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To: [ED Comments](#)
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Subject: Proposed Auditing Standard ASA 701 Communicating Key Audit Matters in the Independent Auditor's Report
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Attachments: [3_ED_01-15_ASA_701.pdf](#)

Good afternoon and thank you for the opportunity to comment on the proposed revisions to our audit report.

I object to these proposals in the strongest form.

As an auditor of public companies I fail to see what these changes add.

The scope and methodology for our audits are set out in massive detail in many black letter auditing and accounting standards. To suggest that I summarise my audit approach and to specifically describe each key audit matter, using an appropriate subheading, in a separate section of the auditor's report in a punchy attractive style shows a lack of understanding of the sheer volume of basic compliance that accompanies audits today.

All companies in Australia that have raised capital via a prospectus are subject to continuous disclosure legislation that requires directors to notify the market of all significant matters. I fail to see how any of the risks and other interesting snippets about the company's operations that the ED suggests I can reveal could or should be disclosed by an auditor in a report that is generally filed three months after the end of the accounting period.

If continuous disclosure is not adequate, then perhaps it should be.

Regulators and governments need to stop targeting auditors because we are easy to regulate and start getting serious with directors over their skill, qualifications and decisions.

If investors need to know more about the risk profile of a company they invest in then Bell Potter do excellent research.

Kind regards

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