

## Assurance on a Greenhouse Gas Statement



## REQUEST FOR COMMENTS

The International Auditing and Assurance Standards Board (IAASB) develops auditing and assurance standards and guidance for use by all professional accountants under a shared standard-setting process involving the Public Interest Oversight Board, which oversees the activities of the IAASB, and the IAASB Consultative Advisory Group, which provides public interest input into the development of the standards and guidance.

The IAASB approved this Consultation Paper, “Assurance on a Greenhouse Gas Statement,” for publication in October 2009. The responses to this Consultation Paper will be considered by the IAASB in its project to develop an International Standard on Assurance Engagements on the same topic.

Respondents are asked to submit their comments **electronically** through the IFAC website ([www.ifac.org](http://www.ifac.org)), using the “Submit a Comment” link on the Exposure Drafts and Consultation Papers page. Please note that first-time users must register to use this new feature. All comments will be considered a matter of public record and will ultimately be posted on the IFAC website. Although IFAC prefers that comments be submitted electronically, e-mail may continue to be sent to [edcomments@ifac.org](mailto:edcomments@ifac.org). Comments can also be faxed to the attention of the IAASB Technical Director at +1 (212) 856-9420, or mailed to:

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Comments should be submitted by **February 19, 2010**.

Copies of this consultation paper may be downloaded free-of-charge from the IFAC website at <http://www.ifac.org>.

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**IAASB CONSULTATION PAPER**  
**ASSURANCE ON A GREENHOUSE GAS STATEMENT**  
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*“Achieving and tracking greenhouse gas emissions reduction is vital to measuring convergence towards the objectives of an effective climate treaty. As businesses we can set an example by contributing to a unified, coherent and reliable measurement, reporting and verification discipline leading to mandatory reporting. Accounting for the emissions we are responsible for will provide the basis for emissions reduction beyond what may be required by regulation and allow our performance to be properly judged and rewarded by investors and the public.”*

– World Business Summit on Climate Change<sup>1</sup>

## Introduction

1. The purpose of this Consultation Paper is to seek views from practitioners and other stakeholders in relation to the IAASB’s project to develop an International Standard on Assurance Engagements (ISAE) on “Assurance on a Greenhouse Gas (GHG) Statement.”
2. Throughout the Consultation Paper, reference is made to the current working draft of an ISAE (the working draft, or WD). The working draft, which is attached to this Consultation Paper as an Appendix, is not an exposure draft. It was developed by the IAASB’s GHG Task Force, and has not been voted on or otherwise approved by the IAASB.
3. The IAASB develops standards through a transparent and iterative due process<sup>2</sup> whereby it discusses successive working drafts prepared by a Task Force, and provides guidance and direction that is considered by the Task Force in preparing the next working draft for discussion by the IAASB. The current working draft reflects the Task Force’s consideration of the IAASB’s discussion at its September 2009 meeting. It is attached to, and referenced in, this Consultation Paper for illustrative purposes only. The working draft will continue to be modified in light of comments received on this Consultation Paper, and will be considered for issue by the IAASB as an exposure draft in 2010.
4. In commenting on this Consultation Paper, respondents are asked to comment not only on technical aspects of the issues raised, but also on their public interest impact, in particular their effect on the costs (for example, additional work effort required) and benefits (for example, improvements in consistency and quality) of GHG assurance engagements.

## Background

5. With the increasing attention given to the link between GHGs and climate change, many entities are quantifying their GHG emissions for internal management purposes, and an increasing number are also preparing a GHG statement:
  - (a) As part of a regulatory disclosure regime;
  - (b) As part of an emissions trading scheme; or

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<sup>1</sup> This call for “Effective measurement, reporting and verification of emissions” is the second of six points in the “Copenhagen Call” issued by global business leaders at the close of the World Business Summit on Climate Change in May 2009. The “Copenhagen Call” is available at <http://www.copenhagenclimatecouncil.com>.

<sup>2</sup> [http://www.ifac.org/Downloads/PIAC\\_Due\\_Process.pdf](http://www.ifac.org/Downloads/PIAC_Due_Process.pdf).

- (c) To inform investors and others on a voluntary basis. Voluntary disclosures may be, for example, published as a standalone document; included as part of a broader sustainability report or in an entity's annual report; or made to support inclusion in a "carbon register."
6. With this in mind, the IAASB approved the project proposal on this topic at its December 2007 meeting.
  7. During 2008, a Project Advisory Panel (PAP)<sup>3</sup> was set up and four roundtables were held in Oceania (Sydney and Melbourne), North America (Toronto), and Europe (Brussels).
  8. Each roundtable had approximately 25-30 participants. Participants were from a diverse range of stakeholder groups, including: accounting firms and accounting bodies; government regulators and policymakers; reporting companies; public sector auditors; non-accounting assurers and standard setters; institutional investors; non-governmental organizations; academics; and legal professionals.
  9. The Oceania roundtables were principally open, exploratory discussions to consider whether an ISAE should be developed and, if so, to identify key issues and seek initial direction. The North American roundtable debated key issues identified at the Oceania roundtables, using a "straw man" skeleton ISAE to focus discussions. The European roundtable provided feedback on an Issues Paper prepared on the basis of input received at the previous roundtables.
  10. The Issues Paper was subsequently discussed at the IAASB's December 2008 meeting and the IAASB agreed that developing an ISAE would be consistent with its public interest mandate.<sup>4</sup> In early 2009, therefore, the IAASB GHG Task Force<sup>5</sup> was set up. That Task Force developed a preliminary working draft of an ISAE, which the IAASB considered at its June 2009 meeting. At its following meeting in September 2009, the IAASB considered a further working draft and also discussed a draft of this Consultation Paper. The IAASB believes that seeking feedback at this stage, that is, prior to finalizing an exposure draft, will assist it in developing an ISAE with appropriate requirements and guidance to enhance the quality of GHG quantification and reporting worldwide.
  11. As stated in paragraph 3 above, the IAASB's intention is to modify the working draft in light of comments received, and then issue the revised document as an exposure draft in 2010.

## **Developing an Assurance Standard for GHG Engagements**

12. The development of a credible assurance standard for GHG engagements combines two fields of knowledge. On the one hand is knowledge of the subject matter, that is, the GHG

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<sup>3</sup> Members of the PAP are noted in the project history available at:  
<http://www.ifac.org/IAASB/ProjectHistory.php?ProjID=0081>.

<sup>4</sup> IAASB agenda papers, minutes, and recordings of meetings are available at:  
<http://www.ifac.org/IAASB/Meetings.php>.

<sup>5</sup> Members of the Task Force are noted in the project history available at:  
<http://www.ifac.org/IAASB/ProjectHistory.php?ProjID=0081>.

quantification and reporting process. On the other hand is knowledge of the assurance process. In developing the working draft, the Task Force drew upon experts in both these fields.

13. Knowledge of the GHG quantification and reporting process has come from Task Force and PAP members who have extensive skills, knowledge and experience with GHG quantification and reporting, as well as the broad feedback received at the roundtables referred to above, supplemented by desk research and informal consultations undertaken by Task Force members and staff.
14. Knowledge of the assurance process has come from the IAASB's accumulated knowledge as articulated in the International Framework for Assurance Engagements (the Assurance Framework)<sup>6</sup> and ISAE 3000,<sup>7</sup> which are the foundations for the working draft; and the International Standards on Auditing (ISAs), some elements of which may fruitfully be adapted to GHG engagements (see the section below on "Number and Nature of Requirements, and Cost and Benefit Considerations"). This accumulated knowledge has been coupled with the expert assurance knowledge of IAASB members, Task Force members, PAP members and staff involved in the development process.

## **Key Issues upon which Comments Are Invited**

### **The Engagement Partner and the Team**

#### *Skills, Knowledge and Experience of the Engagement Partner*

15. Paragraphs 12(a) and (b) of the working draft require that the engagement partner:
  - (a) Be a professional accountant in public practice, or the public sector equivalent, who has specialist skills, knowledge and experience in assurance concepts and processes developed through extensive training and practical application; and
  - (b) Have sufficient skills, knowledge and experience of GHG quantification and reporting to accept responsibility for the assurance opinion.
16. ISAEs are written in the context of a range of measures taken to ensure the quality of assurance engagements undertaken by professional accountants in public practice, such as those taken by IFAC member bodies in accordance with IFAC's Member Body Compliance Program and Statements of Membership Obligations. Such measures include competency requirements, quality control policies and procedures implemented across the firm, and a comprehensive code of ethics, including detailed independence requirements (see WD, paragraph A5, for further detail).
17. One area of specialization within professional accounting is assurance, which includes, but is broader than, financial statement auditing. Competence in assurance requires specialist skills,

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<sup>6</sup> The Assurance Framework is available at:  
[http://web.ifac.org/download/International\\_Framework\\_for\\_Assurance\\_Engagements.pdf](http://web.ifac.org/download/International_Framework_for_Assurance_Engagements.pdf).

<sup>7</sup> ISAE 3000, "Assurance Engagements Other than Audits or Reviews of Historical Financial Information," available at: [http://web.ifac.org/download/2008\\_Auditing\\_Handbook\\_A270\\_ISAE\\_3000.pdf](http://web.ifac.org/download/2008_Auditing_Handbook_A270_ISAE_3000.pdf).

knowledge and experience in assurance concepts and processes developed through extensive training and practical application. In many jurisdictions, regulators develop rules for registration (for example, registration as a financial statement auditor) that, along with IES 8,<sup>8</sup> may provide useful benchmarks for assessing a practitioner’s specialist skills, knowledge and experience in assurance concepts and processes in a particular jurisdiction (see WD, paragraph A6, for further detail).

18. The IFAC *Code of Ethics for Professional Accountants* (IFAC Code) requires professional accountants in public practice to agree to provide only those services that they are competent to perform.<sup>9</sup> The engagement partner will therefore need to have sufficient skills, knowledge and experience of GHG quantification and reporting to accept responsibility for the assurance opinion (see WD, paragraphs A7-A8, for further detail).

### Questions

1. Would the requirements of paragraphs 12(a) and (b) of the working draft preclude any *competent* group that accepts the authority of the IAASB to set standards that apply to that group from adopting the standard? If so, which group would be precluded? Please provide suggestions of how the ISAE should deal with this.
2. Is the ISAE an appropriate place to provide benchmarks or further guidance regarding the skills, knowledge and experience an engagement partner should possess with respect to:
  - (a) Assurance concepts and processes; or
  - (b) GHG quantification and reporting?If so, please provide examples of suitable benchmarks or guidance.

### *Multidisciplinary Teams*

19. Paragraph 12(c) of the working draft requires the engagement partner to be satisfied that the engagement team and any practitioner’s external experts collectively have the appropriate competence and capabilities to:
  - (a) Perform the engagement in accordance with professional standards and applicable legal and regulatory requirements; and
  - (b) Enable an assurance report to be issued that is appropriate in the circumstances.
20. Most complex engagements will be undertaken by a “multidisciplinary team” comprising experts in, for example, engineering or environmental science, as well as professional accountants who are assurance specialists. Certain requirements in the working draft have given prominence to the integration of such experts into various stages of the engagement, for example, requiring key experts to be involved in planning and in discussions regarding the susceptibility of the entity’s GHG statement to material misstatement whether due to

<sup>8</sup> International Education Standard (IES) 8, “Competence Requirements for Audit Professionals.”

<sup>9</sup> IFAC Code, paragraph 210.6.

fraud or error, and the application of the applicable criteria to the entity's facts and circumstances (WD, paragraphs 32 and 42).

21. Internal experts, that is, those employed by the practitioner's firm or network firm, are required to be independent. External experts, on the other hand, are excluded from the definition of "engagement team" under ISQC 1,<sup>10</sup> and are not subject to the detailed independence requirements of the IFAC Code, which has been written for application to accountants and accounting firms only.<sup>11</sup> Paragraph 84 of the working draft nonetheless requires that the practitioner evaluate the objectivity of external experts, and guidance on this matter is included at paragraphs A78-A79 of the working draft.

### Questions

3. Given that engagements, in particular complex engagements, are ordinarily undertaken by a multidisciplinary team, does the working draft adequately reflect how multidisciplinary teams should operate? For example, does the working draft adequately address the collective competence and capabilities of the team? What further improvements could be made?
4. Is there a need for additional guidance regarding the measure of objectivity that should be applied with respect to external experts?
5. Should external experts be required to be independent? If so:
  - (a) In what circumstances should an external expert be required to be independent?
  - (b) What measure of independence should be applied (for example, which elements of the IFAC Code, which has been written for application to accountants and accounting firms only, should be applied to external experts)?
  - (c) What would be the effect on practice (for example, the availability of experts) and the relevant cost and benefit considerations of requiring external experts to be independent?

### Number and Nature of Requirements, and Cost and Benefit Considerations

22. As one consideration when identifying appropriate requirements for the working draft, the Task Force reviewed the requirements of relevant ISAs to identify which, if any, should be adapted and included in the ISAE. In doing so, the Task Force was conscious of the fact that those applying the ISAE will be assurance specialists (see the previous section on "Skills, Knowledge and Experience of the Engagement Partner"), and therefore the volume of material to be adapted can be limited because the practitioner will already have a sound background knowledge of the ISAs.
23. A project to revise ISAE 3000 has recently commenced. When the revision of ISAE 3000 is complete, a number of the requirements in the working draft may be better placed in ISAE 3000 because they apply to all subject matters (for example, requirements regarding

<sup>10</sup> International Standard on Quality Control (ISQC) 1, "Quality Control for Firms that Perform Audits and Reviews of Financial Statements, and Other Assurance and Related Services Engagements."

<sup>11</sup> See Section 291, "Independence – Other Assurance Engagements," of the IFAC Code.

documentation) and would therefore be deleted from this ISAE. For the purpose of this consultation, however, respondents are asked to consider the suitability of the requirements in the working draft regardless of whether they will eventually be included in this ISAE or in ISAE 3000.

24. Ultimately, the number and nature of requirements will be determined by the IAASB's judgment about the importance of individual requirements. In exercising this judgment, the IAASB will need to be mindful that users of the ISAE will be assurance professionals, often working with a multidisciplinary team, and balance the competing needs of (a) keeping the total number of requirements at a practicable level, and (b) ensuring the ISAE has sufficient and appropriate requirements to promote consistent, high-quality assurance engagements.

### Questions

6. What would be the likely impact on the cost of a reasonable assurance GHG engagement if the ISAE included requirements of a similar number and nature as the working draft? Is this cost likely to be proportionate to the benefit to be derived?
7. In your judgment, are there any requirements that:
- (a) Have not been included in the working draft that should have been? If so, why?
  - (b) Have been included in the working draft that should not have been? If so, why?

### Relationship with Regulatory Requirements

25. Paragraph 3 of the IAASB Preface<sup>12</sup> states that the “The IAASB’s pronouncements govern ... assurance ... engagements that are conducted in accordance with International Standards. They do not override the local laws or regulations that govern ... assurance engagements on other information in a particular country required to be followed in accordance with that country’s national standards. In the event that local laws or regulations differ from, or conflict with, the IAASB’s Standards on a particular subject, an engagement conducted in accordance with local laws or regulations will not automatically comply with the IAASB’s Standards. A professional accountant should not represent compliance with the IAASB’s Standards unless the professional accountant has complied fully with all of those relevant to the engagement.”
26. In many cases, assurance engagements on a GHG statement will be performed pursuant to local laws or regulations. The working draft recognizes this at, for example, paragraphs 20 and 113 (report wording), 31 (compliance), A6 (skills, knowledge and experience), A23 and A25 (criteria), and A45 (materiality).

### Questions

8. Are there any additional matters the IAASB should take into account with respect to engagements conducted in accordance with local laws or regulations?

<sup>12</sup> “Preface to the International Standards on Quality Control, Auditing, Review, Other Assurance and Related Services.”

9. Should any aspects of the requirements written to apply only to voluntary reporting (see WD, paragraphs 15(b)(i)-(ii), 15(c), and 106(d)) also apply in other circumstances?

## The Assurance Process

### *Analytical Procedures*

27. The fixed nature of physical or chemical relationships between particular emissions and other measurable phenomena, for example, the relationship between fuel consumption and carbon dioxide and nitrous oxide emissions, can allow for the design of powerful analytical procedures, both as risk assessment and substantive procedures.
28. Similarly, a reasonably predictable relationship may exist between emissions and financial information, for example, the relationship between Scope 2 emissions from electricity and the general ledger balance for electricity purchases.
29. Analytical procedures may be particularly effective when disaggregated data is readily available, or when the practitioner has reason to consider the data to be used is reliable, such as when it is extracted from a well-controlled source. In some cases, data to be used may be captured by the financial reporting information system, or may be entered in another information system in parallel with the entry of related financial data, and some common input controls applied. For example, the quantity of fuel purchased as recorded on suppliers' invoices may be input under the same conditions that relevant invoices are entered into an accounts payable system.

### **Question**

10. Does the working draft appropriately reflect the specific characteristics of analytical procedures used in practice on GHG engagements? In particular, are paragraphs 59-60 appropriate, for example, with respect to the reliability of data on which analytical procedures are based?

### *Internal Control*

30. The approach to internal control adopted in the working draft reflects what has commonly become known as the COSO model.<sup>13</sup> Paragraph 46 of the working draft includes the five elements of: the control environment; the entity's risk assessment procedures; the information system; control activities; and monitoring, and is consistent with the approach adopted in ISA 315 with respect to financial reporting.<sup>14</sup> While detailed assurance procedures tend to focus on the information system and control activities, each of the five interrelated elements plays

<sup>13</sup> "Internal Control – Integrated Framework," The Committee of Sponsoring Organizations (COSO) of the Treadway Commission, 1992. Internal control under the COSO model is a process designed to provide reasonable assurance regarding the achievement of objectives related to the effectiveness and efficiency of operations, and compliance with applicable laws and regulations, as well as the reliability of financial reporting.

<sup>14</sup> ISA 315, "Identifying and Assessing the Risks of Material Misstatement through Understanding the Entity and Its Environment," paragraphs 14-24.

an important role in providing reasonable assurance that the information included in a GHG statement is presented without material misstatement due to fraud or error.

31. As noted in paragraph A55 of the working draft, “The practitioner’s judgment about whether particular control activities are relevant to the engagement may be affected by the level of sophistication, documentation and formality of the entity’s information system, including the related business processes, relevant to reporting emissions. As reporting of emissions evolves, it can be expected that so too will the level of sophistication, documentation and formality of information systems and related control activities relevant to the quantification and reporting of emissions.”

#### **Question**

11. Is the approach to internal control adopted in paragraphs 45-46 of the working draft appropriate? If not, please provide details and suggestions for elaboration or modification of the working draft.

