Australian Government

Auditing and Assurance Standards Board

Consultation Paper

IAASB Proposed International Standards on Audit Evidence & Risk Response

ISA 330 (Revised), *The Auditor's Responses to Assessed Risks*

ISA 500 (Revised), *Audit Evidence*

ISA 520 (Revised), *Analytical Procedures*

Conforming and consequential amendments to other standards

August 2026

Comments due by 16 November 2026

Obtaining a Copy of this Consultation Paper

This Consultation Paper is available on the Auditing and Assurance Standards Board (AUASB) website: www.auasb.gov.au

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Important Note and Disclaimer

This Consultation Paper is issued by the AUASB to seek feedback from auditors, assurance practitioners and other stakeholders on Proposed International Standards on Auditing *ISA 330 (Revised), The Auditor's Reponses to Assessed Risks; ISA 500 (Revised), Audit Evidence* and *ISA 520 (Revised), Analytical Procedures* and confirming and consequential amendments to other standards.

This Consultation Paper contains proposals to amend existing AUASB Standards, but the document itself does not establish or extend the requirements under existing AUASB Standards and is not intended to be a substitute for compliance with the relevant existing AUASB Standards with which auditors are required to comply when conducting an audit of a financial report. No responsibility is taken for the results of actions or omissions to act on the basis of any information contained in this document or for any errors or omissions in it.

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CONSULTATION PAPER

IAASB Proposed International Standards on Audit Evidence & Risk Response

Introduction

1. The International Auditing and Assurance Standards Board (IAASB) has issued the following (collectively – IAASB ED):

   (a) *Exposure Draft for the Audit Evidence and Risk Response Project Overall* (comprising overall explanatory memorandum and conforming and consequential amendments to standards other than ISA 330, ISA 500 and ISA 520) (Overall IAASB ED) (see Exposure Draft for the Audit Evidence and Risk Response Project Overall);

   (b) Proposed International Standards on Auditing ISA 330 *(Revised), The Auditor's Responses to Assessed Risks* (including related explanatory memorandum) (ISA 330 ED or ED-330) (see Exposure Draft Proposed ISA 330 (Revised), *The Auditor's Responses to Assessed Risks*);

   (c) Proposed ISA 500 *(Revised), Audit Evidence* (including related explanatory memorandum) (ISA 500 ED or ED-500) (see Exposure Draft Proposed ISA 500 (Revised), *Audit Evidence*); and

   (d) Proposed ISA 520 *(Revised), Analytical Procedures* (ISA 520 ED or ED-520) (including related explanatory memorandum) (see Exposure Draft Proposed ISA 520 (Revised), *Analytical Procedures*).

2. The Australian Auditing and Assurance Standards Board (AUASB) is seeking feedback from stakeholders to inform us when responding to the IAASB on the IAASB ED, and to identify any potential compelling reasons[1] to modify the proposed standards for application in Australia.

3. This Consultation Paper provides an overview of how the AUASB is requesting feedback from Australian stakeholders on the proposed changes detailed in the IAASB ED, and their impact on the Australian assurance environment.

Overview

Purpose

4. The aim of this Consultation Paper is to:

   (a) provide stakeholders with information about the IAASB ED, including highlighting key differences from extant ASA 330, ASA 500 and ASA 520;

   (b) provide stakeholders with information as to how the proposed audit evidence and risk response standards are being exposed by the AUASB; and

   (c) seek stakeholder feedback.

Materials issued as part of this Consultation

5. The following materials have been issued to seek Australian stakeholder feedback:

   (a) The AUASB's Consultation Paper to the proposed audit evidence and risk response standards (this document) including consultation paper questions (see Attachment 1); and

   (b) The IAASB ED.

[1] Refer to paragraphs 16-17 of this Consultation Paper for an explanation of compelling reasons.

Request for Comments

6. The AUASB requests comments on all matters relating to the IAASB ED, but specifically in relation to the questions included at Attachment 1 of this Consultation Paper. Attachment 1 contains both questions from the IAASB's Explanatory Memoranda (which are included in the four documents outlined in paragraph 2 above) and Australian specific questions.

7. Stakeholder responses to these questions will be used:

   (i) to inform the AUASB in its formal response to the IAASB; and

   (ii) in AUASB deliberations regarding the issuance of the final Australian standard, including assessing compelling reasons for any Australian-specific enhancements.

