

RESPONSE TEMPLATE FOR EXPOSURE DRAFT OF PROPOSED ISSA 5000, *GENERAL REQUIREMENTS FOR SUSTAINABILITY ASSURANCE ENGAGEMENTS*

Guide for Respondents

Comments are requested by **December 1, 2023**. *Note that requests for extensions of time cannot be accommodated due to the accelerated timeline for finalization of this proposed standard.*

This template is for providing comments on the Exposure Draft of proposed International Standard on Sustainability Assurance Engagements™ (ISSA) 5000, *General Requirements for Sustainability Assurance Engagements* (ED-5000), in response to the questions set out in the Explanatory Memorandum to ED-5000. It also allows for respondent details, demographics and other comments to be provided. Use of the template will facilitate the IAASB's automated collation of the responses.

You may respond to all questions or only selected questions.

To assist our consideration of your comments, please:

- For each question, start by indicating your overall response using the drop-down menu under each question. Then below that include any detailed comments, as indicated.
- When providing comments:
 - Respond directly to the questions.
 - Provide the rationale for your answers. If you disagree with the proposals in ED-5000, please provide specific reasons for your disagreement and specific suggestions for changes that may be needed to the requirements, application material or appendices. If you agree with the proposals, it will be helpful for the IAASB to be made aware of this view.
 - Identify the specific aspects of ED-5000 that your response relates to, for example, by reference to sections, headings or specific paragraphs in ED-5000.
 - Avoid inserting tables or text boxes in the template when providing your responses to the questions because this will complicate the automated collation of the responses.
- Submit your comments, using the response template only, without a covering letter or any summary of your key issues, instead identify any key issues, as far as possible, in your responses to the questions.

The response template provides the opportunity to provide details about your organization and, should you choose to do so, any other matters not raised in specific questions that you wish to place on the public record. All responses will be considered a matter of public record and will ultimately be posted on the IAASB website.

Use the “**Submit Comment**” button on the [ED-5000 webpage](#) to upload the completed template.

Responses to IAASB’s Request for Comments in the Explanatory Memorandum for ED-5000, General Requirements for Sustainability Assurance Engagements

PART A: Respondent Details and Demographic information

Your organization’s name (or your name if you are making a submission in your personal capacity)	SGS
Name(s) of person(s) responsible for this submission (or leave blank if the same as above)	
Name(s) of contact(s) for this submission (or leave blank if the same as above)	
E-mail address(es) of contact(s)	Jing.wang2@sgs.com
Geographical profile that best represents your situation (i.e., from which geographical perspective are you providing feedback on ED-5000). Select the most appropriate option.	Global
	If “Other”, please clarify
The stakeholder group to which you belong (i.e., from which perspective are you providing feedback on ED-5000). Select the most appropriate option.	Assurance practitioner or firm - other profession
	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.** The IAASB’s preference is that you incorporate all your views in your comments to the questions (also, the last question in Part B allows for raising any other matters in relation to ED-5000).

Information, if any, not already included in responding to the questions in Parts B and C:

PART B: Responses to Questions in in the Explanatory Memorandum for ED-5000

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.

Overall Questions

1. Do you agree that ED-5000, as an overarching standard, can be applied for each of the items described in paragraph 14 of this EM to provide a global baseline for sustainability assurance engagements? If not, please specify the item(s) from paragraph 14 to which your detailed comments, if any, relate (use a heading for each relevant item).

(See Explanatory Memorandum Section 1-A, paragraph 14)

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

Detailed comments (if any): The standard has the potential to provide a global baseline for sustainability assurance engagement. However, it will be appropriately scalable and adaptable if it could be developed into neutral language, instead of accounting language. Additionally, it needs to consider widening scope to cover existing mainstreaming international reporting frameworks and assurance standards, such as GRI, ESRS, IFRS, AA1000, etc. In a word, it needs to jump out the boundary of accounting to a much wider map.

Public Interest Responsiveness

2. Do you agree that the proposals in ED-5000 are responsive to the public interest, considering the qualitative standard-setting characteristics and standard-setting action in the project proposal? If not, why not?

(See Explanatory Memorandum Sections 1-B, and Appendix)

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

Detailed comments (if any):

ED-5000 is intended to be responsive to the public interest. This goal will be achieved if the standard could address more on reviewing process of stakeholder engagement, which is the foundation of sustainability management and disclosure. The characteristics are fine, it embeds basic principles that gives enough room to be widely used, however it doesn't mention anything regarding to accuracy.