#### *Assertions*

32. In representing that its GHG statement is in accordance with applicable criteria, an entity implicitly or explicitly makes assertions regarding the quantification, presentation and disclosure of emissions. Assertions provide the practitioner with a framework that can be used when identifying the risks of material misstatement and gathering engagement evidence in response to identified risks.
33. The working draft requires the practitioner to use assertions at various stages of the engagement. For example, the practitioner is required to perform risk assessment procedures and identify and assess the risks of material misstatement at the assertion level (WD, paragraphs 39 and 47). The working draft provides guidance regarding categories of assertions that may be used by the practitioner to consider the different types of potential misstatements that may occur (WD, paragraph A49).
34. These assertions are different from those for financial statement audits,<sup>15</sup> primarily in that they:
- (a) Do not include the assertions about account balances at period end, which are not relevant to GHG engagements since the GHGs reported are those emitted throughout a period (making a GHG statement akin to a statement of operations in accounting terms) rather than a stock of GHGs at the end of the period (akin to a balance sheet in accounting terms); and
  - (b) Include an additional presentation and disclosure assertion, “consistency and comparability,” as this is considered to be particularly significant for GHG disclosures because of the importance of trend information in GHG emissions over time, not only in regulated “baseline and credit” schemes, but also, for example, in benchmarking the success of emissions reduction activities.

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<sup>15</sup> ISA 315, paragraph A111.

### Questions

12. Is it appropriate to require practitioners to perform risk assessment procedures at the assertion level for GHG engagements? If not, why not? If so, do the assertions identified in paragraph A49 of the working draft provide an appropriate basis for the identification and assessment of the risks of material misstatement in a GHG statement?
13. As well as referring to the risks of material misstatement at the assertion level, paragraphs 39 and 47 of the working draft refer to risks at the GHG statement level. In your experience, what are commonly the most significant risks at the GHG statement level?

### *Materiality*

35. Obtaining assurance about whether subject matter information is free from material misstatement is at the heart of all assurance engagements.
36. While there are similarities between financial statements and GHG statements, there are also differences that need to be considered before aspects of the materiality concept as it applies to financial statement audits can be adopted for GHG engagements. For example, the following differences will have implications for materiality:
  - (a) Although there may be some similarity to the conversion of foreign currencies, there is no direct financial statement equivalent of the need to aggregate emissions of different gases by using their global warming potential to convert them to carbon dioxide equivalent units; and
  - (b) Although a GHG statement might include a figure for net emissions, there is no direct GHG statement equivalent of a profit or a loss, nor is there a GHG statement equivalent of a balance sheet.
37. The working draft includes a number of requirements with respect to materiality (see WD, paragraphs 36-38 and 74-80), and guidance on applying those requirements in the specific context of a GHG engagement (see WD, paragraphs A39-A47 and A72).

### Question

14. Do the requirements and guidance in the working draft with respect to materiality need modification or elaboration? If so, please provide details. For example:
  - (a) The requirements and guidance refer to materiality in terms of intended users' "economic" decisions. Is it appropriate for materiality with respect to a GHG statement to be limited to economic decisions, or are there other forms of decision made by various users that should be taken into account? If so, how can those decisions best be categorized? Please provide examples.
  - (b) In light of the fact that GHG statements often deal with different types of emissions, is the determination of materiality in the aggregate and for particular types of emissions in the way set out in paragraph 36 of the working draft appropriate?

- (c) Does paragraph A39 of the working draft provide the practitioner with an appropriate frame of reference when the applicable criteria do not discuss the concept of materiality? If not, which elements of paragraph A39 are inappropriate, and why; or which other elements should be added, and why?
- (d) Are the assumptions about intended users stated in paragraph A41 of the working draft appropriate? If not, which assumptions are inappropriate, and why; or which other assumptions should be added, and why?
- (e) When the engagement covers many but not all of the component elements of a GHG statement, should materiality be based on the total emissions or on assured emissions only (WD, paragraph A44)?
- (f) Is the guidance regarding quantitative and qualitative factors in paragraphs A42-A46 of the working draft appropriate? If not, which aspects of that guidance are inappropriate, and why; or which other aspects should be added, and why?

### *Estimates and Uncertainty*

38. Nearly all quantifications of GHG emissions involve some degree of uncertainty because it is virtually impossible in any circumstances to precisely count each molecule of GHG emitted by an entity. To the extent the uncertainty relates to existing gaps in available scientific knowledge, it is unavoidable and permeates all quantifications of GHG emissions. However, quantifications are made within the context of the applicable criteria, and criteria differ in how they treat estimation or measurement uncertainty. Some criteria stipulate rigid models, methods, emissions factors, etc., that must be applied in all circumstances when calculating emissions from a particular source. For example, the applicable criteria may require Scope 2 emissions from electricity to be calculated by multiplying kilowatt hours recorded on suppliers' invoices by a prescribed emission factor. Quantification in accordance with such criteria effectively eliminates estimation uncertainty for the purpose of reporting in accordance with those criteria. This can be contrasted with quantification in accordance with criteria that allow, or require, for example:
- The use of models, methods or emissions factors that involve significant assumptions based on an entity's individual circumstances. While using entity-specific assumptions can result in more accurate quantification than using, for example, average emission factors for an industry, it is nonetheless prone to a greater degree of estimation uncertainty;
  - Direct measurement using periodic sampling; or
  - Estimation of surrogate activity data using extrapolation.

### **Questions**

15. Is the manner in which the working draft has treated assurance with respect to estimates, for example, paragraphs 43(c), 62-63, 89(d), 106(d), and A52-A53 appropriate? If not, please provide details and suggestions for modification or elaboration of the working draft.

16. Should the role of disclosures in the GHG statement with respect to estimates be further emphasized in the working draft, particularly the disclosure of any uncertainty related to particular estimates, the factors that affect that uncertainty, and how those factors have been dealt with?

### *Fraud*

39. The objectives of the practitioner as stated in paragraph 9 of the working draft include obtaining reasonable assurance about whether the GHG statement is free from material misstatement “whether due to fraud or error.” Paragraph 30 of the working draft includes specific requirements with respect to fraud. Fraud is defined at paragraph 10(i) of the working draft as “an intentional act by one or more individuals among management, those charged with governance, employees, or third parties, involving the use of deception to obtain an unjust or illegal advantage.” This is the same definition as in ISA 240.<sup>16</sup>
40. Incentives for intentional misstatement of the GHG statement may arise if, for example, those who are directly involved with, or have the opportunity to influence, the emissions reporting process have a significant portion of their compensation contingent upon achieving aggressive GHG targets. Other incentives to either understate or overstate emissions may result from the entity’s climate change strategy, if any, and associated economic, regulatory, physical and reputational risks.

### **Question**

17. Are the definition of fraud, the requirements of paragraph 30 of the working draft, and the discussion of fraud throughout the application material sufficient and appropriate? If not, please provide details and suggestions for modification or elaboration of the working draft.

### **Reporting**

#### *The Assurance Report*

41. A vital part of any assurance engagement is the assurance report, which is usually a one-way communication from the practitioner to intended users. Because of its one-way nature, it is important that the assurance report be as clear as possible, recognizing of course that some complexity is inevitable when the subject matter of the engagement is itself complex.
42. The working draft includes an example assurance report in its Appendix. It is for a relatively straightforward engagement when the entity’s GHG statement is prepared on a voluntary basis and contains no Scope 3 emissions or emissions deductions.

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<sup>16</sup> ISA 240, “The Auditor’s Responsibilities Relating to Fraud in an Audit of Financial Statements,” paragraph 11(a).

## Questions

18. Is the example report of a suitable length, and structured and worded appropriately, to meet the needs of users with respect to, for example:
  - Restrictions on scope?
  - The practitioner's independence, quality control and expertise?
  - The relative responsibilities of the entity and the practitioner?
  - The wording of the practitioner's opinion?
  - Uncertainties in the quantification and reporting of emissions?
19. Should the ISAE include requirements with respect to Emphasis of Matter paragraphs and Other Matter paragraphs adapted from ISA 706,<sup>17</sup> or are these concepts not particularly relevant to GHG engagements? If so, what are the circumstances in which it would be appropriate to include an Emphasis of Matter paragraph or an Other Matter paragraph in an assurance report on a GHG statement?
20. Should a distinction be made between long-form GHG assurance reports that are provided to certain groups of users (for example, regulators in some schemes) and short-form reports that are made publicly available? How would this impact on the content of the report?
21. The working draft actively discourages including recommendations in the assurance report (see WD, paragraph A89). Are there circumstances in which it is appropriate to include recommendations in the assurance report? If so, please provide details.

### *Fair Presentation versus Compliance Frameworks*

43. The existence of suitable criteria is a necessary element of any assurance engagement. The criteria for a financial statement audit are embodied in the applicable financial reporting framework.
44. The ISAs distinguish between different types of criteria (frameworks) for the purpose of establishing which requirements apply to any particular engagement. The different types of criteria identified in the ISAs are (a) fair presentation versus compliance criteria, and (b) general purpose versus special purpose criteria.
45. Compliance criteria, as the name implies, require compliance with the requirements of the criteria. Fair presentation criteria,<sup>18</sup> on the other hand, acknowledge that, in order to achieve

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<sup>17</sup> Paragraph 5 of ISA 706, "Emphasis of Matter Paragraphs and Other Matter Paragraphs in the Independent Auditor's Report," defines an Emphasis of Matter paragraph as "a paragraph included in the auditor's report that refers to a matter appropriately presented or disclosed in the financial statements that, in the auditor's judgment, is of such importance that it is fundamental to users' understanding of the financial statements." It defines an Other Matter paragraph as "a paragraph included in the auditor's report that refers to a matter other than those presented or disclosed in the financial statements that, in the auditor's judgment, is relevant to users' understanding of the audit, the auditor's responsibilities or the auditor's report."

<sup>18</sup> The term "fair presentation" is not restricted to financial statements only in IAASB pronouncements. For example, ISAE 3402, "Assurance Reports on Controls at a Service Organization," which was recently approved by the

“fair presentation,” it may be necessary to: (i) provide disclosures beyond those specifically required by the criteria, or (ii) depart from the criteria in extremely rare circumstances. The wording used throughout the working draft, including in the objectives of the practitioner (WD, paragraph 9) is that the GHG statement is “prepared in accordance with the applicable criteria,” which indicates that compliance criteria are expected rather than fair presentation criteria.

46. Special purpose criteria are designed to meet the information needs of specific users only. For example, criteria embodied in laws or regulations may have been designed to meet the specific information needs of a particular regulatory emissions reduction scheme and may not be suitable for preparing a GHG statement for general distribution. General purpose criteria, on the other hand, are designed to meet the common information needs of a wide range of users.

### Questions

22. Is it appropriate for the ISAE to be written primarily for compliance criteria? Is there a common understanding of what fair presentation with respect to GHG statements means (for example, in what circumstances might adherence to regulatory criteria not yield fair presentation)? Are the criteria used in jurisdictions with which you are familiar compliance criteria or fair presentation criteria? Please provide examples of such criteria.
23. Should the ISAE provide requirements and guidance for cases where special purpose criteria are used? If so, how would it differ from the working draft? Are criteria in jurisdictions with which you are familiar special purpose or general purpose criteria? Please provide examples of such criteria.

### Emissions Deductions

47. The term “emissions deductions” has been used in the working draft as a way of dealing with the various instruments and mechanisms reported in different jurisdictions as a deduction from the entity’s gross emissions and removals (see WD, paragraph 10(d)).
48. A common deduction in many jurisdictions is a purchased offset, that is, where the entity has paid another entity to either:
- (a) Enable that other entity to lower its emissions compared to a hypothetical baseline of what its emissions would have been had it not received money from selling offsets and spending that money on, for example, energy efficiency measures; or
  - (b) Remove emissions from the atmosphere, for example, by planting and maintaining trees that would otherwise not have been planted/maintained.
49. Even though the concept of offsets is reasonably well-understood in general terms, the availability of relevant and reliable information in relation to the many different offsets in the marketplace varies greatly and, therefore, so does the evidence available to practitioners to

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IAASB, uses “fair presentation” in the context of descriptions of internal control.

support entities' claimed deductions with respect to such offsets.

50. Emissions deductions can also include jurisdiction-specific items, such as credits and allowances for which there is not necessarily any established link between the contribution and any lowering of emissions that may occur as a result of the contribution.
51. Because of the varied nature of deductions and the often limited assurance procedures that can be applied thereto, if the GHG statement includes emissions deductions, paragraph 111(d) of the working draft requires identification of those emissions deductions in the assurance report, and either a statement of the practitioner's responsibility with respect to them, or a statement that the practitioner has not performed any assurance procedures with respect to them and that, therefore, no opinion on them is expressed.
52. A statement that the practitioner has not performed any assurance procedures with respect to emissions deductions could be worded as follows when the emissions deductions are comprised of offsets: "The GHG statement includes a deduction from ABC's emissions for the year of yyy tonnes of CO<sub>2-e</sub> relating to offsets. We have performed assurance procedures as to whether these offsets were acquired during the year, and whether the description of them in the GHG statement is a reasonable summary of the relevant contracts and related documentation. We have not, however, performed any assurance procedures regarding the external providers of these offsets, and express no opinion about whether the offsets have resulted, or will result, in a reduction of yyy tonnes of CO<sub>2-e</sub>."

#### Questions

24. Is the manner in which the working draft has dealt with deductions appropriate? If not, please provide details and suggestions for modification or elaboration of the working draft.
25. Some purchased offset are accompanied by an assurance report. How, if at all, should this be reflected in the content of the ISAE; for example, to what extent and in what circumstances, if at all, would the practitioner who assures the GHG statement be able to rely on assured offsets and provide an opinion on the net of emissions less offsets?
26. Where the GHG statement contains emissions deductions, is the treatment required by paragraph 111(d) of the working draft appropriate? If so, where in the assurance report should the required wording be situated? Would wording along the lines of that in paragraph 52 above be appropriate?

#### Scope 3 Emissions

53. Indirect emissions are emissions that are a consequence of the activities of one entity but that occur at sources owned or controlled by another entity. Indirect emissions can be categorized as what are known as Scope 2 emissions, which are those associated with energy that is transferred to and consumed by the entity. All other indirect emissions are Scope 3 emissions. Scope 3 emissions may include emissions associated with, for example: employee business travel; outsourced activities; consumption of fossil fuel or electricity required to use the entity's products; extraction and production of materials purchased as inputs to the entity's processes; and transportation of purchased fuels.

54. As discussed in paragraphs A29-A31 of the working draft, assurance with respect to Scope 3 emissions can be very problematic. For example, Scope 3 emissions can come from such a wide variety of possible sources that, for all but the very simplest of entities, it would be virtually impossible for the practitioner to be satisfied with respect to the completeness of disclosures. Some entities include their main Scope 3 emissions in their GHG statement, but it is very difficult to quantify those that have not been included and therefore assess their materiality. In practice, it is recognized that it is not practical to expect all of an entity's Scope 3 emissions to be included in its GHG statement. This is becoming better understood as GHG reporting becomes more prevalent.
55. Rather than exclude all Scope 3 emissions because of such difficulties, paragraphs A29-A31 of the working draft include cautionary language about the limitations of Scope 3 information and of assurance procedures with respect to that information. In developing this material, an important consideration has been the fact that it is likely more and more entities will include Scope 3 emissions in their GHG statements as time goes by, and it does not seem to be in the public interest to disallow assurance on such disclosures in all cases. Another important consideration has been the fact that the assurance report is not aimed at intended users who are unaware of the limitations of information presented in a GHG statement and, therefore, as long as suitable disclosures are included in the GHG statement, intended users are not likely to be misled by the inclusion of some Scope 3 emissions, and assurance thereon.
56. Paragraph 111(k) of the working draft requires the assurance report to include a statement of the uncertainties in quantifying emissions relevant to the entity. That statement could include wording along the following lines when the GHG statement includes Scope 3 emissions: "While ABC reports certain Scope 3 emissions, it is not practicable for all such emissions to be included. The full extent of Scope 3 emissions for nearly any entity would be impossible to quantify as it includes all sources both up and down the supply chain."

### Questions

27. Is it appropriate for the ISAE to include cautionary language with respect to Scope 3 emissions (such as that in paragraphs A29-A31 of the working draft)? If not, please provide details and suggestions for modification or elaboration of the working draft.
28. What additions, if any, to the assurance report may be required when the GHG statement contains Scope 3 emissions? Would wording along the lines of that in paragraph 56 above be appropriate to include in the statement of uncertainties required by paragraph 111(k) of the working draft? If so, should such wording be included regardless of whether or not disclosed Scope 3 emissions are covered by the assurance engagement?

### Types of Assurance Engagements

#### *Direct Reporting Engagements*

57. The Assurance Framework states that an assurance engagement may be either an "assertion-

based” engagement or a “direct reporting” engagement.<sup>19</sup> The working draft is written to deal only with assertion-based engagements as evidence available to the Task Force at this time indicates that this is the most common form of engagement (see WD, paragraph 4).

### Question

29. Are you aware of jurisdictions in which direct reporting engagements are common in practice, or are required by law or regulation? If so:
- (a) Please provide details, including example reports where available.
  - (b) Are restrictions placed on the work allowed to be done by the practitioner with respect to quantifying the entity’s emissions; or obligations placed on the entity with respect to, for example, having a reasonable basis for representations made to the practitioner?

### *Level of Assurance*

58. The working draft deals only with reasonable assurance engagements (see WD, paragraph 3). In developing the working draft, the Task Force originally included requirements with respect to limited assurance engagements because limited assurance engagements are allowed for by law or regulation in some jurisdictions and appear to also be in demand with respect to voluntary reporting.
59. However, after discussion at the June 2009 IAASB meeting of this project and the projects to revise ISAE 3000 and ISRE 2400,<sup>20</sup> it became evident that extensive discussion over a number of meetings would be required to fully consider how the ISAE should differentiate a limited assurance engagement from a reasonable assurance engagement. The IAASB therefore agreed that, in the interest of expediting progress to the exposure draft stage, this project should deal first with reasonable assurance engagements. Feedback on that exposure draft, along with the further development of other relevant IAASB projects, in particular the projects to revise ISRE 2400 and ISAE 3000, will assist the IAASB in deciding how to extend the project to deal with limited assurance engagements.
60. It would be helpful at this stage if respondents to this Consultation Paper were to offer any preliminary views they may have regarding the distinction between limited assurance and reasonable assurance engagements with respect to a GHG statement.

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<sup>19</sup> Paragraph 10 of the Assurance Framework states: “In some assurance engagements, the evaluation or measurement of the subject matter is performed by the responsible party, and the subject matter information is in the form of an assertion by the responsible party that is made available to the intended users. These engagements are called ‘assertion-based engagements.’ In other assurance engagements, the practitioner either directly performs the evaluation or measurement of the subject matter, or obtains a representation from the responsible party that has performed the evaluation or measurement that is not available to the intended users. The subject matter information is provided to the intended users in the assurance report. These engagements are called ‘direct reporting engagements.’”

<sup>20</sup> International Standard on Review Engagements (ISRE), 2400 “Engagements to Review Financial Statements.”

### Question

30. How should a limited assurance engagement on a GHG statement be differentiated from a reasonable assurance engagement, for example:<sup>21</sup>
- (a) How should the practitioner determine the procedures to be performed?
  - (b) What is the role of risk assessment in a limited assurance engagement?
  - (c) To what extent, if any, should the practitioner consider the effectiveness of control?
  - (d) Should evidence be primarily obtained through inquiry and analytical review?
  - (e) Which procedures that ordinarily are performed in a reasonable assurance engagement would you not expect to be performed in a limited assurance engagement?

