and how the SSBs could best serve the public interest through their mission of developing high-quality international standards.

This survey is set out in the following sections – stakeholders are asked to respond to the questions included in sections I, III, IV and V, by **May 15, 2026**:

Section I — About the Respondent

Section II — Background

Section III — SSBs' Strategic Positioning for 2028–2031

Section IV — Key Trends Impacting the SSBs

Section V — Areas for Joint Action in SSBs' Work Plans

You may respond to all questions or matters for stakeholder input or only selected questions or matters.

All responses will be considered a matter of public record and submissions will ultimately be posted on the SSBs' websites.

SECTION I: ABOUT THE RESPONDENT

1. From which perspective are you providing this feedback?

(a) A personal view

[If (a) is selected]

Your name:

Your organization (if applicable):

E-mail address:

(b) The view of an organization

[If (b) is selected]

Organization: **Accountancy Europe**

Name(s) of contact(s) for this submission:

E-mail address(es) of contact(s):

2. Please select from the following options to which stakeholder group you or your organization belongs:

- Academia
- Accounting Firm
 - Global Accounting Firm
 - Large National or Regional Accounting Firm
 - Small- or Medium-Sized Accounting Firm
 - Sole Practitioner
- IFAC Member Body or Other Professional Accountancy or Professional Organization
 - IFAC Member Body or Affiliate
 - Other Professional Accountancy or Professional Organization
- International Organization – Please specify: [...]
- Jurisdictional Standard Setter (JSS) or Other Standard Setter
 - JSS for both Auditing and Assurance, and Ethics
 - JSS for Auditing and Assurance only
 - JSS for Ethics only
 - Other – Please specify: [...]
- Organization Other Than an Accounting Firm That Performs Sustainability Assurance Engagements
- Preparer or Issuer of Financial Statements or Other Financial or Non-Financial Information

- Public Sector Organization
- Regulator or Audit, Assurance or Ethics Oversight Body
- Those Charged with Governance
- User of Financial or Non-Financial Information (e.g., investor, analyst, lender or other creditor)
- Other – Please specify: [...]

3. Please select from the following options the geographical region that best matches you or your organization

- Africa
- Asia Pacific
- Europe
- South America
- Middle East
- North America
- Global [*this will not come up as an option if the respondent's view is a personal view*]

SECTION II: BACKGROUND

About IAASB and IESBA

The [International Foundation for Ethics and Audit](#) (IFEA) is a nonprofit organization that supports high-quality, international standard-setting in ethics, audit, and assurance in the public interest. IFEA fulfills its mission through its two standard-setting boards, the IAASB and the IESBA. The IAASB and the IESBA issue their standards independently, following an approved due process including consideration of the [Public Interest Framework](#). The [Public Interest Oversight Board](#) oversees IAASB and IESBA activities and the public interest responsiveness of their standards.

The **IAASB** serves the public interest by setting high-quality international standards for auditing, assurance, quality management, reviews and related services, and by facilitating the convergence of international and national standards. In doing so, the IAASB enhances the quality and uniformity of practice throughout the world and strengthens public confidence in the global auditing and assurance profession.

The **IESBA** serves the public interest by setting high-quality, international ethics (including independence) standards as a cornerstone to ethical behavior in business and organizations, and to public trust in financial and non-financial information that is fundamental to the proper functioning and sustainability of organizations, financial markets and economies worldwide.

SSBs' SWPs 2024–2027

The SSBs maintain a practice of regular and open dialogue with all stakeholders to ensure the SSBs' standard-setting work remains responsive to stakeholder demands and market needs and continues to serve the public interest. Accordingly, each SSB is responsible for developing a comprehensive SWP for standards and related agenda priorities. The current SWPs for both the IAASB and IESBA conclude at the end of 2027.

For the 2024–2027 strategy period, each of the SSBs has identified four strategic objectives.¹ Strategic objectives reflect what each SSB is seeking to achieve during the strategy period, in support of their overarching goal or vision. The strategic objectives guide the selection and prioritization of standard-setting and related activities.

IAASB Strategic Objectives for Its Current Strategy Period, 2024–2027
Establish globally accepted standard(s) for assurance on sustainability reporting
Support the consistent performance of quality audit and review engagements by enhancing our standards in areas where there is the greatest public interest need
Strengthen coordination with IESBA and other leading standard setters and regulators to leverage better collective actions in the public interest
Create more agile, innovative ways of working in line with the Monitoring Group's reform vision

¹ In its 2024–2027 SWP, the IESBA used the term strategic themes instead of strategic objectives.

IESBA Strategic Objectives for Its Current Strategy Period, 2024–2027
Enhancing trust in sustainability reporting and assurance
Strengthening the IESBA Code of Ethics or responding in other ways in areas beyond sustainability reporting and assurance
Further enhancing the diversity of stakeholder perspectives and the global operability and acceptance of the IESBA's standards
Widening the influence of the IESBA's standards through a continued focus on adoption and implementation

SECTION III: SSBs' STRATEGIC POSITIONING FOR 2028–2031

Through a rigorous and transparent due process, extensive stakeholder engagement, and evidence-based analysis, the SSBs work in connected and complementary ways. This collaboration ensures that their standards are responsive to the needs of their stakeholders, and helps to strengthen public trust and confidence in financial and non-financial reporting.

The SSBs' standards promote globally consistent practices that enable auditors and professional accountants in firms and other organizations to deliver their services or perform their activities with a clear focus on the public interest. These global standards help consistency of regulatory approaches. They enhance confidence in reported information for investors' and other users' capital allocation and other decision-making across jurisdictions. These standards therefore offer a critical contribution to economic growth, capital markets efficiency and integrity, and financial stability through enhanced trust and accountability.

Questions or Matters for Stakeholder Input

4. As the SSBs look toward the 2028–2031 period, they are reflecting on how to position their strategies and work plans to best serve the public interest within a rapidly changing global environment. This involves careful consideration of how the SSBs remain relevant, responsive, and impactful in their standard-setting and other related work. **In that context, what do you believe the SSBs should aspire to achieve during their next strategy period, 2028–2031?**

Your answer may touch on different dimensions, for example:

- The relevance, responsiveness and impact of the SSBs' standard-setting and related activities.
- Broader adoption and effective implementation of the SSBs' standards.
- The SSBs' interaction and engagement with key stakeholder groups.
- The SSBs' ability to serve the public interest.