8. Stakeholders may choose to address specific questions relevant to them or raise matters not specifically addressed by the questions.

9. Stakeholders are requested to clearly indicate whether they agree or do not agree with the proposed amendments. Comments will be most helpful when they refer to specific paragraphs, include the reasons for the comments and, when appropriate, make specific suggestions for any proposed changes to wording.

Background (refer to the IAASB Explanatory Memoranda for more detail)

IAASB's Project and Key Proposals on Audit Evidence and Risk Response

10. In revising the standards, the IAASB aims to:

    (a) Enhance the application of professional judgment and professional scepticism exercised by auditors:

        (i) When making judgments about information intended to be used as audit evidence, and evaluating whether sufficient appropriate audit evidence has been obtained; and

        (ii) When designing and implementing overall responses or designing and performing further audit procedures in response to assessed risks of material misstatement;

    (b) Promote consistent practice and auditor behaviour by facilitating effective responses to risks of material misstatement, including by strengthening auditors' work on internal controls; and

    (c) Facilitate, and where appropriate, encourage, auditors' use of technology in obtaining audit evidence and evaluating its sufficiency and appropriateness.

11. For a further understanding of the significant matters dealt with in the IAASB ED stakeholders should refer to the IAASB's Explanatory Memoranda. A summary of the key changes to the standards appears in Appendix 1 to this Consultation Paper.

Proposed Application Date

12. It is proposed that the revised standards will be applicable for audits of financial reports for periods beginning on or after approximately 18 months after the approval of the final ISAs. This application date corresponds with that of the equivalent ISAs.

The AUASB's Process

Overview of process

13. The AUASB has a strategic objective to develop, issue and maintain high quality Australian Auditing and Assurance Standards. The AUASB's policy is to adopt the IAASB's auditing

standards (ISAs), unless there are compelling reasons not to do so; and to amend the ISAs only when there are compelling reasons to do so.[2]

14. The AUASB's approach, in accordance with the *AUASB International Strategy*, is to actively influence the international standard setting process to produce international standards that serve as the most effective base possible from which to develop equivalent Australian Auditing Standards. As part of this strategy, the AUASB actively monitors the development of new IAASB Standards and revisions to IAASB Standards and provides continual feedback and raises issues with the IAASB throughout the development of the international standards.

15. The AUASB makes formal submissions on Exposure Drafts issued by the IAASB to contribute to the setting of international standards. Stakeholder feedback on this Consultation Paper will be used to inform the AUASB in its formal response to the IAASB. Feedback will also be used in AUASB deliberations regarding the issuance of the final Australian standard, including assessing compelling reasons for any Australian-specific enhancements.

16. In accordance with the *AUASB Policy and Process for International Conformance and Harmonisation of Standards*, international standards should only be modified in Australia if there are compelling reasons to do so. The Compelling Reason Test[3] for modification of an international standard is triggered when the international standard does not reflect, or is not consistent with, Australian legal and regulatory arrangements, or principles and practices that are considered appropriate in maintaining or improving audit or assurance quality in Australia. Compelling reasons are further guided by the AUASB's policy of harmonisation with the standards of the New Zealand Auditing and Assurance Standards Board (NZAuASB). Any such changes must not result in a requirement that is lesser than or in conflict with the requirements of the equivalent international standard.

17. Any addition or modification from the international standard will be clearly marked as an Australian paragraph ('Aus' prefix). However, minor wording and spelling changes (as opposed to significant terminology changes) need not be reflected in the Australian standard as a modification to the international standard where the intent remains unchanged.

Comment Closing Date

18. This Consultation Paper will be open to stakeholders for a 90-day comment period closing on **Monday, 16 November 2026**. This is to allow stakeholders time to respond to the AUASB on the IAASB ED and for the AUASB to conduct further outreach and to collate all feedback for our submission to the IAASB due on 15 December 2026.

Roundtables

19. The AUASB recognises the public interest significance of the IAASB proposals and, accordingly, the AUASB will host roundtable consultative meetings to obtain Australian stakeholder feedback on the IAASB ED. The AUASB invites all interested stakeholders, including government bodies, users, preparers, regulators, standard setters, practitioners, professional bodies and academics, to participate in outreach activities. See Auditing and Assurance Standards Board website for details and to register.

20. The AUASB welcomes stakeholders' input to the development of Australian Auditing and Assurance Standards and regards both supportive and critical comments as essential to a balanced review of the proposed standards.