### Guide for Respondents

61. The IAASB invites comments on any aspect of this Consultation Paper, in addition to responses to the specific questions set forth for consideration. While respondents should not feel obliged to answer all the questions posed in the Consultation Paper, it will assist IAASB staff's collation of views if those questions are used to structure responses on the topic. Also, it is helpful if respondents provide reasoning to support their views in a level of detail that will assist the IAASB's consideration of the issues in developing an exposure draft of the ISAE.
62. As noted in the Introduction, respondents are asked to comment not only on technical aspect of the issues raised, but also on their public interest impact, in particular their effect on the costs (for example, additional work effort required) and benefits (for example, improvements in consistency and quality) of GHG assurance engagements.
63. While comments may also refer to specific paragraphs in the working draft and make suggestions for proposed wording in the ISAE, the IAASB emphasizes that the working draft is not an exposure draft, and that references to the working draft are for illustrative purposes only.

Respondents are asked to submit their comments **electronically** through the IFAC website ([www.ifac.org](http://www.ifac.org)), using the "Submit a Comment" link on the Exposure Drafts and Consultation Papers page. Please note that first-time users must register to use this new feature. All comments will be considered a matter of public record and will ultimately be posted on the IFAC website. Although IFAC prefers that comments be submitted electronically, e-mail may continue to be sent to [edcomments@ifac.org](mailto:edcomments@ifac.org). Comments can also be faxed to the attention of the IAASB Technical Director at +1 (212) 856-9420, or mailed to 545 Fifth Avenue, 14th Floor, New York, NY 10017, USA. They should be received by **February 19, 2010**.

<sup>21</sup> The issues identified in Agenda Item 6-A of the September 2009 IAASB meeting regarding the revision of ISRE 2400, while not identical, are indicative of the issues that need to be considered with respect to limited assurance GHG engagements. See <http://www.ifac.org/IAASB/Meeting-BGPapers.php?MID=0168&ViewCat=1138>.

**WORKING DRAFT OF AN INTERNATIONAL STANDARD ON  
ASSURANCE ENGAGEMENTS –  
ASSURANCE ON A GREENHOUSE GAS STATEMENT**

This working draft is attached to the Consultation Paper for illustrative purposes only. It is not an exposure draft. It was developed by the IAASB’s GHG Task Force, and has not been voted on or otherwise approved by the IAASB.

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[Proposed] International Standard on Assurance Engagements (ISAE) xxxx, “Assurance on a Greenhouse Gas Statement” should be read in conjunction with the “Preface to the International Standards on Quality Control, Auditing, Review, Other Assurance and Related Services.”

## Introduction

### Scope of this ISAE

1. This International Standard on Assurance Engagements (ISAE) deals with assurance engagements to report on a greenhouse gas (GHG) statement.<sup>1</sup>
2. Although this ISAE does not provide specific guidance for assurance engagements under ISAE 3000<sup>2</sup> to report on the following, it may nonetheless assist practitioners with such engagements:
  - (a) Statements of emissions other than GHG emissions, for example, nitrogen oxides (NO<sub>x</sub>) and sulfur dioxide (SO<sub>2</sub>);<sup>3</sup>
  - (b) Other GHG-related information, such as key performance indicators based on GHG data. (Ref: Para. A1)

### *Reasonable Assurance and Limited Assurance Engagements*

3. The International Framework for Assurance Engagements (the Assurance Framework) notes that an assurance engagement may be either a reasonable assurance engagement or a limited assurance engagement.<sup>4</sup> This ISAE deals only with reasonable assurance engagements.

### *Assertion-Based and Direct Reporting Engagements*

4. The Assurance Framework notes that an assurance engagement may be either an assertion-based engagement or a direct reporting engagement. This ISAE deals only with assertion-based engagements.

### *Relationship with Other Professional Pronouncements*

5. The performance of assurance engagements other than audits or reviews of historical financial information requires the practitioner to comply with ISAE 3000 in addition to this ISAE. The Assurance Framework, which defines and describes the elements and objectives of an assurance engagement, provides context for understanding this ISAE and ISAE 3000.
6. Compliance with ISAE 3000 requires, among other things, that the practitioner comply with the independence and other requirements of the International Federation of Accountants' *Code of Ethics for Professional Accountants* (IFAC Code) and implement quality control procedures that are applicable to the individual engagement.

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<sup>1</sup> This working draft is attached to the Consultation Paper for illustrative purposes only. It is not an exposure draft. It was developed by the IAASB's GHG Task Force, and has not been voted on or otherwise approved by the IAASB.

<sup>2</sup> ISAE 3000, "Assurance Engagements Other than Audits or Reviews of Historical Financial Information."

<sup>3</sup> NO<sub>x</sub> (i.e., NO and NO<sub>2</sub>, which differ from the GHG nitrous oxide, N<sub>2</sub>O) and SO<sub>2</sub> are associated with "acid rain" rather than climate change.

<sup>4</sup> The Assurance Framework, paragraph 11.

## **GHG Quantification and Reporting**

7. With the increasing attention given to the link between GHGs and climate change, many entities are quantifying their GHG emissions for internal management purposes, and an increasing number are also preparing a GHG statement:
  - (a) As part of a regulatory disclosure regime;
  - (b) As part of an emissions trading scheme; or
  - (c) To inform investors and others on a voluntary basis. Voluntary disclosures may be, for example, published as a standalone document; included as part of a broader sustainability report or in an entity's annual report; or made to support inclusion in a "carbon register."

## **Effective Date**

8. This ISAE is effective for assurance reports covering periods ending on or after [date].<sup>5</sup>

## **Objectives**

9. The objectives of the practitioner are:
  - (a) To obtain reasonable assurance about whether the GHG statement is free from material misstatement, whether due to fraud or error, thereby enabling the practitioner to express an opinion on whether the GHG statement is prepared, in all material respects, in accordance with the applicable criteria; and
  - (b) To report on the entity's GHG statement, and communicate as required by this ISAE, in accordance with the practitioner's findings.

## **Definitions**

10. For purposes of this ISAE, the following terms have the meanings attributed below:
  - (a) Applicable criteria – The criteria used by the entity to quantify and report its emissions.<sup>6</sup>
  - (b) Assertions – Representations by the entity, explicit or otherwise, that are embodied in the GHG statement, as used by the practitioner to consider the different types of potential misstatements that may occur.
  - (c) Emissions – The GHGs that, during the relevant period, have been emitted to the atmosphere or would have been emitted to the atmosphere had they not been captured and channeled to a sink. Emissions can be categorized as:
    - Direct emissions (also known as Scope 1 emissions), which are emissions from sources that are owned or controlled by the entity.

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<sup>5</sup> This date will be at least 6 months after the date on which the ISAE is approved for issue. Paragraph 16 of the "Preface to the International Standards on Quality Control, Auditing, Review, Other Assurance and Related Services" permits application before the effective date.

<sup>6</sup> Criteria are discussed in the Assurance Framework, paragraphs 34-38.

- Indirect emissions, which are emissions that are a consequence of the activities of the entity, but which occur at sources that are owned or controlled by another entity. Indirect emissions can be further categorized as:
  - Scope 2 emissions, which are emissions associated with energy, including electricity, heating/cooling, and steam, that is transferred to and consumed by the entity.
  - Scope 3 emissions, which are all other indirect emissions. (Ref: Para. A2)

The entity's emissions (and its removals and emissions deductions, where applicable) is the "subject matter" of the engagement.<sup>7</sup>

- (d) Emissions deduction – Any item included in the entity's GHG statement that is deducted from the total reported emissions, but which is not a removal; it commonly includes offsets (where the entity pays another entity to remove emissions from the atmosphere, or to undertake measures that lower the other entity's emissions), but can also include a variety of other instruments or mechanisms such as performance credits and allowances that are recognized by a regulatory or other scheme of which the entity is a part. Where an entity's GHG statement includes emissions deductions, the requirements of this ISAE in relation to emissions also apply in relation to emissions deductions as appropriate.
- (e) Emissions factor – A mathematical factor or ratio for converting the measure of an activity (for example, liters of fuel consumed, kilometers travelled, the number of animals in husbandry, or tonnes of product produced) into an estimate of the quantity of GHGs associated with that activity.
- (f) Engagement partner – The partner or other person in the firm who is responsible for the engagement and its performance, and for the assurance report that is issued on behalf of the firm, and who, where required, has the appropriate authority from a professional, legal or regulatory body.<sup>8</sup>
- (g) Engagement team – All partners and staff performing the engagement, and any individuals engaged by the firm or a network firm who perform assurance procedures on the engagement. This excludes a practitioner's external expert engaged by the firm or a network firm.
- (h) Entity – The legal entity, economic entity, or the identifiable portion of a legal or economic entity (for example, a single factory or other form of facility, such as a land fill site), or combination of legal or other entities or portions of those entities (for example, a joint venture) to which the emissions in the GHG statement relate.
- (i) Fraud – An intentional act by one or more individuals among management, those charged with governance, employees, or third parties, involving the use of deception to

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<sup>7</sup> Assurance Framework, paragraph 8.

<sup>8</sup> "Engagement partner," "partner," and "firm" should be read as referring to their public sector equivalents where relevant.

obtain an unjust or illegal advantage.

- (j) GHG statement – A statement setting out constituent elements and quantifying an entity’s GHG emissions for a period, and where applicable, comparative emissions relating to a prior period(s) or base year (sometimes known as a statement of emissions and removals, or an emissions inventory), plus explanatory notes including a summary of significant quantification and reporting policies. An entity’s GHG statement may also include a categorized listing of removals or emissions deductions. The GHG statement is the “subject matter information” of the engagement.<sup>9</sup>
- (k) Greenhouse gases (GHGs) – Carbon dioxide (CO<sub>2</sub>) and any other gases required by the applicable criteria to be included in the GHG statement, such as: methane; nitrous oxide; sulfur hexafluoride; hydrofluorocarbons; perfluorocarbons; and chlorofluorocarbons. These other gases are often expressed in terms of carbon dioxide equivalents (CO<sub>2</sub>-e).
- (l) Management’s expert – An individual or organization possessing expertise in a field other than accounting or auditing, whose work in that field is used by the entity to assist the entity in preparing the GHG statement.
- (m) Organizational boundary – The boundary that determines which organizations or facilities to include in the entity’s GHG statement.
- (n) Performance materiality – The amount or amounts set by the practitioner at less than materiality for the GHG statement to reduce to an appropriately low level the probability that the aggregate of uncorrected and undetected misstatements exceeds materiality for the GHG statement. If applicable, performance materiality also refers to the amount or amounts set by the practitioner at less than the materiality level or levels for particular types of emissions or disclosures.
- (o) Practitioner – “Practitioner” is used to refer to the person or persons conducting the engagement, usually the engagement partner or other members of the engagement team or, as applicable, the firm. Where this ISAE expressly intends that a requirement or responsibility be fulfilled by the engagement partner, the term “engagement partner” rather than “practitioner” is used.
- (p) Practitioner’s expert – An individual or organization possessing expertise in a field other than accounting or auditing, whose work in that field is used by the practitioner to assist the practitioner in obtaining sufficient appropriate evidence. A practitioner’s expert may be either a practitioner’s internal expert (who is a partner or staff, including temporary staff, of the practitioner’s firm or a network firm), or a practitioner’s external expert.
- (q) Professional accountant<sup>10</sup> – An individual who is a member of an IFAC member body.
- (r) Professional accountant in public practice<sup>11</sup> – A professional accountant, irrespective of functional classification (e.g., audit, tax or consulting) in a firm that provides

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<sup>9</sup> Assurance Framework, paragraph 8.

<sup>10</sup> As defined in the IFAC Code.

professional services. This term is also used to refer to a firm of professional accountants in public practice.

- (s) Quantification – The process of attributing a quantity of GHGs to a particular source (or sink).
- (t) Removal – GHGs the entity has removed from the atmosphere, or emissions the entity has prevented from being released to the atmosphere, during the period. Where an entity’s GHG statement includes removals, the requirements of this ISAE in relation to emissions also apply in relation to removals as appropriate. (Ref: Para. A3)
- (u) Sink – A physical unit or process that removes GHGs from the atmosphere.
- (v) Source – A physical unit or process that releases GHGs into the atmosphere.
- (w) Type of emissions – A grouping of emissions based on, for example, source of emission, type of gas, region, or facility.

## Requirements

### ISAE 3000

- 11. The practitioner shall not represent compliance with this ISAE unless the practitioner has complied with the requirements of this ISAE and ISAE 3000. (Ref: Para.A4, A19-A22)

### Competency, Quality Control, and Ethical Requirements

- 12. The engagement partner shall:
  - (a) Be a professional accountant in public practice<sup>12</sup> who has specialist skills, knowledge and experience in assurance concepts and processes developed through extensive training and practical application. (Ref: Para. A5-A6)
  - (b) Have sufficient skills, knowledge and experience of GHG quantification and reporting to accept responsibility for the assurance opinion; (Ref: Para. A7-A8)
  - (c) Be satisfied that the engagement team and any practitioner’s external experts collectively have the appropriate competence and capabilities to: (Ref: Para. A9-A10)
    - (i) Perform the engagement in accordance with professional standards and applicable legal and regulatory requirements; and
    - (ii) Enable an assurance report that is appropriate in the circumstances to be issued; and
  - (d) Evaluate whether the engagement team will be able to be involved, to the extent necessary to obtain sufficient appropriate evidence regarding the GHG statement, in the work of:

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<sup>11</sup> As defined in the IFAC Code.

<sup>12</sup> This ISAE is also applicable to all professional accountants in the public sector who are independent of the entity for which they perform assurance engagements.

- (i) A practitioner's expert where the work of that expert is to be used; and (Ref: Para. A11-A13)
  - (ii) A component practitioner where the work of that practitioner is to be used. (Ref: Para. A14)
13. The practitioner shall comply with relevant ethical requirements, including those pertaining to independence, relating to assurance engagements. (Ref: Para. A15-A16)

### **Management and Those Charged with Governance**

14. Where this ISAE requires the practitioner to inquire of, request representations from, communicate with, or otherwise interact with the entity, the practitioner shall determine the appropriate person(s) within the entity's management or governance structure with whom to interact. This shall include consideration of which person(s) have the appropriate responsibilities for and knowledge of the matters concerned. (Ref: Para. A17)

### **Acceptance and Continuance**

#### *Preconditions for the Engagement*

15. In order to establish whether the preconditions for the engagement are present:
- (a) The engagement partner shall determine that both the GHG statement and the engagement have sufficient scope to be useful to intended users, considering, in particular: (Ref: Para. A18)
    - (i) If the GHG statement is to exclude significant emissions that have been, or could readily be, quantified; or
    - (ii) If the engagement is to exclude significant emissions that are included in the GHG statement,whether such exclusions are reasonable in the circumstances.
  - (b) The practitioner shall obtain the agreement of the entity that it acknowledges and understands its responsibility:
    - (i) In the case of a voluntary reporting engagement, for stating in its GHG statement the applicable criteria it has used, and who developed them;
    - (ii) In the case of a voluntary reporting engagement, to acknowledge to intended users its responsibility for the preparation of its GHG statement in accordance with the applicable criteria;
    - (iii) For such internal control as the entity determines is necessary to enable the preparation of a GHG statement that is free from material misstatement, whether due to fraud or error; and
    - (iv) To provide the practitioner with:
      - a. Access to all information of which the entity is aware that is relevant to the preparation of the GHG statement such as records, documentation and

- other matters;
- b. Additional information that the practitioner may request from the entity for the purpose of the engagement; and
  - c. Unrestricted access to persons within the entity from whom the practitioner determines it necessary to obtain engagement evidence.
- (c) As part of assessing the suitability of the applicable criteria in accordance with ISAE 3000,<sup>13</sup> when the information is to be used to inform investors and others on a voluntary basis, the practitioner shall determine whether they encompass at a minimum: (Ref: Para. A23-A26)
- (i) The method for determining the entity’s organizational boundary; (Ref: Para. A27)
  - (ii) The GHGs to be accounted for;
  - (iii) Quantification methods to be used; and
  - (iv) Disclosure of:
    - a. Which organizations or facilities are included in the entity’s organizational boundary, and the method used for determining that boundary if the applicable criteria allow a choice between different methods; (Ref: Para. A27)
    - b. The method used to determine which Scope 1 and Scope 2 emissions have been included in the GHG statement; (Ref: Para. A28)
    - c. The categorization of emissions attributable to each material type of emission included in the GHG statement;
    - d. Any significant interpretations made in applying the applicable criteria in the entity’s circumstances, including when choices between different methods are allowed, or entity-specific methods are used, disclosure of the method used and the rationale for doing so;
    - e. Where the GHG statement includes Scope 3 emissions, an explanation of: (Ref: Para. A29-A31)
      - The nature of Scope 3 emissions, including that it is not practicable for an entity to include all Scope 3 emissions in its GHG statement; and
      - The basis for selecting those Scope 3 emissions sources that have been included; and
    - f. Changes, if any, in the matters mentioned in this paragraph or in other matters that materially affect the comparability of the GHG statement with a prior period(s) or base year.
16. If the preconditions for the engagement are not present, the practitioner shall discuss the matter with the entity. Unless required by law or regulation to do so, the practitioner shall only accept

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<sup>13</sup> ISAE 3000, paragraph 19.

the proposed engagement if:

- (a) The practitioner has determined that the criteria to be applied in the preparation of the GHG statement are acceptable; and
- (b) The agreement referred to in paragraph 15(b) has been obtained.

#### *Acceptance and Continuance Procedures*

- 17. The engagement partner shall be satisfied that appropriate procedures regarding the acceptance and continuance of client relationships and assurance engagements have been followed, and shall determine that conclusions reached in this regard are appropriate.

#### *Agreement on Engagement Terms*

- 18. The agreed terms of the engagement, as required by ISAE 3000,<sup>14</sup> shall be recorded in an engagement letter or other suitable form of written agreement and shall include:
  - (a) The objective and scope of the engagement;
  - (b) The responsibilities of the practitioner;
  - (c) The responsibilities of the entity;
  - (d) Identification of the applicable criteria for the preparation of the GHG statement; and
  - (e) Reference to the expected form and content of any reports to be issued by the practitioner and a statement that there may be circumstances in which a report may differ from its expected form and content.
  - (f) That entity agrees to provide a representation letter at the conclusion of the engagement.

#### *Acceptance of a Change in the Terms of the Engagement*

- 19. The practitioner shall not agree to a change in the terms of the engagement where there is no reasonable justification for doing so.

#### *Assurance Report Prescribed by Law or Regulation*

- 20. In some cases, law or regulation of the relevant jurisdiction prescribes the layout or wording of the assurance report. In these circumstances, the practitioner shall evaluate:
  - (a) Whether users might misunderstand the assurance obtained from the engagement and, if so,
  - (b) Whether additional explanation in the assurance report can mitigate possible misunderstanding.

If the practitioner concludes that additional explanation in the assurance report cannot mitigate possible misunderstanding, the practitioner shall not accept the engagement, unless

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<sup>14</sup> ISAE 3000, paragraph 10.

required by law or regulation to do so. An engagement conducted in accordance with such law or regulation does not comply with ISAEs. Accordingly, the practitioner shall not include any reference within the assurance report to the engagement having been conducted in accordance with ISAEs.

