

Corporate Sustainability Reporting Directive (EU 2022/2464)

Consultation issued by the Department of Enterprise, Trade and Employment (DETE) on 31 January 2023

Comments from ACCA

Ref: TECH-CDR-2044

9 March 2023

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GENERAL COMMENTS

ACCA welcomes the opportunity to provide feedback on the member state implementation of the Corporate Sustainability Reporting Directive (CSRD). ACCA is strongly supportive of the CSRD and believes it will significantly elevate the corporate reporting landscape, ensuring meaningful environmental, social and governance data on an organisation's value chain.

Practical training requirement for sustainability assurance providers

As highlighted in our report published last week, [Sustainability Assurance – Rising to the Challenge](#), sustainability assurance practitioners face unprecedented demand for their services, and the assurance skills gained from statutory audit experience remain of vital importance in performing sustainability assurance engagements. We are therefore extremely concerned at the practical training requirement of 8 months' sustainability assurance to qualify as a sustainability assurance provider; such a requirement would pose a prohibitive barrier to entry and any grandfathering of existing statutory auditors would provide only a slight improvement in the very short-term.

Given the phased implementation of sustainability assurance requirements under the CSRD, and that only the largest entities will initially be subject to the CSRD, we do not believe it is equitable, nor is it appropriate, to deny trainee auditors at smaller accounting firms the opportunity to obtain the requisite 8 months experience in assurance of annual and consolidated sustainability reporting or in other sustainability-related services. Considering that small- and medium-sized enterprises are typically served by small- and medium-sized accounting firms, we believe this exclusion sends the wrong message to SMEs and will delay the implementation of sustainability reporting across the wider business sector in Ireland. While member states do not have the option to change the 8 months practical training requirement, we urge DETE to ensure that any future revision of the Directive includes an explicit alternative option of enhanced practical skill training.

We have provided further comments on these matters, including how the 8 months sustainability training might be measured, on page 19 below.

Interaction between sustainability assurance providers and statutory auditors

While we believe that statutory auditors are best placed to perform the sustainability assurance engagement, it is important that those charged with governance can select the sustainability assurance provider they deem most suitable. When the Directive is fully implemented, sustainability assurance providers will ultimately provide 'reasonable assurance' on entities' sustainability reports, consistent with that currently expressed by a statutory auditor on statutory financial reporting. For this reason, we believe that, in the instances an entity appoints separate firms to conduct the respective statutory audit and sustainability assurance, enhanced professional guidance will be required to ensure equal access to the other firm's working papers. We encourage DETE to liaise with its equivalent bodies across other EU member states to ensure an internationally-consistent approach.

SPECIFIC COMMENTS

| Member State Option | Background Information | Do you consider that Ireland should exercise this option? Please provide reasons for your answer. |
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| Article 1 – Amendments to Directive 2013/34/EU the Accounting Directive | | |
| Article 1 Scope (Amended) <i>New point 3 last subparagraph (New)</i> | | |
| <p>Member States <u>may</u> choose not to apply the coordination measures referred to in the first subparagraph of this paragraph to the undertakings listed in points (2) to (23) of Article 2(5) of Directive 2013/36/EU of the European Parliament and of the Council.</p> | <p>The new requirements for sustainability reporting under the directive apply to large companies and large public-interest entities and listed SMEs.</p> <p>This option allows Member States to exclude certain undertakings on a case-by-case basis. The list of undertakings relevant to Ireland’s transposition in Article 2¹ are central banks; post office institutions; the Strategic Banking Corporation of Ireland, credit unions and friendly societies.</p> | <p>ACCA supports the continuation of the exemption for credit unions and friendly societies; an exemption also availed of at the time in the transposition of the Transparency Directive. We believe that the scope of reporting would place an undue administrative burden and cost on credit unions and friendly societies.</p> <p>ACCA, with the credit union representative bodies, is providing assistance to credit unions on a voluntary framework of sustainability disclosures, appropriate to the activities of a credit union.</p> <p>Since the enactment of the Friendly Societies and Industrial & Provident Societies (Miscellaneous Provisions) Act 2014 it is no longer possible to register a new friendly society. Those that remain, number less than 50 and are not economically or significant</p> |

¹ [EUR-Lex - 02013L0036-20220101 - EN - EUR-Lex \(europa.eu\)](https://eur-lex.europa.eu/uri/lexuri-vql-article-2-1-2013-36-lexuris)