The examples above are for illustrative purposes only and should **not** limit, direct, or otherwise influence your response.

Your answer should address the IAASB and IESBA collectively; however, you may wish to also highlight matters specifically for the IAASB or IESBA (if applicable, you could use separate headings to address such matters).

Accountancy Europe supports the initiative for a joint consultation between IAASB and IESBA and encourages enhanced coordination between the two boards. We also appreciate the joint efforts of the IAASB and IESBA and would strongly encourage further joint initiatives. Where projects have impact on the Code and standards the IAASB and IESBA must ensure an integrated approach and simultaneously open for public comments and consideration. However, it is important to recognise that that the two boards have fundamentally different mandates.

IAASB focuses on audit and assurance standards while the intention is for IESBA to focus on principle-based ethical framework for all professional accountants. This distinction creates challenges when

responding through a single survey with uniform ratings. We have therefore provided separate ratings and comments in our responses as necessary.

Please note that our assumption of rating each topic is related to the need for standard-setting activities only and not the importance of the topic more broadly. For some topics, we provided different ratings in the comment boxes. In addition, in the overall scoring, we used the higher of the IAASB and IESBA ratings. The rating system proved to be complex and required additional interpretation. Looking ahead, simplifying the rating approach would help ensure more consistent and straightforward responses.

We believe that the priority for both boards should be effective implementation and adoption of existing standards rather than continuing development of new requirements. Many emerging issues (e.g. technology) are better addressed through guidance, education and tools rather than new standards. Excessive standard-setting risks increasing complexity, reducing adoption and contributing to fragmentation. Fundamentally, changes should be based on a more robust analysis of costs and benefits, being mindful of who receives the benefits and who bears the costs (e.g. smaller versus larger audit firms and reporting entities). Embedding more sophisticated cost benefit considerations into the due process would not only improve the value delivered overall but also help convince jurisdictions that local adoption is worthwhile.

There is a growing concern that standards have become increasingly lengthy and complex over time. In many cases, revised standards have expanded to several times the length of their previous versions, adding layers of detail with diminishing returns in terms of improved audit quality or ethical outcomes. Stakeholder engagement processes should avoid an overreliance on input from regulators and instead ensure a more proportionate and inclusive consideration of perspectives across the profession, preparers, users, and other stakeholders especially from small and medium-sized practitioners and entities.

Regarding the IESBA code of ethics, it is essential that it remains strictly within its remit, is principle-based, robust and adaptable, rather than becoming increasingly rules-based or reactive to individual developments not necessarily relevant to professional accountants. Frequent amendments in response to emerging situations risk undermining the clarity, stability and usability of the Code. Instead, greater emphasis should be placed on thorough post-implementation reviews of recently issued standards, such as those on non-assurance services (NAS), fees, external experts and the International Ethics Standards for Sustainability Assurance (IESSA), rather than broad or generalised survey approaches.

Standards should be designed to be durable and stable over time. Frequent or incremental changes can impose considerable costs on the profession, reporting entities, and others, including implementation, training, and system adaptation costs. Accordingly, standard setters should place a strong emphasis on stability and avoid changes unless genuinely necessary and justified by robust root cause and cost benefit analyses.

These elements are critical to ensuring that the standard-setting boards serve the public interest by promoting high-quality, globally consistent standards that are practical, implementable and stable over time.

Accountancy Europe has also addressed an accompanying letter to the Chairs of both Standard-Setting Boards, highlighting a number of key high-level observations. Please find the link to the letter: <https://accountancyeurope.eu/consultation-response/iaasb-and-iesba-joint-consultation-on-2028-2031-strategy/>

SECTION IV: KEY TRENDS IMPACTING THE SSBs

Background and Context

The IAASB's and IESBA's SWPs are shaped by their environment. Shifts in the SSBs' environment influence what topics need to be prioritized, the actions that will best serve the public interest and the timing of such actions. Key trends and changes in the environment create opportunities and challenges and will significantly shape their future SWPs.

Given the rapidly changing environment, the SSBs recognize the importance and potential difficulty in identifying which trends will be the most impactful at the start of the next strategy period in 2028, and how the relevance of these trends may evolve over time. Therefore, the SSBs will remain agile and adapt as necessary throughout the development process of their SWPs as well as during the next strategy period.

The most relevant and impactful trends will be incorporated in the SSBs' SWPs as strategic drivers.² These strategic drivers will assist the SSBs in identifying the opportunities and challenges that affect their ability to deliver on their public interest mandates, while guiding the development of their respective work plans. Although specific trends might have a greater or lesser impact, or imply a certain focus or perspective, for each SSB's work, the strategic drivers may also lead to the identification of topics or items where both SSBs have a role to play, given the connectivity between the SSBs (see **section V**).

In addition to trends impacting the SSBs, there are internal factors relating to the SSBs' governance, structure and operations that will influence how they prioritize standard-setting and related activities and determine future actions. These internal factors are **not** part of this survey. However, they will also inform the SSBs' deliberations and will be incorporated as strategic drivers in developing the IAASB's and IESBA's Consultation Papers on their future SWPs.

Key Trends Impacting SSBs

For the purposes of this survey, the SSBs have included a summary of the trends that may shape their environment and the work they do in the future. To develop this summary, the SSBs conducted a comprehensive review of a wide range of sources of information, including news and publications from jurisdictional auditing and ethics standard-setting bodies, leading financial news outlets, and industry research reports. This multi-source approach enabled the identification of recurring themes and data-supported forecasts across key areas of work for professional accountants. In addition, the SSBs have benefited from input from their Stakeholder Advisory Council (SAC)³ and from the JSS⁴.

Each of the trends that follow was identified for its potential impact on the financial and non-financial reporting ecosystem, including the SSBs' standard-setting landscape in the coming years. The summary of trends is intended to provide a forward-looking, yet grounded, basis to support information gathering, and open a dialogue with stakeholders.

² Strategic drivers are the factors that drive the opportunities and challenges impacting the SSBs' ability to deliver on their mandates in the public interest.

³ More information about the SAC's discussions can be found in the [May 2025 SAC Meeting](#) (Agenda Item 2 and Meeting Highlights) and the [October 2025 SAC Meeting](#) (Agenda Item 1 and Meeting Highlights).