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2 The AUASB's principles of convergence with international auditing and assurance standards can be found in *AUASB Policy and Process for International Conformance and Harmonisation of Standards*. For further background on the AUASB's mandate and strategic directive, and the principles and process adopted by the AUASB to develop Australian Standards based on equivalent international standards, refer to the AUASB's *Due Process Framework for Developing, Issuing and Maintaining AUASB Pronouncements and Other Publications*.

3 Refer to *AUASB Policy and Process for International Conformance and Harmonisation of Standards*, for an explanation of the compelling reasons for modification of international standards and application of the Compelling Reasons Test.

APPENDIX 1 - Summary of the key changes in Proposed ISA 330 (Revised), ISA 500 (Revised), ISA 520 (Revised) and proposed conforming and consequential amendments

Proposed amendments to ISA 330

1. The proposed amendments to ISA 330 aim to strengthen how auditors design and perform further audit procedures in response to assessed risks of material misstatement. The proposals clarify the intended purpose of different types of audit procedures, refine the role of substantive procedures and tests of controls, and add a stand-back evaluation of whether the evidence obtained from further audit procedures is sufficient and appropriate to respond to assessed risks.

2. One significant proposal is to remove the extant requirement to always perform substantive procedures for each material class of transactions, account balance and disclosure, irrespective of assessed risk of material misstatement. This reflects a desire of the IAASB to reinforce the more robust risk assessment process established under ISA 315 (Revised). The IAASB proposes to balance this change with strengthened stand-back and documentation expectations.

3. Enhanced focus on professional scepticism in responding to risks of material misstatement.

   a) Responses to assessed risks to be unbiased

      - Responses must not be biased towards obtaining corroborating evidence or excluding contradictory evidence – reinforcing professional scepticism. (Ref: Para 8 and A26)

   b) New stand-back evaluation

      - A new stand back to evaluate whether the evidence obtained from further audit procedures is sufficient and appropriate to respond to assessed risks. (Ref: Para 31 and A87)

   c) Moved stand-back evaluation (to ISA 700)

      - Whether sufficient appropriate audit evidence has been obtained from all audit evidence obtained. (see paragraphs 54 and 71-73 of the Overall IAASB ED)

4. Clarifying and strengthening work on internal controls.

   a) Revised definitions

      - Refined tests of controls definition with emphasis on the 'purpose' being to obtain audit evidence about the operating effectiveness of controls. (Ref: Para 4(b); A1)
      - Clarified in the application material that tests of controls may be performed to evaluate the reliability of audit evidence. (Ref: Para A1)

   b) Tests of controls alone can be an appropriate response to ROMM (narrow circumstances)

      - Risk based threshold, permitted only where:
        - inherent risk is not at the higher end of the spectrum;
        - is not a significant risk; and
        - the controls reduce risk to an acceptably low level. (Ref: Para 16, 20; A52; A66)

   c) Other related amendments

      - When tests of controls are required. (Ref: Para 6, 7(b); A8)

- Clarify it may be appropriate to use audit evidence from a previous period. (Ref: Para 22-23; A72, A73-A76)
- Clarify it may be possible for an indirect control to not operate effectively, without affecting conclusions about operating effectiveness of direct controls. (Ref: Para 17; A53-A63)

5. It is also proposed to remove the requirement for substantive procedures for each material class of transactions, account balance, and disclosure irrespective of the assessed risks of material misstatement (extant ISA 330 paragraph 18).

Proposed amendments to ISA 500

6. The proposed amendments to ISA 500 strengthen the auditor's responsibilities when evaluating information to be used as audit evidence. The auditor would evaluate relevance and reliability, rather than merely consider those matters. The proposals also introduce a clearer framework for reliability, including attributes such as accuracy, completeness, authenticity, absence of bias and credibility.
7. The proposals recognise that information becomes audit evidence only after audit procedures have been applied to it. They also recognise the increasing role of technology, including where technological tools are used to obtain, process or analyse information. The proposed application material is intended to remain capable of being applied as technology evolves.
8. The proposals include:

   a) Strengthening the requirement on relevance and reliability of information to be used as audit evidence

