

# Instituut van de Bedrijfsrevisoren Institut des Réviseurs d'Entreprises

Koninklijk Instituut - Institut royal

Ms. Kathleen HEALY  
Technical Director IAASB

Submitted via e-mail to:  
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Posted as comment on:  
[www.ifac.org](http://www.ifac.org)

- 6 -10- 2015

Dear Ms. Healy,

## **Re IAASB Exposure draft *Responding to Non-Compliance or Suspected Non-Compliance with Laws and Regulations***

The *Institut des Réviseurs d'Entreprises/Instituut van de Bedrijfsrevisoren* ("IRE-IBR") is pleased to have the opportunity to provide its comments on the Exposure Draft *Responding to Non-Compliance or Suspected Non-Compliance with Laws and Regulations* issued by the International Auditing and Assurance Standards Board (IAASB).

IRE-IBR welcomes the initiative of the IAASB to adapt the International Standards on Auditing (ISAs) to ensure consistency between the IESBA Code of Ethics and the ISAs.

IRE-IBR has also responded to the IESBA re-exposure draft on NOCLAR. This response is attached to this comment letter as an appendix.

We believe that the proposed limited amendments are sufficient to resolve any possible inconsistencies of approach and clarify key aspects of the NOCLAR Proposals in the IAASB's International Standards. In our view, no significant changes are necessary to the ISAs and we support only limited amendments avoiding inconsistencies, without fundamentally amending the standards concerned at this stage.

IRE-IBR does not believe IAASB should explore other possible improvements to ISA 250 under a future IAASB Work Plan. Although this could meet the expectations of regulators, increase the work to be done by the auditor with regard to known or suspected NOCLAR as an essential component in obtaining an understanding of the entity and its environment risks to change the objectives and scope of an audit.

Finally, we would like to point out that the proposed amendments are founded on the draft of the NOCLAR proposals, which are yet to be fully finalized. Therefore, we have reservations regarding the timing implications of both projects. We believe that it will be likely that the IAASB ED will need to be amended to be consistent with the result of the re-exposure of the IESBA Proposals. IAASB should remain attentive to difficulties for respondents to comment on both projects at the same time and therefore not limit their considerations to the application of the ISAs.

Sincerely,



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