

2. SECTION I: ABOUT THE RESPONDENT

1. From which perspective are you providing this feedback?

The view of an organization

Please complete:

Your name:

Your organization (if applicable):

E-mail address:

Please complete:

Organization:

CNCC - CNOEC (FRANCE)

Name(s) of contact(s) for this submission:

Cédric Gélard

E-mail address(es) of contact(s):

cgelard@dipacint.com

2. Please select from the following options to which stakeholder group you or your organization belongs:

IFAC Member Body or Other Professional Accountancy or Professional Organization

Please specify the type of accounting firm:

Please specify:

IFAC Member Body or Affiliate

Please specify:

Please specify:

Please specify:

3. Please select from the following options the geographical region that best matches you or your organization:

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Europe

4. SECTION III: SSBs' STRATEGIC POSITIONING FOR 2028–2031

4. As the SSBs look toward the 2028–2031 period, they are reflecting on how to position their strategies and work plans to best serve the public interest within a rapidly changing global environment. This involves careful consideration of how the SSBs remain relevant, responsive, and impactful in their standard-setting and other related work. In that context, what do you believe the SSBs should aspire to achieve during their next strategy period, 2028–2031?

Your answer may touch on different dimensions, for example:

The relevance, responsiveness and impact of the SSBs' standard-setting and related activities.

Broader adoption and effective implementation of the SSBs' standards.

The SSBs' interaction and engagement with key stakeholder groups.

The SSBs' ability to serve the public interest.

The examples above are for illustrative purposes only and should not limit, direct, or otherwise influence your response.

Your answer should address the IAASB and IESBA collectively; however, you may wish to also highlight matters specifically for the IAASB or IESBA (if applicable, you could use separate headings to address such matters).

6. SECTION IV: KEY TRENDS IMPACTING THE SSBs

A.1 Digital Transformation – Increasing Use of Emerging Technologies

5 – Increasing in importance

Please explain why you do not believe this should be considered a relevant trend for the SSBs:

Do you wish to highlight any matters relating to this trend or identified impacts, or any additional impacts, for the IAASB or IESBA or both the SSBs?

The pace of technological change is so fast that it would not be efficient for standards to try to follow technological evolutions as

they occur. Standards would always run behind; it is therefore essential to maintain standards and a Code of Ethics which are principle-based, and to monitor technological developments while ensuring that professional accountants and auditors maintain their appropriate skills and professional skepticism (through appropriate initial qualifications and continuous education).

A.2 Digital Transformation – Digital Assets and Institutionalization of Digital Assets

4 – Slightly increasing in importance

Please explain why you do not believe this should be considered a relevant trend for the SSBs:

Do you wish to highlight any matters relating to this trend or identified impacts, or any additional impacts, for the IAASB or IESBA or both the SSBs?

This is more a matter of financial reporting than an audit issue; at this stage, we have not identified the need for any additional standard setting in relation to digital assets.

With regard to the institutionalization of digital assets, the technical aspects are highly complex (existence, rights and obligations, valuation...), but the ethical aspect is not; it requires competence, professional skepticism, as already set in the fundamental principles of the code of ethics.

A.3 Digital Transformation – Financial Crimes Enabled by Technology

4 – Slightly increasing in importance

Please explain why you do not believe this should be considered a relevant trend for the SSBs:

Do you wish to highlight any matters relating to this trend or identified impacts, or any additional impacts, for the IAASB or IESBA or both the SSBs?

Financial crime enabled by technology will certainly increase proportionately with technological evolution. The risk will probably be more of an issue in relation to compliance with various laws and regulations (anti-money laundering, fight against organized crime, terrorism, etc.) than an audit issue; at this stage, we have not identified a need to develop additional standards; NOCLAR, ISA 315 (Assessment of Cyber Risks), and ISA 240 (Fraud) already address regulatory requirements.

7. SECTION IV: KEY TRENDS IMPACTING THE SSBs

B.1 Changes in the Geopolitical and Regulatory Landscape – Regulatory Changes

4 – Slightly increasing in importance

Please explain why you do not believe this should be considered a relevant trend for the SSBs:

Do you wish to highlight any matters relating to this trend or identified impacts, or any additional impacts, for the IAASB or IESBA or both the SSBs?

Faced with the rapid changes in the geopolitical and regulatory landscape, there is a risk of fragmentation and a risk of a lesser adoption of the international standards and of the international code of ethics. The solution is therefore not to create new standards or amend the Code (the standards and the Code must remain principle-based), but to test the robustness and resilience in a rapidly evolving environment.

B.2 Changes in the Geopolitical and Regulatory Landscape – Risk of Fragmentation

4 – Slightly increasing in importance

Please explain why you do not believe this should be considered a relevant trend for the SSBs:

Do you wish to highlight any matters relating to this trend or identified impacts, or any additional impacts, for the IAASB or IESBA or both the SSBs?

B.3 Changes in the Geopolitical and Regulatory Landscape – Call for Greater Agility in Standard Setting

4 – Slightly increasing in importance

Please explain why you do not believe this should be considered a relevant trend for the SSBs:

Do you wish to highlight any matters relating to this trend or identified impacts, or any additional impacts, for the IAASB or IESBA or both the SSBs?

In practice, developing standards in less than 18 months is neither feasible nor beneficial, as the current due process (which includes consultation and transparent feedback from all stakeholders) is a positive aspect. It would be preferable to develop non-binding materials such as guidance, FAQs, and targeted amendments that address specific issues more quickly.