Specific Questions

Applicability of ED-5000 and the Relationship with ISAE 3410

3. Is the scope and applicability of ED-5000 clear, including when ISAE 3410 should be applied rather than ED-5000? If not, how could the scope be made clearer?

(See Explanatory Memorandum Section 1-C)

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

Detailed comments (if any): The scopes of ED-5000 and ISAE 3410 are clear. However, it's suggested to specify auditor competence regarding to GHG audit, regardless the assurance engagement is on sustainability information or only on GHG .

Relevant Ethical Requirements and Quality Management Standards

4. Is ED-5000 sufficiently clear about the concept of “at least as demanding” as the IESBA Code regarding relevant ethical requirements for assurance engagements, and ISQM 1 regarding a firm’s responsibility for its system of quality management? If not, what suggestions do you have for additional application material to make it clearer?

(See Explanatory Memorandum Section 1-D)

Overall response: [No, with comments below](#)

Detailed comments (if any): The concept of “at least as demanding as” is not clear enough and could be argumentative. It will add more clarity and inclusivity to list paralleled global requirement from TIC industry e.g., IAF and ISO requirement on ethical, quality and personnel management. Or to provide suggestions/guidance for regulators’ decision-making.

Definitions of Sustainability Information and Sustainability Matters

5. Do you support the definitions of sustainability information and sustainability matters in ED-5000? If not, what suggestions do you have to make the definitions clearer?

(See Explanatory Memorandum Section 1-E, paras. 27-32)

Overall response: [No, with comments below](#)

Detailed comments (if any):

Though paragraph 31 mentioned “IAASB was of the view that governance is related to the actions taken by the entity to address sustainability matters, and therefore is an aspect of a topic”, some of the topics that naturally fall under governance, such as anti-corruption and bribery, although they are essentially control measures the sustainability topic, doesn't really fit into any of the other topic categories mentioned, so may be missed.

Also, since this standard is intending to be framework-neutral, it would be good to include the scope of definitions of mainstreaming reporting frameworks, such as GRI, ESRS, and IFRS. ESRS defines “sustainability matters” as “ *environmental, social and human rights, and **governance factors***”.

We recommend adding governance into the definition of sustainability information and sustainability matters in ED-5000.

6. Is the relationship between sustainability matters, sustainability information and disclosures clear? If not, what suggestions do you have for making it clearer?
(See *Explanatory Memorandum Section 1-E, paras. 35-36*)

Overall response: [Yes \(with no further comments\)](#)

Detailed comments (if any):

Differentiation of Limited Assurance and Reasonable Assurance

7. Does ED-5000 provide an appropriate basis for performing both limited assurance and reasonable assurance engagements by appropriately addressing and differentiating the work effort between limited and reasonable assurance for relevant elements of the assurance engagement? If not, what do you propose and why?
(See *Explanatory Memorandum Section 1-F, paras. 45-48*)

Overall response: [No, with comments below](#)

Detailed comments (if any):

- 1) For Limited Assurance itself, the spectrum is very wide. It's observed in the market there are a lower end and a higher end of limited assurance, yet the intended users couldn't tell the difference. This poses a high risk for assurance credibility and confidence.
- 2) Thresholds of limited assurance and reasonable assurance engagement are still quite blurred and complex, which may cause huge variance in practice by different practitioners.

We recommend a more detailed guidance to be given for planning timing of assurance engagement regarding to limited and reasonable assurance.

Preliminary Knowledge of the Engagement Circumstances, Including the Scope of the Engagement

8. Is ED-5000 sufficiently clear about the practitioner's responsibility to obtain a preliminary knowledge about the sustainability information expected to be reported and the scope of the proposed assurance engagement? If not, how could the requirements be made clearer?

(See Explanatory Memorandum Section 1-F, para. 51)

Overall response: [No, with comments below](#)

Detailed comments (if any):

Though ED-5000 has clear requirement of the practitioner to obtain a preliminary knowledge about the sustainability information. It hasn't clarified how the engagement leader decide the knowledge of the assurance team is sufficient and appropriate. For example, the sector experience related to particular sustainability matters, when to use an internal or external expert, and the qualification and independency of the roles, how to classify an expert, when it is needed, what skill set they use in the assurance engagement, how to evaluate the quality of their work, what is the difference bwt an expert and a sustainability practitioner.

etc.

We recommend more details to be provided in the guidance document.

9. Does ED-5000 appropriately address the practitioner's consideration of the entity's "materiality process" to identify topics and aspects of topics to be reported? If not, what approach do you suggest and why?