⁴ = IAASB and IESBA Jurisdictional Standard Setters (JSS) Liaison Groups (see "[About IAASB](#)" and "[About IESBA](#)" webpages for more information)

SECTION IV: KEY TRENDS IMPACTING THE SSBs

A – Digital Transformation

Rapid digital transformation, driven by the pace and nature of technological innovation and evolution, is reshaping the global economic and business landscape, creating both opportunities and challenges. Three areas stand out as examples of digital transformation that will influence the future of standard setting.

- A1. **Increasing Use of Emerging Technologies:** Businesses and industries are undergoing transformations driven by the adoption and increasing use of emerging technologies such as Artificial Intelligence (AI)-enabled tools and agents, internet of things, and blockchain. These technologies exhibit unique characteristics that present tremendous opportunities for increased quality, effectiveness, and efficiency, but also raise new and different challenges and risks to be managed.
- A2. **Digital Assets and Institutionalization of Digital Assets:** Given the growing use of emerging technologies such as blockchain, digital assets, including cryptocurrencies, have become more popular and their institutionalization is accelerating.
- A3. **Financial Crimes Enabled by Technology:** The growing use of emerging technology has also given rise to significant threats to cybersecurity and a significant rise in unlawful activities that exploit digital systems, networks, and AI-enabled tools and agents to commit, conceal, or facilitate financial misconduct.

Potential Impact on Audit, Assurance, Quality Management, Ethics and Independence Matters	
<ul style="list-style-type: none"> • Need to modernize or enhance the standards, or provide guidance to support stakeholders in navigating the application of the standards amid these developments. • Extended stakeholder engagement, including with emerging technologies experts. 	
Potential Impact on Audit, Assurance and Quality Management Matters for IAASB’s Consideration	Potential Impact on Ethics and Independence Matters for IESBA’s Consideration
<ul style="list-style-type: none"> • Possible need for the development of guidance (e.g., guidance about the use of emerging technological tools, auditing digital assets, blockchain audit trails and reinforcing the exercise of professional skepticism and professional judgment when using technological tools). • Increased emphasis on, or emergence of different types of assurance engagements (e.g., assurance over emerging technological tools, system controls, AI governance, and cybersecurity). 	<ul style="list-style-type: none"> • Ethics and independence considerations relating to the use of AI by professional accountants in public practice and in business and other professionals who use IESBA standards (for example, accountability and threats to professional competence and due care, objectivity and confidentiality). • Over-reliance on the use of technology and its impact on objectivity, professional judgment and professional skepticism. • Growing threats relating to financial crimes

	and cybersecurity. <ul style="list-style-type: none"> Changing business models and governance, and potential impacts on ethics and independence.
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5A. Indicate the extent to which you believe this trend will increase or decrease in importance for the SSBs for their next strategy period starting in 2028.

A.1 Digital Transformation – Increasing Use of Emerging Technologies

6 Strongly increasing in importance	5 Increasing in importance	4 Slightly increasing in importance	3 Slightly decreasing in importance	2 Decreasing in importance	1 Strongly decreasing in importance	0 I do not agree that this is a trend to be considered
X						

[If a respondent selects “6 to 1”]

Do you wish to highlight any matters relating to this trend or identified impacts, or any additional impacts, for the IAASB or IESBA or both the SSBs?

The digital transformation is not primarily a standard-setting issue. Technology is evolving quickly and it is not the role of standards to keep pace, rather the aim is for them to remain principle-based and robust in the face of change. Attempting to respond at a detailed level through new standards can create obsolete requirements and increase complexity without solving practical issues. The appropriate steps should be non-authoritative guidance and practical implementation support.

IAASB rating: 6 (Strongly increasing importance)

Technology is clearly important in general, but IAASB already has projects addressing technology. The issue is not a lack of detail in standards, the issue is whether existing standards are fit for purpose and robust.

IESBA rating: 4 (Slightly increasing in importance)

Despite the rapid pace of technological change, it is important to maintain a robust, principle-based Code that remains applicable across evolving scenarios. At the same time, recent developments have made the Code increasingly rules-based, moving away from its original principles-based foundation.

The recently issued Technology provisions have already strengthened the Code’s ability to address such changes. Further standard-setting in response to specific technological developments is not necessary. Instead, greater emphasis should be placed on non-authoritative material (NAM) to illustrate how the principles-based framework can be applied in practice to emerging technologies.

A.2 Digital Transformation – Digital Assets and Institutionalization of Digital Assets

6 Strongly increasing in importance	5 Increasing in importance	4 Slightly increasing in importance	3 Slightly decreasing in importance	2 Decreasing in importance	1 Strongly decreasing in importance	0 I do not agree that this is a trend to be considered
				X		

[If a respondent selects “6 to 1”]

Do you wish to highlight any matters relating to this trend or identified impacts, or any additional impacts, for the IAASB or IESBA or both the SSBs?

From a standard-setting perspective, digital assets do not introduce fundamentally new concepts that would justify the development of specific standards. The main challenges in this area arise at the level of financial reporting (e.g. recognition, measurement and disclosure), and these issues have already been addressed. At present, there does not appear to be anything intrinsically new that would require further action from audit or ethics standard setters.

However, this assessment may need to be revisited if financial reporting requirements were to change significantly in this area. This area needs to remain closely monitored to assess whether future standard setting might be required.

More importantly, the relevance and urgency of digital assets vary significantly across jurisdictions. In the United States, this topic is more advanced and has gained greater prominence, both from a market and regulatory perspective. In contrast, in Europe, the environment is already heavily regulated and digital assets are currently less of a priority. This regional divergence makes it difficult to justify a strong global standard-setting response.

We therefore consider that digital assets are primarily a matter for financial reporting standards setters, regulators and market developments, rather than for global assurance and ethics standard setters. Any response, if needed, should focus on non-authoritative guidance or knowledge-sharing rather than the creation of new standards.

IAASB rating: 2 Decreasing in importance
 IESBA rating: 1 Strongly decreasing in importance

A.3 Digital Transformation – Financial Crimes Enabled by Technology

6 Strongly increasing in importance	5 Increasing in importance	4 Slightly increasing in importance	3 Slightly decreasing in importance	2 Decreasing in importance	1 Strongly decreasing in importance	0 I do not agree that this is a trend to be considered
	X					

[If a respondent selects “6 to 1”]

Do you wish to highlight any matters relating to this trend or identified impacts, or any additional impacts, for the IAASB or IESBA or both the SSBs?