      - Evaluate – not just consider
      - Based on the source, and the attributes of reliability (one or more). (Ref: Para 11-12; A27-A61)

   b) Retaining requirement on reliability of entity information

      - Retaining requirement to consider the accuracy and completeness attributes when evaluating information produced by the entity.
      - Clarifying in application material as information:
        - Generated internally; or
        - Obtained externally and processed/incorporated into the entity's information system. (Ref: Para 12; A34, A45, A61)

   c) A new requirement on obtaining evidence about reliability

      - Test the operating effectiveness of controls that address the reliability of information, or perform other audit procedures. (Ref: Para13; A27-A28, A55-A61)

   d) Application material on reliability

      - Table of attributes: Accuracy, Completeness, Authenticity, Absence of bias, Credibility. (Ref: Para A4)
      - Not a checklist. (Ref: Para A28)
      - Apply judgement – which attributes are "of significance in the circumstances" to meet the "intended purpose of the audit procedure". (Ref: Para A28)

   e) Clarifying and aligning terminology in ISA 200 with ISA 500 and ISA 240

      - Removing "accepting records and documents as genuine" from ISA 200.A24 and aligning terminology with ISA 500 and ISA 240.

- ISA 500 clarifies that it is not necessary to consider the authenticity of every individual record or document. (Ref: Para A50)

Proposed amendments to ISA 520

9. The proposed amendments to ISA 520 define substantive analytical procedures and clarify how analytical procedures may be used as part of the cumulative body of audit evidence. The proposals require auditors to develop an expectation that is precise enough to detect a misstatement and set a threshold for acceptable differences that does not exceed performance materiality.

10. It is proposed to clarify the principles underpinning effective substantive procedures:

    a) New definition – substantive analytical procedure (SAP)

    - Defined separately from analytical procedures.
    - Linked to the purpose of a substantive procedure which is to detect a material misstatement at the assertion level. (Ref: Para 6; A1-A5)

    b) Clarifying how ‘analytical procedures’ can be used as a substantive procedure

    - Explicitly recognising that analytical procedures (that don’t meet SAP definition) can be used in combination with tests of controls or tests of details (i.e., they contribute to the cumulative body of audit evidence). (Ref: Para 6(a); A4)

    c) New requirement - consider results from risk-assessment analytical procedures

    - A new requirement to consider how inconsistent results from risk-assessment analytical procedures affect the identification and assessment of risks of material misstatement. (Ref: Para 7; A6-A7)

    d) On developing a precise expectation

    - Develop an expectation precise enough to detect a misstatement, premised on reliable information used and the plausibility and predictability of the relationship. (Ref: Para 8(b); A12-A20)

    e) Set a threshold within materiality

    - Set a threshold, not exceeding performance materiality, for the differences that are acceptable without further investigation. (Ref: Para 8(c))

    f) Strengthening requirements to investigate differences

    - Investigate differences that exceed the threshold to determine whether a misstatement exists.
    - ISA 450 then applies in assessing whether misstatements are material. (Ref: Para 8(d); A21-A24)

Technology related amendments (overall)

11. The proposals clarify how principles-based requirements apply when using technological tools:

    - Requirements across the three standards remain principles-based, flexible and therefore current in view of rapid technological evolution.
    - A new appendix provides guidance on applying ISA 500 requirements, including considerations for using technological tools when designing and performing procedures to obtain audit evidence.
    - Term ‘technological tools’ replaces ‘automated tools and techniques’:
        - aligns with the concept of technological resources used in quality management standards; and

    - improves consistency across the standards.
- The definition of substantive procedures now includes (rather than comprises) tests of details and substantive analytical procedures — to allow for possible future new techniques and tools.

Proposed conforming amendments

12. The proposed conforming amendments include technology-related changes to ISQM 1[4] and ISA 220 (Revised)[5]. Other changes move the overall conclusion on whether sufficient appropriate audit evidence has been obtained to ISA 700 (Revised) and amend ISA 200 to align concepts about accepting records and documents as genuine with revisions to ISA 240 (Revised) and proposed revisions to ISA 500. See Conforming and Consequential Amendments (Overall IAASB ED).