### **Engagement Level Quality Control**

#### *Leadership Responsibilities for Quality on the Engagements*

21. The engagement partner shall take responsibility for the overall quality of the engagement.

#### *Relevant Ethical Requirements*

22. Throughout the assurance engagement, the engagement partner shall remain alert, through observation and making inquiries as necessary, for evidence of non-compliance with relevant ethical requirements by members of the engagement team.
23. If matters come to the engagement partner's attention through the firm's system of quality control or otherwise that indicate that members of the engagement team have not complied with relevant ethical requirements, the engagement partner, in consultation with others in the firm, shall determine the appropriate action.

#### *Independence*

24. The engagement partner shall form a conclusion on compliance with independence requirements that apply to the engagement. In doing so, the engagement partner shall:
  - (a) Obtain relevant information from the firm and, where applicable, network firms, to identify and evaluate circumstances and relationships that create threats to independence;
  - (b) Evaluate information on identified breaches, if any, of the firm's independence policies and procedures to determine whether they create a threat to independence for the engagement; and
  - (c) Take appropriate action to eliminate such threats or reduce them to an acceptable level by applying safeguards or, if considered appropriate, to withdraw from the engagement, where withdrawal is possible under applicable law or regulation. The engagement partner shall promptly report to the firm any inability to resolve the matter for appropriate action.

#### *Engagement Performance*

##### **Direction, Supervision and Performance**

25. The engagement partner shall take responsibility for:
  - (a) The direction, supervision and performance of the engagement in compliance with professional standards and applicable legal and regulatory requirements; and
  - (b) The assurance report being appropriate in the circumstances.

## Reviews

26. The engagement partner shall take responsibility for reviews being performed in accordance with the firm's review policies and procedures.
27. On or before the date of the assurance report, the engagement partner shall, through a review of the engagement documentation and discussion with the engagement team, be satisfied that sufficient appropriate evidence has been obtained to support the conclusions reached and for the assurance report to be issued.

## Consultation

28. The engagement partner shall:
  - (a) Take responsibility for the engagement team undertaking appropriate consultation on difficult or contentious matters;
  - (b) Be satisfied that members of the engagement team have undertaken appropriate consultation during the course of the engagement, both within the engagement team and between the engagement team and others at the appropriate level within or outside the firm;
  - (c) Be satisfied that the nature and scope of, and conclusions resulting from, such consultations are agreed with the party consulted; and
  - (d) Determine that conclusions resulting from such consultations have been implemented.

## Differences of Conclusion

29. If differences of conclusion arise within the engagement team, with those consulted or any practitioner's external experts, or where applicable, between the engagement partner and the engagement quality control reviewer, the engagement team shall follow the firm's policies and procedures for dealing with and resolving differences of conclusion.

## **Fraud**

30. The practitioner shall: (Ref: Para. A32-A35)
  - (a) Identify and assess the risks of material misstatement of the GHG statement due to fraud;
  - (b) Obtain sufficient appropriate evidence regarding the assessed risks of material misstatement due to fraud, through designing and implementing appropriate responses; and
  - (c) Respond appropriately to fraud or suspected fraud identified during the engagement.

## **Laws and Regulations**

31. The practitioner shall:
  - (a) Obtain sufficient appropriate evidence regarding compliance with the provisions of those laws and regulations generally recognized to have a direct effect on the content of

the GHG statement; and

- (b) Respond appropriately to non-compliance or suspected non-compliance with laws and regulations identified during the engagement. (Ref: Para. A36)

## **Planning**

### *Involvement of Others*

- 32. The engagement partner, other key members of the engagement team, and any key practitioner's external experts, shall be involved in planning the engagement, including planning and participating in the discussion required by paragraph 42.

### *Planning Activities*

- 33. The practitioner shall establish an overall engagement strategy that sets the scope, timing and direction of the engagement, and that guides the development of the engagement plan. (Ref: Para. A37)
- 34. In establishing the overall engagement strategy, the practitioner shall: (Ref: Para. A38)
  - (a) Identify the characteristics of the engagement that define its scope;
  - (b) Ascertain the reporting objectives of the engagement to plan the timing of the engagement and the nature of the communications required;
  - (c) Consider the factors that, in the practitioner's professional judgment, are significant in directing the engagement team's efforts;
  - (d) Consider the results of preliminary engagement activities and, where applicable, whether knowledge gained on other engagements performed by the engagement partner for the entity is relevant;
  - (e) Ascertain the nature, timing and extent of resources necessary to perform the engagement; and
  - (f) Determine the impact of the internal audit function on the assurance engagement.
- 35. The practitioner shall develop an engagement plan that shall include a description of:
  - (a) The nature, timing and extent of planned risk assessment procedures.
  - (b) The nature, timing and extent of planned further assurance procedures at the assertion level.
  - (c) Other planned assurance procedures that are required to be carried out so that the engagement complies with ISAEs.

## **Materiality in Planning and Performing the Engagement**

### *Determining Materiality and Performance Materiality When Planning the Engagement*

- 36. When establishing the overall engagement strategy, the practitioner shall determine materiality for the GHG statement. If, in the specific circumstances of the entity, there are one or more particular types of emissions or disclosures for which misstatements of lesser

amounts than materiality for the GHG statement could reasonably be expected to influence the economic decisions of users taken on the basis of the GHG statement, the practitioner shall also determine the materiality level or levels to be applied to those particular types of emissions or disclosures. (Ref: Para. A39-A46)

37. The practitioner shall determine performance materiality for purposes of assessing the risks of material misstatement and determining the nature, timing and extent of further assurance procedures.

#### *Revision as the Engagement Progresses*

38. The practitioner shall revise materiality for the GHG statement (and, if applicable, the materiality level or levels for particular types of emissions or disclosures) in the event of becoming aware of information during the engagement that would have caused the practitioner to have determined a different amount (or amounts) initially. (Ref: Para. A47)

### **Identifying and Assessing the Risks of Material Misstatement through Understanding the Entity and Its Environment**

#### *Risk Assessment Procedures and Related Activities*

39. The practitioner shall perform risk assessment procedures to provide a basis for the identification and assessment of risks of material misstatement at the GHG statement and assertion levels. Risk assessment procedures by themselves, however, do not provide sufficient appropriate evidence on which to base the assurance opinion. (Ref: Para. A48-A50)
40. The risk assessment procedures shall include the following:
  - (a) Inquiries of those within the entity who in the practitioner's judgment may have information that is likely to assist in identifying risks of material misstatement due to fraud or error.
  - (b) Analytical procedures.
  - (c) Observation and inspection.
41. If the engagement partner has performed other engagements for the entity, the engagement partner shall consider whether information obtained is relevant to identifying risks of material misstatement. (Ref: Para. A51)
42. The engagement partner and other key members of the engagement team, and any key practitioner's external experts, shall discuss the susceptibility of the entity's GHG statement to material misstatement whether due to fraud or error, and the application of the applicable criteria to the entity's facts and circumstances. The engagement partner shall determine which matters are to be communicated to members of the engagement team, and to any practitioner's external experts not involved in the discussion.

#### *The Entity and Its Environment*

43. The practitioner shall obtain an understanding of the following:
  - (a) Relevant industry, regulatory, and other external factors including the applicable

- criteria.
- (b) The nature of the entity, including:
    - (i) The organizations or facilities included in the entity’s organizational boundary and the nature of their operations, which determine: (Ref: Para. A27)
      - a. The types of emission sources;
      - b. The contribution of each to the entity’s overall emissions; and
      - c. The uncertainties associated with the quantities reported in the GHG statement. (Ref: Para.A19-A22)
    - (ii) Changes in the nature or extent of operations, including whether there have been any mergers, acquisitions, or sales of emission sources, or outsourcing of functions with significant emissions that may require adjustment of comparative emissions relating to a prior period(s) or base year, or disclosure in the GHG statement; and
    - (iii) The frequency or nature of incidents such as shut downs.
  - (c) The entity’s selection and application of quantification methods and reporting policies, including the reasons for changes thereto and the potential for double-counting of emissions; and the requirements of the applicable criteria relevant to estimates, including related disclosures, including: (Ref: Para.A52-A53)
    - (i) An understanding of the data on which estimates are based;
    - (ii) The method, including where applicable the model, used in making estimates;
    - (ii) Relevant controls;
    - (iii) Whether the entity has used a management’s expert;
    - (iv) The assumptions underlying estimates; and
    - (v) Whether there has been or ought to have been a change from the prior period in the methods for making estimates and, if so, why.
  - (d) The entity’s objectives and strategies, and those related business risks that may result in risks of material misstatement. (Ref: Para. A54)
  - (e) The oversight of, and responsibility for, emissions information within the entity.
44. The practitioner shall evaluate whether the entity’s quantification methods and reporting policies, including the determination of the entity’s organizational boundary, are appropriate for its operations, and are consistent with the applicable criteria and quantification and reporting policies used in the relevant industry and in prior periods.

*The Entity’s Internal Control*

45. The practitioner shall obtain an understanding of internal control relevant to the engagement. When obtaining an understanding of controls that are relevant to the engagement, the practitioner shall evaluate the design of those controls and determine whether they have been

implemented, by performing procedures in addition to inquiry of the entity's personnel.

46. The practitioner shall obtain an understanding of the components of internal control relevant to the engagement, being:
- (a) The control environment;
  - (b) The entity's risk assessment procedures;
  - (c) The information system, including the related business processes, relevant to emissions quantification and reporting, and communication of emissions reporting roles and responsibilities and significant matters relating to emissions reporting; (Ref: Para. A55)
  - (d) Control activities relevant to the engagement, being those the practitioner judges it necessary to understand in order to assess the risks of material misstatement at the assertion level and design further assurance procedures responsive to assessed risks. An assurance engagement does not require an understanding of all the control activities related to each significant type of emission and disclosure in the GHG statement or to every assertion relevant to them. (Ref: Para. A55)
  - (e) Monitoring of controls and the collective effectiveness of all five components of internal control, including the internal audit function and its activities with respect to emissions where applicable.

*Identifying and Assessing Risks*

47. The practitioner shall identify and assess the risks of material misstatement at:
- (a) The GHG statement level; and
  - (b) The assertion level for types of emissions and disclosures to provide a basis for designing and performing further assurance procedures.
48. For this purpose, the practitioner shall:
- (a) Identify risks throughout the process of obtaining an understanding of the entity and its environment, including relevant controls that relate to the risks, and by considering the types of emissions and disclosures in the GHG statement;
  - (b) Assess the identified risks, and evaluate whether they relate more pervasively to the GHG statement and potentially affect many assertions;
  - (c) Relate the identified risks to what can go wrong at the assertion level, taking account of relevant controls that the practitioner intends to test; and
  - (d) Consider the likelihood of misstatement, including the possibility of multiple misstatements, and whether the potential misstatement is of a magnitude that could result in a material misstatement.
49. In identifying and assessing risks of material misstatement, the practitioner shall consider at least the following factors: (Ref: Para. A56-A57)
- (a) The possibility of intentional misstatement in the GHG statement, and the possibility of omission of a potentially significant source or sink; (Ref: Para. A32-A35, and A56(a))

- (b) Recent significant economic, regulatory or other requirements and developments; (Ref: Para. A56(b))
- (c) The nature of operations; (Ref: Para. A56(c))
- (d) The nature of quantification methods; (Ref: Para. A56(d))
- (e) The degree of complexity in determining the organizational boundary and whether related parties are involved; (Ref: Para. A27)
- (f) Whether there are significant emissions that are outside the normal course of business for the entity, or that otherwise appear to be unusual; (Ref: Para. A56(e))
- (g) The degree of subjectivity in the quantification of emissions; and (Ref: Para. A56(e))
- (h) Whether Scope 3 emissions are included in the GHG statement. (Ref: Para. A56(f))

*Risks for Which Substantive Procedures Alone Do Not Provide Sufficient Appropriate Evidence*

50. In respect of some risks, the practitioner may judge that it is not possible or practicable to obtain sufficient appropriate evidence only from substantive procedures. In such cases, the entity's controls over such risks are relevant to the engagement and the practitioner shall obtain an understanding of them. (Ref: Para. A58)

*Revision of Risk Assessment*

51. The practitioner's assessment of the risks of material misstatement at the assertion level may change during the course of the engagement as additional engagement evidence is obtained. In circumstances where the practitioner obtains engagement evidence from performing further assurance procedures, or if new information is obtained, either of which is inconsistent with the engagement evidence on which the practitioner originally based the assessment, the practitioner shall revise the assessment and modify the further planned assurance procedures accordingly.

**Responses to Assessed Risks**

*Overall Responses*

52. The practitioner shall design and implement overall responses to address the assessed risks of material misstatement at the GHG statement level.

*Assurance Procedures Responsive to the Assessed Risks of Material Misstatement at the Assertion Level*

53. The practitioner shall design and perform further assurance procedures whose nature, timing, and extent are based on and are responsive to the assessed risks of material misstatement at the assertion level. (Ref: Para. A59)
54. In designing the further assurance procedures to be performed, the practitioner shall:
- (a) Consider the reasons for the assessment given to the risk of material misstatement at the assertion level for each type of emissions and disclosure, including: (Ref: Para. A60)

- (i) The likelihood of material misstatement due to the particular characteristics of the relevant type of emission or disclosure (that is, the inherent risk); and
  - (ii) Whether the risk assessment takes account of relevant controls (that is, the control risk), thereby requiring the practitioner to obtain engagement evidence to determine whether the controls are operating effectively (that is, the practitioner intends to rely on the operating effectiveness of controls in determining the nature, timing and extent of substantive procedures); and
- (b) Obtain more persuasive engagement evidence the higher the practitioner's assessment of risk.

### *Tests of Controls*

55. The practitioner shall design and perform tests of controls to obtain sufficient appropriate evidence as to the operating effectiveness of relevant controls if:
- (a) The practitioner's assessment of risks of material misstatement at the assertion level includes an expectation that the controls are operating effectively (that is, the practitioner intends to rely on the operating effectiveness of controls in determining the nature, timing and extent of substantive procedures); or
  - (b) Substantive procedures alone cannot provide sufficient appropriate evidence at the assertion level.

### *Evaluating the Operating Effectiveness of Controls*

56. If deviations from controls upon which the practitioner intends to rely are detected, the practitioner shall make specific inquiries to understand these matters and their potential consequences, and shall determine whether:
- (a) The tests of controls that have been performed provide an appropriate basis for reliance on the controls;
  - (b) Additional tests of controls are necessary; or
  - (c) The potential risks of misstatement need to be addressed using substantive procedures.

### *Substantive Procedures*

57. Irrespective of the assessed risks of material misstatement, the practitioner shall design and perform substantive procedures for each material type of emission and disclosure. (Ref: Para. A61)
58. The practitioner shall consider whether external confirmation procedures are to be performed as substantive assurance procedures. (Ref: Para. A62)

### *Substantive Analytical Procedures*

59. When designing and performing substantive analytical procedures as substantive procedures, either alone or in combination with tests of details, the practitioner shall:

- (a) Determine the suitability of particular substantive analytical procedures for given assertions, taking account of the assessed risks of material misstatement and tests of details, if any, for these assertions;
  - (b) Evaluate the reliability of data from which the practitioner's expectation of recorded quantities or ratios is developed, taking account of source, comparability, and nature and relevance of information available, and controls over preparation;
  - (c) Develop an expectation of recorded quantities or ratios and evaluate whether the expectation is sufficiently precise to identify a misstatement that, individually or when aggregated with other misstatements, may cause the GHG statement to be materially misstated; and
  - (d) Determine the amount of any difference from that expected that is acceptable without further investigation as required by paragraph 60.
60. If analytical procedures identify fluctuations or relationships that are inconsistent with other relevant information or that differ significantly from expected quantities the practitioner shall investigate such differences by: (Ref: Para. A63-A65)
- (a) Inquiring of the entity and obtaining appropriate engagement evidence relevant to the entity's responses; and
  - (b) Performing other assurance procedures as necessary in the circumstances.

#### Substantive Procedures Related to the GHG Statement Aggregation Process

61. The practitioner's substantive procedures shall include the following assurance procedures related to the GHG statement aggregation process: (Ref: Para. A66)
- (a) Agreeing or reconciling the GHG statement with the underlying records; and
  - (b) Examining material adjustments made during the course of preparing the GHG statement.

#### *Assurance Procedures Regarding Estimates*

62. Based on the assessed risks of material misstatement, the practitioner shall determine:
- (a) Whether the entity has appropriately applied the requirements of the applicable criteria relevant to estimates; and
  - (b) Whether the methods for making the estimates are appropriate and have been applied consistently, and whether changes, if any, in reported estimates or in the method for making them from the prior period are appropriate in the circumstances.
63. In responding to the assessed risks of material misstatement the practitioner shall undertake one or more of the following, taking account of the nature of estimates: (Ref: Para. A67)
- (a) Test how the entity made the estimate and the data on which it is based. In doing so, the practitioner shall evaluate whether:
    - (i) The method of quantification used is appropriate in the circumstances; and

- (ii) The assumptions used by the entity are reasonable in light of the applicable criteria.
- (b) Test the operating effectiveness of the controls over how the entity made the estimate, together with appropriate substantive procedures.
- (c) Develop a point estimate or a range to evaluate the entity's estimate. For this purpose:
  - (i) If the practitioner uses assumptions or methods that differ from the entity's, the practitioner shall obtain an understanding of the entity's assumptions or methods sufficient to establish that the practitioner's point estimate or range takes into account relevant variables and to evaluate any significant differences from the entity's point estimate.
  - (ii) If the practitioner concludes that it is appropriate to use a range, the practitioner shall narrow the range, based on engagement evidence available, until all outcomes within the range are considered reasonable.

### *Sampling*

- 64. When designing a sample, the practitioner shall consider the purpose of the assurance procedure and the characteristics of the population from which the sample will be drawn.
- 65. The practitioner shall determine a sample size sufficient to reduce sampling risk to an acceptably low level.
- 66. The practitioner shall select items for the sample in such a way that each sampling unit in the population has a chance of selection, and shall perform assurance procedures, appropriate to the purpose, on each item selected.
- 67. If the practitioner is unable to apply the designed assurance procedures, or suitable alternative procedures, to a selected item, the practitioner shall treat that item as a deviation from the prescribed control, in the case of tests of controls, or a misstatement, in the case of tests of details.
- 68. The practitioner shall investigate the nature and cause of any deviations or misstatements identified, and evaluate their possible effect on the purpose of the assurance procedure and on other areas of the engagement.
- 69. For tests of details, the practitioner shall project misstatements found in the sample to the population.
- 70. The practitioner shall evaluate:
  - (a) The results of the sample; and
  - (b) Whether the use of sampling has provided a reasonable basis for conclusions about the population that has been tested.