The increase in financial crime enabled by technology, including cyber-related risks is acknowledged. However, we consider that this issue is being framed in a way that overextends the role of standard setters.

Financial crime is fundamentally a matter for legal and regulatory frameworks, including Anti-Money Laundering (AML) systems and enforcement mechanisms. In the European Union (EU), the new AML Regulation and 6th AML Directive are being implemented and the new EU wide regulator, AMLA, has started work.

While evolving risks such as cyber threats may increase expectations on auditors, particularly in areas such as risk assessment and going concern, this does not in itself justify the development of new auditing or ethical standards. Existing frameworks are designed to be adaptable to emerging risks, and the appropriate response should primarily involve guidance, supervisory focus and practical implementation support.

However, more and better collaborations between AML experts and standard setters might need to be envisioned.

IAASB rating: 5 Increasing in importance

IESBA rating: 2 Decreasing in importance

B – Changes in the Geopolitical and Regulatory Landscape

Changes to the geopolitical and regulatory landscape (in)directly influence how the SSBs' international standards evolve. Four areas stand out as particularly illustrative of how these changes shape the environment in which the SSBs operate:

- B1. **Regulatory Changes:** Financial markets, including the accounting and auditing profession, are navigating a complex regulatory environment, with ongoing changes driven by the need for market stability and to prevent economic disruptions, as well as a trend towards reducing regulatory burdens to enhance economic competitiveness and foster innovation and economic growth.
- B2. **Risk of Fragmentation:** In many jurisdictions there is a move away from international alignment toward a more national / regional focus. As a result, different jurisdictions, industries, or organizations may use varied and sometimes conflicting frameworks, rules, and metrics for reporting information. Such fragmentation contributes to uncertainties, adds costs and administrative burdens for providers of professional services and their clients, and erodes trust and confidence in financial and non-financial reporting.
- B3. **Call for Greater Agility in Standard Setting:** Professional accountants and other stakeholders have been emphasizing the need for a more adaptive standard-setting process that allows for addressing issues in a timelier manner. This includes calls for consideration of issuing non-authoritative materials instead of launching standard-setting projects, or undertaking more narrow-scope standard setting to address targeted matters, depending on the circumstances.

B4. Greater Diversity of Voices Sought: Reflecting the broad use of SSBs' standards, there are calls for greater inclusion of voices from emerging economies. The ability to respond to particular needs may impact the adoption and implementation of global standards. It may also impact which stakeholders to connect with and the nature of standards and guidance the SSBs develop.

Potential Impact on Audit, Assurance, Quality Management, Ethics and Independence Matters
<ul style="list-style-type: none"> • Need to identify potential areas of simplification (including scalability and proportionality). • Need for increased agility and responsiveness. • Balance the need for the development of standards (through either full-scope and narrow-scope projects) with the development of non-authoritative materials. • Increased coordination and collaboration between the SSBs and with other standards setters. • Strengthened stakeholder engagement, including with investors and those charged with governance.

5B. Indicate the extent to which you believe this trend will increase or decrease in importance for the SSBs for their next strategy period starting in 2028.

B.1 Changes in the Geopolitical and Regulatory Landscape – Regulatory Changes

6 Strongly increasing in importance	5 Increasing in importance	4 Slightly increasing in importance	3 Slightly decreasing in importance	2 Decreasing in importance	1 Strongly decreasing in importance	0 do not agree that this is a trend to be considered
		X				

[If a respondent selects “6 to 1”]

Do you wish to highlight any matters relating to this trend or identified impacts, or any additional impacts, for the IAASB or IESBA or both the SSBs?

Geopolitical and regulatory changes have always been a feature of the environment in which the profession operates, and we do not consider this to be a new trend.

More importantly, these developments are driven by governments and regulators and are therefore outside the direct influence of standard setters. While they may have indirect implications, they are not something that IAASB or IESBA can meaningfully respond to through standard-setting.

In the current environment, there is a clear move toward simplification and reduction of regulatory burden in several jurisdictions. In this context, it is particularly important that standard setters do not contribute further to complexity and stand back and reflect on simplification and de-burdening means for them. This should be guided by careful cost–benefit considerations and proportionality principles, as it is also reflected in regulatory frameworks such as Directive (EU) 2018/958 on the proportionality test, rather than by short-term political trends.

From this perspective, greater emphasis should be placed on post-implementation reviews to assess where the extant IESBA Code may be creating unnecessary complexity or burden without a corresponding benefit in terms of audit quality or the public interest.

The focus of standard setters should therefore shift from further developing new standards to supporting effective adoption and implementation of existing requirements. In particular, understanding the reasons for limited or inconsistent adoption of certain IESBA standards across jurisdictions would be valuable. This could help identify whether challenges arise from perceived and actual added value, usability, proportionality or alignment with local frameworks, and inform targeted improvements to enhance their practical application.

IAASB rating: 4 Slightly increasing in importance

IESBA rating: 4 Slightly increasing in importance

B.2 – Changes in the Geopolitical and Regulatory Landscape - Risk of Fragmentation

6 Strongly increasing in importance	5 Increasing in importance	4 Slightly increasing in importance	3 Slightly decreasing in importance	2 Decreasing in importance	1 Strongly decreasing in importance	0 I do not agree that this is a trend to be considered
		X				

[If a respondent selects “6 to 1”]

Do you wish to highlight any matters relating to this trend or identified impacts, or any additional impacts, for the IAASB or IESBA or both the SSBs?

Fragmentation is driven by the volume and complexity of standards, not by a lack of them. The priority should be simplification through focused post-implementation reviews, not additional requirements

IAASB rating: 4 Slightly increasing in importance

ISAs are generally well adopted globally. Fragmentation is therefore not primarily an IAASB issue. The main challenge is the increasing complexity of standards, which affects usability and consistent application, particularly for smaller and less complex entities. The focus should be on simplification and proportionality, not additional standard-setting.

IESBA rating: 4 Slightly increasing in importance

Adoption of the Code is uneven across jurisdictions and is a more significant source of fragmentation. Further expansion of the Code risks increasing divergence if usability and operability are not addressed.

