

2026

**Responses Received
Narrow Scope Revisions
to the ISAs (Ireland) and
ISQMs (Ireland)**

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

30 March 2026

Via email submissions@iaasa.ie

Dear Kevin

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

Chartered Accountants Ireland welcomes the opportunity to respond to the proposed changes to ISAs (Ireland) and ISQMs (Ireland).

We are supportive of steps to modernise and strengthen the auditing standards and keep Irish auditing standards in alignment with international and UK standards.

We are not aware of any local laws or market conditions that would impact on the proposed amendments therefore we have no comments on the proposed updates to the standards. We have identified a small number of errors/omissions in the proposed changes which we have listed in the attached appendix to our attached response.

We believe that the proposed effective date, for audits of financial statements for periods beginning on or after December 15, 2026, is appropriate.

I attach our responses to the questions set out in the consultation paper and if you would like to discuss any of the comments in more detail please do not hesitate to contact us anne.sykes@charteredaccountants.ie.

Yours sincerely



Anne Sykes

Chartered Accountants Ireland.



Appendix – Responses to consultation paper questions

Proposal to make narrow scope revisions to the ISAs (Ireland) and ISQMs (Ireland) responses to the questions.

- 1. Do you agree that it is in the public interest that IAASA makes these narrow scope revisions to the ISAs (Ireland) and ISQMs (Ireland)?**

If not, please give your reasons and describe any alternatives that you wish IAASA to consider.

Chartered Accountants Ireland is supportive of the proposal to make the proposed amendments to the ISAs (Ireland) and ISQMs (Ireland).

- 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)**

We have not identified any proposed revisions which conflict with Irish or EU law. We have identified a small number of errors/omissions in the proposed changes which we have listed in the attached appendix.

- 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.

We believe that the proposed effective date is appropriate.



Appendix

Matters noted in our review of the proposed amendments:

1. Overall comments:

Cross references should be to current standards. We noted a couple of examples.

Cross references to the Ethical Standard for Auditors (Ireland) correspond to the 2020 standard and we assume that these will be updated to refer to the Ethical Standard for Auditors (Ireland) 2025.

There are references to ISA (Ireland) 200 which are to the 2018 version rather than the 2024 version.

2. **ISA 260** – paragraph 18A refers to the statement required by paragraph 17, this should be the statement required by paragraph 18.
3. **ISA 265** paragraph A12-1 this needs a footnote to include UK Corporate Governance Code where the entity has elected to apply the UK Corporate Governance Code.
4. **ISA (Ireland) 700**

a. *Paragraph 30-1 from extant standard*

“30-1. For audits of complete sets of general purpose financial statements of public interest entities and other entities that are required, and those that choose voluntarily, to report on how they have applied the Irish Corporate Governance Code^{13a}, the auditor shall communicate in the auditor’s report in accordance with ISA (Ireland) 701 (Revised December 2025).”

The above paragraph also requires amendment as follows (amendment in bold italics): “For audits of complete sets of general purpose financial statements of public interest entities, **publicly traded entities and** other entities that are required.....”

b. *Paragraph 40. (b)(ii) from revised standard*

“(ii) For audits of financial statements of publicly traded entities, communicated with them all relationships and other matters that may reasonably be thought to bear on the auditor’s independence, and where applicable, related safeguards; and”

We suggest that a footnote is added to “publicly traded entities” in the above paragraph to note that paragraph 1.62 of the 2025 Ethical Standard for Auditors requires similar communications for public interest entities as well as publicly traded entities.

5. **ISA (Ireland) 720**

The term “listed” should be updated to “publicly traded” in the following:

Extant standard page 30 – footnote 20

Extant standard page 31 – footnote 22

Extant standard page 32 – footnote 27

Extant standard page 35 – footnote 33

Extant standard page 42 – footnote 44



Extant standard page 43 – footnote 46

Extant standard page 46 – footnote 49

Extant standard page 46 – footnote 51

Extant standard page 49 – footnote 54

Extant standard page 49 – footnote 56

6. ISA 800

There is a sentence missing in one of the Illustrations in ISA 800:

“We also provide those charged with governance with a statement that we have complied with relevant ethical requirements regarding independence.”

This needs to be added to Illustration 2.

