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Tom Seidenstein
International Auditing and Assurance
Standards Board
International Federation of Accountants
529 Fifth Avenue
New York, NY 10017
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Our ref

SRA/288

09 January 2020

Dear Mr Seidenstein

**Re: IAASB Exposure Draft, Proposed Amendments to the IAASB's
International Standards: *Conforming Amendments to the IAASB International
Standards as a Result of the Revised IESBA Code***

We appreciate the opportunity to comment on the above Exposure Draft issued by the IAASB. We have consulted with, and this letter represents the views of, the KPMG network.

We are supportive of the IAASB's objective of updating the IAASB Handbook to address inconsistencies between the International Standards in the Handbook and the revised IESBA Code. We agree with the IAASB's view that it is optimal to make such changes concurrently across all International Standards and that it would not be effective to make the changes on a piecemeal basis as individual standards are revised. We consider that such an approach would lead to a period of inconsistency between standards and several affected standards would not be updated on a timely basis.

We are supportive of the Board's view that it is in the public interest that the International Standards and the IESBA Code are able to operate in concert and without any actual or perceived contradictions/inconsistencies or potential for confusion by users.

In considering the proposed amendments, we recognise the statement made by the Board in the Explanatory Memorandum to the Exposure Draft that the amendments are limited, as their development does not involve re-consideration of the objectives, requirements and application material of the International Standards, in their own right. Furthermore, we acknowledge that the purpose of the proposed amendments is solely to align the extant wording of the International Standards with the revised IESBA Code and is neither intended to re-evaluate or discuss the merits of each particular reference,



nor to reconsider the changes already included in the revised IESBA Code, which have been made further to appropriate due process.

Accordingly, we consider that the proposed limited amendments are sufficient to resolve actual or perceived inconsistencies between the IAASB's International Standards and the changes made by IESBA in issuing the revised IESBA Code.

In addition, since the changes proposed are limited in nature, we do not have concerns with the proposed effective date.

Please contact Sheri Anderson on +44 (0) 20 7694 8871 if you wish to discuss any of the issues raised in this letter.

Yours sincerely

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