[4] ISQM 1 *Quality Management for Firms that Perform Audits or Reviews of Financial Statements, or Other Assurance or Related Services Engagements*

[5] ISA 220 *Quality Management for An Audit of Financial Statements*

ATTACHMENT 1

Consultation Paper Questions

A. Questions from IAASB Explanatory Memoranda

Questions from *Exposure Draft for the Audit Evidence and Risk Response Project Overall* (IAASB EM) (see Overall IAASB ED)		
Questions	**Reference in IAASB EM (Overall IAASB ED)**	**Reference in Conforming and Consequential Amendments ED (Overall IAASB ED)**
Overall Questions		
1. Do you agree that the proposals reflected in ED–330, ED–500 and ED–520 appropriately address the standard-setting actions as set out in the Supplement to this EM? (Those standard-setting actions are linked to relevant qualitative characteristics of the Public Interest Framework and the project objectives in the project proposal.) You are invited to include as part of your response insights on the possible or expected impacts (positive or negative) of implementing the proposed standards. Alternatively, you may choose to highlight such impacts as part of your responses to individual questions in the EMs to ED–330, ED–500 and ED–520.	**Sections 1–A, 1–B** and the **Supplement**	-
2. Do the requirements and application material in ED–330, ED–500 and ED–520 appropriately reinforce the exercise of professional scepticism in obtaining and evaluating audit evidence and responding to ROMMs?	**Section 1–C**	ISA 330 paragraphs 8 and A26 ISA 500 paragraphs 4-5, 9, A5, A19-A25 ISA 520 paragraph A5
Specific Questions – Conforming and Consequential Amendments		
3. Do you support the technology-related amendments to ISQM 1 and ISA 220 (Revised)? In particular, please share your views on whether you support the term “technological tools” as a replacement for the term “automated tools and techniques” and the description for technological tools.	**Section 1–D:** Paragraphs 60–65	ISQM 1 paragraphs A99 and A99A ISA 220 paragraphs 25, A19, A35, A64A and A64B
4. Do you agree with the repositioning of the overall conclusion on the sufficiency and appropriateness of audit evidence obtained from paragraph 26 of extant ISA 330, into paragraph 11A of ISA 700 (Revised)?	**Section 1–D:** Paragraphs 67–73	ISA 700 paragraphs 11A and A0-A0B
5. Do you support the conforming and consequential amendment to paragraph A24 of ISA 200?	**Section 1–D:** Paragraphs 74–78	ISA 200 paragraph A24
6. Are there any other matters you would like to raise in relation to the conforming and consequential amendments to the ISQMs and	Any Section in the EM or matters not specifically discussed	-

Questions from *Exposure Draft for the Audit Evidence and Risk Response Project Overall* (IAASB EM) (see Overall IAASB ED)		
Questions	**Reference in IAASB EM (Overall IAASB ED)**	**Reference in Conforming and Consequential Amendments ED (Overall IAASB ED)**
other ISAs? If so, please clearly indicate the ISQM/ISA requirement(s) or application material, or the theme or topic, to which your comment(s) relate.		
General Matters		
7. Translations—Recognising that many respondents may intend to translate the final standards for adoption in their own environments, have you identified any potential translation challenges or issues? If so, please describe the issue identified and clearly indicate the specific standards, paragraph numbers of any requirements, application material or appendices to which your comments relate.		
8. Effective Date—Given the need for national due process and translation, the IAASB believes that an appropriate effective date for the standards would be at least 18 months after the expected date of approval of the proposed revised standards. Do you agree that this will provide a sufficient period to support effective implementation of the proposed standards? If not, what do you propose and why?	**Section 1–E:** Paragraphs 79–80	**-**

Questions from *Exposure Draft Proposed International Standard on Auditing 330 (Revised) The Auditor's Responses to Assessed Risks* (see ISA 330 ED)		
Questions	**Reference in IAASB EM (ISA 330 ED)**	**Reference in ISA 330 ED (ISA 330 ED)**
1. Do you agree that the collective revisions to the requirements and application material reflected in ED–330 enhance alignment with concepts and principles addressed in ISA 315, including for terminology related matters?	**Section 1–A:** Paragraphs 3–6	-
2. Do you support the revised and new definitions for:	**Section 1–B:**	
(a) Substantive procedures?	Paragraphs 7–10	Paragraph 4(a)
(b) Tests of controls?	Paragraph 11–12	Paragraphs 4(b) and A1
(c) Tests of details?	Paragraphs 13–17	Paragraph 4(c) and A2-A3
3. Do you support removing paragraph 18 of extant ISA 330 (and the related application material in paragraphs A43–A44) and replacing it with strengthened requirements and application	**Section 1–C:** Paragraphs 18–37	Paragraphs 18 and A43-A44 of extant ISA 330