(See Explanatory Memorandum Section 1-F, paras. 52-55)

Overall response: [No, with comments below](#)

Detailed comments (if any):

The standard addressed much on "materiality considered or determined by the practitioner" , but not "materiality assessment" of the entity or "double materiality". Explanatory Memorandum paras.52-55 could be also addressed by Para. 72(c)), A172.and A179: "Relevance of the Criteria". Yet these parts haven't been connected and aligned in the current drafts.

In addition, there are different definitions of materiality and only the double materiality is highlighted. This is one of the newest concepts, but a more neutral wording of paragraphs 59 and 60, open to other definitions of materiality, would make the document more inclusive. Not all organization needs to comply with CSRD, so broad the concept. We have GRI, AA1000 AccountAbility Principles and SASB with their own definition.

The materiality of the client should be part of the assurance engagement if it is part of the scope of the audit. Otherwise, the auditor develops his own materiality study to define the assurance process, and this should be the focus of the ED-5000. Emphasize the importance of the materiality in the engagement, what value it has for the project, how it is to be used and how it is to be performed independently of the client's materiality.

If the client has done a double materiality, good for them. But it does impact the assurance materiality that still need to be performed.

And if the scope of the assurance is just few KPIs, how the materiality impact it? It is not answered in the document.

We recommend an approach to give a clear description of the entity's "materiality process" in the ED-5000, which should cover a process of materiality identification and prioritization involving stakeholder engagement. The practitioner should include the evaluation of the entity's "materiality assessment" as part of the scope of the assurance, in order to fulfill the evaluation of "Relevance of the Criteria".

Suitability and Availability of Criteria

10. Does ED-5000 appropriately address the practitioner's evaluation of the suitability and availability of the criteria used by the entity in preparing the sustainability information? If not, what do you propose and why?

(See Explanatory Memorandum Section 1-F, paras. 56-58)

Overall response: [Yes \(with no further comments\)](#)

Detailed comments (if any):

11. Does ED-5000 appropriately address the notion of "double materiality" in a framework-neutral way, including how this differs from the practitioner's consideration or determination of materiality? If not, what do you propose and why?

(See Explanatory Memorandum Section 1-F, paras. 59-60 and 68)

Overall response: [No \(with no further comments\)](#)

Detailed comments (if any): Refer to question 9.

The current description of "double materiality" in ED -5000 seems try to be framework-neutral but at the other side looks confusing. Paragraph 59 first mentioned ESRS, whose "double materiality" consists of "impact materiality" and "financial materiality". Then said, "*When the needs of the intended users relate to both the impacts on the entity and the entity's impacts, this can be referred to as double materiality*", which is closer to the GRI definition of "materiality".

We recommend the assurance standard to just address the entity's "materiality" process and leave the entity to decide which "double materiality" they prefer to use to meet up the needs of its intended users. The assurance provider's responsibility is to evaluate the entity's "materiality process" as mentioned above.

Materiality

12. Do you agree with the approach in ED-5000 for the practitioner to consider materiality for qualitative disclosures and determine materiality (including performance materiality) for quantitative disclosures? If not, what do you propose and why?

(See Explanatory Memorandum Section 1-F, paras. 65-74)

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

Detailed comments (if any):

There should be more guidance of determining appropriate materiality levels for quantitative disclosures regarding to limited assurance and reasonable assurance, such as 5%, 10%, etc.

And what the benchmark used for materiality?

such as the use of revenue's X%, pre-tax net profit's X% or total assets' X% , under what conditions those benchmarks can be used as benchmarks for assessing materiality?

In addition, if the auditor obtains certain information during the audit process, and if such information will cause it to be materialistic in the audit planning to be different, will it be necessary to adjust and assess the materiality in a timely manner?

Understanding the Entity's System of Internal Control

13. Do you agree with the differentiation in the approach in ED-5000 for obtaining an understanding of the entity's system of internal control for limited and reasonable assurance engagements? If not, what suggestions do you have for making the differentiation clearer and why?

(See Explanatory Memorandum Section 1-F, paras. 75-81)

Overall response: [Neither agree/disagree, but see comments below](#)

Detailed comments (if any):

ED-5000 focus on the internal control of accounting world, which is no problem. However, it shall recognize other internal control system as well, for example the international management systems such as ISO 9001, 14001, 45001, etc.

Using the Work of Practitioner's Experts or Other Practitioners

14. When the practitioner decides that it is necessary to use the work of a firm other than the practitioner's firm, is ED-5000 clear about when such firm(s) and the individuals from that firm(s) are members of the engagement team, or are "another practitioner" and not members of the engagement team? If not, what suggestions do you have for making this clearer?

