EER Consultation Paper July 2020 (General Comments)

15.1 Stakeholder Perspective

15.1.1 Preparers of EER reports

None

15.1.2 Users of EER reports

None

15.1.3 Public Sector

4. Public Sector Organizations

AGA - Office of the Auditor General Alberta

The guidance is useful for the public sector and has some public sector examples and circumstances.

15.1.4 Other

2. National Auditing Standard Setters

CAASB - Canadian Auditing and Assurance Standards Board

The Advisory Group who provided input to the AASB for this response letter included members who are preparers of EER reports as well as a public sector member. Their perspectives are included in the responses to the questions above.

5. Member Bodies and Other Professional Organizations

IAAA - Inter-American Accounting Association

As independent professionals in the audit services practice, users of IFAC standards, from our perspective, we understand that the project adequately addresses this new assurance service and constitutes a good guideline guide for both the preparation as well as for the EER examination, in addition, opens a new job opportunity, on the one hand, and on the other, it will increase in a superlative way the role of the public accountant in public activity, which in turn will increase the consideration towards professionals, in addition to increasing the quality of the service for the users who hire them.

ICPAR - Institute of Certified Public Accountants of Rwanda

ICPAR is the sole Professional Accountancy Organisation (PAO) in Rwanda enacted by the Law no. 11/2008. Our responses to the exposure drafts from Standard Setters (IAASB, IESBA, IPSASB and IASB) are provided by our Professional Standards Committee (PSC) composed by members in practice, business and public sector.

Rwanda has adopted the International Standards (IFRS, ISAs and IPSAS) through the ICPAR Law. The EER Guidance supports ICPAR plans to promote the preparation of integrated financial reports in the country in a bid to enhance transparency and accountability – which is the main pillar of the country’s National Strategy for Transformation (NST1). We have made progress in this journey however, the major
challenges still at stake include: lack of general understanding on importance of preparation of integrated reporting and lack of expertise to prepare integrated financial reports.

SAICA - South African Institute of Chartered Accountants

Our outreach activities included the solicitation of views from different stakeholders. Our internal working group comprised individuals from various constituencies, including public and private sector spheres. Therefore, the responses to the questions above incorporate the views of all of these stakeholders. Except for the matters identified in the questions above, there are no foreseeable difficulties or potential translation issues identified in using the draft guidance.

15.1.5 No particular view

1. Investors and Analysts

ICGN - International Corporate Governance Network

No response to General questions

2. National Auditing Standard Setters

AUASB - Australian Auditing and Assurance Standards Board

No comments

CNCC-CSOEC - Compagnie Nationale des Commissaires aux Comptes and Conseil Supérieur de l’Ordre des Experts-Comptables

No applicable

HKICPA - Hong Kong Institute of Certified Public Accountants

No comment

IDW - Institut der Wirtschaftsprüfer

As we do not represent these entities, we do not respond to this request for comments.

JICPA - Japanese Institute of Certified Public Accountants

No comment

NZAASB - New Zealand Auditing and Assurance Standards Board

not

3. Accounting Firms

BDO - BDO International Limited

No response to General questions

CG - Crowe Global

No comment on Supplement A or B and no response to General q
DTT - Deloitte Touche Tohmatsu Limited
No response to General questions

EYG - Ernst & Young Global Limited
No response to General questions

GTI - Grant Thornton International Ltd
Not answered

KPMG - KPMG Network
No response to General questions

PwC - PriceWaterhouseCoopers
No response to General questions

RSMI - RSM International Limited
we have no other comments

4. Public Sector Organizations
AGNZ - Auditor-General of New Zealand
No comment

AGSA - Auditor-General of South African
24. No additional comments.

