

Irish Auditing & Accounting Supervisory Authority
Willow House
Millennium Park
Naas
Co Kildare
W91 C6KT

1 September 2025

Submitted via email to: submissions@iaasa.ie

To whom it may concern,

Subject: Consultation Paper- IAASA Work Programme 2026 - 2028

Chartered Accountants Ireland is delighted to have the opportunity to respond to IAASA's Consultation on the proposed update of the above Policy Paper. This has been completed following discussions with members of the Institute including some of our technical committees.

Our responses to the questions asked are included in Appendix 1.

If you have any questions on this response or require any further information, please do not hesitate to contact me at dee.moran@charteredaccountants.ie.

Yours Sincerely

Dee Moran

Dee Moran
Head of Professional Accounting
Chartered Accountants Ireland



Appendix 1- Responses to matters on which stakeholder views are sought

Q1. Do the three strands, supporting strategies and enablers set out in the proposed work programme provide an appropriate strategic direction for IAASA for the years 2026-2028?

Overall, we agree that the work programme describes an appropriate strategic direction for IAASA for 2026-2028. We note the revision of the third strategic strand to focus more closely on enhancing IAASA's organisational capacity, and we consider this emphasis to be appropriate. Against a background of a quickly changing regulatory environment which includes technology advancements as well as an increasing remit for IAASA (e.g. CSRD) it is important for IAASA to be agile and prepared to address challenges in the coming years.

Looking at the strands in more detail we have the following comments for consideration:

Strand 1:

- More timely and frequent communications on recommendations/best practice would enable PIE audit firms to strive for continuous improvement more effectively. The roundtables that are organised with PIE firms generally occur in Oct/Nov each year covering results of the inspection report issued in the previous February. Many of the engagement inspections covered in this report are completed as early as Q2 the previous year covering financial periods that could be 12 to 18 months prior to the inspection, for example a 31/12/2022 financial period inspected in 2024, reported in Feb 2025, covered in roundtable discussion in Q4 2025. Therefore, in order to effectively monitor if actions taken by firms to address recommendations are effective, inspections should focus on most recently completed PIE audits. Selection of files completed prior to previous years reports issued means recurring issues may well occur
- Members have also suggested publishing the IAASA Inspection Priorities for Audit and Assurance Engagements each year for more transparency so that the audit firms can focus on those areas in advance which IAASA is going to focus on during their inspection process for the upcoming year. There is an appreciation that IAASA does that in some shape or form individually with every firm through a learning session, it would be helpful to have something available in the public domain for transparency (similar to how some of the other regulators do globally)
- In linking to the agility piece, should there be consideration given to industry specific factors and approach during the inspection of audit and assurance engagements with “no one size fits all approach”
- In relation to the CSRD, it would be helpful if the strategy could more clearly set out the approach to inspections for CSRD engagements given that this is a new area for all concerned

Strand 2:

- The production of more guidance by IAASA alongside the standards that they issue would be really beneficial



- It would be helpful to disseminate best practice in a more timely and more comprehensive way
- Given the FRC SME Market Study and the Practice Note Exposure Draft on the guidance for audits and/or less complex entities, it may be beneficial for IAASA to consider the scalability of ISAs (Ireland) for smaller and less complex entities

Strand 3:

- More transparency on breakdown of the budget would be beneficial given this impacts the fees paid by PIE audit firms
- In terms of “being heard”, this should be reciprocal and equally ensure the Authority is listening to the audit profession, and consider the appropriate fora for same



Q2. Does the proposed work programme address the most significant challenges and opportunities that IAASA is likely to face during 2026 to 2028?

The work programme is prepared at a very high level and therefore it is difficult to assess whether it fully addresses all of the challenges and opportunities which may arise during 2026-2028. However, the work programme seems to provide the flexibility which IAASA is likely to need to meet its statutory obligations and achieve its strategic goals in the face of a fast-evolving regulatory environment.

In particular, innovation should also cover adapting approaches in line with changing ways of auditing.



Q3. Are the intended outputs for 2026-2028 clearly defined and appropriate given IAASA's statutory objects and functions?

As noted above the work programme is prepared at a very high level. While this is appropriate for a three-year work programme there may nonetheless be scope for some further detail to be provided in certain areas. The third strand in particular is forward looking and could benefit from a more distinct link to specific matters which are identified in the introductory section describing IAASA's environmental context.

We note that previous IAASA work programmes have set out targeted activities under each strategic strand rather than targeted outcomes. The articulation of outcomes in the draft work programme is welcome. This outcomes approach helps ensure that the programme is impactful and accountable, enabling measurement of progress while allowing for flexibility in activity as the work programme is implemented.

The intended outputs could be clearer particularly for new focus areas in terms of how these items will be delivered and what the output will be. If there are changes in approach/ more outreach etc this could be clearer.



Q4. Do you have any other comments or suggestions to improve the draft work programme?

We note that the work programme describes a number of outcomes which will be achieved through IAASA outreach to stakeholders and contributions to regulatory networks. We continue to welcome IAASA engagement with the accounting and auditing profession through the prescribed/recognised accountancy bodies.

As developments emerge in relation to the implementation of CSRD, auditing and quality management standards, EU statutory audit legislation and even anti-money laundering obligations for the accounting profession, the Institute will be pleased to engage with IAASA to ensure a balanced and appropriate regulatory environment in the public interest.

IAASA should also consider the use of roundtable or similar forum with firms to discuss specific areas of change or change of approach/engagement expected as they move into this new period to ensure clarity.

In the draft the term ‘listed entity’ is used, it would be helpful if there was a footnote to clarify the definition to be used and whether this is limited to entities that issue “financial instruments that are transferrable and traded through a publicly accessible market mechanism” given the newly released IAASA Glossary.

In consultation with members there were comments made that, given the significant fall in the number of PIEs in Ireland since 2016 (circa 50%) and the increasing divergence between UK and EU regulatory regimes, perhaps IAASA could consider rebalancing resources from inspections to standards and policy. For example, the significant changes in the corporate governance regime following the introduction of the Irish Corporate Governance Code, necessitate changes in the audit standards which have not yet been addressed due to, we understand, resource constraints in the standards and policy team.

It is quite likely there will be further divergence between the UK and EU regulatory regimes (e.g. CSRD) which will require more resource in the standards and policy are going forward, whereas given the significant fall in the numbers of PIEs in Ireland since 2016 you would not expect the same level of need for resourcing in that area.