

I have some observations which I submit hereafter.

1. CPD should start at the level of the theoretical formation. The need for CPD in education is not being discussed. I consider this a problem area. Intensive cooperation between professional institutes and the educators should be promoted.

2. What parties should be involved in organizing CPD. I would think that here there is challenge for both the profession and educators to work out a common practical solution, but then point 1 should be considered. And consideration should be given to scientific and critical analyses; the profession is traditional and critical (but critical seems to be a neglected issue these years.

This consideration should be read in conjunction with the fact, that CPD courses cover in general updates considered necessary following changes in law and regulations. These days such changes are intensively distributed by all kind of newsletters and basic information. A good practitioner obtains hereby sufficient information to update himself, without a necessity to attend updates of changes, which in general lack critical observations and a profound analysis.

I merely consider that the professional institutes should react to the massive production of laws and regulations, most of the time fastly written and not sufficiently critically analyzed. I think this should be a challenge for the professional institutes.

3. The IES 7 redraft leaves a large responsibility with the professional institutions, with the risk that they fall back on a traditional-historical experience and approach. CPD should pay sufficient attention to the coming and future challenges of the profession. and the personal needs of the professional.

4. As long as CPD is associated with the concept of a general practitioner can 120 hours cover adequately the whole range of the theoretical formation topics. I sincerely doubt this.

The modern office organizes a division of duties (which easily become specializations). Once specialized the magnitude of CPD becomes then more stratified on specialized issues. Which does not mean the practitioner should remain updated on the general issues of the profession, but can you call this CPD.

5. Practitioners working in industry or the public sector do not always remain a member of the professional institutes. But they also should engage in CPD schemes. But as the professional institutes do not reach this category there is a missing link in the accounting development.

6. In Europe we have now IFRS, IFRS LIGHT (under study), the fourth and seventh directives (under revision), micro-entities and local GAAP. And in the US GAAP for private companies is being worked out. For a good practice is this not to much of the same. Consider how the theoretical formation and an office could deal with these divergent issues.

7. Senior partners of the larger offices and CFI of the larger companies have a surcharged agenda. Most of the time new issues are on their desk before even a CPD course gives attention to those. So they learn whilst working. I have problems in understanding how they can organize their

CPD. Obviously, apart from their professional function, they need to be involved in stimulating innovation, motivation, future outcomes. But rarely enough HRM and ERP seems not to be a professional competence commitment, whereas in their daily responsibilities those are priorities.

Otherwise these officers have such a variety of daily experience, that I have a difficulty in defining what kind of CPD should be a plus value for them.

8. Assessing the effectiveness of CPD courses remains - in my view - the weak point of CPD efforts. I consider that organizing exams is the only good solution. But is this practical with institutes having thousands of members and it consumes CPD time.

9. Therefore I consider the IES 7 should underlying the responsibility of the practitioner towards CPD rather than putting the strength with the professional institutes. This aspect was better defined in the previous IES 7.

10. CPD becomes now largely associated with efforts to be made by professionals in this challenging time. But, no consideration is given to the impact of small and medium sized companies, which are not waiting for professional advice, which they could not pay. Whereas the larger firms are now for their professionalism - acclaimed by the larger companies - willing to pay fees as charged in the circumstances.

I am advocating to a certain extent, that the smaller firms are operating under different circumstances than the larger firms, which would imply less competition. Merely I would stress the fact that opportunities should be made available that on the market smaller firms can grow. Therefore they require special consideration.

Yours truly

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