GAO - United States Government Accountability Office
GAO’s

5. Member Bodies and Other Professional Organizations
ACCA-CAANZ - Chartered Accountants Australia and New Zealand and Association of Chartered
Certified Accountants
No response to General questions

AE - Accountancy Europe
No comment

AICPA - The American Institute of Certified Public Accountants
No response to General questions

Assirevi
No response to General questions
BICA - Botswana Institute of Chartered Accountants
No comment

BRLF - Australian Business Reporting Leaders Forum
No comment on General questions

CPAA - CPA Australia
No response to General questions

FACPCE - Federación Argentina de Consejos Profesionales de Ciencias Económicas
No response to General questions

FAR - Institute for the Accountancy Profession in Sweden
No comment on General questions

GRI - Global Reporting Initiative
No response to General questions

ICAS - Institute of Chartered Accountants Scotland
No response to General questions

ICPAU - Institute of Certified Public Accountants of Uganda
No response to General questions

IIA - Institute of Internal Auditors
No response to general questions

IIRC - International Integrated Reporting Council
No response to general questions

ISCA - Institute of Singapore Chartered Accountants
No response to General questions

MIA - Malaysian Institute of Accountants
No comment

MICPA - Malaysian Institute of Certified Public Accountants
No response to General questions

SASB - Sustainability Accounting Standards Board
No response to General questions
SVI - Social Value International
No comments on Supplement A or B or on General questions.

6. Academics
DEAKIN - Deakin University Integrated Reporting Centre
No comment.

15.2 Developing Nations

15.2.1 Foresee difficulties

5. Member Bodies and Other Professional Organizations
IAAA - Inter-American Accounting Association
As we discussed in c) below, developing countries have a vast amount of difficulties in appropriately adopting the international standards issued by IFAC through its different Councils due to the problem of translation. The difficulties that these developing nations already have is aggravated by the difficult access to the current IFAC standards, although it is true on the website of the issuing entity of the standards is available, it should be borne in mind that several of These countries do not have sufficient and easy access to the electronic page, added to the complexity of finding the standard that the user requires on the page. If it wants a more universal application, IFAC should make every effort to facilitate access to its standards, especially for developing countries.

15.2.2 Do not foresee difficulties

5. Member Bodies and Other Professional Organizations
ICPAR - Institute of Certified Public Accountants of Rwanda
ICPAR adopts international standards without any modification, including translation.

15.2.3 No particular view

1. Investors and Analysts
ICGN - International Corporate Governance Network
No response to General questions

2. National Auditing Standard Setters
AUASB - Australian Auditing and Assurance Standards Board
No comments

CAASB - Canadian Auditing and Assurance Standards Board
We have no comments on this question.

CNCC-CSOEC - Compagnie Nationale des Commissaires aux Comptes and Conseil Supérieur de l'Ordre des Experts-Comptables
No applicable

**HKICPA - Hong Kong Institute of Certified Public Accountants**
No comment

**IDW - Institut der Wirtschaftsprüfer**
As we do not represent a developing nation, we do not respond to this request for comments.

**JICPA - Japanese Institute of Certified Public Accountants**
No comment

**NZAASB - New Zealand Auditing and Assurance Standards Board**
not

3. Accounting Firms

**BDO - BDO International Limited**
No response to General questions

**CG - Crowe Global**
No comment on Supplement A or B and no response to General q

**DTT - Deloitte Touche Tohmatsu Limited**
No response to General questions

**EYG - Ernst & Young Global Limited**
No response to General questions

**GTI - Grant Thornton International Ltd**
Not answered

**KPMG - KPMG Network**
No response to General questions

**PwC - PriceWaterhouseCoopers**
No response to General questions

**RSMI - RSM International Limited**
we have no other comments
4. Public Sector Organizations
AGA - Office of the Auditor General Alberta
No comment

AGNZ - Auditor-General of New Zealand
No comment

AGSA - Auditor-General of South African
24. No additional comments.

GAO - United States Government Accountability Office
GAO’s

5. Member Bodies and Other Professional Organizations
ACCA-CAANZ - Chartered Accountants Australia and New Zealand and Association of Chartered Certified Accountants
No response to General questions

AE - Accountancy Europe
No comment

AICPA - The American Institute of Certified Public Accountants
No response to General questions

Assirevi
No response to General questions

BICA - Botswana Institute of Chartered Accountants
No comment

BRLF - Australian Business Reporting Leaders Forum
No comment on General questions

CPAA - CPA Australia
No response to General questions

FACPCE - Federación Argentina de Consejos Profesionales de Ciencias Económicas
No response to General questions

