

Responses to IFAC’s Request for Comments in the EM for the ED, Proposed Revisions to IES 2, 3, and 4 – Sustainability

PART A: Respondent Details and Demographic information

Your organization’s name (or your name if you are making a submission in your personal capacity)	The Japanese Institute of Certified Public Accountants (JICPA)
Name(s) of person(s) responsible for this submission (or leave blank if the same as above)	Yuko Suzuki, Executive Board Member, CPD
Name(s) of contact(s) for this submission (or leave blank if the same as above)	CPD, Administration and Operations Strategy Division
E-mail address(es) of contact(s)	cpd-g@sec.jicpa.or.jp
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.	Asia Pacific
	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.	Member body and other professional organization
	If “Other”, please specify
Should you choose to do so, you may include information about your organization (or yourself, as applicable).	

Should you choose to do so, you may provide overall views or additional background to your submission. **Please note that this is optional.** IFAC’s preference is that you incorporate all your views in your comments to the questions (also, the last question in Part C 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:

The Japanese Institute of Certified Public Accountants (JICPA) welcomes the revision of the International Education Standards (IESs) by the International Federation of Accountants (IFAC) to incorporate findings on sustainability reporting and assurance and appreciates the opportunity to comment on the proposed revisions.

PART B: Responses to Specific 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.

1. Do you support the proposed revisions to IES 2, 3, and 4 for sustainability? If not, please explain your reasons and indicate what changes you would suggest.

Overall response: [Agree, with comments below](#)

Detailed comments (if any):

Considering society's growing need for sustainability reporting and assurance, it is important to include sustainability learning outcomes in the initial professional development for aspiring professional accountants. We support the revisions to IES 2, 3, and 4 because it includes them in a necessary, sufficient, and clear manner.

2. Are the sustainability learning outcomes sufficient and appropriate expectations for aspiring professional accountants? If not, please explain your reasons and indicate what changes you would support.

Overall response: [Agree, with comments below](#)

Detailed comments (if any):

The sustainability learning outcomes specified in this revision are considered sufficient and appropriate for aspiring professional accountants.

- 3A. Do you support the proposal to create a new competence area for assurance? If not, please explain your reason and indicate what changes you would suggest.

Overall response: [Agree, with comments below](#)

Detailed comments (if any):

As the demand for assurance engagements for sustainability information is expected to increase in society, it would be desirable to create a new area of competence in assurance that covers this concept at an appropriate and balanced level.

- 3B. Is the level of the proposed assurance competence area and learning outcomes at foundation level appropriate for aspiring for professional accountants? If not, please explain your reason and indicate what changes you would suggest.

Overall response: [Agree, with comments below](#)

Detailed comments (if any):

We agree if "Review" is included in the competence area "(e)Audit" in Table A of IES 2. To clarify this, we propose that the competence area in Table A of IES 2 be rewritten as follows

(e)Audit→Audits and Reviews of Historical Financial Information

(f) Assurance→Other Assurance

Because,

- The ED is unclear whether Review is included in (e) or (f).
- The IAASB's International Framework for Assurance Engagements broadly divides Assurance into Audits and Reviews of Historical Financial Information and Other Assurance Engagements, and the same division and wording should be used in the IES.
- Level of proficiency for Review should be Intermediate, as in the past.

4. Are there any terms within the new and revised learning outcomes of IES 2, 3, and 4 which require further clarification? If so, please explain which terms and how they could be better explained or revised.

Overall response: [Agree, with comments below](#)

Detailed comments (if any):

The terms of the new and revised learning outcomes are sufficiently clear.

5. Do you believe the adoption and implementation of the proposed revised IES 2, 3, and 4, including will present any challenges to your organization? If yes, what challenges do you foresee?

Overall response: [Agree, with comments below](#)

Detailed comments (if any):

We recognize the possibility of establishing a system to comply with the proposed revised IES 2, 3, and 4, including consideration of expanding sustainability-related education program in the curriculum of the professional accountancy education program.

Part C: Request for General Comments

IFAC is also seeking comments on the matters set out below

6. General comments are welcomed on all matters addressed in the proposed IES 2, 3, and 4 (See Appendices A to E). Where relevant, when making general comments, it is helpful to refer to specific paragraphs, include the reason for the comments and, where appropriate, make specific suggestions for any proposed changes to wording to fully appreciate the respondent's position. Where a respondent agrees with proposals in the exposure draft (especially those calling for a change in current practice), it is helpful to note the reason you agree.

Overall response: No response

Detailed comments (if any):