B.3 Changes in the Geopolitical and Regulatory Landscape - Call for Greater Agility in Standard Setting

6 Strongly increasing in importance	5 Increasing in importance	4 Slightly increasing in importance	3 Slightly decreasing in importance	2 Decreasing in importance	1 Strongly decreasing in importance	0 I do not agree that this is a trend to be considered
						X

Please explain why you do not believe this should be considered a relevant trend for the SSBs:

We do not support the idea that greater agility in standard setting is required if this implies more frequent updates or additional standards. Standard setters should instead prioritise simplification, usability, and implementation of existing standards. Quick fixes that do not stand the test of time do not lead to durable and robust standard setting that provides a stable platform for the profession and wider ecosystem.

IAASB rating: 0 I do not agree that this is a trend to be considered

There is already a significant volume of standards, which are increasingly complex and difficult to implement. More frequent updates would worsen this situation. Greater agility should instead focus on non-authoritative material, practical examples and timely support.

IESBA rating: 0 I do not agree that this is a trend to be considered

The Code should remain stable, and principle-based. Recent developments have made the Code increasingly rules-based, moving away from its original principles-based foundation. Greater agility should instead focus on non-authoritative material, practical examples and timely support.

B.4 Changes in the Geopolitical and Regulatory Landscape - Greater Diversity of Voices Sought

6 Strongly increasing in importance	5 Increasing in importance	4 Slightly increasing in importance	3 Slightly decreasing in importance	2 Decreasing in importance	1 Strongly decreasing in importance	0 I do not agree that this is a trend to be considered
						X

[If a respondent selects "0"]

Please explain why you do not believe this should be considered a relevant trend for the SSBs:

While diversity of perspectives is valuable, this is not a new concept and should not be presented as such. There is already extensive engagement, including numerous roundtables and consultations.

The priority should not be more outreach, but more effectively use of the output. In particular, greater emphasis should be placed on properly analysing and reflecting the balance of stakeholders'

feedback, including from the accountancy profession as the buy-in of those applying the standards is crucial.

There is also a need for more balanced and inclusive formats, such as multi-stakeholder discussions, which allow different perspectives to be heard and challenged in a single forum.

In addition, the board composition of SSBs should include a wide variety of stakeholders, including the profession.

IAASB rating: 0 I do not agree that this is a trend to be considered

IESBA rating: 0 I do not agree that this is a trend to be considered

C – Evolving Expectations Concerning Sustainability Information

Global challenges regarding sustainability are reshaping expectations for transparency, accountability, and corporate responsibility in addressing the diverse risks and opportunities associated with sustainability matters. These expectations underscore the need for globally consistent approaches that support public trust in sustainability reporting and assurance.

- C1. Continuing Demand for Sustainability Reporting and Assurance: Reporting on sustainability information continues to grow as a critical component of corporate transparency. Stakeholders, including users of financial and non-financial information and regulators, are demanding more comprehensive and reliable sustainability disclosures. Also, sustainability information is more and more interconnected with financial information.
- C2. Regulatory and Geopolitical Changes: The sustainability regulatory landscape has evolved beyond climate reporting, with amendments to existing regulations and the potential emergence of new jurisdictional and international requirements. On the other hand, some jurisdictions are in the process of recalibrating their previously announced requirements around sustainability reporting and assurance.

Potential Impact on Audit, Assurance, Quality Management, Ethics and Independence Matters

- Monitoring the adoption and implementation of the SSBs' Sustainability Standards and providing timely responses to implementation questions or challenges, including the need to develop further guidance or standards.
- Establishing potentially new mechanisms to develop materials in an agile fashion and to draw on specialized expertise.
- Extended outreach to ensure alignment, interoperability and global consistency across jurisdictions.

Potential Impact on Audit, Assurance and Quality Management Matters for IAASB Considerations	Potential Impact on Ethics and Independence Matters for IESBA Considerations
<ul style="list-style-type: none"> Address the increased connectivity between sustainability assurance and financial audits to contribute to a coherent approach and consistent assurance quality. 	<ul style="list-style-type: none"> Consideration of need for ethics standards for all preparers of sustainability information.

5C. Indicate the extent to which you believe this trend will increase or decrease in importance for the SSBs for their next strategy period starting in 2028.

C.1 Evolving Expectations Concerning Sustainability Information – Continuing Demand for Sustainability Reporting and Assurance

6 Strongly increasing in importance	5 Increasing in importance	4 Slightly increasing in importance	3 Slightly decreasing in importance	2 Decreasing in importance	1 Strongly decreasing in importance	0 I do not agree that this is a trend to be considered
			X			

[If a respondent selects “6 to 1”]

Do you wish to highlight any matters relating to this trend or identified impacts, or any additional impacts, for the IAASB or IESBA or both the SSBs?

IAASB rating: 3 Slightly decreasing in importance

We acknowledge that ISSA 5000 is an important global development and provides a comprehensive, principles-based framework for sustainability assurance. However, the current trend in the EU and elsewhere for more simplification, de-burdening or deregulation clearly demonstrates a fundamental challenge regarding the support for ESG and thus the adoption and implementation of sustainability standards.

While ISSA 5000 is expected to be used as a reference point, the European Commission is considering potential EU add-ons and carve-outs. This means that ISSA 5000 may not be applied directly in the EU.

IESBA rating: 3 Slightly decreasing in importance

The Code already provides a robust basis for addressing ethical considerations, and further expansion risks adding complexity without clear benefit.

In particular, the potential development of standards for all preparers of sustainability information represents a significant extension beyond the IESBA's remit. The Code is designed for professional accountants, and expanding it to non-professional accountants risks overreach, unclear applicability and limited enforceability. This is more appropriately the domain of regulators and policymakers rather than a global ethics standard setter for professional accountants.

This concern is reinforced by the experience with the recently issued sustainability-related provisions (IESSA), where there are clear concerns regarding adoption, usability and practical impact. Before considering further expansion the IESBA should assess whether existing standards are being effectively adopted and implemented, and should only consider professional accountants in accordance with their remit.

In addition, the European Commission does not plan to adopt the IESBA Code of Ethics nor its dedicated sustainability standards and it is currently unclear whether audit firms will adopt these new sustainability standards. There are lessons to be learnt by IESBA, one of which could be the potential for revision of these standards.