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| | | from a sustainability context. |
| Article 19a – Sustainability Reporting (New) <i>Point 3 last subparagraph (New)</i> | | |
| <p>Member States <u>may</u> allow information relating to impending developments or matters in the course of negotiation to be omitted in exceptional cases where, in the duly justified opinion of the members of the administrative, management and supervisory bodies, acting within the competences assigned to them by national law and having collective responsibility for that opinion, the disclosure of such information would be seriously prejudicial to the commercial position of the undertaking, provided that such omission does not prevent a fair and balanced understanding of the undertaking's development, performance and position, and the impact of its activity.</p> | <p>The new Article 19a on Sustainability Reporting replaces the existing Article 19a. Article 19a sets out substantially enhanced requirements for sustainability reporting by undertakings in scope of the Directive. The information to be reported should be clearly identifiable within the undertaking's management report (ie the directors' report). This option allows Member States to permit undertakings to exclude commercially sensitive information from the sustainability reporting under certain circumstances.</p> | <p>ACCA supports the state availing of this exemption but would recommend that when a company does avail of the exemption that the company be required to disclose that they have done so.</p> <p>The exemption is quite narrow in scope referring to "impending developments or matters in the course of negotiation" only and with the qualifier that it must also be "seriously prejudicial" and disclosure must still be "fair and balanced". We would not envisage many instances where those criteria would be met.</p> |
| <i>Point 9 subparagraph three (New)</i> | | |
| <p>The Member State by whose national law the exempted subsidiary undertaking is governed <u>may</u> require that the consolidated management report or, where applicable, the consolidated sustainability report, of the</p> | <p>Point 9 sets out exemptions from sustainability reporting for subsidiary undertakings where a parent in the EU includes information on the subsidiary in</p> | <p>English is the almost universal business language and most of the world's multinational companies produce English language annual reports. This option would require foreign non-English language parent companies to produce English language translations of</p> |

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| <p>parent undertaking is published in a language that that Member State accepts, and that any necessary translation into such language is provided. Any translation that has not been certified shall include a statement to that effect.</p> | <p>the consolidated management report drawn up under Article 29 and 29a or, if the parent is in a third country equivalent consolidated sustainability report. Member States have the option to require that the consolidated management/sustainability report is published in an accepted language.</p> | <p>their consolidated sustainability reports or to produce an Irish subsidiary specific English language sustainable report.</p> <p>On the basis that translation costs are immaterial for most companies and English language sustainability reports are increasingly expected by consumers and other stakeholders, ACCA recommends that this option be taken and there be a requirement for English language translations to be made available for that small cohort of companies not already producing such reports.</p> |
| <p>Article 29a. – Consolidated Sustainability Reporting (New) <i>Point 3 last subparagraph (New)</i></p> | | |
| <p>Member States <u>may</u> allow information relating to impending developments or matters in the course of negotiation to be omitted in exceptional cases where, in the duly justified opinion of the members of the administrative, management and supervisory bodies, acting within the competences assigned to them by national law and having collective responsibility for that opinion, the disclosure of such information would be seriously prejudicial to the commercial position of the group, provided that such omission does not prevent a fair and balanced understanding of the group’s development, performance, and</p> | <p>The new Article 29a on Consolidated Sustainability Reporting replaces the existing Article 29a. Article 29a, similar to Article 19a, sets out substantially enhanced requirements for consolidated sustainability reporting by undertakings in scope of the Directive. The information to be reported should be clearly identifiable within the group management (directors) report. This option allows Member States to permit undertakings to</p> | <p>As noted in our response to Article 19a (point 3, last subparagraph) above, we support the use of this option but urge DETE to ensure that entities taking advantage of this option are required to disclose the fact in their sustainability reporting.</p> |

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| position, and the impact of its activity. | exclude commercially sensitive information from the sustainability reporting under certain circumstances. | |
| <i>Point 8 subparagraph (new)</i> | | |
| The Member State by whose national law the exempted parent undertaking is governed <u>may</u> require that the consolidated management report or, where applicable, the consolidated sustainability report of the parent undertaking is published in a language that that Member State accepts, and that any necessary translation into such language is provided. Any translation that has not been certified shall include a statement to that effect. | As in Article 19a, Member States have the option to require that the consolidated management/sustainability report is published in an accepted language. | As noted in our response to Article 19a (point 3, last subparagraph) above, we support the use of English as an internationally-accepted language in a company's sustainability report. |
| Article 30 General Publication (Amended) | | |
| <i>Point 1 subparagraph 2 (New)</i> | | |
| Member States <u>may</u> require undertakings subject to Articles 19a and 29a to make the management report available to the public on their website, free of charge. Where an undertaking does not have a website, | Article 30 of the Accounting Directive sets out the publication requirements for annual financial statements and management reports (i.e. the directors' report). | ACCA supports this option; it is vital that sustainability reports are readily available in the public domain and online, free of charge. |