7. Glossary

We suggest that the following changes are also made to the 2025 Glossary

a. Delete the *following*:

Listed entity—An entity whose shares, stock or debt are quoted or listed on a recognized stock exchange, or are marketed under the regulations of a recognized stock exchange or other equivalent body.

This includes any entity in which the public can trade shares, stock or debt on the open market, such as those listed on the Irish/London Stock Exchanges (including those admitted to trading on the Alternative Investment Market and Euronext Growth) and ISDX Markets.

b. Amend the *following*:

“SME listed entity” to “SME publicly traded entity”

Kevin Prendergast
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C6KT

Email: submissions@iaasa.ie

3 April 2026

Dear Mr. Prendergast,

Deloitte Ireland LLP welcomes the opportunity to respond to the Irish Auditing & Accounting Supervisory Authority's (IAASA's) invitation to comment on the proposed narrow scope revisions to the International Standards on Auditing (Ireland) (ISAs (Ireland)) and the International Standards on Quality Management (Ireland) (ISQMs (Ireland)) ("the standards").

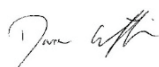
We fully support IAASA in their overarching ambition in relation to the standards and alignment with the international standards issued by the International Auditing and Assurance Standards Board (IAASB). We believe that continued alignment by IAASA to the international requirements promotes consistency in application of the requirements within auditing standards both within and across audit firms.

While we are fully supportive of the overarching ambition, we have set out a small number of our observations in relation to the precise nature and/or wording of the proposed changes in Appendix 1 to this letter.

We have also set out below our responses to the questions posed as part of the consultation. We are grateful for the opportunity to participate and share our views as part of this consultation and would be happy to discuss any areas contained in this response as you consider your next steps.

If you have any questions in relation to this response, please contact myself (dagriffin@deloitte.ie) or Arpan Bajaj (arpbajaj@deloitte.ie).

Yours sincerely



Darren Griffin
Audit & Assurance Quality Leader
For and on behalf of
Deloitte Ireland LLP

Consultation Questions:

- 1. Do you agree that it is in the public interest that IAASA makes these narrow scope revisions to the ISAs (Ireland) and ISQMs (Ireland)?**

If not, please give your reasons and describe any alternatives that you wish IAASA to consider.

We fully agree that it is in public interest that IAASA makes the narrow scope revisions to the ISAs (Ireland) and ISQMs (Ireland).

- 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)**

We have not identified any proposed narrow scope revisions that conflict with Irish or EU law.

As noted earlier, we have set out a small number of our observations in relation to the precise nature and/or wording of the proposed changes in Appendix 1 to this letter.

- 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.

We believe the proposed effective date, i.e. for audits of financial statements for periods beginning on or after 15 December 2026, is appropriate.

Appendix 1: Observations noted during our review of the proposed amendments.

1. Overall, we noted that there are cross-references to the previous versions of the standards in the proposed revisions while these should be reflective of the current and most up-to-date standards. We noted a couple of such cross-references throughout the proposed revisions.

For example: The cross-reference to ISA (Ireland) 200 notes ISA (Ireland) 200 (Updated December 2018) while the latest version of the standard on the IAASA website is ISA (Ireland) 200 (Updated October 2023).

Additionally, we noted where there are cross-references to the requirements within the IAASA's Ethical Standard for Auditors (Ireland), specific paragraph references are from the 2020 ethical standard and with the proposed effective date of the narrow scope revisions, we believe that specific paragraph references should be from the revised 2025 ethical standard.

2. **ISA (Ireland) 200** – Paragraph A13C has an example reference to the IESBA Code which we understand is aligned with the international standards issued by the IAASB. Our observation is to consider having a footnote to provide cross-reference to the IAASA's Ethical Standard for Auditors (Ireland) for audits based on ISAs (Ireland) so that it does not confuse the readers.
3. **ISA (Ireland) 260** – Paragraph 18A refers to the statement required by paragraph 17, this should be the statement required by paragraph 18.
4. **ISA (Ireland) 265** – Paragraph A12-1 should have a footnote to include UK Corporate Governance Code where the entity has elected to apply the UK Corporate Governance Code.
5. **ISA (Ireland) 700** – There should be paragraph 30-1 in the “Key Audit Matters” section similar to the extant standard, which should also make a reference to publicly traded entities, for instance: “30-1. For audits of complete sets of general purpose financial statements of public interest entities, **publicly traded entities** and other entities that are required, and those.....”