### **Engagement Evidence**

- 71. If information to be used as engagement evidence has been prepared using the work of a management's expert, the practitioner shall, to the extent necessary, having regard to the

significance of that expert's work for the practitioner's purposes:

- (a) Evaluate the competence, capabilities and objectivity of that expert; (Ref: Para. A68-A71)
  - (b) Obtain an understanding of the work of that expert; and
  - (c) Evaluate the appropriateness of that expert's work as engagement evidence for the relevant assertion.
72. When using information produced by the entity, the practitioner shall evaluate whether the information is sufficiently reliable for the practitioner's purposes, including as necessary in the circumstances:
- (a) Obtaining engagement evidence about the accuracy and completeness of the information; and
  - (b) Evaluating whether the information is sufficiently precise and detailed for the practitioner's purposes.
73. If:
- (a) Engagement evidence obtained from one source is inconsistent with that obtained from another; or
  - (b) The practitioner has doubts over the reliability of information to be used as engagement evidence,
- the practitioner shall determine what modifications or additions to assurance procedures are necessary to resolve the matter, and shall consider the effect of the matter, if any, on other aspects of the engagement.

## **Evaluation of Misstatements Identified during the Engagement**

### *Accumulation of Identified Misstatements*

74. The practitioner shall accumulate misstatements identified during the engagement, other than those that are clearly trivial. (Ref: Para. A72)

### *Consideration of Identified Misstatements as the Engagement Progresses*

75. The practitioner shall determine whether the overall engagement strategy and engagement plan need to be revised if:
- (a) The nature of identified misstatements and the circumstances of their occurrence indicate that other misstatements may exist that, when aggregated with misstatements accumulated during the engagement, could be material; or
  - (b) The aggregate of misstatements accumulated during the engagement approaches materiality determined in accordance with paragraphs 36-38 of this ISAE.
76. If, at the practitioner's request, the entity has examined a type of emission or disclosure and corrected misstatements that were detected, the practitioner shall perform additional assurance procedures to determine whether misstatements remain.

### *Communication and Correction of Misstatements*

77. The practitioner shall communicate on a timely basis all misstatements accumulated during the engagement with the appropriate level within the entity and shall request the entity to correct those misstatements.
78. If the entity refuses to correct some or all of the misstatements communicated by the practitioner, the practitioner shall obtain an understanding of the entity's reasons for not making the corrections and shall take that understanding into account when evaluating whether the GHG statement is free from material misstatement.

### *Evaluating the Effect of Uncorrected Misstatements*

79. Prior to evaluating the effect of uncorrected misstatements, the practitioner shall reassess materiality determined in accordance with paragraphs 36-38 of this ISAE to confirm whether it remains appropriate in the context of the entity's actual emissions.
80. The practitioner shall determine whether uncorrected misstatements are material, individually or in the aggregate. In making this determination, the practitioner shall consider the size and nature of the misstatements, both in relation to particular types of emissions or disclosures and the GHG statement, and the particular circumstances of their occurrence.

### **Using the Work of Component Practitioners**

81. When the practitioner intends to use the work of component practitioners regarding components of the GHG statement, the practitioner shall: (Ref: Para. A73)
  - (a) Communicate clearly with those component practitioners about the scope and timing of their work on those components and their findings; and (Ref: Para. A74-A75)
  - (b) Obtain sufficient appropriate evidence regarding those components and the process for including related information in the GHG statement to express an opinion on whether the GHG statement is prepared, in all material respects, in accordance with the applicable criteria. (Ref: Para. A76)

### **Using the Work of Internal Audit**

82. The practitioner shall, where the entity has an internal audit function, determine whether it is likely to be relevant to the engagement and, if so: (Ref: Para. A77)
  - (a) Determine whether, and to what extent, to use specific work of the internal auditors; and
  - (b) If using the specific work of the internal auditors, determine whether that work is adequate for the purposes of the engagement.

### **Using the Work of a Practitioner's Expert**

#### *Nature, Timing and Extent of Assurance Procedures*

83. The nature, timing and extent of the practitioner's procedures with respect to the requirements in paragraphs 84-88 of this ISAE will vary depending on the circumstances. In

determining the nature, timing and extent of those procedures, the practitioner shall consider matters including:

- (a) The nature of the matter to which that expert's work relates;
- (b) The risks of material misstatement in the matter to which that expert's work relates;
- (c) The significance of that expert's work in the context of the engagement;
- (d) The practitioner's knowledge of and experience with previous work performed by that expert; and
- (e) Whether that expert is subject to the practitioner's firm's quality control policies and procedures. (Ref: Para. A11-A13)

*The Competence, Capabilities and Objectivity of the Practitioner's Expert*

84. The practitioner shall evaluate whether the practitioner's expert has the necessary competence, capabilities and objectivity for the practitioner's purposes. In the case of a practitioner's external expert, the evaluation of objectivity shall include inquiry regarding interests and relationships that may create a threat to that expert's objectivity. (Ref: Para. A78-A79)

*Obtaining an Understanding of the Field of Expertise of the Practitioner's Expert*

85. The practitioner shall obtain a sufficient understanding of the field of expertise of the practitioner's expert to enable the practitioner to:
- (a) Agree with the practitioner's expert the nature, scope and objectives of that expert's work for the practitioner's purposes; and
  - (b) Evaluate the adequacy of that work for the practitioner's purposes.

*Agreement with the Practitioner's Expert*

86. The practitioner shall agree, in writing when appropriate, on the following matters with the practitioner's expert:
- (a) The nature, scope and objectives of that expert's work;
  - (b) The respective roles and responsibilities of the practitioner and that expert;
  - (c) The nature, timing and extent of communication between the practitioner and that expert, including the form of any report to be provided by that expert; and
  - (d) The need for the practitioner's expert to observe confidentiality requirements.

*Evaluating the Adequacy of the Practitioner's Expert's Work*

87. The practitioner shall evaluate the adequacy of the practitioner's expert's work for the practitioner's purposes, including:
- (a) The relevance and reasonableness of that expert's findings or conclusions, and their consistency with other engagement evidence;
  - (b) If that expert's work involves use of significant assumptions and methods, the

relevance and reasonableness of those assumptions and methods in the circumstances;  
and

- (c) If that expert's work involves the use of source data that is significant to that expert's work, the relevance, completeness, and accuracy of that source data.
88. If the practitioner determines that the work of the practitioner's expert is not adequate for the practitioner's purposes, the practitioner shall:
- (a) Agree with that expert on the nature and extent of further work to be performed by that expert; or
  - (b) Perform additional assurance procedures appropriate to the circumstances.

### **Written Representations**

89. The practitioner shall request written representations from the entity:
- (a) That the entity has fulfilled its responsibility for the preparation of the GHG statement in accordance with the applicable criteria, as set out in the terms of the engagement;
  - (b) That the entity has provided the practitioner with all relevant information and access as agreed in the terms of the engagement and reflected all relevant matters in the GHG statement;
  - (c) Whether the entity believes the effects of uncorrected misstatements are immaterial, individually and in the aggregate, to the GHG statement. A summary of such items shall be included in or attached to the written representation;
  - (d) That significant assumptions used in making estimates are reasonable; and
  - (e) That the entity has communicated to the practitioner all deficiencies in internal control relevant to the engagement that are not clearly trivial and inconsequential of which the entity is aware.

### *Requested Written Representations Not Provided*

90. If the entity does not provide one or more of the requested written representations, the practitioner shall:
- (a) Discuss the matter with the entity;
  - (b) Reevaluate the integrity of the entity and evaluate the effect that this may have on the reliability of representations (oral or written) and engagement evidence in general; and
  - (c) Take appropriate actions, including determining the possible effect on the opinion in the assurance report, having regard to the requirement in paragraph 91 of this ISAE.

### *Written Representations about the Entity's Responsibilities*

91. The practitioner shall disclaim an opinion on the GHG statement if:
- (a) The practitioner concludes that there is sufficient doubt about the integrity of the entity such that the written representations required by paragraphs 89(a) and (b) are not reliable; or

- (b) The entity does not provide the written representations required by paragraphs 89(a) and (b).

### **Subsequent Events**

- 92. The practitioner shall:
  - (a) Obtain sufficient appropriate evidence about whether events occurring between the date of the GHG statement and the date of the assurance report that require adjustment of, or disclosure in, the GHG statement are appropriately reflected in that GHG statement in accordance with the applicable criteria; and
  - (b) Respond appropriately to facts that become known to the practitioner after the date of the assurance report, that, had they been known to the practitioner at that date, may have caused the practitioner to amend the assurance report.

### **Other Information**

- 93. When documents containing a GHG statement and the assurance report thereon include other information, the practitioner shall read that other information to identify material inconsistencies, if any, with the GHG statement and, if on reading that other information, the practitioner:
  - (a) Identifies a material inconsistency with the GHG statement, or
  - (b) Becomes aware of a material misstatement of fact in that other information that is unrelated to matters appearing in the GHG statement,the practitioner shall discuss the matter with the entity and take any further appropriate action. (Ref. Para. A80-A82)

### **Documentation**

#### *Documentation of the Assurance Procedures Performed and Engagement Evidence Obtained*

- 94. The practitioner shall prepare on a timely basis engagement documentation that is sufficient to enable an experienced practitioner, having no previous connection with the engagement, to understand: (Ref. Para. A83)
  - (a) The nature, timing and extent of the assurance procedures performed to comply with the ISAEs and applicable legal and regulatory requirements;
  - (b) The results of the assurance procedures performed, and the engagement evidence obtained; and
  - (c) Significant matters arising during the engagement, the conclusions reached thereon, and significant professional judgments made in reaching those conclusions.
- 95. In documenting the nature, timing and extent of assurance procedures performed, the practitioner shall record:
  - (a) The identifying characteristics of the specific items or matters tested;
  - (b) Who performed the engagement work and the date such work was completed; and

- (c) Who reviewed the engagement work performed and the date and extent of such review.
- 96. The practitioner shall document discussions of significant matters with the entity and others, including the nature of the significant matters discussed and when and with whom the discussions took place.
- 97. If the practitioner identified information that is inconsistent with the practitioner's final conclusion regarding a significant matter, the practitioner shall document how the practitioner addressed the inconsistency.

#### Quality Control

- 98. The practitioner shall include in the engagement documentation:
  - (a) Issues identified with respect to compliance with relevant ethical requirements and how they were resolved.
  - (b) Conclusions on compliance with independence requirements that apply to the engagement, and any relevant discussions with the firm that support these conclusions.
  - (c) Conclusions reached regarding the acceptance and continuance of client relationships and assurance engagements.
  - (d) The nature and scope of, and conclusions resulting from, consultations undertaken during the course of the engagement.

#### *Matters Arising after the Date of the Assurance Report*

- 99. If, in exceptional circumstances, the practitioner performs new or additional assurance procedures or draws new conclusions after the date of the assurance report, the practitioner shall document:
  - (a) The circumstances encountered;
  - (b) The new or additional assurance procedures performed, engagement evidence obtained, and conclusions reached, and their effect on the assurance report; and
  - (c) When and by whom the resulting changes to engagement documentation were made and reviewed.

#### *Assembly of the Final Engagement File*

- 100. The practitioner shall assemble the engagement documentation in an engagement file and complete the administrative process of assembling the final engagement file on a timely basis after the date of the assurance report. (Ref. Para A84)
- 101. After the assembly of the final engagement file has been completed, the practitioner shall not delete or discard engagement documentation of any nature before the end of its retention period.
- 102. In circumstances other than those envisaged in paragraph 99 where the practitioner finds it necessary to modify existing engagement documentation or add new engagement

documentation after the assembly of the final engagement file has been completed, the practitioner shall, regardless of the nature of the modifications or additions, document:

- (a) The specific reasons for making them; and
- (b) When and by whom they were made and reviewed.

### **Engagement Quality Control Review**

103. For those engagements, if any, for which a quality control review is required by law or regulation or for which the firm has determined that an engagement quality control review is required, the engagement partner shall:
- (a) Determine that an engagement quality control reviewer has been appointed;
  - (b) Discuss significant matters arising during the engagement, including those identified during the engagement quality control review, with the engagement quality control reviewer; and
  - (c) Not date the assurance report until the completion of the engagement quality control review.
104. The engagement quality control reviewer shall perform an objective evaluation of the significant judgments made by the engagement team, and the conclusions reached in formulating the assurance report. This evaluation shall involve.
- (a) Discussion of significant matters with the engagement partner;
  - (b) Review of the GHG statement and the proposed assurance report;
  - (c) Review of selected engagement documentation relating to the significant judgments the engagement team made and the conclusions it reached;
  - (d) Evaluation of the conclusions reached in formulating the assurance report and consideration of whether the proposed assurance report is appropriate;
  - (e) Consideration of the engagement team's evaluation of the firm's independence in relation to the engagement;
  - (f) Consideration of whether appropriate consultation has taken place on matters involving differences of conclusion or other difficult or contentious matters, and the conclusions arising from those consultations; and
  - (g) Consideration of whether engagement documentation selected for review reflects the work performed in relation to the significant judgments and supports the conclusions reached.

### **Forming the Assurance Opinion**

105. The practitioner shall form an opinion on whether the GHG statement is prepared, in all material respects, in accordance with the applicable criteria.
106. In order to form that opinion, the practitioner shall conclude as to whether the practitioner has obtained reasonable assurance about whether the GHG statement is free from material

misstatement, whether due to fraud or error. That conclusion shall take into account the following procedures, and the requirement of paragraph 80 of this ISAE:

- (a) Based on the assurance procedures performed and the engagement evidence obtained, the practitioner shall evaluate before the conclusion of the engagement whether the assessments of the risks of material misstatement at the assertion level remain appropriate.
- (b) The practitioner shall conclude whether sufficient appropriate evidence has been obtained. In forming a conclusion, the practitioner shall consider all relevant engagement evidence, regardless of whether it appears to corroborate or to contradict the assertions in the GHG statement.
- (c) If the practitioner has not obtained sufficient appropriate evidence as to a material GHG statement assertion, the practitioner shall attempt to obtain further engagement evidence.
- (d) The practitioner shall evaluate whether the GHG statement is prepared, in all material respects, in accordance with the applicable criteria. This evaluation shall include consideration of the qualitative aspects of the entity's quantification methods and reporting practices, including indicators of possible bias in judgments and decisions in the making of estimates and in preparing the GHG statement.<sup>15</sup> When the information is to be used to inform investors and others on a voluntary basis, the practitioner shall evaluate whether, in view of the applicable criteria:
  - (i) The GHG statement adequately discloses the significant quantification methods and reporting policies selected and applied, including the method of determining the entity's organizational boundary;
  - (ii) The quantification methods and reporting policies selected and applied are consistent with the applicable criteria and are appropriate;
  - (iii) Estimates made in preparing the GHG statement are reasonable;
  - (iv) The information presented in the GHG statement is relevant, reliable, complete, comparable and understandable;
  - (v) The GHG statement provides adequate disclosures, including disclosure of uncertainties in the quantification of the entity's emissions, to enable the intended users to understand the information conveyed; and
  - (vi) The terminology used in the GHG statement is appropriate;

107. The practitioner shall evaluate whether the GHG statement adequately refers to or describes the applicable criteria. (Ref: Para. A85-A87)

### **Form of Opinion**

108. The practitioner shall express an unmodified opinion when the practitioner concludes that the GHG statement is prepared, in all material respects, in accordance with the applicable

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<sup>15</sup> Indicators of possible bias do not themselves constitute misstatements for the purposes of drawing conclusions on the reasonableness of individual estimates.

criteria.

109. If the practitioner:

- (a) Concludes that, based on the engagement evidence obtained, the GHG statement is not free from material misstatement; or
- (b) Is unable to obtain sufficient appropriate evidence to conclude that the GHG statement is free from material misstatement,

the practitioner shall modify the opinion in the assurance report.<sup>16</sup>

#### *Other Matter Paragraphs in the Assurance Report*

110. If the practitioner considers it necessary to communicate a matter other than those that are presented or disclosed in the GHG statement that, in the practitioner's judgment, is relevant to users' understanding of the engagement, the practitioner's responsibilities or the assurance report and this is not prohibited by law or regulation, the practitioner shall do so in a paragraph in the assurance report, with the heading "Other Matter," or other appropriate heading. (Ref: Para. A88-A89)

#### **Assurance Report Content**

111. The assurance report shall include the following basic elements: (Ref: Para. A90)

- (a) A title that clearly indicates the report is an independent assurance report.
- (b) The addressee of the assurance report. (Ref: Para. A91)
- (c) Identification of the GHG statement and, if any information in that statement is not covered by the practitioner's opinion, identification of that information, and a statement that the practitioner has not performed any assurance procedures with respect to it and that, therefore, no opinion on it is expressed.
- (d) If the GHG statement includes emissions deductions, identification of those emissions deductions, and either a statement of the practitioner's responsibility with respect to them, or a statement that the practitioner has not performed any assurance procedures with respect to them and that, therefore, no opinion on them is expressed. (Ref: Para. A92)
- (e)
  - (i) Identification of the applicable criteria;
  - (ii) Identification of how those criteria can be accessed;
  - (iii) If those criteria are available only to specific intended users, or are relevant only to a specific purpose, a statement restricting the use of the assurance report to those intended users or that purpose; and
  - (iv) If established criteria need to be supplemented by disclosures in the explanatory notes for those criteria to be suitable, identification of the relevant note(s).

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<sup>16</sup> Paragraphs 51-52 of ISAE 3000 discuss when a qualified opinion, an adverse opinion or a disclaimer of opinion is appropriate.

- (f) A description of the entity’s responsibilities.
- (g) A statement identifying the relevant ethical code and firm-level quality control requirements, and that they have been complied with.
- (h) A description of the practitioner’s responsibilities, including:
  - (i) A statement that the engagement was performed in accordance with ISAE xxxx, “Assurance on a Greenhouse Gas Statement.”
  - (ii) A summary of the practitioner’s procedures.
- (i) The practitioner’s opinion, expressed in the positive form, about whether the GHG statement is prepared, in all material respects, in accordance with the criteria identified in paragraph 111(e)(i).
- (j) If the practitioner expresses an opinion that is other than unqualified, a clear description of all the reasons therefor.
- (k) A statement of the uncertainties in quantifying emissions relevant to the entity.
- (l) The name of the practitioner or the practitioner’s firm.
- (m) The date of the report.
- (n) The name of the city where the office that has responsibility for the engagement is.

*Reference to the Practitioner’s Expert in the Assurance Report*

112. If the practitioner refers to the work of a practitioner’s expert in an assurance report, the wording of that report shall not imply that the practitioner’s responsibility for the conclusion expressed in that report is reduced because of the involvement of that expert.

*Assurance Report Prescribed by Law or Regulation*

113. If the practitioner is required by law or regulation to use a specific layout or wording of the assurance report, the assurance report shall refer to this or other ISAEs only if the assurance report includes, at a minimum, each of the elements identified in paragraph 111.

**Other Reporting Requirements**

114. The practitioner shall communicate appropriately to the entity the following matters that come to the practitioner’s attention during the course of the engagement, and shall determine whether there is a responsibility to report them to a party outside the entity:
- (a) Deficiencies in internal control that, in the practitioner’s professional judgment, are of sufficient importance to merit attention.
  - (b) Identified or suspected fraud.
  - (c) Matters involving non-compliance with laws and regulations, other than when the matters are clearly inconsequential.