FAR - Institute for the Accountancy Profession in Sweden
No comment on General questions
GRI - Global Reporting Initiative
No response to General questions

ICAS - Institute of Chartered Accountants Scotland
No response to General questions

ICPAU - Institute of Certified Public Accountants of Uganda
No response to General questions

IIA - Institute of Internal Auditors
No response to general questions

IIRC - International Integrated Reporting Council
No response to general questions

ISCA - Institute of Singapore Chartered Accountants
No response to General questions

MIA - Malaysian Institute of Accountants
No comment

MICPA - Malaysian Institute of Certified Public Accountants
No response to General questions

SAICA - South African Institute of Chartered Accountants
Except for the matters identified in the questions above, there are no foreseeable difficulties or potential translation issues identified in using the draft guidance

SASB - Sustainability Accounting Standards Board
No response to General questions

SVI - Social Value International
No comments on Supplement A or B or on General questions.

6. Academics

DEAKIN - Deakin University Integrated Reporting Centre
No comment.
15.3 Translations

15.3.1 Foresee difficulties

3. Accounting Firms
RSMI - RSM International Limited
Apart from any impact that the length and complexity may have on translation, we have no other comments.

5. Member Bodies and Other Professional Organizations
IAAA - Inter-American Accounting Association
In countries that speak a language other than English, possibly the biggest problem that users of IFAC standards have is the translation into a language other than the one of origin (English), particularly into Spanish, there are discrepancies between translations made by different jurisdictions, since in this language there are several translators, which generates different interpretations from one jurisdiction to another, conspiring against the high quality of all the standards issued by the different IFAC Councils. We believe that a great solution to this problem could be provided through a single translation carried out by IFAC through an internal body, for which it could constitute an official translation committee for the different languages.

15.3.2 Do not foresee difficulties

3. Accounting Firms
GTI - Grant Thornton International Ltd
We noted no specific translation issues with the proposed draft Guidance.

5. Member Bodies and Other Professional Organizations
ICPAR - Institute of Certified Public Accountants of Rwanda
ICPAR adopts international standards without any modification, including translation.

15.3.3 No particular view

1. Investors and Analysts
ICGN - International Corporate Governance Network
No response to General questions

2. National Auditing Standard Setters
AUASB - Australian Auditing and Assurance Standards Board
No comments
CAASB - Canadian Auditing and Assurance Standards Board
We have no comments on this question.
Given the length of the guidance, even if the guidance were to eliminate all of the issues we have identified as not being in line with the standard or going beyond the standard in an inappropriate manner, it is unlikely that we would employ our limited resources to translate the guidance. We therefore refrain from making any comments on translation issues.

3. Accounting Firms

BDO - BDO International Limited
No response to General questions

CG - Crowe Global
No comment on Supplement A or B and no response to General q

DTT - Deloitte Touche Tohmatsu Limited
No response to General questions

EYG - Ernst & Young Global Limited
No response to General questions

KPMG - KPMG Network
No response to General questions

PwC - PriceWaterhouseCoopers
No response to General questions

4. Public Sector Organizations

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No comment
AGNZ - Auditor-General of New Zealand
No comment

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Assirevi
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BICA - Botswana Institute of Chartered Accountants
No comment

BRLF - Australian Business Reporting Leaders Forum
No comment on General questions

CPAA - CPA Australia
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FACPCE - Federación Argentina de Consejos Profesionales de Ciencias Económicas
No response to General questions

FAR - Institute for the Accountancy Profession in Sweden
No comment on General questions

GRI - Global Reporting Initiative
No response to General questions
ICAS - Institute of Chartered Accountants Scotland
No response to General questions

ICPAU - Institute of Certified Public Accountants of Uganda
No response to General questions

IIA - Institute of Internal Auditors
No response to general questions

IIRC - International Integrated Reporting Council
No response to general questions

ISCA - Institute of Singapore Chartered Accountants
No response to General questions

MIA - Malaysian Institute of Accountants
No comment

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SASB - Sustainability Accounting Standards Board
No response to General questions

SVI - Social Value International
No comments on Supplement A or B or on General questions.

6. Academics
DEAKIN - Deakin University Integrated Reporting Centre
No comment.