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- please always indicate -

**IAASB Invitation to Comment  
Consultation Paper: A Framework for Audit Quality**

Dear Mr. Gunn,  
Dear Ladies and Gentlemen,

We are pleased to take this opportunity to participate in the above-mentioned invitation to comment on the IAASB Consultation Paper: A Framework for Audit Quality.

We agree with the IAASB that a Framework for Audit Quality may raise the awareness of the key elements of audit quality, encourage key stakeholders to explore ways to improve audit quality and thereby facilitate a greater dialogue between all relevant stakeholders on this topic.

From our point of view, the IAASB's draft of the audit quality framework does meet these objectives only partially. This is due to the following considerations:

- **No concentration on key elements:**

The draft framework lists a variety of potential factors on audit quality and does not – from our perspective – focus on the key elements of audit quality (as was intended).

Some of the factors listed are repetitive and therefore redundant (e.g. 1.7.5. *There is appropriate audit documentation* and 1.8.4. *The methodology requires appropriate audit documentation*). Some of the listed factors are a reproduction from the IESBA Code of Ethics

or from the ISAs. And still other factors are mere banalities (e.g. 1.7.2. *The engagement team makes appropriate use of information technology*).

- **Too voluminous in combination with an insufficient addressee orientation:**

The draft audit quality framework includes explanations on about 60 pages (for comparison, the Framework to the IFRS comprises less than half of this amount). The preparation and presentation of this bulk of information occurs in a less user friendly and appealing way.

- **No definition of audit quality:**

The draft framework does not contain a clear definition of audit quality – which should be the core element of an audit quality framework. Instead the framework lists arguments why it seems difficult to define audit quality.

In order to determine the usefulness and usability of such a framework, it is necessary from our point of view, to have a clear understanding of “audit quality” in an objective sense. Even though we recognise that this understanding may differ in part from the individual perspective of different stakeholder groups.

We hope that our remarks will be taken into consideration in the subsequent course of the proceedings, and we would be delighted to answer any questions you may have.

Kind regards

RA Peter Maxl  
Executive Director

RA Dr. Volker Schnepel  
Head of professional law, accounting & auditing