B.4 Changes in the Geopolitical and Regulatory Landscape – Greater Diversity of Voices Sought

4 – Slightly increasing in importance

Please explain why you do not believe this should be considered a relevant trend for the SSBs:

Do you wish to highlight any matters relating to this trend or identified impacts, or any additional impacts, for the IAASB or IESBA or both the SSBs?

As mentioned above, in the present geopolitical context, there is a high risk of fragmentation and of a lesser adoption of the standards. In order to fight against this risk, it is necessary that the elaboration of standards remains the fruit of a multilateral process within a multistakeholders' board with sufficient geographic diversity and also with a sufficient diversity of backgrounds. This requires that the composition of the Boards reflects the diverse components of the profession including SMPs and the diverse cultures, not only the anglo-saxon one.

8. SECTION IV: KEY TRENDS IMPACTING THE SSBs

C.1 Evolving Expectations Concerning Sustainability Information – Continuing Demand for Sustainability Reporting and Assurance

4 – Slightly increasing in importance

Please explain why you do not believe this should be considered a relevant trend for the SSBs:

Do you wish to highlight any matters relating to this trend or identified impacts, or any additional impacts, for the IAASB or IESBA or both the SSBs?

Demand for sustainable information is expected to continue growing (despite certain current geopolitical setbacks). The ISSA 5000 standard effectively addresses this need; it can serve as a reference point that can be adapted for the European Union. There appears to be an international demand for a single assurance standard, which would simplify the work of both auditors and preparers while making the sustainability reporting easier for users to understand and compare.

C.2 Evolving Expectations Concerning Sustainability Information – Regulatory and Geopolitical Changes

4 – Slightly increasing in importance

Please explain why you do not believe this should be considered a relevant trend for the SSBs:

Do you wish to highlight any matters relating to this trend or identified impacts, or any additional impacts, for the IAASB or IESBA or both the SSBs?

To avoid the risk of fragmentation in assurance engagements—a risk that already exists in the area of sustainability reporting—we need awareness-raising and support measures to convince stakeholders that existing standards and the Code are fit for purpose. There is no need to draft new standards, and existing standards must remain framework neutral.

9. SECTION IV: KEY TRENDS IMPACTING THE SSBs

D.1 Evolving Structure and Business Models of Accounting Firms – Alternative Ownership Structures

4 – Slightly increasing in importance

Please explain why you do not believe this should be considered a relevant trend for the SSBs:

Do you wish to highlight any matters relating to this trend or identified impacts, or any additional impacts, for the IAASB or IESBA or both the SSBs?

The increase in private equity investment in the accounting profession raises the question of its potential impact, particularly in terms of ethics and audit quality. As a first step, we should test the Code's resilience in light of these changes in ownership

structure.

D.2 Evolving Structure and Business Models of Accounting Firms – Increased Involvement of Non-Professional Accountants in the Accounting and Auditing Profession

4 – Slightly increasing in importance

Please explain why you do not believe this should be considered a relevant trend for the SSBs:

Do you wish to highlight any matters relating to this trend or identified impacts, or any additional impacts, for the IAASB or IESBA or both the SSBs?

D.3 Evolving Structure and Business Models of Accounting Firms – Challenges to Attracting and Retaining Talent

6 – Strongly increasing in importance

Please explain why you do not believe this should be considered a relevant trend for the SSBs:

Do you wish to highlight any matters relating to this trend or identified impacts, or any additional impacts, for the IAASB or IESBA or both the SSBs?

There is cause for concern that the profession could become less attractive and that it could be difficult to retain talent if private equity investors demanded a return on investment that would require lower salaries and the hiring of less qualified—and therefore less expensive—staff.

A focus on returns could lead to the demise of the partnership system.

We do not believe that standard setting can in any way resolve this issue.

D.4 Evolving Structure and Business Models of Accounting Firms – Non-Assurance Service Line

0 – I do not agree that this is a trend to be considered

Please explain why you do not believe this should be considered a relevant trend for the SSBs:

In current practice at most firms, non-audit service lines, such as consulting and tax, are subject to the same ethical and quality rules as auditing; existing auditing standards and the Code already serve as a framework for non-audit activities

Do you wish to highlight any matters relating to this trend or identified impacts, or any additional impacts, for the IAASB or IESBA or both the SSBs?

6. Are there trends or related areas or matters that you believe the SSBs should consider that are not covered? If so, please provide details.

No

Additional trends

Please number your additional trend (O.1, O.2, O.3, ...)

Please describe the additional trend

On a scale of 1 to 6, indicate the extent to which you believe this trend will increase or decrease in importance for the SSBs for their next strategy period starting in 2028.

Do you wish to explain your rating or highlight any matters relating to this trend for the IAASB, IESBA, or both the SSBs?

7. Based on your evaluation of the identified trends, please rank what you believe are the TOP FIVE most important trends for the SSBs to consider for their next strategy period starting in 2028.

Rank 1 : D.3

Rank 2 : A.1

Rank 3 : C.1

Rank 4 : D.1

Rank 5 : B.4

11. SECTION V: AREAS FOR JOINT ACTIONS IN SSBs' WORK PLANS

8. Please share your views about areas of common interest and possible joint or parallel work plan topics (e.g., standard-setting or non-authoritative materials), or other initiatives or activities.