Questions from *Exposure Draft Proposed International Standard on Auditing 330 (Revised) The Auditor's Responses to Assessed Risks* (see ISA 330 ED)		
Questions	**Reference in IAASB EM (ISA 330 ED)**	**Reference in ISA 330 ED (ISA 330 ED)**
material in ISA 315? Please also include any views you may have regarding the options that the Board deliberated in addressing this matter (see paragraphs 30–33 of Section 1–C).		
4. For substantive procedures, do you support:	**Section 1–D:**	
(a) The new baseline requirement for designing and performing substantive procedures in paragraph 9 of ED–330?	Paragraph 38	Paragraph 9
(b) Retaining the approach from extant ISA 330 that when the auditor's approach to a significant risk consists only of substantive procedures, those procedures shall include tests of details on the basis that substantive analytical procedures are insufficient by themselves to provide sufficient appropriate evidence to respond to a significant risk?	Paragraphs 39–44	Paragraph 10
5. For tests of controls, do you support the following proposals in ED-330:	**Section 1–E:**	
(a) The principle reflected in the conditional requirement in paragraph 16 of ED–330 that makes explicit the possibility of performing tests of control alone to address ROMMs at the assertion level?	Paragraphs 49–56	Paragraphs 16 and A52
(b) The circumstances in which a "tests of controls alone" approach (see (a) above) is appropriate, including the criteria (see paragraphs 16(a) and (b), 20 and the related application material) for such an approach?	Paragraphs 49–56	Paragraphs 16, 20, A52 and A66
(c) Indirect controls, including the Board's position that "controls" in paragraph 17 of ED–330 already include indirect controls when necessary, and the application material that has been added to clarify the auditor's approach to indirect controls (including GITCs)?	Paragraphs 57–61	Paragraphs 17 and A53-A63
(d) The application material in paragraphs A59 and A62–A63 of ED–330 that addresses the possible impact of emerging technologies on the auditor's considerations relating to the consistency of the operation of automated controls?	Paragraphs 62–63	Paragraphs A59 and A62-A63
6. Are there any other matters you would like to raise in relation to ED–330? If so, please clearly indicate the requirement(s) or application material paragraphs, or the theme or topic, to which your comment(s) relate.	Any Section in this EM or matters not specifically discussed	-

Questions from *Exposure Draft Proposed International Standard on Auditing 500 (Revised) Audit Evidence* (see ISA 500 ED)		
Questions	**Reference in IAASB EM (ISA 500 ED)**	**Reference in ISA 500 ED (ISA 500 ED)**
1. With respect to the purpose, scope and objective of ED–500: (a) Does ED–500 provide an appropriate principles-based reference framework for auditors when making judgments about audit evidence throughout the audit? (b) Are the relationships to, or linkages with, other ISAs clear and appropriate?	**Section 1–A** and **Overall**	Paragraphs 1-3, 7 and Appendix 1
2. With respect to the revised definition of audit evidence: (a) Do you support the revised definition? (b) Do you agree that the interaction of the revised definition and the requirements addressing inconsistencies in audit evidence are appropriate?	**Section 1–B:** Paragraphs 10–14 **Section 1–E:** Paragraphs 57–62	Subparagraph 8(b) and paragraph A1, A6-A7 Paragraphs 17 and A80
3. Does the application material in paragraphs A10–A12 of ED–500 appropriately describe the interrelationship of the sufficiency, appropriateness and persuasiveness of audit evidence?	**Section 1–B:** Paragraphs 15–20	Paragraphs A10-A12
4. With respect to the proposals (requirements and application material) in ED–500 for evaluating the relevance and reliability of information intended to be used as audit evidence:	**Section 1–D:**	
(a) Does the requirement in paragraph 11 support an appropriately robust evaluation by the auditor, including being scalable to accommodate varying degrees of work effort that may be needed, depending on the specific circumstances?	Paragraphs 34-36, 38-42	Paragraphs 11 and A29-A33
Please also include views you may have on sources of information (paragraphs A29–A33 of ED–500) and the attributes of reliability of information intended to be used as audit evidence (paragraphs A4, A28, and A42–A54 of ED–500).	Paragraphs 34, 43-46	Paragraphs A29-A33; A4, A28 and A42-A54
(b) Do you support the IAASB's position to retain in paragraph 12 of ED–500 the approach for the auditor to evaluate, to the extent necessary, the accuracy and completeness of information produced by the entity?	Paragraphs 34, 43-46	Paragraph 12
(c) Do you agree with the requirement in paragraph 13 that builds on preceding requirements and that sets the expectation for the auditor's work effort in evaluating the reliability of information intended to be used as audit evidence?	Paragraphs 34 and 37	Paragraph 13