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## Application and Other Explanatory Material

### Introduction

*Key Performance Indicators Based on GHG Data* (Ref: Para. 2(b))

- A1. An example of a key performance indicator based on GHG data is the weighted average of emissions per kilometer of vehicles manufactured by an entity during a period, which is required to be calculated and disclosed by law or regulation in some jurisdictions.

### Definitions

*Scope 3 Emissions* (Ref: Para. 10(c))

- A2. Scope 3 emissions may include emissions associated with, for example: employee business travel; outsourced activities; consumption of fossil fuel or electricity required to use the entity's products; extraction and production of materials purchased as inputs to the entity's processes; and transportation of purchased fuels. Scope 3 emissions are discussed further in paragraphs A29-A31.

*Removal* (Ref: Para. 10(t))

- A3. Removal may be achieved by storing GHGs in geological or biological sinks. Removal of GHGs the entity would have otherwise emitted to the atmosphere are ordinarily accounted for on a gross basis, that is, both the source and the sink are disclosed in the GHG statement.

**ISAE 3000** (Ref: Para 11)

- A4. ISAE 3000 includes a number of requirements that apply to all assurance engagements, including engagements in accordance with this ISAE. In some cases, this ISAE may include additional requirements or application material in relation to those topics.

### Competency, Quality Control, and Ethical Requirements

*Professional Accountants in Public Practice* (Ref: Para. 12(a))

- A5. This ISAE has been written in the context of a range of measures taken to ensure the quality of assurance engagements undertaken by professional accountants in public practice, such as those taken by IFAC member bodies in accordance with IFAC's Member Body Compliance Program and Statements of Membership Obligations. Such measures include:
- Competency requirements, such as education and experience benchmarks for entry to membership, and ongoing continuing professional development/life-long learning requirements.
  - Quality control policies and procedures implemented across the firm. ISQC 1 applies to all firms of professional accountants in respect of assurance and related services engagements.<sup>17</sup> Compliance with ISQC 1 requires, among other things, that the firm

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<sup>17</sup> International Standard on Quality Control (ISQC) 1, "Quality Control for Firms that Perform Audits and Reviews of Financial Statements," paragraph 4.

establish and maintain a system of quality control that includes policies and procedures addressing each of the following elements, and that it documents its policies and procedures and communicates them to the firm's personnel:<sup>18</sup>

- Leadership responsibilities for quality within the firm.
- Relevant ethical requirements.
- Acceptance and continuance of client relationships and specific engagements.
- Human resources.
- Engagement performance.
- Monitoring.
- A comprehensive Code of Ethics, including detailed independence requirements, founded on fundamental principles of integrity, objectivity, professional competence and due care, confidentiality and professional behavior.

*Specialist Skills, Knowledge and Experience in Assurance* (Ref: Para. 12(a))

A6. As noted in International Education Standard (IES) 8, no one professional accountant can master all areas of accountancy. Specialization is necessary to ensure services can be provided by professional accountants having sufficient depth of knowledge and expertise.<sup>19</sup> One area of specialization is assurance, which includes, but is broader than, financial statement auditing. Competence in assurance requires specialist skills, knowledge and experience in assurance concepts and processes developed through extensive training and practical application. In many jurisdictions, regulators develop rules for registration (for example, registration as a financial statement auditor) that, along with IES 8, may provide useful benchmarks for assessing compliance with paragraph 12(a) of this ISAE in a particular jurisdiction. Such rules may involve, for example, demonstration of specific competencies, or a requirement to spend set periods of time on particular aspects of assurance engagements.

*Skills, Knowledge and Experience of GHG Quantification and Reporting* (Ref: Para. 12(b))

A7. The IFAC Code requires the professional accountant in public practice to agree to provide only those services that the professional accountant in public practice is competent to perform.<sup>20</sup> The practitioner has sole responsibility for the assurance opinion expressed, and that responsibility is not reduced by the practitioner's use of the work of a practitioner's expert. Nonetheless, if the practitioner using the work of a practitioner's expert, having followed this ISAE, concludes that the work of that expert is adequate for the practitioner's purposes, the practitioner may accept that expert's findings or conclusions in the expert's field as appropriate evidence.

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<sup>18</sup> ISQC 1, paragraphs 16 and 17.

<sup>19</sup> IES 8, "Competence Requirements for Audit Professionals."

<sup>20</sup> IFAC Code, paragraph 210.6.

A8. In some cases, an assurance engagement on a GHG statement may be quite straightforward. This may be the case for instance when a service entity has no Scope 1 emissions and is reporting only Scope 2 emissions using an emissions factor specified in regulation, applied to electricity consumption at a single location. In this case, the engagement may focus largely on the system used to record and process electricity consumption figures identified on invoices, and arithmetical application of the specified emissions factor. General GHG skills, knowledge or experience that may, nonetheless, be relevant in such cases include:

- General understanding of climate science, including the scientific processes that relate GHGs to global warming.
- Understanding who the intended users of the information in the entity's GHG statement are, and how they are likely to use that information.
- Understanding emissions trading schemes and related market mechanisms, when relevant.
- Knowledge of applicable laws and regulations, if any, that affect how the entity should report its emissions, and may also, for example, impose a limit on the entity's emissions.
- Knowledge of the applicable criteria, including, for example:
  - Identifying appropriate emissions factors.
  - Identifying those aspects of the criteria that call for significant or sensitive estimates to be made, or for the application of considerable judgment.
  - Methods used for determining the entities whose emissions are to be included in the GHG statement.
  - Which emissions deductions are permitted to be included in the entity's GHG statement.

*Collective Competence and Capabilities* (Ref: Para. 12(c))

A9. When the engagement is not straightforward (see paragraph A8), it is likely to require specialist skills, knowledge and experience in the quantification and reporting of emissions. Particular areas of expertise that may be relevant in such cases include:

*Information systems expertise*

- Understanding how emissions information is generated, including the assessment of controls over how data is initiated, recorded, processed, corrected as necessary, collated and reported in a GHG statement.

*Scientific expertise*

- Mapping the flow of materials through a production process, and the accompanying processes that create emissions, including identifying the relevant points at which source data are gathered. This may be particularly important in considering whether the entity's identification of emissions sources is complete.

- Analyzing chemical and physical relationships between inputs, processes and outputs, and relationships between emissions and other variables. The capacity to understand and analyze these relationships will often be important in designing analytical procedures that are sufficiently robust to identify a material misstatement.
- Identifying the components of uncertainty and the effect of uncertainty on the GHG statement.
- Experience with specific industries and related emissions creation and removal processes. Procedures for Scope 1 emissions quantification vary greatly depending on the industries and processes involved, for example, the nature of electrolytic processes in aluminum production; combustion processes in the production of electricity using fossil fuels; and chemical processes in cement production are all different.
- The operation of physical sensors and other quantification methods, and the selection of appropriate emissions factors.

A10. ISQC 1 requires the firm to establish policies and procedures for the acceptance and continuance of client relationships and specific engagements, designed to provide the firm with reasonable assurance that it will only undertake or continue relationships and engagements where the firm is competent to perform the engagement and has the capabilities, including time and resources, to do so.<sup>21</sup>

*Practitioner's Expert* (Ref: Para. 12(d)(i) and 83(e))

A11. Other than when the engagement is straightforward (see paragraph A8), the assurance work will often need to be performed by a multidisciplinary team that includes one or more practitioner's experts. A practitioner's expert may be needed to assist the practitioner in one or more of the following:

- Obtaining an understanding of the entity and its environment, including its internal control.
- Identifying and assessing the risks of material misstatement.
- Determining and implementing overall responses to assessed risks at the GHG statement level.
- Designing and performing further assurance procedures to respond to assessed risks at the assertion level, comprising tests of controls or substantive procedures.
- Evaluating the sufficiency and appropriateness of engagement evidence obtained in forming an opinion on the GHG statement.

A12. A practitioner's expert may be employed by the practitioner's firm, or engaged by that firm, perhaps as part of a strategic alliance or ongoing subcontracting arrangement with an organization of experts (such as a firm of consulting engineers). A practitioner's internal expert may be a partner or staff, including temporary staff, of the practitioner's firm, and

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<sup>21</sup> ISQC 1, paragraph 26.

therefore subject to the quality control policies and procedures of that firm in accordance with ISQC 1 or national requirements that are at least as demanding. Alternatively, a practitioner's internal expert may be a partner or staff, including temporary staff, of a network firm, which may share common quality control policies and procedures with the practitioner's firm. A practitioner's external expert is not a member of the engagement team and is not subject to quality control policies and procedures in accordance with ISQC 1.

A13. Engagement teams are entitled to rely on the firm's system of quality control, unless information provided by the firm or other parties suggests otherwise. The extent of that reliance will vary with the circumstances, and may affect the nature, timing and extent of the practitioner's procedures with respect to such matters as:

- Competence and capabilities, through recruitment and training programs.
- The practitioner's evaluation of the objectivity of the practitioner's expert. Practitioner's internal experts are subject to relevant ethical requirements, including those pertaining to independence.
- The practitioner's evaluation of the adequacy of the practitioner's expert's work. For example, the firm's training programs may provide the practitioner's internal experts with an appropriate understanding of the interrelationship of their expertise with the assurance process. Reliance on such training and other firm processes, such as protocols for scoping the work of the practitioner's internal experts, may affect the nature, timing and extent of the practitioner's procedures to evaluate the adequacy of the practitioner's expert's work.
- Adherence to regulatory and legal requirements, through monitoring processes.
- Agreement with the practitioner's expert.

Such reliance does not reduce the practitioner's responsibility to meet the requirements of this ISAE.

*Component Practitioners* (Ref: Para. 12(d)(ii))

A14. The GHG statement may include information from one or more components upon which a component practitioner may have been required by statute, regulation or for another reason, to express an opinion. The practitioner, in opining on the entity's GHG statement, may decide to use the evidence on which that component practitioner's opinion is based to provide evidence regarding the entity's GHG statement. Components may comprise, for example, a factory or other form of facility at a remoter location; a subsidiary, division or branch in a foreign jurisdiction; or a joint venture or associate.

*Independence* (Ref: Para. 13)

A15. Independence requirements ordinarily comprise Parts A and B of the IFAC Code together with national requirements that are more restrictive. The IFAC Code adopts a threats and safeguards approach to independence. Compliance with the fundamental principles may potentially be threatened by a broad range of circumstances. Many threats fall into the following categories:

- Self-interest, for example, undue dependence on total fees from the entity.
- Self-review, for example, performing another service for the entity that directly affects the GHG statement, such as involvement in the quantification of the entity's emissions.
- Advocacy, for example, acting as an advocate on behalf of the entity with respect to the interpretation of the applicable criteria.
- Familiarity, for example, a member of the engagement team having a long association, or close or immediate family relationship, with an employee of the entity who is in a position to exert direct and significant influence over the preparation of the GHG statement.
- Intimidation, for example, being pressured to reduce inappropriately the extent of work performed in order to lower fees, or being threatened with withdrawal of the assurance professional's registration by a registering authority that is associated with the entity's industry group.

A16. Safeguards created by the profession, legislation or regulation, or safeguards in the work environment, may eliminate or reduce such threats to an acceptable level.

#### **Management and Those Charged with Governance** (Ref: Para. 14)

A17. Management and governance structures vary by jurisdiction and by entity, reflecting influences such as different cultural and legal backgrounds, and size and ownership characteristics. Such diversity means that it is not possible for this ISAE to specify for all engagements the person(s) with whom the practitioner is to interact regarding particular matters. With respect to written representations, these will ordinarily be obtained from senior management or those charged with governance. In some cases, for example, when the entity may be a single facility and not a complete legal entity, identifying the appropriate management personnel or those charged with governance from whom to request written representations may require the exercise of professional judgment.

#### **Acceptance and Continuance**

##### *Scope of the GHG Statement and the Engagement* (Ref: Para. 15(a))

- A18. Examples of circumstances where the reasons for excluding known emissions sources from the GHG statement, or excluding disclosed emission sources from the engagement, may not be reasonable in the circumstances include where:
- The entity has significant Scope 1 emissions but only includes Scope 2 emissions in the GHG statement.
  - The entity is a part of a larger legal entity that has significant emissions that are not being reported on because of the way the organizational boundary has been determined, and this is likely to mislead intended users.
  - The emissions that the practitioner is reporting on are only a small proportion of the total emissions included in the GHG statement.

*Assessing the Appropriateness of the Subject Matter* (Ref: Para. 11 and 43(b)(i)c.)

A19. ISAE 3000 requires the practitioner to assess the appropriateness of the subject matter.<sup>22</sup> In the case of assurance on a GHG statement, the entity's emissions (and removals and emissions deductions if applicable) are the subject matter of the engagement. An appropriate subject matter is, amongst other things, capable of consistent evaluation or measurement against suitable criteria.<sup>23</sup> Quantification is the process of attributing a quantity of GHGs to a particular source or sink. GHG sources may be quantified by:

- (a) Direct measurement (or direct monitoring) of GHG concentration and flow rates using continuous emissions monitoring or periodic sampling; or
- (b) Measuring a surrogate activity, such as fuel consumption, and calculating emissions using, for example, mass balance equations,<sup>24</sup> entity-specific emissions factors, or average emissions factors for a region, source, sector or process.

A20. The process of GHG quantification is subject to uncertainty because of such things as:

- Estimates made in quantifying inputs, such as activity data and emission factors, that are used by mathematical models to calculate emissions (sometimes known as measurement, or parameter, uncertainty).
- The inability of such models to precisely characterize under all circumstances the relationships between various inputs and the resultant emissions (sometimes known as calculation, or model, uncertainty).

A21. The mere existence of uncertainty does not mean the entity's emissions are not capable of consistent measurement against suitable criteria. However, because intended users may not understand the uncertainties associated with the quantification of emissions if they are not adequately explained, it is ordinarily appropriate to include in the explanatory notes a discussion of the nature of the uncertainties that affect the GHG statement. This is particularly so where the intended users did not determine the criteria to be used. For example, a GHG statement may be available to a broad range of intended users even though the criteria used were developed for a particular regulatory purpose.

A22. Regardless of what, if any, disclosures regarding uncertainties are included in the explanatory notes, uncertainty is a characteristic of the subject matter that paragraph 111(k) requires to be mentioned in the assurance report to ensure readers of that report are aware of it.<sup>25</sup>

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<sup>22</sup> ISAE 3000, paragraph 18.

<sup>23</sup> Assurance Framework, paragraphs 34-38, and ISAE 3000, paragraphs 19-21.

<sup>24</sup> That is, equating the amount of a substance entering and exiting a defined boundary, for example, the amount of carbon in a hydrocarbon based fuel entering a combustion device equals the amount of carbon exiting the device in the form of carbon dioxide.

<sup>25</sup> See also ISAE 3000, paragraph 49(e).

*Assessing the Suitability of the Criteria*

Specifically Developed and Established Criteria (Ref: Para. 15(c))

- A23. Suitable criteria exhibit the following characteristics: relevance, completeness, reliability, neutrality, and understandability. Criteria may be “specifically developed” or they may be “established,” that is, embodied in laws or regulations, or issued by authorized or recognized bodies of experts that follow a transparent due process.<sup>26</sup> Ordinarily, established criteria are suitable when they are relevant to the needs of the intended users.
- A24. Specifically developed criteria may be appropriate when, for example, the entity has very specialized machinery or is aggregating emissions information from different jurisdictions where the established criteria used in those jurisdictions differ. Special care may be necessary when assessing the neutrality and other characteristics of specifically developed criteria, particularly if they are not substantially based on established criteria generally used in the entity’s industry or region, or are inconsistent with such criteria.
- A25. The applicable criteria may comprise established criteria supplemented by disclosures, in the explanatory notes of the GHG statement, of specific boundaries, methods, assumptions, emission factors, etc. In some cases, established criteria may not be suitable, even when supplemented by disclosures in the explanatory notes of the GHG statement. Some established criteria may be developed for application in particular circumstances, and be unsuitable for application in other circumstances. For example, criteria that include emissions factors for a particular region may render misleading information if used for emissions in another region; or criteria that are designed to report only on particular regulatory aspects of emissions may be unsuitable for reporting to intended users other than the regulator that developed the criteria.
- A26. A request to change the scope of the engagement may not have a reasonable justification when, for example, the request is made to exclude certain emissions sources from the scope of the engagement because of the likelihood that the practitioner’s opinion would be modified.

Organizations or Facilities Included in the Entity’s Organizational Boundary (Ref: Para. 15(c)(i), 15(c)(iv)a., 43(b)(i), and 49(e))

- A27. Determining which organizations or facilities to include in the entity’s GHG statement is known as determining the entity’s organizational boundary. In some cases, the applicable criteria may allow a choice between different methods for determining the entity’s organizational boundary, for example, the criteria may allow a choice between an approach that aligns the entity’s GHG statement with its financial statements, or another approach that treats, for example, joint ventures or associates differently. Determining the entity’s organizational boundary may require the analysis of complex organizational structures such as joint ventures, partnerships, and trusts, and complex or unusual contractual relationships.

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<sup>26</sup> Assurance Framework, paragraphs 36-37.

For example, a facility may be owned by one party, operated by another, and process materials solely for another party.

**Scope 1 and Scope 2 Emissions** (Ref: Para. 15(c)(iv)b.)

A28. Criteria commonly call for all material Scope 1, Scope 2, or both Scope 1 and Scope 2 emissions, to be included in the GHG statement. Where some Scope 1 or Scope 2 emissions sources have been excluded, it is important that the explanatory notes disclose the basis for determining which sources are included and which are excluded, particularly if the sources that are included are not likely to be the largest sources for which the entity is responsible.

**Scope 3 Emissions** (Ref: Para. 15(c)(iv)e.)

A29. While some criteria require the reporting of specific Scope 3 emissions, more commonly the inclusion of Scope 3 emissions is entirely optional because the full extent of indirect emissions for nearly any entity would be impossible to quantify as it includes all sources both up and down the entity's supply chain. Where some Scope 3 emissions sources have been included, it is important that the basis for selecting which sources to include is reasonable, particularly if those included are not likely to be the largest sources for which the entity is responsible.

A30. In some cases, the source data used to quantify Scope 3 emissions may be maintained by the entity. For example, the entity may keep detailed records as the basis for quantifying emissions associated with employee air travel. In some other cases, the source data used to quantify Scope 3 emissions may be maintained in a well-controlled and accessible source outside the entity. Where this is not the case, however, it may be unlikely that the practitioner will be able to obtain sufficient appropriate evidence with respect to Scope 3 emissions sources. In such cases, it may be appropriate to exclude those Scope 3 emissions sources from the engagement.

A31. It may also be appropriate to exclude Scope 3 emissions sources from the engagement where the quantification methods commonly in use are imprecise or lead to large variations in reported emissions. For example, various quantification methods for estimating the emissions associated with air travel are commonly in use, and can give widely varying quantifications even when identical source data is used. If such Scope 3 emissions sources are included in the engagement, it is important that the quantification methods used are selected objectively and that they are fully described along with the uncertainties associated with them.

**Fraud** (Ref: Para. 30 and 49(a))

A32. Misstatements in the GHG statement can arise from either fraud or error. The distinguishing factor between fraud and error is whether the underlying action that results in the misstatement of the GHG statement is intentional or unintentional.

