



7 December 2011

Our ref: ICAEW Rep 115/11

Hazel O'Sullivan  
Project Director  
The Auditing Practices Board  
5th Floor  
Aldwych House  
71-91 Aldwych  
London WC2B 4HN

Dear Hazel

**Consultation on amendments to the APB Ethical Standards for Auditors: November 2011**

ICAEW welcomes the opportunity to comment on the *Consultation on amendments to the APB Ethical Standards for Auditors: November 2011* published by the Auditing Practices Board, a copy of which is available from this [link](#).

ICAEW is a world-leading professional accountancy body. We operate under a Royal Charter, working in the public interest. ICAEW's regulation of its members, in particular its responsibilities in respect of auditors, is overseen by the UK Financial Reporting Council. We provide leadership and practical support to over 136,000 member chartered accountants in more than 160 countries, working with governments, regulators and industry in order to ensure that the highest standards are maintained. ICAEW members operate across a wide range of areas in business, practice and the public sector. They provide financial expertise and guidance based on the highest professional, technical and ethical standards. They are trained to provide clarity and apply rigour, and so help create long-term sustainable economic value.

We welcome the proposals in the consultation, both in respect of the extension of the transitional period for non-audit services relating to long term tax claims, and the alignment of the template for disclosure of audit and non-audit services, with the Regulations issued since the Ethical Standards were last updated.

Yours sincerely

**TONY BROMELL**  
Head of Integrity and Markets

**T** +44 (0) 1908 546284  
**E** tony.bromell@icaew.com