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Trade Register 17052456
Eindhoven, The Netherlands

Public Company Accounting Oversight Board
Office of the Secretary
1666 K Street NW
Washington, DC 20006-2803

Re: PCAOB Release No. 2026-001 – Request for Public Comment on Strategic Priorities

Dear Members of the Board,

I appreciate the opportunity to share my views on the Public Company Accounting Oversight Board's Strategic Priorities, as set out in PCAOB Release No. 2026-001. I sincerely welcome the Board's decision to seek stakeholder input at an early stage to help shape goals and objectives aligned with its statutory mission to protect investors and the public interest by promoting informative, accurate, and independent auditor reports.

This letter provides feedback on the general (improvement) areas of attention, I believe, will most effectively advance the Board's priorities, without responding to each of the seven questions individually. In my view, the questions are closely interrelated, and a thematic response is therefore deemed more insightful.

The Board's efforts to further enhance audit quality, transparency, public reporting, and stakeholder engagement are critical in a dynamic world while avoiding overregulated additions but taking a simplicity & focus based approach inspired by practical wisdom concepts. In that context, I believe the following focus areas would most effectively support the PCAOB's strategic objectives over the coming planning period:

1. Strengthen transparency and comparability while promoting sharing of best practices, in alignment with preparers, to improve business understanding and a risk-based audit approach. Overall, where relevant and applicable we advocate a principle-based approach with best practice guidance requiring companies to explain and disclose the choices made supporting a meaningful dialogue with stakeholders
2. Increase the value of inspection reporting for Audit Committees by separating systemic, industry-relevant issues from one-off or non-recurring findings, and avoid check mark exercises based on Audit Quality Indicator's (AQI's)
3. Strengthen audit quality by encouraging a company-specific understanding of operations and risks, rather than leveraging on standardized or presumed Critical Audit Matters (CAMs)
4. Move toward near real-time analysis and monitoring of audit work, leveraging technology (including AI), to make inspections more preventive (rather than detective), increase flexibility of the audit approach, and enhance overall audit effectiveness
5. Prioritize audit talent attraction and retention to support quality and long-term resilience, to address the weakening talent pipeline and keep the profession up to par with technological advances and increasing complexities and challenges in which companies are executing their sustainable long term focused value creation strategies,

6. Enhance cooperation with local regulators across jurisdictions, to reduce the burden from duplicative inspections while improving regulatory efficiency, transparency, and overall effectiveness

For your consideration, the six steps below represent for illustration purposes possible practical next stages to focus your efforts on the above-mentioned areas of attention

1. Strengthen transparency and comparability while promoting sharing of best practices

- Share best-practice examples openly, in addition to reporting on deficiencies, to support continuous improvement
- Reduce information asymmetry among Audit Committees, audit firms, and regulators

2. Enhance the usefulness of inspection reporting for Audit Committees

- Improve the clarity of inspection reports by clearly distinguishing systemic, firm-wide, or industry-wide issues from isolated or incidental findings, enabling Audit Committees to focus their oversight and remediation efforts on matters of great significance
- Incorporate industry-level benchmarking to highlight leading practices, emerging risk areas, and serious systemic deficiencies, thereby supporting trend analysis, comparability, and more informed Audit Committee dialogue
- Avoid “form over-substance reporting” on AQIs

3. Encourage a deeper understanding of companies’ operations to avoid overly mechanical audit approaches

- Promote audit methodologies grounded in a robust understanding of each company’s business model, operations, and risk profile, rather than a mechanical application of presumed risks or standardized indicators
- Consider benchmarking the auditor’s identified significant audit risk areas against the company’s own publicly disclosed risks, including operational, financial, and cybersecurity-related disclosures where applicable, to encourage more company-specific and decision-useful CAMs
- Acknowledge that an inspection focused on uniformity can inadvertently incentivize checklist-driven behavior, rather than tailored audit responses to the accounting-relevant risks of the specific company

4. Move toward near real-time analysis and monitoring of audit work, leveraging technology (including AI)

- Explore opportunities to complement retrospective inspections with more continuous monitoring approaches that provide earlier risk insights and enable timely, preventive actions
- Develop consistent and future-ready evaluation frameworks that can adapt to evolving laws and regulations, auditing standards, and technological developments
- Encourage responsible innovation by providing illustrative examples and practical guidance that reduce uncertainty and mitigate undue hesitation driven by perceived inspection risk

- Deepen the focus on technology risk in light of rapid technological change and the significant increase in cybersecurity incidents

5. Prioritize audit talent attraction and retention to support quality and long-term resilience

- Address high attrition and the weakening talent pipeline within the audit profession, recognizing the associated risks to audit quality and long-term resilience
- Promote continuous upskilling to ensure auditors keep pace with technological advances that affect audit execution and quality management, while avoiding excessive reliance on standardized shared-service-center processes
- Encourage the modernization of recruitment strategies to attract, engage, and retain the next generation of professionals, while reinforcing a strong culture of compliance more effectively.
- Support modernized education and training models that keep professionals current on emerging risk areas, evolving stakeholder expectations, and changing regulatory requirements.

6. Enhance cooperation with local regulators across jurisdictions

- Strengthen cross-border regulatory coordination to reduce duplicative inspections that create disproportionate burden while delivering limited incremental insight, particularly where supervisory focus areas diverge
- Align supervisory approaches and guidance on key risk areas and CAMs, where appropriate, while fully respecting jurisdiction-specific regulatory mandates and requirements
- Pursue greater consistency in restrictive measures, remediation expectations, and follow-up processes to improve regulatory efficiency, transparency, and overall effectiveness

Thank you for the opportunity to provide input on the PCAOB's Strategic Priorities.

Yours sincerely,

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