A33. Incentives for intentional misstatement of the GHG statement may arise if, for example, those who are directly involved with, or have the opportunity to influence, the emissions reporting process have a significant portion of their compensation contingent upon achieving aggressive GHG targets. As noted in paragraph A54, other incentives to either understate or

overstate emissions may result from the entity's climate change strategy, if any, and associated economic, regulatory, physical and reputational risks.

A34. Although fraud is a broad legal concept, for the purposes of this ISAE, the practitioner is concerned with fraud that causes a material misstatement in the GHG statement. Although the practitioner may suspect or, in rare cases, identify the occurrence of fraud, the practitioner does not make legal determinations of whether fraud has actually occurred.

A35. In responding to fraud or suspected fraud identified during the engagement, it may be appropriate for the practitioner to, for example:

- Discuss the matter with the entity.
- Request the entity to consult with a qualified third party, such as the entity's legal counsel.
- Consider the implications of the matter in relation to other aspects of the engagement, including the practitioner risk assessment and the reliability of written representations
- Obtain legal advice about the consequences of different courses of action.
- Communicate with third parties (e.g., a regulator).
- Withhold the assurance report.
- Withdraw from the engagement.

#### **Laws and Regulations** (Ref: Para. 31(b))

A36. The actions noted in paragraph A35 may be appropriate in responding to non-compliance or suspected non-compliance with laws and regulations identified during the engagement. It may also be appropriate to describe the matter in an Other Matter paragraph in the practitioner's report in accordance with paragraph 110 of this ISAE, unless the practitioner:

- (a) Concludes that the non-compliance has a material effect on the GHG statement and has not been adequately reflected in the GHG statement; or
- (b) Is precluded by the entity from obtaining sufficient appropriate evidence to evaluate whether non-compliance that may be material to the GHG statement has, or is likely to have, occurred,

in which case paragraph 51 of ISAE 3000 applies.

#### **Planning**

##### *Overall Engagement Strategy* (Ref: Para. 33-34)

A37. When establishing the overall engagement strategy it may be relevant to consider the emphasis given to different aspects of the design and implementation of the GHG information system. For example, in some cases the entity may have been particularly conscious of the need for adequate internal control to ensure the reliability of reported information, while in other cases the entity may have focused more on accurately determining the scientific, operational or technical characteristics of the information to be

gathered.

A38. Smaller engagements or more straightforward engagements (see paragraph A8), may be conducted by a very small engagement team. With a smaller team, coordination of, and communication between, team members is easier. Establishing the overall engagement strategy for a smaller engagement, or for a more straightforward engagement, need not be a complex or time-consuming exercise. For example, a brief memorandum based on discussions with the entity, can serve as the documented engagement strategy if it covers the matters noted in paragraph 34.

### **Materiality in Planning and Performing the Engagement** (Ref: Para. 36)

#### *Determining Materiality and Performance Materiality When Planning the Engagement*

A39. The criteria may discuss the concept of materiality in the context of the preparation and presentation of the GHG statement. Although criteria may discuss materiality in different terms, the concept of materiality generally includes that:

- Misstatements, including omissions, are considered to be material if they, individually or in the aggregate, could reasonably be expected to influence the economic decisions of users taken on the basis of the GHG statement;
- Judgments about materiality are made in light of surrounding circumstances, and are affected by the size or nature of a misstatement, or a combination of both; and
- Judgments about matters that are material to intended users of the GHG statement are based on a consideration of the common information needs of intended users as a group. The possible effect of misstatements on specific individual users, whose needs may vary widely, is not considered.

A40. Such a discussion, if present in the applicable criteria, provides a frame of reference to the practitioner in determining materiality for the engagement. If the applicable criteria do not include a discussion of the concept of materiality, the characteristics referred to above provide the practitioner with such a frame of reference.

A41. The practitioner's determination of materiality is a matter of professional judgment, and is affected by the practitioner's perception of the common information needs of intended users as a group. In this context, it is reasonable for the practitioner to assume that intended users:

- (a) Have a reasonable knowledge of GHG related activities, and a willingness to study the information in the GHG statement with reasonable diligence;
- (b) Understand that the GHG statement is prepared and assured to levels of materiality;
- (c) Recognize the uncertainties involved in the quantification of emissions;<sup>27</sup> and
- (d) Make reasonable economic decisions on the basis of the information in the GHG statement.

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<sup>27</sup> See paragraphs A20-A22 of this ISAE.

- A42. Judgments about materiality are made in light of surrounding circumstances, and are affected by both quantitative and qualitative factors.
- A43. A percentage is often applied to a chosen benchmark as a starting point in determining materiality for the GHG statement. Factors that may affect the identification of an appropriate benchmark include:
- The elements included in the GHG statement (for example, Scope 1, Scope 2 and Scope 3 emissions, emissions deductions, and removals).
  - The quantity of GHGs to be disclosed for a particular type of emission and how that type relates in quantitative terms to the entity's total reported emissions.
  - How the GHG statement presents relevant information, for example, whether it includes comparisons of emissions with a prior period(s) or base year, or a quantification of uncertainties.
  - The relative volatility of the benchmark.
- A44. A benchmark that may be appropriate, depending on the circumstances of the entity, is total emissions before removals, if any, and emissions deductions, if any. Materiality relates to the emissions on which the practitioner is reporting. Therefore, when the engagement does not cover the entire GHG statement, materiality is set in relation to only that portion of the GHG statement that is covered by the engagement as if it were the GHG statement.
- A45. Qualitative factors may include:
- The sources of emissions.
  - The types of gases involved.
  - The uncertainties associated with quantification.
  - The context in which the information in the GHG statement will be used (for example, whether the information is for use in an emissions trading scheme, is for submission to a regulator, or is for inclusion in a widely distributed sustainability report); and the types of decisions that intended users are likely to make.
  - Whether there are one or more types of emissions or disclosures on which the attention of the intended users tends to be focused, for example, gases that, as well as contributing to climate change, are ozone depleting.
  - The nature of the entity, its climate change strategies and progress toward related objectives, and the industry and economic environment in which the entity operates.
- A46. In some cases, the applicable criteria may set a threshold for accuracy and may refer to this as materiality. For example, the criteria may state an expectation that total emissions are measured with a 5% "materiality threshold." Where this is the case, the threshold set by the criteria provides a frame of reference to the practitioner in determining materiality for the engagement.

*Revision as the Engagement Progresses* (Ref: Para. 38)

A47. If the practitioner concludes that a lower materiality for the GHG statement (and, if applicable, materiality level or levels for particular types of emissions or disclosures) than that initially determined is appropriate, it may be necessary to revise performance materiality, and the nature, timing and extent of the further assurance procedures.

**Identifying and Assessing the Risks of Material Misstatement through Understanding the Entity and Its Environment**

*The Use of Assertions* (Ref: Para. 39)

A48. In representing that the GHG statement is in accordance with the applicable criteria, the entity implicitly or explicitly makes assertions regarding the quantification, presentation and disclosure of emissions.

A49. Assertions used by the practitioner to consider the different types of potential misstatements that may occur fall into the following categories and may take the following forms:

- (a) Assertions about the quantification of emissions for the period subject to assurance:
  - (i) Occurrence—emissions that have been recorded have occurred and pertain to the entity.
  - (ii) Completeness—all emissions that should have been recorded have been recorded.<sup>28</sup>
  - (iii) Accuracy—the quantification of emissions has been recorded appropriately.
  - (iv) Cutoff—emissions have been recorded in the correct reporting period.
  - (v) Classification—emissions have been recorded as the proper type.
- (b) Assertions about presentation and disclosure:
  - (i) Occurrence and responsibility—disclosed emissions and other matters have occurred and pertain to the entity.
  - (ii) Completeness—all disclosures that should have been included in the GHG statement have been included.
  - (iii) Classification and understandability—emissions information is appropriately presented and described, and disclosures are clearly expressed.
  - (iv) Accuracy and quantification—emissions quantification and other information included in the GHG statement are appropriately disclosed.
  - (v) Consistency and comparability—changes in quantification methods have been adequately disclosed, and the presentation of comparative emissions relating to a prior period(s) or base year takes account of any significant structural changes in the entity.

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<sup>28</sup> See paragraphs A28-A31 of this ISAE for a discussion of completeness with respect to various Scopes.

A50. The practitioner may use the assertions as described above or may express them differently provided all aspects described above have been covered.

*Other Engagements Performed for the Entity* (Ref: Para. 41)

A51. Information obtained from other engagements performed for the entity may relate to, for example, aspects of the entity's control environment and risk assessment procedures.

*Estimates* (Ref: Para. 43(c))

A52. Nearly all quantifications of GHG emissions involve some degree of uncertainty because it is virtually impossible in any circumstances to precisely count each molecule of GHG emitted by an entity.<sup>29</sup> To the extent the uncertainty relates to existing gaps in available scientific knowledge, it is unavoidable and permeates all quantifications of GHG emissions. However, all quantifications are made within the context of the applicable criteria, and criteria differ in how they treat estimation or measurement uncertainty. Some criteria stipulate rigid models, methods, emissions factors, etc., that must be applied in all circumstances when calculating emissions from a particular source. For example, the applicable criteria may require Scope 2 emissions from electricity to be calculated by multiplying kilowatt hours recorded on suppliers' invoices by a prescribed emission factor. Quantification in accordance with such criteria effectively eliminates estimation uncertainty for the purpose of reporting in accordance with those criteria. The resultant calculation is not, therefore, considered to be an estimate for the purpose of this ISAE.

A53. This can be contrasted with quantification in accordance with criteria that allow, or require, for example:

- The use of models, methods or emissions factors that involve significant assumptions based on an entity's individual circumstances. While using entity-specific assumptions can result in more accurate quantification than using, for example, average emission factors for an industry, it is nonetheless prone to a greater degree of estimation uncertainty;
- Direct measurement using periodic sampling; or
- Estimation of surrogate activity data using extrapolation.

*Objectives and Strategies* (Ref: Para. 43(d))

A54. Consideration of the entity's climate change strategy, if any, and associated economic, regulatory, physical and reputational risk, may assist the practitioner to identify risks of material misstatement in the GHG statement. For example, if the entity has made commitments to become carbon neutral, this may provide an incentive to understate emissions so the target will appear to be achieved within a declared timeframe. Conversely, if the entity is expecting to be subject to a regulated emissions trading scheme in the future, this

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<sup>29</sup> See paragraphs A20-A22 of this ISAE.

may provide an incentive to overstate emissions in the meantime to increase the opportunity for it to receive a larger permit quota at the outset of the scheme.

*Control Activities Relevant to the Engagement* (Ref: Para. 46(c) and (d))

A55. The practitioner's judgment about whether particular control activities are relevant to the engagement may be affected by the level of sophistication, documentation and formality of the entity's information system, including the related business processes, relevant to reporting emissions. As reporting of emissions evolves, it can be expected that so too will the level of sophistication, documentation and formality of information systems and related control activities relevant to the quantification and reporting of emissions. In immature information systems, particular control activities are likely to be more rudimentary, less well-documented, and may only exist informally. When this is the case, it is less likely the practitioner will judge it necessary to understand particular control activities in order to assess the risks of material misstatement at the assertion level and design further assurance procedures responsive to assessed risks. In some regulated schemes, on the other hand, the information system and control activities may be required to be formally documented and their design approved by the regulator. Even in some of these cases, however, not all relevant data flows and associated controls may be documented. For example, it may be more likely that control activities with respect to source data collection from continuous monitoring are sophisticated, well-documented, and more formal than control activities with respect to subsequent data processing and reporting.

*Causes of Risks of Material Misstatement* (Ref: Para. 49)

A56. Examples of factors referred to in paragraph 49 include:

- (a) Omission of one or more emissions sources is more likely for sources that are less obvious, which may be overlooked, such as GHG leakages (fugitive emissions).
- (b) Significant economic, regulatory or other requirements and developments may include, for example, increases in renewable energy targets, which may lead to increased risk of misclassification of sources at an electricity generator.
- (c) The nature of the entity's operations may be complex (for example, it may involve multiple and disparate sites and processes), is discontinuous (for example, peak load electricity generation), or result in few or weak relationships between the entity's emissions and other measurable activity levels (for example, a cobalt nickel plant). In such cases, the opportunity for meaningful analytical procedures may be significantly reduced.

Changes in operations or boundaries, for example, introduction of new processes, or the sale, acquisitions or outsourcing of emissions sources or removal sinks may also introduce risks of material misstatement, for example, through unfamiliarity with quantification or reporting procedures. Also double counting of an emission source or removals sink may occur due to inadequate coordination in the identification of sources and sinks at a complex installation.

- (d) Selection of an inappropriate quantification method, for example, calculating emissions using an emissions factor when using a more accurate direct measurement method would be more appropriate. Selecting an appropriate quantification method is particularly important when the method has been changed. This is because intended users may often be interested in emission trends over time, or relative to a base year. Some criteria may require that quantification methods are only changed when a more accurate method is to be used.

Incorrect application of a quantification method, such as not calibrating meters or not reading them sufficiently frequently, or use of an emissions factor that is inappropriate in the circumstances. For example, an emissions factor may be predicated on an assumption of continuous use and is not appropriate to use after a shut down.

Complexity in quantification methods will likely involve higher risk, for example, extensive or complex mathematical manipulation of source data, such as the need to use complex mathematical models, or extensive use of state conversion factors, such as those to convert measures of liquid to measures of gas, or unit conversion factors, such as those to convert imperial measures to metric measures.

Changes in quantification methods or input variables, for example, if the quantification method used is based on the carbon content of biomass, and the composition of the biomass used changes during the period.

- (e) Significant non-routine emissions or judgmental matters are a source of greater risk relative to routine, non-complex emissions that are subject to systematic quantification and reporting. Non-routine emissions are those that are unusual, in size or nature, and that therefore occur infrequently, for example one-off events such as a plant malfunction or major leak. Judgmental matters may include the development of subjective estimates. Risks of material misstatement may be greater because of matters such as:
- Greater management intervention to specify the quantification methods or reporting treatment.
  - Greater manual intervention for data collection and processing.
  - Complex calculations or quantification methods and reporting principles.
  - The nature of non-routine emissions, which may make it difficult for the entity to implement effective controls over the risks.
  - Quantification methods and reporting principles for estimates may be subject to differing interpretation.
  - Required judgments may be subjective or complex.
- (f) The inclusion of Scope 3 emissions where the source data used in quantification are not maintained by the entity, or where quantification methods commonly in use are imprecise or lead to large variations in reported emissions.<sup>30</sup>

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<sup>30</sup> See paragraphs A29-A31 of this ISAE.

A57. Examples of other factors that may lead to risks of material misstatement include:

- Human error in the quantification of emissions, which may be more likely to occur if personnel are unfamiliar with, or not well-trained regarding, emissions processes or data recording.
- Undue reliance on a poorly designed information system, which may have few effective controls, for example, the use of spreadsheets without adequate controls.
- Manual adjustment of otherwise automatically recorded activity levels, for example, manual input may be required if a flare meter becomes overloaded.

*Risks for Which Substantive Procedures Alone Do Not Provide Sufficient Appropriate Evidence*

(Ref: Para. 50)

A58. The quantification of emissions may include processes that are highly automated with little or no manual intervention, for example, where relevant information is recorded, processed, or reported only in electronic form such as in a continuous monitoring system, or when the processing of activity data is integrated with an IT-based financial reporting information system. In such cases:

- Engagement evidence may be available only in electronic form, and its sufficiency and appropriateness dependent on the effectiveness of controls over its accuracy and completeness.
- The potential for improper initiation or alteration of information to occur and not be detected may be greater if appropriate controls are not operating effectively.

*Site Visits* (Ref: Para. 53)

A59. Where the GHG statement includes emissions from different processes, or processes using different technologies, it may be appropriate to perform further assurance procedures at a selection of facilities relevant to each process or technology, considering such things as the number of facilities, the size of each facility and its contribution to overall emissions, the methods used at each facility to gather emissions information, and the experience of relevant staff at each facility. For facilities that are not visited, sources such as energy flow and material flow diagrams may be reviewed.

*Inherent and Control Risks* (Ref: Para. 54(a))

A60. Factors that may influence inherent and control risks include:

- The number, nature, geographical spread, and ownership characteristics of facilities from which data is collected.
- The number and nature of the various gases and emissions sources included in the GHG statement.
- Whether processes to which emissions relate are continuous or intermittent, and the risk of disruption to such processes.
- The complexity of methods for activity measurement and for calculating emissions, for

example, some processes require unique measurement and calculation methods.

- The risk of unidentified fugitive emissions.
- The extent to which the quantity of emissions correlates with readily available input data.
- Whether personnel who perform data collection are trained in relevant methods, and the frequency of turnover of such personnel.
- The nature and level of automation used in data and manipulation.
- The nature and frequency of instrument calibration.
- The quality control policies and procedures implemented at testing laboratories, whether internal or external.
- The complexity of criteria and of quantification and reporting policies, including how the organizational boundary is determined.

*Substantive Procedures* (Ref: Para. 57)

A61. In addition to confirmation and analytical procedures, and substantive procedures related to the GHG statement aggregation process (see paragraphs A62-A66), substantive procedures may include, for example:

- Reviewing joint venture agreements and other contracts relevant to determining the entity's organizational boundary.
- Reconciling recorded data to, for example, odometers on vehicles owned by the entity.
- Reperforming calculations, for example, mass balance and energy balance calculations, and reconciling differences noted.
- Taking readings from continuous monitoring equipment.
- Checking emissions factors to authoritative sources and considering their applicability in the circumstances.
- Observing or reperforming physical measurements, such as dipping oil tanks.
- Analyzing the soundness and appropriateness of unique measurement or quantification techniques, particularly complex methods that may involve, for example, recycle or feedback loops.
- Sampling and independently analyzing the characteristics of materials such as coal, or observing the entity's sampling techniques and reviewing laboratory test results.
- Checking the accuracy of calculations and the suitability of calculation methods used, for example, the conversion and aggregation of input measurements.
- Agreeing recorded data back to source documents, such as production records, fuel usage records, and invoices for purchased energy.

*Confirmation Procedures* (Ref: Para. 58)

A62. Situations where external confirmation procedures may provide relevant engagement evidence include:

- Activity data collected by a third party, such as a travel agent that collates data on employee air travel, a supplier that meters the inflow of energy to a facility, or an external fleet manager that records kilometers travelled by entity-owned vehicles.
- The accuracy of industry benchmark data used in calculating emission factors.
- The terms of agreements, contracts, or transactions between the entity and other parties, or whether other parties are, or are not, including particular emissions in their GHG statement, when considering the entity's organizational boundary.
- Results of laboratory analysis of, for example, the calorific value of input samples.

*Substantive Analytical Procedures* (Ref: Para. 60)

A63. In many cases, the fixed nature of physical or chemical relationships between particular emissions and other measurable phenomena allows for the design of powerful analytical procedures, both as risk assessment and substantive procedures, for example, the relationship between fuel consumption and carbon dioxide and nitrous oxide emissions.