(See Explanatory Memorandum Section 1-G, paras. 82-87)

Overall response: [No, with comments below](#)

Detailed comments (if any):

The requirement of whether to use another practitioner is clear. The unclear part is “How”. For instance, how to control the risks of conflict of interest, how to manage the assurance quality, how to issue the assurance statement, how to define the accountability of different practitioners?

We recommend more details to be provided in the guidance document.

We recommend this section of ED-5000 to align with ISO 17029 7.4 Outsourcing.

15. Are the requirements in ED-5000 for using the work of a practitioner’s external expert or another practitioner clear and capable of consistent implementation? If not, how could the requirements be made clearer?

(See Explanatory Memorandum Section 1-G, paras. 88-93)

Overall response: [No, with comments below](#)

Detailed comments (if any):

The current standard requirement is very subjective regarding to using external expert or another practitioner. This may pose high risk to the principle of independence, for example if the external expert is an individual who has played a significant role in preparing the sustainability information.

We recommend applying principle of independence when selecting external expert or another practitioner. This could refer to ISO standards such as ISO 17029.

Estimates and Forward-Looking Information

16. Do you agree with the approach to the requirements in ED-5000 related to estimates and forward-looking information? If not, what do you propose and why?

(See Explanatory Memorandum Section 1-G, paras. 94-97)

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

Detailed comments (if any):

ED-5000 134L-135R listed the detailed approach to the requirement of Estimates and Forward-looking information. However, Para.97 mentioned “*The IAASB also noted that estimates and forward-looking information could be addressed further in a separate topic-specific ISSA in the future.*” We would urge this document to be published with ED-5000.

Risk Procedures for a Limited Assurance Engagement

17. Do you support the approach in ED-5000 to require the practitioner to design and perform risk procedures in a limited assurance engagement sufficient to identify disclosures where material misstatements are likely to arise, rather than to identify and assess the risks of material misstatement as is done for a reasonable assurance engagement? If not, what approach would you suggest and why?

(See Explanatory Memorandum Section 1-G, paras. 98-101)

Overall response: [Yes \(with no further comments\)](#)

Detailed comments (if any):

Groups and “Consolidated” Sustainability Information

18. Recognizing that ED-5000 is an overarching standard, do you agree that the principles-based requirements in ED-5000 can be applied for assurance engagements on the sustainability information of groups or in other circumstances when “consolidated” sustainability information is presented by the entity? If not, what do you propose and why?

(See Explanatory Memorandum Section 1-G, paras. 102-107)

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

Detailed comments (if any):

For grouped information, ED-5000’s requirement can be applied but more guidance is needed, e. the timing of assurance engagement, sampling requirements of limited and reasonable assurance, etc.

We recommend referring to the International Accreditation Forum (IAF) guidance.

Fraud

19. Do you agree that ED-5000 appropriately addresses the topic of fraud (including “greenwashing”) by focusing on the susceptibility of the sustainability information to material misstatement, whether due to fraud or error? If not, what suggestions do you have for increasing the focus on fraud and why?

(See Explanatory Memorandum Section 1-G, paras. 108-110)

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

Detailed comments (if any):

The standard address extensively on fraud. However, “greenwashing” is a more concealing concept and not all greenwashing are fraud. It might relate to some green claims or marketing activities that the company are not aware of greenwashing. In order to avoid greenwashing, the practitioner shall evaluate entity’s “materiality process” to determine if any material impact has been hidden/neglected from their reporting resulting in showing misleading information to intended users, i.e., greenwashing.

We recommend to better define the concepts of fraud and greenwashing. And highlight the auditor duty in these cases, how to classify and identify the cases.

Communication with Those Charged with Governance

20. Do you support the high-level requirement in ED-5000 regarding communication with management, those charged with governance and others, with the related application material on matters that may be appropriate to communicate? If not, what do you propose and why?

(See Explanatory Memorandum Section 1-G, paras. 111-112)

Overall response: [Yes \(with no further comments\)](#)

Detailed comments (if any):

Reporting Requirements and the Assurance Report

21. Will the requirements in ED-5000 drive assurance reporting that meets the information needs of users? If not, please be specific about any matters that should not be required to be included in the assurance report, or any additional matters that should be included.

