

Compilation of Significant ED Comments

Note: This Agenda Item has been prepared for information only. A comprehensive summary of the significant comments received on the Exposure Draft (ED) of [Proposed Revisions to The Code Addressing Tax Planning And Related Services](#), and the Task Force’s related analysis of significant issues and proposals are presented in **Agenda Item 9-A**.

Proposed New Sections 380 and 280

1. Do you agree with the IESBA’s approach to addressing TP by creating two new Sections 380 and 280 in the Code as described in Section VI of this memorandum?

No	Respondent	Respondent Comments
1	Accountancy Europe	<p>We agree with IESBA's approach in creating two new sections: Section 380 for professional accountants in practice (PAPP) and Section 280 for professional accountants in business (PAIB).</p> <p>Although the proposed requirements and guidance are broadly the same, using terminology specific to PAPPs and PAIBs is useful to avoid confusion. This, we feel, will be particularly useful in the sections covering how the professional accountant deals with disagreement on the tax planning arrangement.</p> <p>For the sake of clarity, it would be useful if any significant divergences (i.e., not mere differences of terminology) between Sections 280 and 380 are clearly highlighted, with explanation of why the divergence was considered necessary</p>
2	American Institute of Certified Public Accountants	<p>We are generally supportive of IESBA's efforts to incorporate a principles-based framework regarding the ethical performance of tax planning services into the IESBA code for jurisdictions that do not have tax and personal financial planning performance standards in place. However, we have significant concerns with some of the elements of the proposed additions to the Code as noted:</p> <p><u>Taxpayer Protections</u></p> <p>Paragraph 11 of the exposure draft acknowledges the "...need to balance the public interest benefits of the proposed revisions to the Code with consideration of global operability, practicality, and scalability for users of the Code." Paragraph 12 acknowledges "...the Code does not and cannot override laws and regulations." We believe that if PAs are required to apply the proposed standards in a manner that would compromise or jeopardize protections to which a</p>

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		<p>taxpayer is legally entitled, neither the taxpayer’s nor the public’s interest would be served and laws and regulations affecting the taxpayer would be undermined.</p> <p>CPAs in the United States have limited ability to protect communications with their clients related to tax advice. Proposed provisions that trigger disclosure of information to the client or preparation of documentation would potentially provide the tax authorities with the ability to use the CPA’s communications with the taxpayer against the taxpayer. The communication could also be used in any litigation involving the taxpayer. This would compromise significant legal protections to which U.S. taxpayers are entitled. We believe that the public’s and taxpayers’ interests are best served by allowing the CPA to use professional judgment regarding the level of detail and nature of communications with the taxpayer.</p> <p>Moreover, IESBA standards, as proposed, will likely cause taxpayers to seek advice from other tax service providers, many of whom, as noted above, may not be subject to any standards or ethical requirements, or to requirements that are not as robust as those CPAs are currently subject to.</p> <p>Additionally, if adopted, the proposed standards might lead PAs to contemplate alternative service entities that would not be subject to the tax planning standards of IESBA or other similar organizations.</p> <p>To avoid these serious consequences, which we believe are contrary to the public and other stakeholder interests, we recommend the following be added to the proposed framework:</p> <p><i>A PA shall not be required to apply a tax planning standard if application of that standard would compromise or jeopardize the legal rights or protections of a taxpayer in that jurisdiction. This includes, for example, any standard that would affect or compromise a taxpayer client’s protection of communications with its tax adviser under law or that would affect or compromise a client’s confidence threshold in taking a tax position to which the taxpayer is entitled in that tax jurisdiction.</i></p> <p>Alternatively, IESBA could provide an exception for jurisdictions that have long-standing and proven tax practice standards. This will avoid unnecessary and prolonged conflict in attempting convergence in such jurisdictions.</p> <p>AICPA tax practice standards have been in effect in the United States for more than a century and continue to evolve based on changes in federal and state legislation, regulations and global ethical norms. We believe that the high ethical and practice standards to which U.S. CPAs must already adhere are well known to the profession, interested stakeholders, and the public at large, and have proven to be effective. We believe our existing U.S. standards, in</p>

