

# **Consultation Paper**

## Proposal to make narrow scope revisions to the ISAs (Ireland) and ISQMs (Ireland)

## **Disclaimer**

The Irish Auditing & Accounting Supervisory Authority accepts no liability and disclaims all responsibility for the consequences of anyone acting or refraining from acting on the information contained in this document or for any decision based on it.

Every effort has been made to ensure the accuracy of the information contained in this document. However, the Irish Auditing & Accounting Supervisory Authority accepts no responsibility or liability howsoever arising from any errors, inaccuracies, or omissions occurring in this document.



## Vision

Public trust and confidence in quality auditing and accounting



## Mission

Upholding quality corporate reporting and an accountable profession

## Our Values



### Excellence

Striving to be the best we can be



### Independence

Regulating impartially and objectively



### Integrity

Being trustworthy and respectful

# Table of Contents

|  |   |
|--|---|
| 1. Summary .....   | 5 |
| 2. Background .....  | 5 |
| 2.1 2025 Revision of the Ethical Standard for Auditors (Ireland) ..... | 5 |
| 2.2 Publicly traded entities .....                                     | 5 |
| 2.3 Additional IAASB narrow scope amendments .....                     | 6 |
| 2.4 Irish auditing framework .....                                     | 6 |
| 3. Overview of proposed narrow scope revisions .....                   | 6 |
| 3.1 Revisions .....  | 6 |
| 3.2 Standards being amended .....                                      | 6 |
| 3.3 Effective date .....   | 7 |
| 4. Matters on which IAASA is consulting .....                          | 7 |
| 5. Making your submission .....  | 8 |

# 1. Summary

The purpose of this consultation is to obtain stakeholders' views on IAASA's proposed narrow scope revisions to the International Standards on Auditing (Ireland) (ISAs (Ireland)) and the International Standards on Quality Management (Ireland) (ISQMs (Ireland)). The proposed revisions reflect changes made to the international standards by the International Auditing and Assurance Standards Board (IAASB).

The proposed effective date of the revisions is for audits of financial statements for periods commencing on or after 15 December 2026, with early adoption permitted.

The main proposed revisions are summarised in section 3 below.

Details of all the proposed revisions can be found [here](#).

## 2. Background

### 2.1 2025 Revision of the Ethical Standard for Auditors (Ireland)

IAASA issued a revised Ethical Standard for Auditors (Ireland) in April 2025 (details of which are available [here](#)). The revisions included replacement of the term 'listed entity' with 'publicly traded entity' (PTE) when applying additional ethical requirements to the audits of certain entities. The primary impact of this change was to exclude the audits of entities whose financial instruments are listed but not actively traded, such as certain special purpose vehicles, from the additional ethical requirements.

When responding to IAASA's consultation on the revisions to the Ethical Standard for Auditors (Ireland), respondents noted that the term 'listed entity' is also used in the auditing framework to impose additional auditing requirements. They requested IAASA to make the same amendment to the ISAs (Ireland) and ISQMs (Ireland). IAASA noted that the term 'listed entity' was consistent with the terminology in the IAASB standards at that time and stated that it would consider whether such changes should be made in Ireland when the IAASB had adopted the definition of PTE.

### 2.2 Publicly traded entities

The IAASB standards set out additional requirements that apply to audits of entities that are not public interest entities (PIEs), as defined in legislation, but considered to be of public interest. In general, these requirements are less stringent than those required in Irish and EU law for PIEs.

In September 2025, the IAASB issued Narrow Scope Amendments to the ISQMs, ISAs, and ISRE 2400 (Revised) as a Result of the Revisions to the Definitions of Listed Entity and Public Interest Entity in the IESBA Code. These narrow scope amendments replaced the term 'listed entity' with PTE in the IAASB's standards. The IAASB definition of PTE is the same as that used in both the IESBA Code and the revised Ethical Standard for Auditors (Ireland):

"An entity that issues financial instruments that are transferrable and traded through a publicly accessible market mechanism, including through listing on a stock exchange. A listed entity as defined by relevant securities law or regulation is an example of a publicly traded entity."

## 2.3 Additional IAASB narrow scope amendments

The IAASB has also made narrow scope amendments to both ISA 260 Communication With Those Charged with Governance and ISA 700 Forming an Opinion and Reporting on Financial Statements. These changes focused on how the auditor should disclose application of the additional ethical requirements for the audits of PIEs and PTEs.

## 2.4 Irish auditing framework

The Irish auditing framework is based on the UK framework developed by the Financial Reporting Council (FRC), which in turn is based on the IAASB's standards. IAASA's policy is to make minimal amendments to the UK standards. Amendments are considered where there is a conflict with Irish or EU law, or where there are distinct differences between the Irish and UK markets which impact on the applicability of a standard in Ireland.

In response to the IAASB's 2023 changes, the FRC included the revisions to ISA 700 and ISA 260 in a recent consultation.

While the FRC has yet to adopt the term PTE, it is IAASA's view that the proposed PTE definition is broadly consistent with the term 'listed entity' in the UK standards.

Consequently, it is IAASA's view that the proposed revisions will ensure that the Irish auditing framework remains consistent with both the UK and international standards.

