

International Auditing and Assurance Standards
Board (IAASB)
Attn. Mr. Tom Seidenstein

International Ethics Standards Board for
Accountants (IESBA)
Attn. Ms. Gabriela Figueiredo Dias

Submitted through the IESBA Website

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Date	Re	Our ref	Attachment
May 13, 2026	IAASB-IESBA Joint Stakeholder Survey	26/JZ/171966	Our response to the IAASB-IESBA Joint Stakeholder Survey

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Dear Board Members,

The Royal NBA (Netherlands Institute of Chartered Accountants) appreciates the opportunity to respond to the IAASB–IESBA Joint Stakeholder Survey. Alongside our completed survey response, we are pleased to share this accompanying letter to highlight several considerations.

First, we strongly support continued and enhanced cooperation between the IAASB and IESBA. In our view, a coordinated approach between the two Boards helps promote consistency, avoids duplication or conflicting expectations, and strengthens the international standard-setting framework. We encourage the IAASB and IESBA to collaborate on initiatives involving assurance practices and ethical principles.

Secondly, the NBA emphasises maintaining a principles-based approach. In a rapidly changing environment, overly prescriptive requirements risk becoming outdated too quickly and may encourage a compliance-driven mindset. We encourage both Boards to focus on high-quality principles-based standards that support the exercise of professional judgement by accountants and anticipate to adopt/use new developments and technology.

Finally, where appropriate, we encourage using non-authoritative materials to address emerging issues and new technologies rather than creating new standards. This can enhance understanding and implementation while preserving the stability of core standards

The NBA remains committed to continued collaboration. For further information, please contact Martijn Duffels at m.duffels@nba.nl and Kristel Valk at k.valk@nba.nl.

Yours sincerely,
NBA, Royal Netherlands Institute of Chartered Accountants,

/s/ Frank van Hoek
Chair of the Dutch Ethics and Assurance Standards Board

Royal Netherlands
Institute of Chartered
Accountants



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:

The Royal Netherlands Institute of Chartered Accountants

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

Martijn Duffels, Berthold de Jong and Kristel Valk

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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).

- The priority should be effective implementation and adoption of existing standards rather than continuing developments of new requirements. The Code and standards should be as principles based as possible. They should be compact and clear with long-term value. Environments change rapidly so detailed rules-based regulations are quickly outdated.

When there are signs indicating guidance is needed on specific topics, new or more specific standards are not always the solution. We would prefer options like an e-learning, supporting explanations (NAM) etc. to support the application of the principles in the occurring circumstances.

- Alignment between the Code and the standards is important. We urge the Boards to ensure that projects that have impact on both the standards and the Code are conducted in an integrated approach and simultaneously open for public comment and consideration. For example, this was the case regarding project external expert. Now the IESBA has launched a workstream on private equity investment in accounting firms. However, private equity investments in accounting firms has also impact on the quality standards of the IAASB. It seems this is not included and a project solely by IESBA. Hence, we highlight the importance of working together on projects.

- Measures to promote transparency in due process and governance are vital for fostering stakeholder trust in standards, as well as their consistent adoption and implementation:

- Stakeholder Input – Emphasizing the necessity of balanced participation from all stakeholders, while ensuring adequate involvement from practitioners to enhance the practicality and effectiveness of high-quality standards, particularly in a rapidly

changing environment.

- Transparency – Proposing approaches to reinforce stakeholder confidence through increased transparency in Board decisions, including clear communication on how feedback was incorporated when determining the rationale for initiating standard-setting; addressing matters of public interest; and documenting final decisions regarding the standards.

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 increasing use of emerging technologies offers significant opportunities to enhance audit quality and efficiency, but also introduces new risks, including over-reliance on technology. Technology evolves quickly and it is not the role for standards to keep pace with every change in technology. It is therefore essential that standards remain principle based and continue to rely on the exercise of professional judgment and professional skepticism. The accountant must remain responsible for decisions and critically assess output generated by technologies such as AI.

It is important that accountants are supported in the transformations driven by the adoption and increasing use of emerging technologies. This requires focus from the boards. If necessary, standards should be adequately and timely revised.

Additionally, non-authoritative guidance could support practitioners in applying principles in a rapidly evolving technological environment, for example by addressing the assessment of technology outputs such as AI and maintaining professional skepticism.

We notice an opportunity for the audit to be more relevant (for instance continuous auditing). Standard setters can contribute to this by enhancing standards to facilitate to implement these innovations. For instance, by the present standards there are only two types of procedures possible: substantive procedures and test of controls. By new technology these procedures are mixed and the procedures do not comply to the strict definition and the need to classify the procedures can be a complicating factor.

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?

Blockchain, digital assets, including cryptocurrency or other emerging technologies can be complex. Technical capabilities of financial auditors might be insufficient to fully assess for example the use of blockchain technology and cryptocurrency. Part of the audit needs to be performed by other professionals This will cause an increase in use of specialists and the increasing importance of professional skepticism and judgement of the accountant. Any response, if needed, should focus on non-authoritative guidance or knowledge-sharing rather than the creation of new standards.

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?

While evolving risks such as cyber threats may increase expectations on auditors, particularly in areas such as risk assessment and going concern, this does not in itself lead to a need for adjusted standards. The existing standards are sufficient to use in this context.

This trend can also relate to more collaboration with specialists and the increasing importance of the professional skepticism and judgement of the accountant. Any response, if needed, should focus on non-authoritative guidance or knowledge-sharing rather than the creation of new standards.

7. SECTION IV: KEY TRENDS IMPACTING THE SSBs

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

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?

In the current environment, there is a clear move toward simplification and reduction of regulatory burden in several jurisdictions. In this context, it is particularly important that standard setters do not contribute further to complexity of standards. Standard setters should stand back and reflect on simplification.

