



Mr Imran Vanker
Director: Standards
The Independent Regulatory Board for Auditors

Email: standards@irba.co.za

2 August 2021

Dear Mr Vanker

Comment on the Exposure Draft: Proposed Conforming and Consequential Amendments to IRBA Pronouncements, arising from the International Auditing and Assurance Standards Board's (IAASB) Quality Management Standards

We appreciate the opportunity to comment on the Committee for Auditing Standards' (CFAS) Exposure Draft: *Proposed Conforming and Consequential Amendments to IRBA Pronouncements, arising from the International Auditing and Assurance Standards Board's (IAASB) Quality Management Standards (Revised June 2021)* (the "Exposure Draft"). This response summarises the views of the South African firm of PricewaterhouseCoopers.

We have provided our views on the matters on which comments were specifically requested.

If you would like to discuss our comments further, please do not hesitate to contact Natalie Terblanche on (011) 797 5723 or Mohammed Adam on (011) 797 4837.

Yours sincerely,

A handwritten signature in black ink, appearing to be 'L S Machaba', written over a faint, illegible printed name.

Director

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REQUEST FOR SPECIFIC COMMENTS

a. Are there any aspects of the proposed conforming and consequential amendments contained in this Exposure Draft with which respondents disagree? Please provide details and suggestions for correction/and or improvements.

Details and suggestions for correction/and improvement on specific aspects of the proposed conforming and consequential amendments contained in the Exposure Draft are set out below:

Page number of the Exposure Draft	Name of Pronouncement	Paragraph reference in the Pronouncement	Comment
10	Guide for Registered Auditors <i>Joint Audit Engagements</i>	26	<p>We propose the following change to the last sentence of paragraph 26 to align with the terminology in ISA 220 (Revised) paragraph 19:</p> <p>A letter by each of the joint auditors to each other, explaining their processes in this regard and any identified threats or breaches of relevant ethical requirements or the firm's related policies or procedures—non-compliance as well as safeguards applied, may form part of the audit documentation.</p>
11	Guide for Registered Auditors <i>Joint Audit Engagements</i>	Footnote 9	<p>We believe that the proposed change should be categorised as Category A as opposed to Category B as set out in the Exposure Draft due to the change only relating to updating of the reference to ISA 220 (Revised) and changing in references to the equivalent paragraphs in ISA 220 (Revised).</p>



18	Guide for Registered Auditors <i>Joint Audit Engagements</i>	81	No category has been assigned for this proposed change. We believe that this is a category A change due to it being non-substantive and relates to aligning terminology with that applied in ISQM 1.
26	Guide for Registered Auditors <i>Engagements on Legal Practitioners' Trust Accounts (Revised March 2020)</i>	Footnote 32	We believe that the proposed change should be categorised as Category A as opposed to Category B as set out in the Exposure Draft. The proposed change is an update to terminology in order to align with ISQM 1.
29	Revised Guide (June 2018): <i>Access to Working Papers</i>	Footnote 33	No category has been assigned for this proposed change. We believe that this is a category A change due to it being non-substantive and relates to aligning terminology with that applied in ISQM 1.



- b. Are there any aspects of the proposed conforming and consequential amendments contained in this Exposure Draft that are unclear and require further clarity? If so, please list those aspects and the clarification required.

Page number of the Exposure Draft	Name of Pronouncement	Paragraph reference in the Pronouncement	Comment
16	Guide for Registered Auditors <i>Joint Audit Engagements</i>	59	<p>Due to the extent of the proposed changes made to this paragraph, we recommend that an explanation be provided in the notes column to the Exposure Draft setting out the reason for the proposed change.</p> <p>We propose the following explanation be inserted:</p> <p>“To align with paragraph A91 and A92 of ISA 220 (Revised).”</p>



c. Given the above-mentioned scope, are there further aspects that should be included in this Exposure Draft? If so, please list those aspects and the details thereof.

We believe that the scope of the Exposure Draft adequately meets the objective of aligning the IRBA pronouncements with the Quality Management standards.

d. Do the respondents support the effective date?

We are in support that the effective date for the proposed conforming and consequential amendments aligns with the effective dates of the Quality Management Standards.