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		<p>conjunction with our highly developed regulatory system, sufficiently protect the public interest, and would meet the criteria for a such an exception.</p>
3	Association of Chartered Certified Accountants	<p>Overall, we agree with the creation of two new sections in the Code to address TP. However, we wish to highlight that in many jurisdictions, tax advisory and compliance services are not protected or formally regulated activities. As a result, TP and related services are often provided by non-professional accountants, such as lawyers and other individuals who may be from different professions or who may have no professional qualifications at all. Such individuals are not under the purview of the Code and may not be subject to a similar and equally rigorous set of ethical and independence requirements.</p>
4	Chartered Accountants and CA Australia and NZ	<p>As noted in our cover letter, we consider that the IESBA should reconsider its approach to addressing TP. However, if IESBA chooses to proceed with the approach as described in Section VI of the explanatory memorandum ("the EM"), in order for the accountancy profession to fully address stakeholder concerns about TP, PAs will need to understand and comply with proposed sections 280 and 380 and professional bodies will need to be able to enforce the Sections.</p> <p>In this regard, we request that IESBA consider clarifying certain aspects of the proposed sections. Please refer to our responses to questions 2, 6, 9, 10, 11 and 12.</p>
5	Chartered Accountants Ireland	<p>The creation of two new sections in the Code that is specific to a single category of service provided by Professional Accountants' is a new development. The current structure of the IESBA Code of Ethics establishes the Fundamental Principles and Conceptual Framework at the outset and proceeds to address specific requirements and considerations for Professional Accountants in Public Practice (PAPPs) and Professional Accountants in Business (PAIBs) in the context of threats to those principles and conceptual framework.</p> <p>Within Sections 380 and 280, many subsections cross reference existing requirements and application material in the Code that already addresses the considerations necessary. Examples of sections cross-referenced include:</p> <ul style="list-style-type: none"> • The Fundamental Principles (sections 111 to 115) • The Conceptual Framework (Section 120) <p>PAIB:</p>

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		<ul style="list-style-type: none"> • Responding to non-compliance with laws and regulations (Section 260) <p>PAPP:</p> <ul style="list-style-type: none"> • Professional Appointments (Section 320) • Fees and Other Types of Remuneration (Section 330) • Responding to non-compliance with laws and regulations (Section 360) <p>The specific requirements for Tax planning could be embedded within other existing sections of the Code of Ethics such as:</p> <ul style="list-style-type: none"> • Acting with sufficient expertise – Section 230 • Pressure to breach the fundamental principles – Section 270 <p>The current IESBA Handbook of the International Code of Ethics for Professional Accountants (including International Independence Standards) is more than 300 pages. Adding additional sections further increases size and complexity, two risk factors that can result in poorer adherence to requirements. We suggest size and complexity can be reduced by embedding the additional requirements and considerations for tax planning within the existing sections of the Code of Ethics.</p> <p>We note and support the approach to embed additional content within Section 321, Second Opinions.</p>
6	CPA Australia	<p>Yes. CPA Australia supports in principle the creation of the two new Sections 380 and 280 in the Code. However, we note that TP services are clearly distinct from audit and assurance services and that any requirements for TP must be sufficiently flexible to recognize the different forms and level of engagement involved in TP.</p> <p>Taxpayers, specifically the decision makers such as company directors or partners in a partnership are ultimately responsible for the information reported to the tax authority. PAPPs and other TP service providers are engaged to provide their professional views on the application of tax laws and to assist taxpayers make decisions in relation to their tax affairs. PAPPs also support their clients during audits and to resolve disputes with tax authorities. Their role in TP is more closely aligned to that of legal counsel or consultant. PAIBs, specifically tax managers, will rarely be decision makers and generally have a broad range of responsibilities across a multitude of tax obligations, often jurisdiction</p>