Questions from *Exposure Draft Proposed International Standard on Auditing 500 (Revised) Audit Evidence* (see ISA 500 ED)		
Questions	**Reference in IAASB EM (ISA 500 ED)**	**Reference in ISA 500 ED (ISA 500 ED)**
(d) Do you support the IAASB's position not to pursue introducing specific documentation requirements in ED–500?	Paragrphas 47-50	
5. Do you support the IAASB's position to include application material to provide guidance on how the principle-based requirements of the standard apply when the auditor uses technological tools and to do so in the format of an Appendix (Appendix 3 of ED–500)?	**Section 1–F:** Paragraphs 65-71	A14-A15, A19 and Appendix 3
6. Are there any other matters you would like to raise in relation to ED–500? If so, please clearly indicate the requirement(s) or application material paragraphs, or the theme or topic, to which your comment(s) relate.	-	-

Questions from *Exposure Draft Proposed International Standard on Auditing 520 (Revised) Analytical Procedures* (see ISA 520 ED)		
Questions	**Reference in IAASB EM (ISA 520 ED)**	**Reference in ISA 520 ED (ISA 520 ED)**
1. Do you agree with the revised scope and objectives of ED–520?	**Section 1–A:** Paragraphs 3-7	Paragraphs 1-3 and 5
2. Do you support the proposals in ED–520 relating to definitions; specifically:	**Section 1–B:**	
(a) The revised definition of analytical procedures?	Paragraph 8	Subparagraph 6(a)
(b) The clarification in paragraph A4 of ED–520 about analytical procedures that are not substantive analytical procedures?	Paragraph 9	Paragraph A4
(c) Introducing a definition of substantive analytical procedures, including whether this definition appropriately embeds the features that differentiate substantive analytical procedures from an analytical procedure used more broadly in other aspects of an audit?	Paragraphs 10-13	Subparagraph 6(b)
3. For substantive analytical procedures, do you support the proposals (requirements and application material) in ED–520 related to the following matters:	**Section 1–C:**	
(a) The level of precision of the auditor's expectation, including the linkage to ED–500 with respect to evaluating the reliability of information used in developing such expectation?	Paragraph 15	Subparagraph 8(b) and paragraphs A12-A20
(b) The threshold for determining the amount of difference from expected amounts that is acceptable without further investigation?	Paragraphs 16–18	Subparagraph 8(c)

Questions from *Exposure Draft Proposed International Standard on Auditing 520 (Revised) Analytical Procedures* (see ISA 520 ED)		
Questions	**Reference in IAASB EM (ISA 520 ED)**	**Reference in ISA 520 ED (ISA 520 ED)**
(c) Investigating the results of substantive analytical procedures?	Paragraphs 19–22	Subparagraph 8(d) and paragraphs A21-A24
4. Are there any other matters you would like to raise in relation to ED–520? If so, please clearly indicate the requirement(s) or application material paragraphs, or the theme or topic, to which your comment(s) relate.	-	-

B. Australian Specific Questions

Aus 1	Have applicable laws and regulations been appropriately addressed in the proposed standards and related conforming amendments?
Aus 2	Are there any laws or regulations that may, or do, prevent or impede the application of the proposed standards and related conforming amendments, or may conflict with the proposed standards and related conforming amendments?
Aus 3	Are there any principles and practices considered appropriate in maintaining or improving audit quality in Australia that may, or do, prevent or impede the application of the proposed standards and related conforming amendments, or may conflict with the proposed standards and related conforming amendments?
Aus 4	What, if any, are the additional significant costs to/benefits for users, auditors and the business community arising from compliance with the requirements of the proposed standards? If significant costs are expected, the AUASB would like to understand: (i) Where those costs are likely to occur; (ii) The estimated extent of costs, in percentage terms (relative to audit fees); and (iii) Whether expected costs outweigh the benefits to the users of audit services?
Aus 5	Are there compelling reasons for the proposals to be modified in Australia other than to reflect references to the *Corporations Act 2001*? If so, please explain how the proposals should be modified in Australia, including any cost or benefit considerations.
Aus 6	Are there any other significant public interest matters that you wish to raise?