C.2 Evolving Expectations Concerning Sustainability Information – Regulatory and Geopolitical Changes

6 Strongly increasing in importance	5 Increasing in importance	4 Slightly increasing in importance	3 Slightly decreasing in importance	2 Decreasing in importance	1 Strongly decreasing in importance	0 I do not agree that this is a trend to be considered
					X	

[If a respondent selects “6 to 1”]

Do you wish to highlight any matters relating to this trend or identified impacts, or any additional impacts, for the IAASB or IESBA or both the SSBs?

IAASB rating: 1 Strongly decreasing in importance

Evolving expectations concerning sustainability information are primarily driven by regulatory and geopolitical developments. Similar discussions around regulatory change and increasing expectations have existed for many years. From an IAASB perspective, this is not something that can be directly addressed through standard setting. These developments are driven by legislators and regulators, and standard setters can only react at a very limited level.

IESBA rating: 1 Strongly decreasing in importance

From an ethics perspective, these developments do not fundamentally change the need for a principles-based approach. On the contrary, the increasing pace of regulatory and geopolitical change reinforces the importance of having a stable, principles-based Code that can be applied in different situations.

D – Evolving Structure and Business Models of Accounting Firms

The accounting profession is undergoing profound shifts in how its work and firms are structured, financed, and operated, with direct implications for the future of audit, assurance, and ethics standard setting.

D1. Alternative Ownership Structures: Changing ownership structures raise quality management, and ethics and auditor independence considerations, including on firms’ ethical culture. In particular, private equity organizations are increasingly investing in accounting firms, driving growth and technological innovation.

- D2. **Increased Involvement of Non-Professional Accountants in the Accounting and Auditing Profession:** Traditionally, accounting firms were staffed almost exclusively with accountants and auditors. Now, like other private enterprises, a growing share of their workforce consists of specialists from other disciplines, such as technology, data science, law, consulting and sustainability.
- D3. **Challenges to Attracting and Retaining Talent:** The accounting and auditing industry is facing an increasing challenge in attracting and retaining talent, driven by perceptions of the industry as less dynamic and the allure of alternative career paths. Also, given the rapid changes in technology, firms will need to attract and retain talent, and build capacity, in areas where there is strong competition for talent.
- D4. **Non-Assurance Service Line:** The growth of non-assurance services has become a major source of revenue for accounting firms compared to fees for their audit and assurance services. If there is a corporate scandal or failure related to the provision of these services, it impacts the trust in the accountancy profession and its public interest role.

Potential Impact on Audit, Assurance and Quality Management Matters for IAASB Considerations	Potential Impact on Ethics and Independence Matters for IESBA Considerations
<ul style="list-style-type: none"> Need for guidance or potential enhancement of standards that address firm level or engagement level quality management. For example, the impact on the governance and leadership, client acceptance and continuance, relevant ethical requirements, and information and communication 	<ul style="list-style-type: none"> Consideration of issues related to ethics and independence raised by private equity investments in firms and their impact on firm culture, and whether, and how, guidance or standards could help address challenges to a firm’s ethical culture arising from new ownership models. Consideration of challenges regarding familiarity and compliance with the IESBA Code of Ethics in a multidisciplinary context.

5D. Indicate the extent to which you believe this trend will increase or decrease in importance for the SSBs for their next strategy period starting in 2028.

D.1 Evolving Structure and Business Models of Accounting Firms - Alternative Ownership Structures

6 Strongly increasing in importance	5 Increasing in importance	4 Slightly increasing in importance	3 Slightly decreasing in importance	2 Decreasing in importance	1 Strongly decreasing in importance	0 I do not agree that this is a trend to be considered
		X				

[If a respondent selects “6 to 1”]

Do you wish to highlight any matters relating to this trend or identified impacts, or any additional impacts, for the IAASB or IESBA or both the SSBs?

IAASB rating: 2 Decreasing in importance

This topic does not fall within the remit of auditing standard setting.

The structure and ownership of accounting firms are matters defined by law and regulation, not by auditing standards. IAASB cannot meaningfully address these developments through standard-setting. However, coordination with the IESBA may be important to ensure consistent treatment of related risks from an audit perspective.

IESBA rating: 4 Slightly increasing in importance

IESBA has already taken initial steps in this area, including the publication of material such as staff alerts addressing alternative practice structures and private equity involvement. This work is useful and relevant, as it highlights key risks, particularly around independence, and provides a basis for further consideration. However, coordination with the IAASB may be important to ensure consistent treatment of related risks from an audit perspective.

There is increasing concern from regulators, including on specific matters such as the ability of firms to audit entities within the same private equity fund also holding a stake in the audit firm. Some regulators have already indicated that such situations may not be acceptable, even where current rules do not explicitly prohibit them. This suggests that certain aspects of the current framework, such as definition and scope of network firms, may not fully capture the risks arising from alternative practice structures.

In this context, rather than expanding the Code more broadly, consideration could be given to targeted revisions, including a review of the network firm definition, to better reflect these developments. In addition, enhanced coordination between the IESBA and IAASB would be beneficial to ensure a consistent and coherent approach across ethics and audit frameworks.

In addition, Accountancy Europe has contributed to this discussion with two papers:

[Private equity investments in accountancy firms](#)

[Beyond private equity: third party ownership in the accountancy and audit sector](#)

D.2 Evolving Structure and Business Models of Accounting Firms - Increased Involvement of Non-Professional Accountants in the Accounting and Auditing Profession

6 Strongly increasing in importance	5 Increasing in importance	4 Slightly increasing in importance	3 Slightly decreasing in importance	2 Decreasing in importance	1 Strongly decreasing in importance	0 I do not agree that this is a trend to be considered
		X				

[If a respondent selects “6 to 1”]

Do you wish to highlight any matters relating to this trend or identified impacts, or any additional impacts, for the IAASB or IESBA or both the SSBs?

IAASB rating: 1 Strongly decreasing in importance

This topic does not fall within primary remit of auditing standard setting. The structure, ownership and composition of accounting firms are primarily determined by national legal and regulatory frameworks, rather than auditing standards.