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		<p>specific. As such, the revisions should be mindful not to conflate the behavior and actions of a taxpayer with those of the PAPPs or PAIBs who are engaged or employed by the taxpayer.</p> <p>It is also essential that these Sections do not prescribe impractical requirements or exceed existing legislative and regulatory requirements already in place in many jurisdictions, including Australia.</p>
7	European Federation of Accountants and Auditors for SMEs	<p>We generally agree with the approach. While we believe it is important that the TP provisions allow PAs to exercise their professional judgement, as this will help ensure SMEs can gain access to high quality TP services from SMPs, as we explain later in some cases having to apply judgement will pose challenges.</p>
8	Grant Thornton International Limited	<p>While GTIL agrees with IESBA on the need to address tax planning services from an ethical perspective, we do have some concerns with IESBA's approach.</p> <p>We acknowledge the issues concerning tax planning work are unique and they vary depending on the tax advisor's role and the jurisdiction the professional accountant practices in. However, the proposals may be difficult for professional accountants to operationalize in jurisdictions with existing laws and regulations.</p> <p>Many jurisdictions have robust regulatory regimes that govern the provision of tax planning services performed by professional accountants. The proposed revisions should be intended to set baseline standards, particularly for jurisdictions without robust standards currently in place, rather than set additional compliance requirements. Attempting to establish additional compliance requirements will potentially yield no incremental benefits or enhancements to the public interest.</p> <p>Therefore, we believe it would be more appropriate to develop a principles-based framework for tax planning services that accounts for various jurisdictional distinctions, including current laws and regulations.</p>
9	Hong Kong Institute of CPA	<p>Overall, we have no particular issue with the two new Sections approach.</p> <p>A general point to make about Section 280 is that it assumes that the PA's relationship is only with the employing organization whereas, in fact, there may be another relevant relationship between the PA and an external professional adviser engaged by the employing organization (who may or may not be a PA) who is recommending or advising on a</p>

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		<p>particular TP arrangement. We therefore suggest the IESBA to include guidance to address the circumstance, for example, recognizing the employing organization’s potential use of an external tax expert and the PA’s consideration (being an employee of the employing organization) in this regard.</p>
10	<p>IFAC Small and Medium Practices Advisory Group (SMPAG)</p>	<p>The SMPAG generally agrees with the approach of creating two new sections. It is important that the proposals minimize prescriptive areas and allow PAs to exercise judgement, as the proposed guidance is currently all applicable equally regardless of size of entity or practice. In this case, PAs, but SMPs in particular, must be allowed some freedom to determine whether application of some areas is appropriate to the nature and circumstances of the arrangement in question. At the same time, we note there will be challenges to applying judgment in some areas, which we will detail later in this response.</p> <p>A challenge may also be posed where PAs are engaged to provide corrective advice to resolve past problems caused by inappropriate tax advice or guidance taken by clients. While the arrangements in question may lack a ‘credible basis,’ it would appear neither to be in the public interest nor appropriate to disassociate with the client under such circumstances, as this would deny access to all PAs who may be best placed to assist in resolution of the matter. It may be useful to consider such a scenario explicitly either through revised wording or examples.</p>
11	<p>Institute of Certified Public Accountants of Uganda</p>	<p>The Institute of Certified Public Accountants of Uganda (ICPAU) applauds the IESBA’s initiative on tax planning and related services.</p> <p>ICPAU notes that the proposed insertion of new ethical requirements in relation to tax planning and related services into the IESBA Code will impact ICPAU as it will need to adopt it into ICPAU’s Code. The proposed revisions to the IESBA Code raise questions about the scope of the new IESBA revisions and how they will impact the existing guidance in the ICPAU Code to ensure that they provide a consistent and coherent Code.</p> <p>We also note that the proposed revisions are driven by continued public interest concerns about tax avoidance and the role played by professional tax advisers (who constitute a significant portion of the members of ICPAU). However, the difficulty is likely to be that the IESBA approach is more prescriptive than a principles-based approach. This could present some challenges, especially given that in our jurisdiction, the established tax laws/ rules do not provide great scope for tax planning or related services.</p>

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12	Institute of Chartered Accountants in England and Wales	<p>We acknowledge the difficulty in framing one Code which works for both members in practice and members in business. Therefore, in principle we support IESBA's approach of inserting two new sections, namely section 380 for professional accountants in practice (PAPP) and section 280 for professional accountants in business (PAIB).</p> <p>That said, we would expect the proposed requirements for both sectors to be broadly similar.</p>
13	Institute of Chartered Accountants of Scotland	<p>As noted in our general comments above, IESBA's initiative to strengthen tax ethics amongst professional accountants is helpful.</p> <p>Given that the Code already exists with the two separate parts for (i) professional accountants in business and (ii) professional accountants in public practice, it is understandable that this approach has been taken. Therefore, in principle we support IESBA's approach of inserting two new sections, namely section 380 for professional accountants in practice (PAPP) and section 280 for professional accountants in business (PAIB).</p> <p>That said, we would expect the proposed requirements for both sectors to be broadly similar, otherwise any differences between the two may cause difficulties in implementation across our membership. We also note that UK PCRT is a code that does not differentiate between PAPP and PAIB.</p>
14	Institute of Financial Accountants	<p>We note the issues regarding tax planning services identified in the Consultation, concerning the significance of the financial impact they have on clients and employers, the role taxes play in meeting jurisdictions' policy goals, and the complexity of the subject of tax planning. This combination of factors will make it difficult for any two people to agree on the ethical course of action.</p> <p>The challenge is to construct a framework that can bring about consistent, ethical decision-making. While the creation of two new sections to the Code would appear to be the logical approach, they must be drafted so widely – applying to all types of client and employer – that their impact is bound to be minimal. As drafted, we believe the requirements and guidance are unclear, such that they risk confusion and disengagement with the principles embedded in the Code. This is especially true in respect of professional accountants in SMPs and SMEs</p>

