

Comments on “Proposed IESBA Strategy and Work Plan 2024-2027”
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Dear IESBA members,

I appreciate the opportunity to comment on “Proposed IESBA Strategy and Work Plan 2024-2027”. My comments are included in the following pages.

All opinions and points of view outlined in this document are my own and they do not necessarily represent the views of any company, employer, organisation or committee.

If you have any questions, please contact me at cristian_munarriz@yahoo.com.ar.

Yours faithfully,

Cristian E. Munarriz
Public Accountant
Autonomous City of Buenos Aires, Argentina

1. Do you agree with the IESBA’s *Proposed Strategic Drivers* (see pp.9-13)?

Yes, I generally agree. However, I do not think the IESBA should extend its focus to develop profession-agnostic subject matter standards (e.g. sustainability) as it would be contradictory with the fact of IESBA being a standard-setter focused in the accountancy profession. Also, even if IESBA decides to follow that approach, it would be contradictory with the tax planning project only being applicable to tax accountants (instead of all professionals providing tax planning services like it is intended in the case of sustainability). Also I am skeptical in the feasibility of individuals from other professions being able to apply a separate sustainability standard without the background and knowledge of the full IESBA code in a consistent manner.

In addition, I cannot see how jurisdictions can adopt the standards for use of individuals from other professions that are not regulated by IFAC members.

2. Do you agree with the IESBA’s *Proposed Strategic Themes and Proposed Strategic Actions* (see pp.13-18)?

Yes, I generally agree. However, I do not think the IESBA should extend its focus to develop profession-agnostic subject matter standards (e.g. sustainability) as it would be contradictory with the fact of IESBA being a standard-setter focused in the accountancy profession. Also, even if IESBA decides to follow that approach, it would be contradictory with the tax planning project only being applicable to tax accountants (instead of all professionals providing tax planning services like it is intended in the case of sustainability). Also I am skeptical in the feasibility of individuals from other professions being able to apply a separate sustainability standard without the background and knowledge of the full IESBA code in a consistent manner.

In addition, I cannot see how jurisdictions can adopt the standards for use of individuals from other professions that are not regulated by IFAC members.

3. Do you support the IESBA considering the topics set out in Table B as potential work streams (see pp.22-24)? If so, please also share your views on any specific issues or questions you believe the IESBA should consider under these topics. If not, please explain your reasons.

Yes, I generally agree. Regarding “Custody of data” I think consideration of cybersecurity issues and impact in independence should be considered.

4. Do you believe the IESBA should accelerate or defer any particular ongoing, potential or pre-committed work stream(s) set out in Tables A, B and C? Please explain your reasons.

I think the “Custody of data” project should be accelerated due to its importance in the current business environment with extensive use of technology.

- 5. Are there other topics the IESBA should consider as potential new work streams? If so, please indicate whether these topics are more important than the topics identified in Table B (see pp.22-24), and the needs and interests that would be served by undertaking work on such topic(s).**

I think the IESBA should consider adding a project to incorporate exceptions to some independence rules applicable to audits performed using the ISA for LCEs, similar to the UK Provisions Available for Audits of Small Entities. I think this topic should be prioritized to be applicable to audits performed using the ISA for LCEs. I understand that these provisions work well in the UK and may be useful for relief to SMP auditors in cases where some safeguards are difficult to apply (e.g. safeguards for self-review threats in NAS provided by sole practitioners and other small firms), while not compromising public interest.

- 6. The IESBA’s proposed Strategy and Work Plan emphasizes the importance of close coordination with its sister Board, the IAASB. Do you have views or suggestions as to how coordination between the IESBA and IAASB could be enhanced to better serve the public interest?**

No additional comments

- 7. Do you have comments on any other matters addressed in this Consultation Paper or any significant matters not covered that you believe the IESBA should consider in finalizing the SWP 2024-2027?**

No additional comments