## 3. Overview of proposed narrow scope revisions

### 3.1 Revisions

The substantive revisions to the ISAs (Ireland) and ISQMs (Ireland) which IAASA proposes to adopt are:

- Replacement of the term 'listed entity' with PTE, as explained in sections 2.1 and 2.2 of this consultation paper. This will ensure consistency between the auditing, quality management and ethical standards in Ireland. The main impact of this change will be that audits of entities whose financial instruments are listed but not actively traded, such as special purpose vehicles will no longer be subject to additional requirements. For example, the need to have an engagement quality review performed and the inclusion of additional disclosures in the auditor's report.
- Changes to ISA (Ireland) 260 and ISA (Ireland) 700 focused on how the auditor should disclose application of the additional ethical requirements for the audits of PIEs and PTEs. These changes are consistent with those adopted by the IAASB.

We believe that the proposed narrow scope revisions to the ISAs (Ireland) and ISQMs (Ireland) are appropriate for adoption in Ireland. They will also ensure the Irish auditing framework is aligned with international standards.

### 3.2 Standards being amended

The standards impacted by the proposed narrow scope revisions are listed below.

- ISA (Ireland) 200 Overall Objectives of the Independent Auditor and the Conduct of an Audit in Accordance with International Standards on Auditing (Ireland)

- ISA (Ireland) 210 Agreeing the Terms of Audit Engagements
- ISA (Ireland) 220 Quality Management for an Audit of Financial Statements
- ISA (Ireland) 240 The Auditor's Responsibilities Relating to Fraud in an Audit of Financial Statements
- ISA (Ireland) 260 Communication with Those Charged with Governance
- ISA (Ireland) 265 Communicating Deficiencies in Internal Control to Those Charged with Governance and Management
- ISA (Ireland) 315 Identifying and Assessing the Risks of Material Misstatement
- ISA (Ireland) 510 Initial Audit Engagements - Opening Balances
- ISA (Ireland) 570 Going Concern
- ISA (Ireland) 600 Special Considerations – Audits of Group Financial Statements (Including the Work of Component Auditors)
- ISA (Ireland) 700 Forming an Opinion and Reporting on Financial Statements
- ISA (Ireland) 701 Communicating Key Audit Matters in the Independent Auditor's Report
- ISA (Ireland) 705 Modifications to the Opinion in the Independent Auditor's Report
- ISA (Ireland) 706 Emphasis of Matter Paragraphs and Other Matter Paragraphs in the Independent Auditor's Report
- ISA (Ireland) 710 Comparative Information - Corresponding Figures and Comparative Financial Statements
- ISA (Ireland) 720 The Auditor's Responsibilities Relating to Other Information
- ISA (Ireland) 800 Special Considerations - Audits of Financial Statements Prepared in Accordance with Special Purpose Frameworks
- ISA (Ireland) 805 Special Considerations - Audits of Single Financial Statements and Specific Elements, Accounts or Items of a Financial Statement
- ISQM 1 Quality Management for Firms that Perform Audits or Reviews of Financial Statements, or Other Assurance or Related Services Engagements
- ISQM 2 Engagement Quality Reviews

### 3.3 Effective date

The proposed effective date of the revisions is for audits of financial statements for periods commencing on or after 15 December 2026. This is consistent with the effective date of the revised Ethical Standard for Auditors (Ireland) and the IAASB's narrow scope amendments for publicly traded entities. Early adoption is permitted.

## 4. Matters on which IAASA is consulting

Set out below are several matters on which IAASA is seeking views by 5pm on Friday 3 April 2026.

| No. | Matter on which views are sought  |
|-----|---|
| 1.  | <p>Do you agree that it is in the public interest that IAASA makes these narrow scope revisions to the ISAs (Ireland) and ISQMs (Ireland)?</p> <p>If not, please give your reasons and describe any alternatives that you wish IAASA to consider.</p> |

2. Are there any proposed narrow scope revisions that conflict with Irish or EU law?

If so, please:

- Identify the relevant proposals and the relevant legal provisions
- Give reasons for your view
- Describe how you believe these matters should be addressed in the ISAs (Ireland) or ISQMs (Ireland)

3. Is the proposed effective date, i.e. for audits of financial statements for periods beginning on or after 15 December 2026, appropriate?

If not, please give reasons and indicate an effective date that you would consider appropriate.

## 5. Making your submission

IAASA invites comments on the proposed narrow scope revisions to the ISAs (Ireland) and ISQMs (Ireland). In particular, comments are sought on the matters set out in section 4.

Comments are most helpful if they:

- Respond directly to the question asked
- Provide a clear rationale for your position
- Provide evidence supporting your views
- Describe in detail any alternative options you wish IAASA to consider

Please email your response to [submissions@iaasa.ie](mailto:submissions@iaasa.ie) by **5pm on Friday 3 April 2026**.

IAASA will consider all responses from identifiable individuals and organisations that are received by this deadline. IAASA may publish a feedback statement summarising the content of the responses. Responses may also be published in full or in part and attributed to respondents.



**Irish Auditing & Accounting  
Supervisory Authority**

Willow House  
Millennium Park  
Naas, Co. Kildare  
W91 C6KT  
Ireland

Phone: +353 (0) 45 983 600  
Email: [info@iaasa.ie](mailto:info@iaasa.ie)

**[www.iaasa.ie](http://www.iaasa.ie)**