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15	International Bar Association Tax Committee	<p>We agree with IESBA's approach to address tax planning as a category of service through sections R380 & R280. We believe a broad principle-based framework in the code that addresses tax planning specifically will promote the overall integrity of the profession. However, it is important that the standard, in practice, provides flexibility to professionals to interpret legitimate tax planning in line with the laws of the jurisdiction and the tax culture within which they operate.</p> <p>India has significant jurisprudence with the subject of tax avoidance and tax planning. For long, Indian courts have held that tax planning within the legal framework is permissible so long as taxpayers do not resort to colorable devices or subterfuges. In 2017, India's statutory general anti avoidance rules (GAAR) came into effect, which codified the commercial substance doctrine. In a circular issued by the Indian Government, it clarified that GAAR will not impede the taxpayer's right to choose a method for implementing a transaction. Notably, India's GAAR have only just become operational and their practice still in evolution. Therefore, practitioners should have the flexibility to discern legitimate tax planning in view of the tax ecosystem they operate in.</p>
16	Japanese Institute of Certified Public Accountants	<p>We agree with the proposed approach except for the following matters.</p> <p>The Code defines a "professional accountant in business ("PAIB")" as "a professional accountant working in areas such as commerce, industry, service, the public sector, education, the not-for-profit sector, or in regulatory or professional bodies, who might be an employee, contractor, partner, director (executive or non-executive), owner-manager or volunteer" and does not limit the types or recipients of the services. As a result, it is considered that the provisions of Part 2 of the Code would apply to services provided by PAIB for others. On the other hand, paragraph 280.4 A1 proposed in this ED states, "Professional accountants play an important role in tax planning by contributing their knowledge, skills and experience to assist employing organizations in meeting their tax planning goals while complying with tax laws and regulations" and Section 280 reads as it is intended for the provision of TP services for their employing organizations. However, it is not clear whether the Section is also intended to apply to the provision of TP services for others.</p> <p>We believe that it should be clarified whether Section 280 applies to the provision of TP services for others by PAIB. In Japan, there is a system of certified public tax accountants, and it is prohibited for professionals other than certified public tax accountants to provide tax-related services for others. However, in other jurisdictions, for example, the above issue arises with respect to a professional accountant who belongs to a financial institution and provides tax-related services for others, so we comment on it as an issue in the application of the Code.</p>

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17	Korean Institute of Certified Public Accountants	In general, the KICPA agrees with the proposed revisions to the Code as described in the ED, except for the following additional aspects that we ask you to consider in developing the final version of the Code.
18	Malaysian Institute of Accountants	We are supportive of the IESBA's approach to creating two new Sections 380 and 280 in addressing tax planning, especially given the complex nature of the tax planning environment and thereby providing a framework that guides the ethical conduct and frames the mindset of both public accountants in business as well as public accountants in public practice when providing TP and related services to either the employing organizations or clients. However, we would highlight that difficulties could arise when a professional accountant (PA) is engaged to offer their services to address past issues resulting from a client receiving improper tax advice or arrangements. Although these arrangements in question may lack a “credible basis”, it would not be in the public interest and impractical to disassociate with the client in such situations. We propose that the IESBA consider providing further relevant examples of such situations.
19	Malta Institute of Accountants	This is in principle welcome. However, as highlighted in the document, legislation is being considered at EU level to regulate tax advice and tax advisers. Hence, we recommend that the possible impact of the EU plans (and those of any other jurisdictions looking to do the same) to the proposed amendments to the Code are taken into consideration.
20	Mo Chartered Accountants (Zimbabwe)	<p>PAs, irrespective of the sector they serve are guided by the same fundamental principles and conceptual framework which has to be applied at all times. This high bar needs to be maintained and it should never be deemed that a different expectation is desired merely on the basis that they are in public practice or in business. They both act in the public interest and the situations they may face are different, but the principles applied to the resolutions remain unchanged.</p> <p>We agree with the uncertainties faced being different, but it stands to reason that in the recent slew of leaked papers, PAs in practice and those in business were both implicated for their role and complicity in it. Usually, we believe that PAs in public practice and those in business may work together on certain TP schemes. Irrespective of the uncertainties faced in the different sectors, they remain uncertainties which require resolution.</p> <p>In conclusion the separation into 2 sections for the different sector accountants may not have the intended effect due to the stakeholders they serve and their compliance with the law. Even if they seek legal advice, this does not mean</p>