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| <p>Member States <u>may</u> require it to make a written copy of its management report available upon request.</p> | <p>As a general rule, the management report must be filed with the Companies Registration Office.</p> <p>This option allows Member States to require undertakings in scope of the requirements for sustainability reporting to publish the management report on their website or make a copy available upon request.</p> | |
| <p><i>Point 1 subparagraph 4 (Existing)</i></p> | | |
| <p>Member States <u>may</u>, however exempt undertakings from the obligation to publish the management report where a copy of all or part of any such report can be easily obtained upon request at a price not exceeding its administrative cost.</p> | <p>As stated above as a general rule, the management report must be filed with the Companies Registration Office. Member States may exempt undertakings from this requirement provided the report can be readily obtained from the undertaking at a price not exceeding its administrative cost.</p> <p>This option is not new and was not taken in the transposition of Directive 2013/34/EU but it is</p> | <p>ACCA would not support taking this option. The information should be easily accessible by all stakeholders.</p> |

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| | repeated here for completeness. | |
| Article 34.3 General Requirement Auditing (Amended) <i>Point 3 (New)</i> | | |
| <p>Member States <u>may</u> allow a statutory auditor or an audit firm other than the one(s) carrying out the statutory audit of financial statements to express the opinion referred to in point (aa) of the second subparagraph of paragraph 1.</p> <p>(i.e. the opinion on the compliance with sustainability reporting)</p> | <p>Article 34 of the Accounting Directive sets out the general requirement for the statutory audit of financial statements of undertakings. It is amended to provide for the assurance (audit) of sustainability reporting by undertakings.</p> <p>This option allows Member States to permit undertakings to engage separate statutory auditors/audit firms to carry out the statutory audit of financial statements and the assurance of the sustainability reporting.</p> | <p>ACCA supports the taking of this option. While we believe that the statutory auditor will be best placed to undertake the sustainability audit as well as the statutory audit, those charged with Governance should be allowed the choice. We believe that, in time, the work of the statutory auditor and the sustainability assurance provider will merit equal status, given that on full implementation of the Directive, both will provide reasonable assurance on an entity's reporting. The statutory auditor and sustainability assurance provider will require access to each other's working papers, to ensure that there are no matters that are of relevance to the statutory audit that the sustainability assurance provider identified but that the statutory auditor was not aware of, and vice versa. Such arrangements could be addressed through enhanced professional guidance. We strongly encourage DETE to work with its equivalents elsewhere in the European Union to ensure a consistent approach across member states.</p> |
| <i>Points 4 and 5 Independent Assurance Services Provider (New)</i> | | |
| <p>Member States <u>may</u> allow an independent assurance services provider established in their territory to express the opinion referred to in point (aa) of the second subparagraph of paragraph 1, provided that such independent</p> | <p>This option allows Member States to introduce a new category of Independent Assurance Services Provider (IASP) to provide for the</p> | <p>If the state were to avail this option there would need to be a full education, licensing and supervision requirement analogous to that in place for existing auditors. This structure is already in place for statutory auditors and duplicating it for non-statutory auditors</p> |

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| <p>assurance services provider is subject to requirements that are equivalent to those set out in Directive 2006/43/EC of the European Parliament and of the Council as regards the assurance of sustainability reporting as defined in point 22 of Article 2 of that Directive, in particular the requirements on:</p> <p>(a) training and examination, ensuring that independent assurance services providers acquire the necessary expertise concerning sustainability reporting and the assurance of sustainability reporting;</p> <p>(b) continuing education;</p> <p>(c) quality assurance systems;</p> <p>(d) professional ethics, independence, objectivity, confidentiality and professional secrecy;</p> <p>(e) appointment and dismissal;</p> <p>(f) investigations and sanctions;</p> <p>(g) the organisation of the work of the independent assurance services provider, in</p> | <p>assurance of sustainability reporting by undertakings. IASPs must be subject to equivalent requirements to statutory auditors in respect of this assurance work including in respect of training, education, quality assurance and investigations and sanctions. In due course Member States that exercise the option to introduce IASPs must also exercise the option to permit separate statutory auditors/audit firms to carry out the audit of financial statements and assurance of sustainability reporting. Member states that exercise the option to introduce IASPs must also in due course provide for home/host model of oversight of IASPs with other Member States.</p> | <p>would serve no purpose.</p> <p>Statutory auditors already engage experts within a framework requirement set out in International Standard on Auditing (Ireland) 620, Using the Work of an Auditor's Expert. Should specialist sustainability or engineering measurements be needed, they can be arranged by the auditor.</p> |

