Comments to the Non Assurance Services Project Proposal by Standard-Setting Board (SSB)/IFAC Technical Managers

The comments of SSB/IFAC Technical Managers for the technical areas within, or supported by, IFAC are required before this Project Proposal is considered by the SSB or IFAC committee proposing to undertake the project.

Technical Manager to the Compliance Advisory Panel and Professional Accountancy Organization Development Committee

We emphasize that implementation costs identified in #22 are likely to be greater for PAOs in developing contexts and might delay timely adoption and implementation of changes to the Code.

Where the IESBA needs to engage with IFAC member organizations to better understand on-the-ground realities of NAS engagements, the Compliance Program portfolio managers can facilitate introductions.

No additional material concerns or comments related to this project proposal.

We encourage the IESBA to update, issue, and if feasible translate, the guidance for the changes, especially for PAOs in developing contexts.

Signed: Sarah Gagnon Date: 9/10/18

Technical Manager to the International Accounting Education Standards Board (IAESB)

It would be helpful if some work was done to ensure that there is a common understanding of the expectations for Non-assurance and Assurance skills and competence of professional accountants/practitioners providing services in these areas, especially in the areas of ICT, environment accounting, and corporate responsibility.

Signed: David McPeak Date: September 7, 2018

Technical Director to International Auditing and Assurance Standards Board (IAASB)

The matters of coordination related to the Non-Assurance Services initiative will follow the general principles of coordination agreed by the IAASB and IESBA during their September 2017 joint meeting.

Technical Manager to the Professional Accountants in Business (PAIB) Committee

No comments.

Signed: Stathis Gould Date: 9/10/2018

Technical Director to the International Public Sector Accounting Standards Board (IPSASB)

No comments.

Signed: John Stanford Date: 9/7/2018
Technical Director to the IFAC Small and Medium Practices (SMP) Committee

The project on NAS is of great interest to the SMPC. Ahead of the March and June 2018 IESBA meetings the SMPC raised concerns about the possible disproportionate impact on SMPs and SMEs. It supported the position that NAS provisions should not only be sufficiently robust, but must also be principles-based in order for them to remain relevant and applicable at the international level.

I welcome the acknowledgement that the SMPC will be kept apprised of developments to ensure that IESBA receives input at key stages. Given the high degree of relevance of the project to the SMP/SME community, I believe that it would be a significant benefit to this project if an SMP were to be included on the resultant IESBA project task force and would be happy to explore potential representation from the SMPC.

Given the overlap with the Fees project I would also like to take this opportunity to emphasize the importance of the NAS Working Group liaising closely with the Fees Working Group.

Signed: C. Arnold  
Date: 9/7/18

Technical Manager to the Transnational Auditors Committee (TAC)

Supportive of this project with no comments.

Signed: Barry Naik  
Date: 9/7/2018