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		that similar TP schemes adopted in the leaked papers will not be avoided. The legal framework has to change to match the professional changes to have any real impact.
21	Pennsylvania Institute Of Certified Public Accountants	<p>The committees do not support the creation of new Sections 380 and 280 in the Code as included in the proposal. The committees believe that only two areas of the proposed guidance are appropriate for the Code of Professional Conduct:</p> <ul style="list-style-type: none"> • Threats to compliance with the fundamental principles and related safeguards. • Compliance with tax laws and regulations – The committees note that the guidance for noncompliance with laws and regulations to tax planning services is included in the section under Members Providing Services Other Than a Financial Statement Audit or Review Service. The committees support enhancing Section 360 of the Code to cover tax evasion or suspected tax evasion. <p>The committees do not believe that the remaining tax-specific guidance belongs in the Code. Specifically, the following do not belong:</p> <ul style="list-style-type: none"> • Introduction • General • Responsibilities of Management and Those Charged with Governance • Responsibilities of All Professional Accountants • Basis for Recommending or Otherwise Advising on a Tax Planning Arrangement • Circumstances of Uncertainty • Communication of Basis of Tax Planning Arrangement • Disagreement • Tax Planning Products or Arrangements Developed by a Third Party • Documentation <p>Instead, any such specific tax practice guidelines should be included in a separate set of standards similar to the AICPA's Statements on Standards for Tax Services or best practices. The committees note, for example, that the</p>

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		responsibilities of the auditor, management, and those charged with governance, and the detailed audit requirements, are not included in the Code.
22	PKF (Durban)	<p>Whilst we understand the rationale in terms of wanting to apply the Code to tax services rendered to all clients (not just entities subject to audit, review or assurance engagements) we are not fully convinced that an entire new section needs to be created as the fundamental concepts are already covered in other parts of the Code.</p> <p>However, on the basis that section 604 should be limited to audit clients and the new section 380 be created to address the tax services to clients other than corporate entities, then we would recommend that the underlying principles of this section should be closely aligned to section 604 which specifically deals with tax services in relation to audit or review clients.</p> <p>For example: section 604.2.A1 contains a description of what would comprise a "tax service" and specifically lists "Tax advisory services", "Tax planning services", "assistance in the resolution of tax disputes" etc., whereas section 380.5 A1 contains a description of "Tax Planning and Related Services".</p> <p>Section 380.5.A2 specifically lists examples of tax planning which contains very specific tax planning scenarios and then at 380.5.A3 a description of related services which includes dispute resolution, preparing a client's tax return etc.</p> <p>There is concern that the term tax services as contained 604.2 A1 and A2 may cause confusion as it differs to the terms used in section 380.5 A2 and A3 of "tax planning and related services". We recommend that these different terminologies be reassessed to determine if it is considered necessary to have differing terminology in these sections.</p> <p>Further example: Section 380.4 A3 makes reference to an "adjudicative body" whereas section 604 makes reference to a "tribunal or court". Whilst it is accepted that the term "adjudicative body" is used multiple times in the Code, we are of the view that the term "tribunal or court" is more appropriate in the context of a tax matter (particularly a tax dispute). In particular we note that 6.4.27 A2 reads as follows:</p> <p>"What constitutes a 'tribunal or court' depends on how tax proceedings are head in the particular jurisdiction".</p>
23	Pricewaterhouse Coopers	PwC generally agrees with the IESBA's approach to addressing TP. IESBA is an important standard setter with global reach, and it can be expected that the proposed sections will not only give guidance to professional accountants, but