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| <p>particular in terms of sufficient resources and personnel and the maintenance of client account records and files; and</p> <p>(h) reporting irregularities.</p> <p>Member States shall ensure that, where an independent assurance services provider expresses the opinion referred to in point (aa) of the second subparagraph of paragraph 1 of this Article, that opinion is prepared in accordance with Articles 26a, 27a and 28a of Directive 2006/43/EC and that, where applicable, the audit committee, or a dedicated committee, reviews and monitors the independence of the independent assurance services provider in accordance with point (e) of Article 39(6) of Directive 2006/43/EC.</p> <p>Member States shall ensure that independent assurance services providers accredited before 1 January 2024 for the assurance of sustainability reporting, in accordance with Regulation (EC) No 765/2008, are not subject to the training and examination requirements referred to in point (a) of the first subparagraph of this paragraph.</p> | | |

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| <p>Member States shall ensure that independent assurance services providers that on 1 January 2024 are undergoing the accreditation process in accordance with the relevant national requirements are not subject to the training and examination requirements referred to in point (a) of the first subparagraph as regards the assurance of sustainability reporting, provided they complete that process by 1 January 2026.</p> <p>Member States shall ensure that the independent assurance services providers referred to in the third and fourth subparagraphs acquire the necessary knowledge in sustainability reporting and the assurance of sustainability reporting via the continuing education requirement referred to in point (b) of the first subparagraph.</p> <p>If a Member State, pursuant to the first subparagraph, decides to allow an independent assurance services provider to express the opinion referred to in point (aa) of the second subparagraph of paragraph 1, it shall also allow a statutory auditor other than the one(s) carrying out the statutory audit of</p> | | |

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| <p>financial statements to do so, as provided for in paragraph 3.</p> <p>5. From 6 January 2027, a Member State that has made use of the option provided for in paragraph 4 (the “host Member State”) shall allow independent assurance services provider established in a Member State other than the host Member State (the “home Member State”) to carry out the assurance of sustainability reporting.</p> <p>The home Member State shall be responsible for the supervision of the independent assurance services providers established in its territory, unless the host Member State decides to supervise the assurance of sustainability reporting carried out by independent assurance services providers in its territory.</p> <p>If the host Member State decides to supervise the assurance of sustainability reporting carried out in its territory by independent assurance services providers registered in another Member State, the host Member State shall:</p> <p>(a) not impose more stringent requirements</p> | | |

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| <p>or liability on such independent assurance services providers than those required for assurance of sustainability reporting by the national laws for the independent assurance services providers or auditors established in that host Member State; and</p> <p>(b) inform other Member States about its decision to supervise the assurance of sustainability reporting carried out by independent assurance services providers established in other Member States.</p> | | |
| <p>Article 40a Sustainability Reports concerning third-country undertakings (New) <i>Point 1 last subparagraph (new)</i></p> | | |
| <p>Member States <u>may</u> require subsidiary undertakings or branches referred to in the first and third subparagraphs to send them information about the net turnover generated in their territory and in the Union by the third-country undertakings.</p> | <p>This is a new Article 40a inserted into the Accounting Directive on sustainability reports concerning third country undertakings. This option underpins the requirement for sustainability reports by large subsidiaries and branches operating in the EU (turnover > €40 million) of non-EU companies (turnover in the EU > €150 million). It permits Member States to require subsidiary undertakings and branches to send information</p> | <p>We do not believe that this option is necessary.</p> <p>The statutory auditor will as a standard part of their work assess a subsidiary's compliance with law and regulation in accordance with ISA (Ireland) 250A, Consideration of Laws and Regulations in an Audit of Financial Statements. Non-compliance with the requirement to prepare financial statements correctly, including the making of sustainability disclosures, will be a Category 2 offence under Section 290 et seq. of the Companies Act 2014. A company not complying with the sustainability disclosures will be reported to</p> |

