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Accountants

Sent by email to  
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Paris, 18<sup>th</sup> July 2017

**Subject: CNCC and CSOEC comments on the *IESBA Strategy Survey***

Dear Mr. Ken Siong,

The two French institutes, CNCC and CSOEC, are pleased to provide you with their comments on the IESBA Strategy Survey.

As a preliminary remark, we wish to stress the need to make a pause and not undergo any new changes to the Code before we get an in depth understanding of how the restructured Code gets implemented by professional accountants (PAs) and how it is understood and perceived by stakeholders.

We believe it is time for the IESBA to “stand back” and launch its implementation review. It should be IESBA’s main priority and we, therefore, favour the project of assessing whether the restructured Code has effectively met the project’s objectives (item B.12).

The IESBA states, in its consultation, that in order to avoid standards overload, it has decided that any new changes to the Code after the completion of the restructuring project will not become effective before June, 15 2020. We believe that the post implementation process may in fact need more than two years, and we are of the view that IESBA should foresee a pause of at least three to four years.

When the IAASB underwent the clarity project, it was followed by a long period of “stable platform” to allow the profession to implement the clarified ISAs.

As a second priority, we consider that IESBA should closely monitor the impact of the technological changes on the profession, and thus in relation with each one of Code Principles.

The technological revolution will push forward the frontiers of what is feasible, possible but also acceptable.

Therefore, monitoring *trends and developments in technology and innovation* (item B.1) is essential but, if the principles are set at the right level, should not necessarily lead to modifying the Code whose principles should remain appropriate and consistent even when technological advances occur.

We consider that dealing with *Emerging or newer models of service delivery* (item B.2) is a timely subject that requires a watch but without necessarily implying any changes in the Code.

A close monitoring on *Tax planning and related services* (item B.5) is also certainly timely as the topic of aggressive tax planning is on the front row at the moment. It is important to note however that some jurisdictions such as the European Union for example are working on the topic and it is critical that the various initiatives on the topic remain consistent.

Lastly, in our opinion, some topics must be definitely written off from the IESBA work plan such as *Collective investment vehicles* (item B.4) and *Meaning of public interest in the global context* (item B.13), because they are either too philosophical or not relevant enough for the IESBA Board.

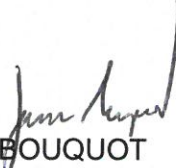
You will find below our ranking of the topics which, except for the post implementation review, we consider useful but not necessarily urgent to deal with.

Priority topics:

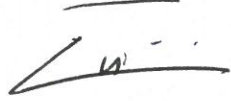
	<b>Topics</b>	<b>Proposed ranking</b>
B.1	Trends and developments in technology and innovation	2
B.2	Emerging or newer models of service delivery	3
B.3	Concepts of “public interest entity” and “listed entity”	
B.4	Collective investment vehicles	To be written off
B.5	Tax planning and related services	4
B.6	Materiality	
B.7	Communication with those charged with governance	
B.8	Documentation	
B.9	Familiarity threat in relation to extant Part C	
B.10	Breach of the Code	
B.11	Definitions and descriptions of terms	
B.12	Post-implementation review of the restructured Code	1
B.13	Meaning of public interest in the global context	To be written off

We hope you will find our comments helpful. If you have any question, please do not hesitate to contact us.

Best regards,



Jean BOUQUOT  
President of CNCC



Charles-René TANDE  
President of CSOEC

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