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	International Limited	also serve as inspiration for other standard setters and professionals not covered by the Code. Our suggestions below relate to Section 380 but are equally relevant for parts of Section 280 dealing with professional accountants in business.
24	Public Accountants and Auditors Board Zimbabwe	The PAAB agrees with the IESBA's approach because the nature of work done by an PA in public practice and a PA in business is significantly different, the type of threats they face and the fundamental principles that are affected are different, hence it is necessary to set out two new sections in the Code. Further, the roles taken by a PA in public practice and PA in business might pose different situations that could emanate for both PAs hence different threats on compliance with fundamental principles as well as the appropriate safeguards to eliminate the threats or reduce them to an acceptable level.
25	Saudi Organization for Chartered and Professional Accountants	<p>In principle, we agree with the proposed approach to emphasize on ethics pertinent to TP and similar services that are needed by those who hold interest in accountants' practices. However, we have some concerns about expanding the ethical guidelines on certain accounting issues (e.g., TP services), that can be summarized as follows:</p> <ul style="list-style-type: none"> • developing separate sections to provide a practical guidance in relation to TP services seems to diverge from the IFAC's endeavors into making the professional and ethical pronouncements more stable, relevant and proportionate (such as IAASB's complexity, understandability, scalability and proportionality (CUSP) project). • stressing the ethical requirement regarding securing compliance with laws and regulations about specific topic (such as taxes) may convey unintended message to, for instance, tax authoritative parties or those who seek TP services, about PAs' responsibilities which may result in expanding PAs' responsibilities (widening the expectation gap) to an extent where the profession's reputation may be significantly impacted. The proposed changes seem perplexing since they highlighted PAs' ethical role to protect the "public interest" while at the same time they made certain attempts to show that management and Those Charged with Governance (TCWG) have the ultimate responsibility to follow the tax laws and regulations, and courts have the authority to determine whether such a tax planning arrangement meets the tax laws and regulations. • detailing certain procedures in order to deal with threats arising from providing TP services, and confirming compliance with the basic principles of the Code does not go along with the IFAC's effort to increase alignment between the International Standards on Auditing (ISAs) (specifically Related Services and Quality Management standards) and the Code requirements. For instance, some of the procedures highlighted to assure having the

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		<p>right competency in order to provide the service, or to document the professional procedures taken by Professional Accountants in Public Practice (PAPP) have already been explained in details in ISRS and ISQMs.</p> <ul style="list-style-type: none"> • introducing new additional concepts such as "tax-efficiency", "credible basis" and "stand back test" may add to the complexity associated with the ethical guidance proposed in relation to TP and related services since these concepts endure highly subjective practices which may have unintended application of the proposed guidelines where PAs' responsibilities are expanded.
26	South African Institute of Chartered Accountants	<p>SAICA acknowledges the need for revisions internationally and support interventions to reduce unlawful tax avoidance and evasion, however we disagree with the proposed amendments in its current form in the new Sections 380 and 280 and propose the following should be considered:</p> <p>(a) The level of over-regulations of tax practitioners that the proposed amendments will place on PAs. The proposed amendments may potentially increase the risk of PAs required to resign from PAOs by employers as a result of additional responsibilities of being a member of the PAO and the requirements of the Code which is not applicable to other tax advisors.</p> <p>(b) A lot of the proposed amendments are subjective and may not be consistently applied by all PAs. The proposed amendments should be reviewed and updated to ensure that they are clear and unambiguous and practically implementable.</p> <p>(c) The proposed amendments will have consequential amendments on other paragraphs of the Code such as Section 604 which will have to be amended accordingly.</p> <p>(d) Given the subjectivity of the proposal, PAOs may experience difficulty in the implementation and monitoring of the proposed amendments. It is most important to ensure that the IESBA ensures that the proposals can be practically implemented by professional accountants.</p> <p>(e) The regulation of tax advisors within jurisdictions varies, as a result the proposals may not be appropriate in all jurisdictions, therefore it is important that the IESBA allows each PAO to adopt based on the TP environment in that country.</p>

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		<p>(f) In addition, the responsibilities of tax advisors vary from preparing simple tax returns to more complex TP arrangements, it will be difficult to include requirements that will be applicable to all tax advisors, and this could potentially place unnecessary burden on PAs who perform fewer complex transactions.</p> <p>SAICA recommends that the IESBA leaves each of the jurisdictions to individually consider the proposed amendments as tax legislation and the regulation of tax advisors varies in different jurisdiction.</p>
27	WirtschaftsprüferKammer	We agree with IESBA's approach in creating two new sections. However, professional accountants in business (PAIB) do not exist in Germany, so Section 280 has no relevance for us.