(See Explanatory Memorandum Section 1-G, paras. 116-120, 124-130)

Overall response: [No, with comments below](#)

Detailed comments (if any):

To enable paras.120 “require the name of the engagement leader to be included in the assurance report”, the assurance practitioner shall ensure the engagement leader have the appropriate level of accountability. The concern is that sustainability assurance has far wider scope than financial audit and assurance.

The assurance report shall include what criteria (regarding to para.72 of ED-5000) the practitioner used to evaluate the sustainability information and the overall evaluation result.

22. Do you agree with the approach in ED-5000 of not addressing the concept of “key audit matters” for a sustainability assurance engagement, and instead having the IAASB consider addressing this in a future ISSA? If not, what do you propose and why?

(See Explanatory Memorandum Section 1-G, paras. 121-123)

Overall response: [Agree \(with no further comments\)](#)

Detailed comments (if any):

23. For limited assurance engagements, is the explanation in the Basis for Conclusion section of the assurance report that the scope and nature of work performed is substantially less than for a reasonable assurance engagement sufficiently prominent? If not, what do you propose and why?
(See *Explanatory Memorandum Section 1-G, para. 131*)

Overall response: [No, with comments below](#)

Detailed comments (if any):

Mentioned by earlier comments, thresholds of limited assurance and reasonable assurance engagement are still quite blurred and complex, which may cause huge variance in practice by different practitioners. Limited Assurance itself extends very wide scope with a lower end and a higher end, which can't be identified by the intended users.

We recommend more detailed clarification with quantified guidance.

Other Matters

24. Are there any public sector considerations that need to be addressed in ED-5000?
(See *Explanatory Memorandum Section 1-I, para. 135*)

Overall response: [Click to select from dropdown menu](#)

Detailed comments (if any):

25. Are there any other matters you would like to raise in relation to ED-5000?

Overall response: [Click to select from dropdown menu](#)

Detailed comments (if any):

In several areas there is a need for assurance practitioners to make judgements on risk related to sustainability information disclosure. It would seem sensible to include a recommendation for evaluation of the Materiality assessment process, to enable an assurance to be conducted in relation to several of the key principles and to evaluate the risk of omission of information on material issues.

the standard-setting action part:

- Developing a standard that provides more specificity than ISAE 3000 (Revised) and ISAE 3410 for the priority areas identified in the PP, recognizing that the degree of specificity needs to be commensurate with the overarching nature of the standard (see PP, paragraph 18(b)).

ISO standards can add guidance in that part, since ISAE is not specific enough. I should mention here and specific the reference to improve and standardize the assurance process (how many visits, samples, errors acceptancy). Iso is a bit more specific.

- PA.1: The difference in work effort between limited and reasonable assurance, including sufficiency of evidence

It should better set the boundary of each assurance criteria.

- PA.2: The suitability of the reporting criteria, including addressing concepts such as “double materiality” . It is clearly CSRD focus, review the language and description. It should be "materiality" solely.

PA.4: Evidence, including the reliability of information and what comprises sufficient appropriate evidence.

PA.5: The entity’s system of internal control and its impact on the ability of the practitioner to obtain sufficient appropriate evidence.

It is missing the relevance on site visit, in some specific situations where desktop is not enough to confirm the scope, evidence and management process (ISO can be add as a reference)

In addition,

1.ED-5000, referring to control tests, if evidence is obtained in the middle of the period and the conclusions of these control tests are intended to be extended to the remaining period, which the remaining period specified to be at least a few months?

2. ED-5000 If only internal control understanding is carried out and no control test is performed, it is intended to obtain evidence through the implementation of substantive procedures.

Whether with limited assurance and reasonable assurance, the work to be performed in relation to the substantive procedures, we recommend more detailed clarification with quantified guidance.

Part C: Request for General Comments

The IAASB is also seeking comments on the matters set out below:

26. Translations—Recognizing that many respondents may intend to translate the final ISSA for adoption in their own environments, the IAASB welcomes comment on potential translation issues respondents note in reviewing ED-5000.

Overall response: [No response](#)

Detailed comments (if any):

27. Effective Date—As explained in paragraph 138 of Section 1-I – Other Matters, the IAASB believes that an appropriate effective date for the standard would be for assurance engagements on sustainability information reported for periods beginning or as at a specific date approximately 18 months after approval of the final standard. Earlier application would be permitted and encouraged. Do you agree that this would provide a sufficient period to support effective implementation of the ISA. If not, what do you propose and why?

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

Detailed comments (if any):

It doesn't matter to propose a specific date or not, since ISSA 5000 will be adopted on a voluntary basis. Unless the use of ISSA 5000 is requested by regulations, then effective date will be decided by the regulator.