



Mr Keith Billing
Project Director Financial Reporting Council
Via; e-mail: AAT@frc.org.uk

02 April 2020

Dear Keith

**The Institute of Certified Public Accountants in Ireland welcomes the opportunity to comment on:
Consultation paper proposing to revise ISA (UK) 315 (Revised – June 2016) - Identifying and
Assessing the Risks of Material Misstatement Through Understanding the Entity and Its
Environment.**

Question 1

Do you agree that ISA (UK) 315 (Revised June 2016) and other ISAs (UK) should be revised to adopt the revisions to the underlying international standard and the related conforming amendments to other ISAs? If not, please give your reasons and explain what action, if any, that you believe should be taken to update the ISAs (UK) in relation to identifying and assessing the risks of material misstatement.

We are supportive and in agreement that ISA (UK) 315 (Revised June 2016) and other ISAs (UK) should be revised to adopt the revisions to the underlying international standard and the related conforming amendments to other ISAs. These revisions will bring it in line with international standards to reflect revisions made by the International Auditing and Assurance Standards Board (IAASB) which are designed to establish a more robust and consistent risk identification and assessment.

Question 2

If you agree that the ISAs (UK) should be revised to adopt the revised ISA 315 and conforming amendments, do you agree that the UK supplementary material can be limited to that shown in the exposure draft? If not, please give your reasons and explain what supplementary material, if any, you believe should be added.

We are supportive and in agreement that the UK supplementary material can be limited to that shown in the exposure draft. The FRC has carried over the small amount of supplementary material added to ISA (UK) 315 (Revised June 2016), which clarifies who are those charged with governance in a UK context and identifies that they are the appropriate persons to provide critical written confirmations in line with ISA (UK) 580 Written Representations. In the UK, those charged with governance are responsible for preparing the financial statements.

Question 3

Is the proposed effective date (audits of financial statements for accounting periods beginning on or after 15 December 2021), which is consistent with the effective date of the IAASB's revised ISAs, appropriate? If not, please give reasons and indicate the effective date that you would consider appropriate.

We are in agreement that the proposed effective date (audits of financial statements for accounting periods beginning on or after 15 December 2021), which is consistent with the effective date of the IAASB's revised ISAs, is appropriate.

If you have any questions on the above, please do not hesitate to contact me.

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**On behalf of - David Roxburgh
Chairperson, Financial Reporting Sub - Committee**

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