



**Irish Auditing and Accounting Supervisory Authority,  
Millennium Park,  
Naas,  
Co. Kildare**

**26<sup>th</sup> November 2021**

Submitted by email to: [submissions@iaasa.ie](mailto:submissions@iaasa.ie)

Dear Sir/Madam,

***Consultation Paper on the Proposal to Revise the Irish Quality Management Standards***

CPA Ireland welcomes the opportunity to respond to the consultation regarding the proposal to revise the Irish Quality Management Standards.

CPA Ireland supports the proactive risk- based approach of these proposed standards and in particular supports the integrated approach to quality management that is proposed.

The ongoing alignment of quality management standards to the IAASAB standards is considered important and supports the global approach to audit quality.

We have set out below our responses to the specific questions raised in the consultation.

**1. In the context of IAASA's policy to make minimal amendments to the UK standards, are there any provisions in the proposed quality management standards that, in your opinion, conflict with Irish or EU law?**

We have not identified any provisions in the proposed quality management standards that conflict with Irish or EU law.

**2. In the context of IAASA's policy to make minimal amendments to the UK standards, are there any areas not identified in this consultation paper where there are distinct differences between the Irish and UK markets which, in your opinion, would impact on the applicability of the proposed quality management standards in Ireland?**

We consider that the implementation of these standards will be a challenge for small and medium sized firms. One key difference between the UK and Irish market is the impact of late CRO filing on the eligibility of a small company to avail of audit exemption. This can

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result in very small companies being subject to statutory audit, and often it can be small audit firms conducting these audits.

IAASA's publication "Profile of the Profession" in recent years, indicates a declining number of statutory audit firms and statutory auditors in Ireland. Additional regulatory requirements for small firms will likely accelerate this decline going forward.

Therefore, we consider that it would be of great benefit for implementation guidance to be available to assist with the introduction of the standards.

**3. Is the proposed effective date of 15 December 2022, as set out in section 3, appropriate? If not, please give reasons and indicate the effective date that you would consider appropriate.**

We consider that the implementation date of 15<sup>th</sup> December 2022 is appropriate, however would consider that it will be necessary to provide for an extensive education and outreach programme to ensure that audit firms are prepared for this date.

If you have any queries on any aspect of our response, please do not hesitate to contact us.

Yours sincerely,

A handwritten signature in black ink that reads 'Emer Kelly'.

**Emer Kelly**  
**Secretary – Audit Practices Sub Committee**