The focus of standard setters should therefore change from expanding the body of standards to the effective transposition and implementation of existing standards. Increased standard setting elevates the risk of fragmentation in implementation. With respect to current IESBA projects we foresee implementation issues as these projects threaten to exceed our mandate for standard setting.

There should be more emphasis on principles-based regulations. This creates more robust regulations for the long term. This also relates to the EU principle of proportionality.

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

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?

Emphasizing high-quality, scalable, and principles-based standards encourages global acceptance and helps prevent fragmented regulations across jurisdictions. It is also crucial to sustain and strengthen communication with standard setters and regulators in different regions to track and respond to new issues affecting international standards.

There is potential for closer alignment and simplification of jurisdictional and international standards, presenting an opportunity for substantial convergence.

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

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?

Ongoing geopolitical impacts and the opposing risks and opportunities of jurisdictional fragmentation/alignment further enhance the criticality of the Boards ability to be agile and have processes to be able to respond to emerging issues on a more rapid and efficient manner.

This argues for a Code and standards to be as principles-based as possible. They should be compact and clear with long-term value. Environments change rapidly so detailed rules-based regulations are quickly outdated.

When there are signs guidance is needed on specific topics, new or more specific standards are not always the solution. We would prefer options like an e-learning, webinars, Q&A's, supporting explanations etc. to support the application of the principles in the occurring circumstances.

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

3 – Slightly decreasing 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?

Overall, this trend would be better characterized as "no change" rather than increasing or decreasing in importance. Both Boards have over recent years conducted extensive regional outreach, which should be maintained, including efforts to enhance engagement with investors, preparers and those charged with governance.

The primary objective should remain and be the development of clear, practical, and globally applicable standards which should meet the expectations and needs of major stakeholders.

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

2 – Decreasing 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?

While we expect reporting on sustainability information stays a critical component of corporate transparency, we do not expect it to grow. Sustainability engagements do not fundamentally change the existing principles-based framework.

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

1 – Strongly decreasing 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?

By 2028 many jurisdictions may be moving into a first phase of mandatory sustainability reporting and assurance. Others may still be in an adoption phase. Through this period, we do not anticipate any drivers that would lead to an increase in importance of this trend for the Boards. Rather, in the next few years there will likely be more a period of monitoring and evaluating adoption and reporting practices.

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?

Private equity investment in accountancy firms has increased in recent years. While such investments can support growth, innovation, and succession planning on the shorter term, they also raise important questions about governance, quality management, independence, and professional control on the longer term. Our legislation requires that accountants retain a majority of voting rights and maintain decisive influence over the firm. In practice, however, complex ownership and governance structures involving private equity may create uncertainty as to whether this majority exists not only formally, but also in

substance.

Alignment between the Code and the Standards is important. We urge the Boards to ensure that projects that have impact on both the Standards and the Code are conducted in an integrated approach and simultaneously open for public comment and consideration. For example, the IESBA has launched a workstream on private equity investment in accounting firms. However, private equity investments in accounting firms have also impact on the quality standards of the IAASB. It seems this is not included and a project solely by IESBA. Hence, we highlight the importance of working together in projects.

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

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:

Increased Involvement of Non-Professional Accountants in the Accounting and Auditing Profession is not a new trend. This has been ongoing for years. The standards and guidance are sufficient for involvement of Non-Professional Accountants, hence we do not see this as a trend to be considered by the boards.

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

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:

Some of the evolving structures can result in more focus on efficiency and profits, more standardization. This is less attractive for retaining or attracting talents. Changes in team composition, staff retention, and related matters can influence engagement quality and ethical conduct. There should be a focus on the main objectives of the accounting profession and coaching of talent. However, we do not see the impact on standard-setting of the boards relating to this development.

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

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?

We have noticed an increase by accounting firms to engage in non-assurance services. This can result in independence issues or a decrease in the focus on high quality audits. Especially when there is more profit to gain on advisory services than fixed fees for audit engagements. This development reinforces the need for robust quality controls to safeguard audit quality. Even though we see an increase in non-assurance services, we are highly concerned regarding standard setting for firms providing mainly non-assurance services (especially non-assurance services which are not related to assurance) due to restrictions in our mandate. We cannot implement standards outside of our mandate. This increases the risk of fragmentation.

10. SECTION IV: KEY TRENDS IMPACTING THE SSBs - OTHER TRENDS AND RANKING

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.

Yes

Additional trends

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

O1. Evaluation of ongoing and proposed projects

Please describe the additional trend

We encourage the IESBA and IAASB to critically evaluate whether ongoing and proposed projects are necessary and add value within a principles-based framework for accountants. A key consideration should be whether identified issues are already addressed by existing principles, and whether additional requirements result in unnecessary complexity or leaning more to rules based.

We strongly support maintaining a clear focus on rules and guidance for accountants providing audit, assurance or related services, rather than broadening the scope to other professional groups (e.g. CFOs regarding the Role of the CFO project or all assurance practitioners regarding the IESSA).

If new requirements are nevertheless proposed, it is essential to clearly articulate the specific gap in the current principles, and to explain how any new material logically derives from, and is anchored in, the existing fundamental principles of the Code.

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.

6 – Strongly increasing in importance

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

See above

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 : O1. Regulation burden and principles-based regulations

Rank 2 : Alignment between the Code and standards

Rank 3 : Technology developments (AI) and professional criticism

Rank 4 : Non-financial information and in control statements and focus to it for the audit

Rank 5 : New business models of audit firms

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.

The new business model of audit firms (private equity) and developments in technology.

Instead of more regulation more focus on non-authoritative materials as webinars etc.