



Mr David McPeak
Technical Manager IAESB
International Federation of Accountants
277 Wellington Street West
Toronto Ontario Canada M5V 3H2

Email: davidmcpeak@ifac.org

17 March 2011

Ref.: QMA/PWE/GCA/MBR

Dear Sir,

Re: FEE Comments on the IAESB Consultation Paper on the Proposed IES 7 (Redrafted)

FEE (the Federation of European Accountants) is pleased to provide you below with its comments on the Proposed IES 7 (Redrafted) Continuing Professional Development: A Program of Lifelong Learning and Continuing Development of Professional Competence.

FEE supports the IAESB's project to improve the clarity of its standards including the proposed IAESB redraft of IES 7 issued in December 2010.

Part 1 – Responses to questions

Question 1 – Is the objective to be achieved by a member body, stated in the proposed redrafted IES 7, appropriate?

Yes, we believe so.

Question 2 – Have the criteria identified by the IAESB for determining whether a requirement should be specified been applied appropriately and consistently, such that the resulting requirements promote consistency in implementation by member bodies?

Yes, we believe so.

Question 3 – Are there any terms within the proposed redrafted IES 7 which require further clarification? If so, please explain the nature of the deficiencies.

Overall, we believe the terminology within the proposed redrafted standard is sufficiently clear.

Generally, it could be helpful if IES started with definitions of all terms used in the standard (like e.g. Clarified ISAs). IES 7 for example contains a definition of CPD in paragraph 3, however, a definition of lifelong learning is missing although the term is used in paragraph 2 and in the header of paragraph 8. The former paragraph 17 that had contained a definition of lifelong learning has been deleted and its content is not fully reflected in paragraphs 3 and A 6 as suggested in the supplement to the exposure draft.

Part 2 – General comments

Although this is not directly part of the questions because there is no change compared with IES 7, the following additional observations might be useful for IAESB to consider in due course:

According to paragraph A 2, CPD is a mean to ensure that professional accountants are up-to-date on technical and general knowledge "relevant to the professional services they provide" (see also A 16). Paragraph A 9 envisages the possibility for a member body to set additional requirements for members working in specialist areas. The standard does not envisage the reverse situation which is that an accountant specialising in a given area would not longer maintain some competences acquired in its IPD. Would that be acceptable or not? What consequences would that have on an output based approach?

Regarding the Output-Based Approach outlined in paragraphs A 12 – A 13, it might be helpful to consider an appendix or a separate paper with best practices on this approach.

For further information on this letter, please contact Ms Petra Weymüller from the FEE Secretariat (email: petra.weymuller@fee.be, Tel.: +32 2 285 40 75).

Yours sincerely,



Philip Johnson
President