

Mr Kevin Prendergast
Chief Executive
Irish Auditing & Accounting Supervisory Authority (“IAASA”)
Willow House
Millennium Park
Naas
Co Kildare

17 July 2020

Dear Kevin,

Consultation Paper: Proposals to revise the Ethical Standard for Auditors (Ireland), International Standards on Auditing (Ireland) and Glossary of Terms

EisnerAmper Audit Limited (the “Firm”) welcomes the opportunity to respond to IAASA’s consultation paper (“CP”) regarding its proposals to issue revised versions of the Ethical Standard for Auditors (Ireland), certain International Standards on Auditing (Ireland), the International Standard on Quality Control (Ireland) 1, and the Glossary of Terms.

The Firm fully supports changes to the Irish auditing framework that serve to improve audit quality and underpin a competitive and dynamic audit market. We have contributed to the response to the CP by the Audit and Assurance Committee of Chartered Accountants Ireland (CAI) through involvement in an Ethics & Audit Independence working group. Therefore, we have not repeated detailed points contained in CAI’s response and have limited the Firm’s response to one key point below which we feel merits reiteration.

Q5. Is the proposed effective date, i.e. for financial periods beginning on or after 15 October 2020, appropriate? If not, please give reasons and indicate the effective date that you would consider appropriate.

We would suggest that IAASA defer the effective date by a suitable period for the following reasons:

- To allow adequate time for IAASA to consider the likely impact of the revised standards in Ireland, including any structural changes in the Irish market that may ensue. The population of responses to the CP could be used as part of this consideration.
- To allow IAASA to leverage off FRC’s experience in the UK in dealing with any transitional challenges relating to the implementation of the revised standards.
- To enable audit firms to focus on addressing other changes in auditing requirements coming into force – e.g. update of firms’ policies and procedures and running of training programmes to address the impact of substantive changes in ISA 540 *Auditing Accounting Estimates and Related Disclosures* and ISA 570 *Going Concern*.
- To take into account workplace restrictions in the current operating environment which may compound the challenge of embedding the effect of the revised standards in the work practices of audit firms, particularly as these restrictions may continue for some time.





We hope the above observation is helpful to IAASA and we would be happy to discuss our comments in more detail with IAASA or provide further clarity.

Yours sincerely

Diarmaid O’Keeffe
Head of Audit