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| | about net turnover generated in the Member State and in the EU. | the Corporate Enforcement Authority by their auditor in accordance with Section 393 of the Companies Act 2014. A separate administrative provision to enforce this is therefore not required. |
| Article 3 Amendments to Directive 2006/43/EC the Audit Directive | | |
| Article 12 Combination of practical training and theoretical instruction (replaced) <i>Point 1 (existing)</i> | | |
| <p>1. Member States <u>may</u> provide that periods of theoretical instruction in the subjects referred to in Article 8(1) and (2) shall count towards the periods of professional activity referred to in Article 11, provided that such instruction is attested by an examination recognised by the Member State. Such instruction shall not last less than one year, nor may it reduce the period of professional activity by more than four years.</p> <p>2. The period of professional activity and practical training shall not be shorter than the course of theoretical instruction together with the practical training required under the first subparagraph of Article 10(1).’;</p> | <p>This Article and option allows Member States to permit that periods of study can count towards professional activity periods required in Article 11 which governs qualifications through long term practical experience of statutory auditors. There is no substantive change to this option and it is not concerned with sustainability reporting but it is amended to take account of new cross-references in Article 8 arising from the amending Directive. It was not exercised in the transpositions of Directive 2006/43/EC and Directive 2014/56/EU however it is repeated here for completeness.</p> | <p>Although this option was not taken under the existing provisions, we believe it should be taken this time. We believe that there may be qualified accountants with many years’ experience of sustainability and sustainability assurance who are not currently statutory auditors. We would propose that admission through this route would require a minimum of a professional accounting qualification from one of the recognised professional accounting bodies in addition to specific sustainability experience in a process that, like the granting of statutory audit status, would be overseen by IAASA.</p> |
| Article 26a Assurance Standards for sustainability reporting (New) <i>Point 2 (New)</i> | | |

| Member State Option | Background Information | Do you consider that Ireland should exercise this option? Please provide reasons for your answer. |
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| <p>2. Member States <u>may</u> apply national assurance standards, procedures or requirements as long as the Commission has not adopted an assurance standard covering the same subject matter.</p> <p>Member States shall communicate the national assurance standards, procedures or requirements to the Commission at least three months before their entry into force.</p> | <p>Article 26a is a new article inserted into the Audit Directive which sets out the requirement for the audit of sustainability reporting to be done in accordance with assurance standards which will be developed by the EU Commission. This option permits Member States to apply national standards in the event that the Commission has not adopted a standard on the same subject matter.</p> | <p>ACCA does not recommend Ireland diverging from the EU standards in any way.</p> |
| <p>Article 28a Assurance Report on sustainability reporting (New) <i>Point 5 (New)</i></p> | | |
| <p>5. Member States <u>may</u> require that, where the same statutory auditor carries out the statutory audit of annual financial statements and the assurance of sustainability reporting, the assurance report on sustainability reporting may be included as a separate section of the audit report.</p> | <p>Article 28a is a new article inserted into the Audit Directive which sets out the requirements for the assurance report by statutory auditors/audit firms of sustainability reporting to be done in accordance with assurance standards which will be developed by the EU Commission (or any national standard if relevant).</p> | <p>ACCA recommends that this option be taken. A qualified audit report on the finance statements of a company can have serious detrimental effects on a company including breach of covenants. Separating the financial statements audit and the sustainability audit will allow an auditor to separate their opinions and ensure that a qualified sustainability report does not affect the company to the same extent as a qualified statutory audit report might.</p> |

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| | <p>This option permits Member States to provide that where the same statutory auditor/audit firm carries out the statutory audit of the financial statements and the assurance of sustainability reporting, the assurance report may be included as a separate section of the audit report.</p> | |
| <p>Article 29 Quality Assurance Systems (Amendment) <i>Point 2a (New)</i></p> | | |
| <p>2a. Member States <u>may</u> exempt, until 31 December 2025, persons who carry out quality assurance reviews relating to the assurance of sustainability reporting from the requirement to have relevant experience in sustainability reporting and in the assurance of sustainability reporting or in other sustainability-related services.’;</p> | <p>The amendments to Article 29, which governs quality assurance systems for statutory audit, allow where applicable for quality assurance of sustainability reporting.</p> <p>This option permits Member States to allow for a transition period for persons carrying out quality assurance reviews on sustainability reporting by exempting them until the end of 2025 from the requirement to have relevant experience in sustainability reporting or the assurance of same.</p> | <p>ACCA recommends that Ireland take this option.</p> <p>In the initial period there will be a very limited pool of experienced sustainability assurance providers and limited opportunity to train as a sustainability assurance provider. ACCA and the other professional accounting bodies will provide guidance and continuing professional development and best practice leadership for the sector. This will help ensure that the sustainability assurance services are performed to the highest standard while the sector builds capacity.</p> |