However, evolving firm structures and the increasing involvement of non-professional accountants may have implications for audit quality, particularly in relation to governance and the operation of systems of quality management. In this respect, a joint IAASB and IESBA approach is important to ensure that any implications for independence and firm structures are addressed consistently.

IESBA rating: 4 Slightly increasing in importance

The increasing involvement of non-professional accountants in accounting firms and the evolution of firm structures raise important considerations for independence, governance and oversight. While the presence of multidisciplinary teams within firms is not new, evolving ownership and influence structures may create new or more pronounced risks.

In this context, there is a need to assess whether the current framework sufficiently captures these risks. In particular, consideration could be given to whether the definition and scope of network firms adequately reflect modern firm structures and the potential influence of non-accountants.

D.3 Evolving Structure and Business Models of Accounting Firms - Challenges to Attracting and Retaining Talent

6 Strongly increasing in importance	5 Increasing in importance	4 Slightly increasing in importance	3 Slightly decreasing in importance	2 Decreasing in importance	1 Strongly decreasing in importance	0 I do not agree that this is a trend to be considered
						X

[If a respondent selects "0"]

Please explain why you do not believe this should be considered a relevant trend for the SSBs:

Challenges related to attracting and retaining talent in the profession are acknowledged. However, this topic does not fall within the remit of global audit or ethics standard setting.

The attractiveness of the profession is influenced by a range of factors, including firm culture, workload, organisational practices, regulatory environment and broader market expectations. These are primarily matters for firms, professional bodies and regulators, rather than standard setters.

While auditing and ethical standards may have an indirect impact, for example through their complexity and practical application or simplification of standard, they are not the root cause of talent-related challenges. SSBs should think or test their standards to see if it is written and organised in a way that is meaningful for a young generation.

IAASB rating: 0 I do not agree that this is a trend to be considered

IESBA rating: 0 I do not agree that this is a trend to be considered

D.4 Evolving Structure and Business Models of Accounting Firms - Non-Assurance Service Line

6 Strongly increasing in importance	5 Increasing in importance	4 Slightly increasing in importance	3 Slightly decreasing in importance	2 Decreasing in importance	1 Strongly decreasing in importance	0 I do not agree that this is a trend to be considered
					X	

[If a respondent selects “6 to 1”]

Do you wish to highlight any matters relating to this trend or identified impacts, or any additional impacts, for the IAASB or IESBA or both the SSBs?

This topic should not lead to further expansion of standards. The provision of non-assurance services is already addressed through existing frameworks, and recent revisions have significantly increased requirements in this area. The priority should be on post-implementation reviews of recent changes (e.g. NAS and fee-related provisions) to assess whether they remain proportionate, effective and operable in practice.

This topic should be closely monitored going forward, particularly in light of changes in ownership structures.

IAASB rating: 1 Strongly decreasing in importance

IESBA rating: 1 Strongly decreasing in importance

Other Trends and Ranking

6. Are there trends or related areas or matters that you believe the SSBs should consider that are not covered? If so, please provide details.

- Yes

[If “yes” is selected, text boxes appear.]

Please number your additional trend (O.1, O.2, O.3, ...)

O.1 Increased reliance on third-party information and need for more responsive, practical guidance

Please describe the additional trend

There is a growing trend towards increased reliance on information from third parties, driven by developments in technology, data ecosystems and extended value chains (e.g. sustainability reporting and supply chain data). This raises important considerations for both audit and assurance, including the reliability of external data sources and the appropriate level of assurance over such information. This trend is relevant both for reporting entities and practitioners themselves and their own quality management systems.

While this topic is relevant to the IAASB, we do not consider that it necessarily requires the development of new standards at this stage. Existing principles-based frameworks should be capable of addressing these developments as well as more timely, practical and non-authoritative guidance, including use cases and examples, to support consistent application in practice.

On a scale of 1 to 6, indicate the extent to which you believe this trend will increase or decrease in importance for the SSBs for their next strategy period starting in 2028.

6 Strongly increasing in importance	5 Increasing in importance	4 Slightly increasing in importance	3 Slightly decreasing in importance	2 Decreasing in importance	1 Strongly decreasing in importance
		X			

Do you wish to explain your rating or highlight any matters relating to this trend for the IAASB, IESBA, or both the SSBs?

This trend is primarily relevant to the IAASB. Efforts to identify solutions for optimising the application of existing assurance standards would be helpful. We also see potential for exploring ways of better sharing assurance reporting within networks and the broader reporting ecosystems to enable quality and efficiency improvements.

[Further boxes will appear to add more than one trend, if necessary]

- No

Please number your additional trend (O.1, O.2, O.3, ...)

O.2 Adoption, implementation and trust in global standards

Please describe the additional trend

A key area for further focus is the adoption and implementation of standards across jurisdictions. There are increasing signs of fragmentation, with some jurisdictions not adopting, or only partially adopting, recent standards. Understanding the reasons for this lack of adoption would be highly valuable, as it may highlight challenges related to complexity, operability or relevance in practice.

Rather than relying solely on formal post-implementation reviews, standard setters could consider more targeted and timely engagement with profession, national standard setters and regulators to identify barriers to adoption. This could support a more effective and globally consistent framework.

On a scale of 1 to 6, indicate the extent to which you believe this trend will increase or decrease in importance for the SSBs for their next strategy period starting in 2028.

6 Strongly increasing in importance	5 Increasing in importance	4 Slightly increasing in importance	3 Slightly decreasing in importance	2 Decreasing in importance	1 Strongly decreasing in importance
		X			

Do you wish to explain your rating or highlight any matters relating to this trend for the IAASB, IESBA, or both the SSBs?

[Further boxes will appear to add more than one trend, if necessary]

- No

Please number your additional trend (O.1, O.2, O.3, ...)

O.3 Expansion of standard-setting beyond core mandate – topic that should not be prioritised

Please describe the additional trend

We consider that both the IAASB and IESBA should avoid further expanding their activities into areas that fall outside their core mandates. Recent discussions and projects suggest a trend towards addressing topics such as firm culture, governance structures or broader preparer-related matters, including extension of ethical requirements beyond professional accountants (e.g. to roles such as CFOs who are not professional accountants). These topics are more appropriately addressed by firms or other stakeholders.

We therefore encourage both Boards to place greater emphasis on prioritisation, including identifying areas where less work is needed, and to focus their efforts on their core responsibilities in audit, assurance and ethics standard setting.

