

Kathleen Kerrigan Healy International Auditing and Assurance Standards Board 545 Fifth Avenue 14th Floor New York, NY 10017 USA

24 November 2009

Dear Madam,

BUSINESSEUROPE welcomes the opportunity to comment on "The PIOB Contribution to IFAC Reform – A self-assessment for the Monitoring Group Review". We apologise for the slight delay in submitting these comments and hope that they can nevertheless be taking into account.

We recognise the efforts that have been made by the PIOB and believe that these have contributed to a better recognition of the International Standards on Auditing. We note however that there are very few references to business or preparers in the self assessment report. The only reference is on page 12 in the report, where the following paragraph is included:

"Of even greater significance are several of the projects on which the IAASB has embarked that respond to requirements beyond what is strictly understood today as a financial audit. Thus the IAASB has undertaken projects to refine the standards for review and compilation engagements. These efforts, and others, may, among other things, assist small and medium sized preparers to provide a level of assurance beneficial to the users of their financial statements without incurring the cost of a full audit. Furthermore, there is a clear public interest in ensuring that the resulting standards are responsive to the needs of policy makers, preparers, users and the accountancy profession itself."

As we mentioned at the last CAG-session, the direct representation of preparers in the standard setting boards, especially IAASB, could be improved significantly. Therefore, BUSINESSEUROPE would like the PIOB to reflect further on PIAC governance structure and to incorporate the role of preparers into chapter *2 "Nominations – the 'Right People'"* on page 4-5 and on page 8 under the headline *"The PIACs"*.



As mentioned above, BUSINESSEUROPE recognizes the efforts that have been made and appreciates that by including more "non-practitioners" the balance in the PIACs has improved. However, we still believe that more could be done in this area in order for the PIACs to properly reflect the needs that they are responding to.

Lastly, we suggest that under the headline "nominations" on page 9, the PIOB reflects on the background of the "non-practitioners" and the "public members" and to consider whether the candidates reflected the wider policy needs.

We remain at your disposal when you wish to discuss this issue any further.

Yours sincerely,

Jérôme P. Chauvin

Director

Legal Affairs Committee Internal Market Committee