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| Article 30 Systems of Investigations and Sanctions (Amended) <i>Point 2 second subparagraph (existing)</i> | | |
| <p>Member States <u>may</u> decide not to lay down rules for administrative sanctions for infringements which are already subject to national criminal law. In that event, they shall communicate to the Commission the relevant criminal law provisions.’;</p> | <p>The amendments to Article 30, which governs systems of investigations and sanctions for breaches of statutory audit rules, allow for the extension of investigation and sanctions systems to assurance of sustainability reporting.</p> <p>This option is not amended directly and allows Member States not to provide for an administrative sanction regime where criminal law already applies. It was not exercised in the transposition of Directive 2014/56/EU.</p> | <p>ACCA does not see a need to adopt this option.</p> |
| Article 39 Audit Committee (Amended) <i>Paragraph 4a (New)</i> | | |
| <p>Member States <u>may</u> allow the functions assigned to the audit committee relating to sustainability reporting and relating to the assurance of sustainability reporting to be</p> | <p>The amendments to Article 39, which governs the rules for Audit Committees of public interest entities, allow for the extension of</p> | <p>Sustainability should be central to a business, and it will not be central if it is governed by a subsidiary board. ACCA recommends that this option not be taken.</p> |

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| <p>performed by the administrative or supervisory body as a whole or by a dedicated body established by the administrative or supervisory body.</p> | <p>certain audit committee functions to include assurance of sustainability reporting. This option permits Member States to allow these functions to be assigned to the board of directors of the public-interest for example or another dedicated body established by the public interest entity. It is similar to an option at Article 39(4) which applies to statutory audit. This option was not exercised in the transposition of Directive 2014/56/EU.</p> | <p>A company may form an advisory committee to consider and advise the main board or audit committee on sustainability, but the absolute responsibility should remain with the main board. Sustainability should be embedded in every business decision and not a standalone function.</p> |

Please provide any further views you have in relation to the transposition and development of future policy in this area.

The practical training requirement

The requirement to obtain 8 months sustainability experience to qualify as a sustainability assurance provider will act as a major barrier to entry to the profession. Grandfathering of existing statutory auditors will ameliorate any very short-term shortages of sustainability assurance providers, but the phased implementation of the audit requirements, which apply initially to only the largest entities, will serve to exclude trainee auditors from smaller accounting firms from reaching their 8 month experience requirement in assurance of annual and consolidated sustainability reporting or in other sustainability-related services.

Sustainability can't be just a large company imperative; it must be implemented in small business as well. If small and medium sized accounting practices are excluded by virtue of the 8 months experience requirement, then their clients, small and medium sized enterprises, will have difficulty providing their sustainability credentials to their customers and stakeholders.

Changing the 8 months training requirement is not a member state option. However, any future revision of the Directive should include an explicit alternative option of enhanced practical skill training.

How the 8 months experience is measured

The Directive differentiates between "practical training" or skills training and "theoretical knowledge". However, these can be and are usually delivered simultaneously, especially in the professional accounting examination. In the original audit directive, there was a requirement that "such practical training shall be completed with a statutory auditor or audit firm approved in any Member State." However, the requirements for a sustainability assurance provider as set out in the Directive is that the practical training be "on the assurance of annual and consolidated sustainability reporting or on other sustainability-related services", without this requirement being to undertake this training with a qualified sustainability assurance provider. It would appear to be the intention of the legislators to allow a more flexible approach to training which could include practical training in the form of simulations, workshops and skills training as well as extracting and measuring the skills element of the professional exams and counting these as part of the eight months requirement.

The actual tutor/trainer contact hours on a skills training programme do not typically reflect the hours of training actually undertaken. Students will do course work and projects and self study as well as the contact hours. The European Credit Transfer and Accumulation System (ECTS) is an academic credit system based on the estimated student workload required to achieve the objectives and learning outcomes of a module or programme of study. Each ECTS corresponds to a number of standard hours, with 60 ECTS corresponding to 1,500 hours and micro accreditation of 5 or 10 ECTS available prorata for shorter accredited courses. We recommend that legislation accommodates either on the job training or 8 months of ECTS equivalent or a mix of both to add up to 8 months of skills training.