

13 July 2020

Ref: 002/PDS/07/2020

**Willie Botha**  
**Technical Director**  
**International Auditing and Assurance Standards Board**  
**New York, USA**

Dear Sir,

**RE: ICPAR COMMENTS ON PROPOSED NON-AUTHORITATIVE GUIDANCE FOR EXTENDED EXTERNAL REPORTING (EER) ASSURANCE**

The Institute of Certified Public Accountants of Rwanda (ICPAR) is delighted to submit its comments on the IAASB Proposed Non-Authoritative Guidance for Extended External Reporting (EER) Assurance.

Our responses to specific questions and request for general comments are provided below:

**1. RESPONSES TO SPECIFIC QUESTIONS**

**Question One**

Does the Guidance adequately address the challenges for practitioners that have been identified as within the scope of the draft Guidance? If not, where and how should it be improved to better serve the public interest in EER assurance engagements?

**Response:**

Yes. We agree that the Guidance adequately addresses the challenges for practitioners that have been identified as within the scope of the draft Guidance.

**Question Two**

Is the draft Guidance structured in a way that is easy for practitioners to understand and use in performing EER assurance engagements? If not, where and how should it be improved to better serve the public interest in EER engagements?

**Response:**

Yes. We agree that the draft Guidance is structured in a way that is easy for practitioners to understand and use in performing EER assurance engagements.

**2. REQUEST FOR GENERAL COMMENTS**

In addition to the request for specific comments above, the IAASB is also seeking comments on the matters set out below:

- (a) Stakeholder Perspectives – Respondents representing stakeholders such as preparers (including smaller entities) of EER reports, users of EER reports, and public sector entities are asked to comment on the question above from their perspective.
- (b) Developing Nations – Recognizing that many developing nations have adopted or are in the process of adopting the International Standards, the IAASB invites respondents from these nations to comment, in particular, on any foreseeable difficulties in using the draft guidance in a developing nation environment.
- (c) Translation – Recognizing that many respondents may intend to translate the final guidance for adoption in their own environments, the IAASB welcomes comments on potential translation issues.

**Responses:**

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.

ICPAR adopts international standards without any modification, including translation.

Yours Sincerely,





**Felicien Muvunyi**

**Chair – ICPAR Professional Standards Committee**

CC: - ICPAR CEO

- ICPAR President