On a scale of 1 to 6, indicate the extent to which you believe this trend will increase or decrease in importance for the SSBs for their next strategy period starting in 2028.

6 Strongly increasing in importance	5 Increasing in importance	4 Slightly increasing in importance	3 Slightly decreasing in importance	2 Decreasing in importance	1 Strongly decreasing in importance
		X			

Do you wish to explain your rating or highlight any matters relating to this trend for the IAASB, IESBA, or both the SSBs?

7. Based on your evaluation of the identified trends, please rank what you believe are the TOP FIVE most important trends for the SSBs to consider for their next strategy period starting in 2028.

Please enter the trend code for each of your top five trends (e.g. A.1, B.3), **in order of importance from 1 to 5**, where 1 is the most important. You may include:

- Any of the pre-identified trends (A.1 to D.4), and/or
- Any additional trends you identified above (e.g., O.1).

A.1 Digital Transformation – Increasing Use of Emerging Technologies 6

A.3 Digital Transformation – Financial Crimes Enabled by Technology 5

B.2 Changes in the Geopolitical and Regulatory Landscape - Risk of Fragmentation 4

D.1 Evolving Structure and Business Models of Accounting Firms - Alternative Ownership Structures 4

O.2 Adoption, implementation and trust in global standards 4

SECTION V: AREAS FOR JOINT ACTIONS IN SSBs' WORK PLANS

Background and Context

Although the IAASB and IESBA are independent Boards, each with its own remit, their standard-setting actions have a collective impact on the financial and non-financial reporting ecosystem. Given this collective impact, the two SSBs work closely together to ensure their standards are interoperable and complementary. They endeavor to maintain and enhance their coordination on topics of mutual interest, including improving on the early identification of work plan topics where both SSBs have a role to play and can act jointly or in parallel.

Both the IAASB and IESBA anticipate that certain projects or initiatives on their current 2024–2027 work plans will be carried over to their 2028–2031 work plans.⁵ The SSBs will elaborate on these topics or initiatives, as well as possible new projects or initiatives for their 2028–2031 SWP period, in their respective Consultation Papers targeted for the end of 2026.

This survey focuses **only** on the call from various stakeholders for the early identification of possible joint or parallel work plan topics, or other initiatives or activities. Based on the trends identified in **Section IV** and stakeholders' expectations about the collective impact of the IAASB's and IESBA's work, the SSBs are seeking feedback about areas of common interest that may lead to potential projects or initiatives in which both SSBs have a role to play and that may be undertaken jointly or in parallel.

Questions or Matters for Stakeholder Input

8. **Please share your views about areas of common interest and possible joint or parallel work plan topics (e.g., standard-setting or non-authoritative materials), or other initiatives or activities.**

Both Boards should focus on improving implementation, adoption and usability of existing standards, including through more targeted post-implementation reviews and better use of stakeholder's feedback. Greater weight should be given to input from the profession, as the primary users responsible for applying the standards in practice.

Parallel efforts should be avoided; work should be joint or separate.

Overall, joint efforts should prioritise guidance, implementation support and simplification, rather than the development of new standards.

⁵ The IAASB's Work Plan for 2024–2027 is included in the IAASB's [Strategy and Work Plan for 2024-2027](#) and IESBA's Work Plan for 2024–2027 is included in the IESBA's [Strategy and Work Plan for 2024-2027](#). See **Appendix 1** for a summary of projects or workstreams that are on the IAASB's and IESBA's work plans for 2026 and 2027, some of which are expected to be carried over to the next work plan period.

APPENDIX 1

SUMMARY OF IAASB WORK PLAN

Projects or Initiatives	Targeted Milestones	
	2026	2027
Post-Implementation Review of ISA 540 (Revised) ⁶	Recommendations	
Post-Implementation Review – Public Interest Entity– Joint SSBs Action		Revisit Public Interest Entity definition
Maintenance of The ISA for Less Complex Entities	Exposure Draft	Final Standard
Audit Evidence and Risk Response	Exposure Draft	Final Standard
ISRE 2410 ⁷	Exposure Draft	Final Standard
Technology Quality Management Workstream	Action Plan Work commences	Ongoing Work
Other Standards in the ISA 500-Series	Project Proposal Exposure Draft	Post-exposure development
Post-Implementation Review of ISA 315 (Revised 2019) ⁸		Information Gathering
ISA 320 – Materiality in Planning and Performing an Audit		Information Gathering

⁶ International Standard on Auditing (ISA) 540 (Revised), *Auditing Accounting Estimates and Related Disclosures*

⁷ International Standard on Review Engagements (ISRE) 2410, *Review of Interim Financial Information Performed by the Independent Auditor of the Entity*

⁸ ISA 315 (Revised 2019), *Identifying and Assessing the Risks of Material Misstatement*

SUMMARY OF IESBA WORK PLAN

Projects or Initiatives	Targeted Milestones	
	2026	2027
Collective Investment Vehicles and Pension Funds	Non-authoritative Materials	
Firm Culture and Governance	Non-authoritative Materials and Other Initiatives; Firm Culture and Governance framework	Non-authoritative Materials and Other Initiatives; Firm Culture and Governance framework
Exploring Extending the Impact of the Code to All Preparers of Sustainability Information		Terms of Reference and Information Gathering
Role of the CFOs	Information Gathering; Report and Recommendations	
Development of Profession-Agnostic Independence Standards for Sustainability Assurance Engagements not Within the Scope of Part 5	Information Gathering; Report and Recommendations	
Business Relationships		Terms of Reference and Information Gathering
Audit firm – Audit Client Relationship		Terms of Reference and Information Gathering
Post-Implementation Review – Non-compliance with Laws and Regulations	Information Gathering; Report and Recommendations	
Post-Implementation Review – Restructured Code	Information Gathering; Report and Recommendations	
Post-Implementation Review – Long Association Phase 2		Terms of Reference
Post-Implementation Review – Non-Assurance Services and Fees		Terms of Reference

Joint IESBA and IAASB Stakeholder Survey
Strategy and Workplans for 2028-2031

Post-Implementation Review – Public Interest Entity - Joint SSBs' Action		Terms of Reference
Post-Implementation Review – Engagement Team - Group Audit Independence		Terms of Reference