

21 June 2019

Mr. Willie Botha
IAASB Technical Director
International Auditing and Assurance Standards Board
International Federation of Accountants
529 5th Avenue
New York 10017
USA

Re: *Extended External Reporting (EER) Assurance Consultation Paper/Request for Input*

Dear Mr. Botha,

BDO International Limited¹ (BDO) is pleased to respond to the consultation on Extended External Reporting (EER) Assurance. BDO supports the overall aim and scope of providing non-authoritative guidance in applying the ISAE 3000 to EER. We continue to actively contribute to this process, being part of the EER Taskforce, and aim to comment fully on the final EER exposure draft document in 2020.

Below please find our specific comments and observations.

Q1

We agree the draft guidance adequately addresses the challenges faced by practitioners across all significant matters (paragraphs 9-15, 25, 29, 33, 35, 40 and 41).

Q2

We agree the draft guidance is clear and easy to comprehend for the experienced practitioner (paragraphs 16-17, 34, 37 and 40). Practitioners with less experience in using ISAE 3000 (Revised) alongside other EER frameworks and standards, including GRI and integrated reporting, will likely need more guidance on both terminology and practical application. This additional guidance is likely to be provided by more experienced managers and through formal training but it would aid understanding and demonstrate greater inclusivity if the use of key terminology would be explained in greater detail through links to credible sources and information.

Q3

We agree with the proposed structure of the draft guidance (paragraph 18).

Q4

We agree that the draft guidance does not contradict or conflict with the requirements of ISAE 3000 (Revised) and that the draft does not introduce any new requirements (paragraphs 19-21, 24, 26 and 36).

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Q5

We agree with the way the draft guidance covers matters not addressed in the ISAE 3000 (Revised) including materiality processes, preconditions, systems of control and assertions (paragraphs 19-21, 24, 26 and 36).

Q6

We agree that the additional papers are helpful and should be published alongside the non-authoritative document (paragraphs 42-45).

Q7 (B)

We do not anticipate BDO firms in developing nations to face difficulties in using the draft guidance. BDO will consult relevant firms on any issues or changes to be considered as part of the IAASB's EER exposure draft consultation in 2020.

We have no comments on questions 7 (A) and (C).

Thank you for the opportunity to feedback and we look forward to reviewing the final exposure draft in 2020.

If you have any questions or need further clarification please feel free to contact me.

Yours sincerely,

BDO International Limited

Chris Smith

Global Head of Audit and Accounting