Additionally for paragraph 40(b)(ii) in the proposed revisions, we suggest that a footnote is added to “publicly traded entities” in relation to this paragraph to note paragraph 1.62 of the Ethical Standard for Auditors (Ireland) 2025 requires similar communications for both public interest entities as well as publicly traded entities.

6. **ISA (Ireland) 720** – The term “listed” should be updated to “publicly traded” at the following places per the extant standard which is currently not included in the proposed revisions: page 30 – footnote 20, page 31 – footnote 22, page 32 – footnote 27, page 35 – footnote 33, page 42 – footnote 44, page 43 – footnote 46, page 46 – footnotes 49 and 51, and page 49 – footnotes 54 and 56.
7. **ISA (Ireland) 800** – The following paragraph seems to be missing for illustration 2 in the proposed revisions: “We communicate with those charged with governance regarding, among other matters, the planned scope and timing of the audit and significant audit findings, including any significant deficiencies in internal control that we identify during our audit. We also provide those charged with governance with a statement that we have complied with relevant ethical requirements regarding independence.”
8. **Glossary** – We suggest that the definition of the “SME listed entity” is updated to “SME publicly traded entity” per the 2025 Glossary.



**Shape the future
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Mr Kevin Prendergast
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2 April 2026

Email: submissions@iaasa.ie

Dear Mr Prendergast

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

We are pleased to respond to your consultation paper with regard to the proposal to make narrow scope revisions to the ISAs (Ireland) and ISQMs (Ireland).

We are supportive of the proposal to make these narrow scope revisions.

We have responded to the specific questions set out in the consultation in the attached and have included some general observations on the revisions.

Yours sincerely,

A handwritten signature in black ink that reads 'Marie Treacy'.

Marie Treacy
Audit Compliance Principal

Attachment



Shape the future with confidence

1. Do you agree that it is in the public interest that IAASA makes these narrow scope revisions to the ISAs (Ireland) and ISQMs (Ireland)?

If not, please give your reasons and describe any alternatives that you wish IAASA to consider.

We agree that it is in the public interest that IAASA makes these narrow scope revisions to the ISAs (Ireland) and ISQMs (Ireland).

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)**

We are not aware of any provisions in the proposed standard that conflict with Irish or EU law.

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.

We believe the proposed effective date is appropriate.

General observations

In the proposed revisions, there are references to paragraphs in IAASA's Ethical Standard which correspond to the paragraphs applicable to listed entities in the Ethical Standard for Auditors (Ireland) 2020. We believe these should be updated to the relevant paragraphs in the Ethical Standard for Auditors (Ireland) 2025.

We also noted certain references to listed entities in the extant ISAs which we believe should also be updated to publicly traded entities as part of these narrow scope revisions.

We recommend that the definition of a listed entity be deleted from IAASA's Glossary of Terms, as this is now superseded by the definition of publicly traded entity.

We identified a small number of errors in the cross referencing between the standards as a result of the narrow scope revisions. We suggest that IAASA undertake a final review of all references and cross references across the proposed documents to ensure they are internally consistent and aligned to the final versions of the Ethical Standard and related ISAs.



2 April 2026

Mr Kevin Prendergast
Chief Executive
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Willow House
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W91C6KT

Response to Consultation on proposed narrow scope revisions to the ISAs (Ireland) and the ISQMs (Ireland)

Dear Kevin,

We welcome the opportunity to respond to the above consultation. We have set out below our responses to questions 1- 3 as set out in the consultation paper.

Question 1 -Do you agree that it is in the public interest that IAASA makes these narrow scope revisions to the ISAs (Ireland) and ISQMs (Ireland)?

We agree that it is in the public interest to make the narrow scope revisions to the ISAs (Ireland) and the ISQMs (Ireland).

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

In our view, none of the proposed narrow scope revisions conflict with Irish or EU law.

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

We agree that the effective date is appropriate.

Kind regards.

Yours sincerely,

A handwritten signature in blue ink that reads "Paul W O'Connor". The signature is written in a cursive, flowing style.

Paul W O'Connor
Partner

Email: paul.w.oconnor@pwc.com
Tel:086 806 8492



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