A64. Similarly, a reasonably predictable relationship may exist between emissions and financial information, for example, the relationship between Scope 2 emissions from electricity and the general ledger balance for electricity purchases.

A65. Analytical procedures may be particularly effective when disaggregated data is readily available, or when the practitioner has reason to consider the data to be used is reliable, such as when it is extracted from a well-controlled source. In some cases, data to be used may be captured by the financial reporting information system, or may be entered in another information system in parallel with the entry of related financial data, and some common input controls applied. For example, the quantity of fuel purchased as recorded on suppliers' invoices may be input under the same conditions that relevant invoices are entered into an accounts payable system.

*Substantive Procedures Related to the GHG Statement Aggregation Process* (Ref: Para. 61)

A66. As noted in paragraph A55, as reporting of emissions evolves, it can be expected that so too will the level of sophistication, documentation and formality of information systems relevant to the quantification and reporting of emissions. In immature information systems, the aggregation process may be very informal. In more sophisticated systems, the aggregation process may be more systematic and formally documented. The nature, and also the extent, of the practitioner's examination of adjustments and the manner in which the practitioner agrees or reconciles the GHG statement with the underlying records depends on the nature and complexity of the entity's quantifications and reporting process and the related risks of material misstatement.

*Assurance Procedures Regarding Estimates* (Ref: Para. 63)

A67. In some cases it may be appropriate for the practitioner to evaluate, in addition to other

substantive procedures for a particular type of emission or disclosure, how the entity has considered alternative assumptions or outcomes, and why it has rejected them.

## **Engagement Evidence**

### *Management's Expert* (Ref: Para. 71(a))

- A68. The risks of material misstatement may increase if, in preparing the GHG statement, the entity does not possess the necessary expertise. In such cases, a management's expert may be used in addressing those risks. Relevant controls, including controls that relate to the work of a management's expert, if any, may also reduce the risks of material misstatement.
- A69. A broad range of circumstances may threaten the objectivity of a management's expert, for example, self-interest threats, advocacy threats, familiarity threats, self-review threats and intimidation threats. Safeguards may reduce such threats, and may be created either by external structures (for example, the management's expert's profession, legislation or regulation), or by the management's expert's work environment (for example, quality control policies and procedures).
- A70. Although safeguards cannot eliminate all threats to a management's expert's objectivity, threats such as intimidation threats may be of less significance to an expert engaged by the entity than to an expert employed by the entity, and the effectiveness of safeguards such as quality control policies and procedures may be greater. Because the threat to objectivity created by being an employee of the entity will always be present, an expert employed by the entity cannot ordinarily be regarded as being more likely to be objective than other employees of the entity.
- A71. When evaluating the objectivity of an expert engaged by the entity, it may be relevant to discuss with the entity and that expert any interests and relationships that may create threats to the expert's objectivity, and any applicable safeguards, including any professional requirements that apply to the expert; and to evaluate whether the safeguards are adequate. Interests and relationships creating threats may include:
- Financial interests.
  - Business and personal relationships.
  - Provision of other services.

## **Evaluation of Misstatements Identified during the Engagement**

### *Accumulation of Identified Misstatements* (Ref: Para. 74)

- A72. The practitioner may designate an amount below which misstatements would be clearly trivial and would not need to be accumulated because the practitioner expects that the accumulation of such amounts clearly would not have a material effect on the GHG statement. "Clearly trivial" is not another expression for "not material." Matters that are clearly trivial will be of a wholly different (smaller) order of magnitude than materiality determined in accordance with this ISAE, and will be matters that are clearly inconsequential, whether taken individually or in the aggregate and whether judged by any criteria of size, nature or circumstances. When there is any uncertainty about whether one or

more items are clearly trivial, the matter is considered not to be clearly trivial.

## **Using the Work of Component Practitioners**

### *Planning to Use the Work of a Component Practitioner* (Ref: Para. 81)

A73. Relevant considerations when the engagement team plans to request a component practitioner to perform work on the information of a component may include:

- Whether the component practitioner understands and complies with the ethical requirements that are relevant to the engagement and, in particular, is independent.
- The component practitioner's professional competence.
- The extent of the engagement team's involvement in the work of the component practitioner.
- Whether the component practitioner operates in a regulatory environment that actively oversees practitioner.

### *Communication to Component Practitioners* (Ref: Para. 81(a))

A74. Relevant matters to communicate with component practitioners about the work to be performed, the use to be made of that work, and the form and content of the component practitioner's communication with the engagement team may include:

- A request that the component practitioner, knowing the context in which the engagement team will use the work of the component practitioner, confirms that the component practitioner will cooperate with the engagement team.
- Performance materiality for the component (and, if applicable, the materiality level or levels for particular types of emissions or disclosures) and the threshold above which misstatements cannot be regarded as clearly trivial to the GHG statement.
- Identified risks of material misstatement of the GHG statement that are relevant to the work of the component practitioner; and a request that the component practitioner communicate on a timely basis any other identified risks in the component that may be material to the GHG statement, and the component practitioner's responses to such risks.

### *Communication from Component Practitioners* (Ref: Para. 81(a))

A75. Relevant matters that the engagement team may request the component practitioner to communicate include:

- Whether the component practitioner has complied with ethical requirements that are relevant to the group engagement, including independence and professional competence;
- Whether the component practitioner has complied with the group engagement team's requirements;
- Information on instances of non-compliance with laws or regulations that could give rise to a material misstatement of the GHG statement.

- A list of uncorrected misstatements of the component information that are not clearly trivial.
- Indicators of possible bias in the preparation of the component information.
- Description of any identified significant deficiencies in internal control at the component level.
- Other significant matters that the component practitioner has communicated or expects to communicate to the component, including fraud or suspected fraud.
- Any other matters that may be relevant to the GHG statement, or that the component practitioner wishes to draw to the attention of the engagement team, including exceptions noted in any written representations that the component practitioner requested from the component.
- The component practitioner's overall findings, conclusions or opinion.

*Evidence* (Ref: Para. 81(b))

A76. Relevant considerations when obtaining sufficient appropriate evidence regarding components and the process for including related information in the GHG statement may include:

- Discussions with the component practitioner, or the component itself, regarding those of the component's business activities that are significant to the GHG statement.
- Discussions with the component practitioner regarding the susceptibility of the component to material misstatement of the GHG statement
- Reviewing the component practitioner's documentation of identified risks of material misstatement, responses to those risks, and conclusions. Such documentation may take the form of a memorandum that reflects the component practitioner's conclusion with regard to the identified risks.

**Using the Work of Internal Audit** (Ref: Para. 82)

A77. The entity's internal audit function is likely to be relevant to the engagement if the nature of the internal audit function's responsibilities and activities are related to the entity's GHG reporting, and the practitioner expects to use the work of the internal auditors to modify the nature or timing, or reduce the extent, of assurance procedures to be performed.

**Using the Work of a Practitioner's External Expert** (Ref. Para. 84)

A78. The evaluation of the significance of threats to objectivity and of whether there is a need for safeguards may depend upon the role of the practitioner's expert and the significance of the expert's work in the context of the engagement. There may be some circumstances in which safeguards cannot reduce threats to an acceptable level, for example, if a proposed practitioner's expert is an individual who has played a significant role in preparing the information included in the GHG statement, that is, if the practitioner's expert is a management's expert.

A79. When evaluating the objectivity of a practitioner's external expert, it may be relevant to:

- Inquire of the entity about any known interests or relationships that the entity has with the practitioner's external expert that may affect that expert's objectivity.
- Discuss with that expert any applicable safeguards, including any professional requirements that apply to that expert; and evaluate whether the safeguards are adequate to reduce threats to an acceptable level. Interests and relationships that it may be relevant to discuss with the practitioner's expert include:
  - Financial interests.
  - Business and personal relationships.
  - Provision of other services by the expert, including by the organization in the case of an external expert that is an organization.

In some cases, it may also be appropriate for the practitioner to obtain a written representation from the practitioner's external expert about any interests or relationships with the entity of which that expert is aware.

**Other Information** (Ref: Para. 93)

A80. A GHG statement may be published as a standalone document, or with other information, for example, it may be included as part of an entity's annual report or sustainability report, or included with information such as:

- A strategic analysis, including:
  - A statement of the entity's position on climate change.
  - An explanation of significant actions the entity is taking to maximize opportunities and minimize risks associated with climate change.
  - Emissions reduction targets and an analysis of performance against those targets.
  - A description of the entity's assessment of future movements in direct and indirect emissions for timescales over which the entity typically plans its strategies and assesses risks and opportunities, including detailed information on trends and factors likely to affect the assessment.
  - A description of corporate governance actions taken to address climate change.
- Regulatory risks from climate change, including an analysis of the material legal and financial effects that current and prospective climate change-related regulation may have on the entity's business and operations.
- Physical risks from climate change, including a qualitative overview of the entity's current and potential material exposure to direct and indirect physical risks due to climate change.

A81. In some cases, the entity may publish emissions information that is calculated on a different basis from that used in preparing the GHG statement. For example, the other information may be prepared on a "like-for-like" basis whereby emissions are recalculated to omit the effect of non-recurring events, such as the commissioning of new plant or the closing down

of a facility. The practitioner may seek to have such information removed if the methods used to prepare it would be disallowed by the criteria used to prepare the GHG statement.

A82. Further actions that may be appropriate if the practitioner identifies a material inconsistency or becomes aware of a material misstatement of fact include, for example:

- Requesting the entity to consult with a qualified third party, such as the entity's legal counsel.
- Obtaining legal advice about the consequences of different courses of action.
- Communicating with third parties (e.g., a regulator).
- Withholding the assurance report.
- Withdrawing from the engagement.
- Describing the material inconsistency in the assurance report.

## **Documentation**

*Documentation of the Assurance Procedures Performed and Engagement Evidence Obtained*  
(Ref: Para. 94)

A83. The following may be appropriate to include in the engagement documentation:

### *Fraud*

- The identified and assessed risks of material misstatement due to fraud.
- The overall responses to the assessed risks of material misstatement due to fraud at the GHG statement level and the nature, timing and extent of assurance procedures, and the linkage of those procedures with the assessed risks of material misstatement due to fraud at the assertion level.
- Communications about fraud made to the entity, regulators and others.

### *Laws and regulations*

- Identified or suspected non-compliance with laws and regulations and the results of discussion with the entity and other parties outside the entity.

### *Planning*

- The overall engagement strategy.
- The engagement plan.
- Any significant changes made during the engagement to the overall engagement strategy or the engagement plan, and the reasons for such changes.

### *Materiality*

- The following amounts and the factors considered in their determination:
  - Materiality for the GHG statement;
  - If applicable, the materiality level or levels for particular types of emissions or

disclosures;

- Performance materiality; and
- Any revision of the above as the engagement progressed.

*Identifying and assessing risks*

- The discussion required by paragraph 42, and the significant decisions reached.
- Key elements of the understanding obtained regarding each of the aspects of the entity and its environment specified in paragraph 43 and of each of the internal control components specified in paragraph 46; the sources of information from which the understanding was obtained; and the risk assessment procedures performed.
- The identified and assessed risks of material misstatement at the GHG statement level and at the assertion level as required by paragraph 47 for which in the practitioner's professional judgment further procedures were required.

*Responses to assessed risks*

- The overall responses to address the assessed risks of material misstatement at the GHG statement level, and the nature, timing, and extent of the further assurance procedures performed.
- The linkage of those procedures with the assessed risks at the assertion level.
- The results of the assurance procedures, including the conclusions where these are not otherwise clear.
- If the practitioner plans to use engagement evidence about the operating effectiveness of controls obtained in previous engagements, the conclusions reached about relying on such controls that were tested in a previous engagement.
- How the GHG statement agrees or reconciles with the underlying records.

*Evaluation of misstatements*

- The amount below which misstatements would be regarded as clearly trivial.
- All misstatements accumulated during the engagement and whether they have been corrected.
- The practitioner's conclusion as to whether uncorrected misstatements are material, individually or in the aggregate, and the basis for that conclusion.

*Assembly of the Final Engagement File* (Ref: Para. 100)

A84. ISQC 1 (or national requirements that are at least as demanding) requires firms to establish policies and procedures for the timely completion of the assembly of engagement files.<sup>31</sup> An appropriate time limit within which to complete the assembly of the final engagement file is

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<sup>31</sup> ISQC 1, paragraph 45.

ordinarily not more than 60 days after the date of the assurance report.<sup>32</sup>

## **Forming the Assurance Opinion**

### *Description of the Applicable Criteria* (Ref: Para. 107)

- A85. The preparation of the GHG statement by the entity requires the inclusion of an adequate description of the applicable criteria in the explanatory notes. That description advises intended users of the framework on which the GHG statement is based, and is particularly important when there are significant differences between various criteria regarding how particular matters are treated in a GHG statement, for example: which emissions deductions are included, if any, how they have been quantified and what they represent; and the basis for selecting which Scope 3 emissions are included, and how they have been quantified.
- A86. A description that the GHG statement is prepared in accordance with particular criteria is appropriate only if the GHG statement complies with all the requirements of those criteria that are effective during the period covered by the GHG statement.
- A87. A description of the applicable criteria that contains imprecise qualifying or limiting language (e.g., “the GHG statement is in substantial compliance with the requirements of XYZ”) is not an adequate description as it may mislead users of the GHG statement.

## **Form of Opinion**

### *Other Matter Paragraphs in the Assurance Report* (Ref: Para. 110)

- A88. The content of an Other Matter paragraph reflects clearly that such other matter is not required to be presented and disclosed in the GHG statement. Paragraph 110 limits the use of an Other Matter paragraph to matters relevant to users’ understanding of the engagement, the practitioner’s responsibilities or the assurance report, that the practitioner considers it necessary to communicate in the assurance report. A widespread use of Other Matter paragraphs diminishes the effectiveness of the practitioner’s communication of such matters.
- A89. Unless required by law or regulation, it is not appropriate to include the practitioner’s recommendations on matters such as improvements to the entity’s information system or the presentation of its GHG statement in the assurance report. Including such recommendations may imply that the matters addressed have not been appropriately dealt with in preparing the GHG statement. Such matters may be communicated in accordance with paragraph 54 of ISAE 3000, for example, in a management letter or in discussion with those charged with governance. An Other Matter paragraph does not include information that the practitioner is prohibited from providing by law, regulation or other professional standards, for example, ethical standards relating to confidentiality of information. An Other Matter paragraph also does not include information that is required to be provided by management.

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<sup>32</sup> ISQC 1, paragraph A54.

## **Assurance Report Content**

### *Illustrative Assurance Report* (Ref: Para. 111)

A90. Example wording of an assurance report on a GHG statement is included in the Appendix.

### *Use of the Assurance Report* (Ref: Para. 111(b))

A91. As well as identifying the addressee of the assurance report, the practitioner may consider it appropriate to include wording in the body of the assurance report that specifies the purpose for which, or the intended users for whom, the report was prepared. In addition, the practitioner may consider it appropriate to include wording that specifically restricts distribution of the assurance report other than to intended users, its use by others, or its use for other purposes.

### *Emissions Deductions* (Ref: Para. 111(d))

A92. The wording of the statement to be included in the assurance report when the GHG statement includes emissions deductions may vary considerably depending on the circumstances.

## **Example Assurance Report**

*This form of assurance report may be appropriate when the entity's GHG statement is prepared on a voluntary basis and contains no Scope 3 emissions and no emissions deductions.*

### **Independent Assurance Report on ABC's Greenhouse Gas Statement**

To: *addressee*

#### **Section 1: Report on GHG Statement** *(this heading not needed if this is the only section)*

We have undertaken a reasonable assurance engagement of the accompanying GHG statement of ABC for the year to December 31, 20X1, which comprises the Emissions Inventory and the Explanatory Notes on pages xx – yy, including the summary of significant quantification and reporting policies in Note 1.

#### *Restriction on Scope*

Information in respect of the year to December 31, 20X3, 20X8 targets, 20X0 baseline, and percentage changes has not been included within the scope of our engagement. We have not performed any assurance procedures with respect to this information and accordingly express no opinion on it.

#### *ABC's Responsibility for the GHG Statement*

ABC is responsible for the preparation of the GHG statement in accordance with [*applicable criteria*<sup>33</sup>], applied as explained in Note 1 to the Emissions Inventory. This responsibility includes the design, implementation and maintenance of internal control relevant to the preparation of a GHG statement that is free from material misstatement, whether due to fraud or error.

#### *Independence, Quality Control and Expertise*

We have complied with the International Federation of Accountants' *Code of Ethics for Professional Accountants*, which includes comprehensive independence and other requirements founded on fundamental principles of integrity, objectivity, professional competence and due care, confidentiality and professional behavior.

In accordance with International Standard on Quality Control 1, [name of firm] maintains a comprehensive system of quality control including documented policies and procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.

This engagement was conducted by a multidisciplinary team including auditing and assurance practitioners, engineers and environmental scientists.

#### *Our Responsibilities*

Our responsibility is to express an opinion on the GHG statement based on our assurance

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<sup>33</sup> [*Applicable criteria*] are available for free download from [www.GHGcriteria.org](http://www.GHGcriteria.org).

engagement. We conducted our reasonable assurance engagement in accordance with International Standard on Assurance Engagements xxxx, “Assurance on a Greenhouse Gas Statement,” issued by the International Auditing and Assurance Standards Board. That standard requires that we plan and perform this engagement to obtain reasonable assurance about whether the GHG statement is free from material misstatement.

A reasonable assurance engagement with respect to a GHG statement involves performing procedures to obtain evidence about the quantification of emissions, and about the other information disclosed as part of the statement. The procedures selected depend on the practitioner’s judgment, including the assessment of the risks of material misstatement in the GHG statement, whether due to fraud or error. In making those risk assessments, we considered internal control relevant to the entity’s preparation of the GHG statement. Our engagement also included:

- Assessing the suitability in the circumstances of ABC’s use of *[applicable criteria]*, applied as explained in Note 1 to the Emissions Inventory, as the basis for preparing the GHG statement;
- Evaluating the appropriateness of quantification methods and reporting policies used and the reasonableness of necessary estimates made by ABC; and
- Evaluating the overall presentation of the GHG statement.

We believe that the evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

### *Opinion*

Our opinion has been formed on the basis of the matters outlined in this report. In our opinion, the GHG statement for the year to December 31, 20X1, insofar as it relates to information not restricted from the scope of our engagement, is prepared, in all material respects, in accordance with the *[applicable criteria]* applied as explained in Note 1 to the Emissions Inventory.

### *Uncertainty in the Quantification of Emissions*

Greenhouse gas quantification is subject to uncertainty because of such things as estimates made in quantifying inputs, including activity data and emission factors, that are used by mathematical models to calculate emissions, and the inability of those models to precisely characterize under all circumstances the relationships between various inputs and the resultant emissions.

The effect of these uncertainties, and the actions taken by ABC to reduce them as far as practicable, are explained in Note 2 to the Emissions Inventory.

### **Section 2: Report on Other Legal and Regulatory Requirements** *(applicable for some engagements only)*

*(Form and content of this section will vary depending on the nature of the practitioner’s other reporting responsibilities.)*

*[Practitioner’s signature]*

*[Date of the practitioner’s assurance report]*

*[Practitioner’s address]*





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