

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.

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

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.

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

KPMG - KPMG Network

No response to General questions

PwC - PriceWaterhouseCoopers

No response to General questions

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.