

ISA 800 responses in detail by paragraph

#	Org	Org Number	Org Type	Other Paragraphs	Comments
					General
	E&Y	35	FIRM		We recommend that the IAASB fully debate and approve the scope of the revision to ISA 800 before ISA 700 is issued, to make certain that all relevant reporting matters are duly considered and no important issues are omitted. Further, as the IAASB issues ISA 700, it should acknowledge the possibility that ISA 700 may need to be amended in the future if issues arise as a result of the revisions to ISA 701 and ISA 800.
	Public Accountants & Auditor's board Jo-Burg	19	MB		The engagements covered by the proposed ISA 700 remains unclear, and if one adds the fact that ISA 800, The Independent Auditor's Report on Special Purpose Audit Engagements, is currently under development, it once more raises concerns as to how practical it is to issue ISA 700 without the completion of ISA 800. Currently, paragraph 2(b) specifically includes a single financial statement in ISA 800 while paragraph 34 of the proposed amended ISA 200, Objective and general principles governing an audit of financial statements, specifically includes a single financial statement in the definition of financial statements, and therefore within the scope of the revised ISA 700. Furthermore, it is unclear why paragraph 2(a) to 2(d) are specified in ISA 700, as these do not constitute a complete list of what falls in the scope of ISA 800. It is also our belief that paragraph 2(c) might be more appropriately covered in an International Standard on Assurance Engagements as it does not constitute either an audit or review of historical financial information. We believe that it would be preferable for the revision of the reporting standards to be done simultaneously to ensure comprehensive coverage of all relevant aspects in any changes. We are aware that the International Auditing and Assurance Standards Board (IAASB) is working on a project which will consider the overall structure of standards (re-engineering of standards). Although not peculiar to the current exposure draft, we suggest that bold – type paragraphs appear immediately under the title of each section and are not scattered amongst the paragraph in each section as is presently the case. The principle, which the auditor has to comply with, must therefore appear up front and the guidance thereafter.
	BASEL	32	R		We believe that the elements of ISA 800 auditor's reports should be aligned with the elements identified for ISA 700. More specifically, the descriptions of management's and the auditor's responsibilities should be the same as the respective descriptions in ISA 700, where applicable. Similarly, the examples in the Appendices to ISA 800 should reflect these conforming changes.
11	IRE	12	MB	11	In the conforming changes within ISA-800, paragraph 11 mentions the IFRS, and the word "accounting" should be suppressed as well.

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	FEE	7		11	Paragraph 11 tried to make reference to IFRS rather than IAS by mistakenly calling it the “International Accounting Financial reporting Standards”. “Accounting” can be deleted.
	CICA	18	MB	11	The word accounting should be deleted from I“A” FRS
12	CICA	18	MB	12	Paragraph 12 The last sentence of this paragraph conflicts with paragraph 15. Paragraph 15 indicates that the opinion will either refer to the applicable financial reporting framework or to an identified basis of accounting. The last sentence of paragraph 12 indicates only that the opinion would refer to the identified basis of accounting.....
	IDW	31	MB	12	The last sentence states that this type of engagement does not result in a report on the financial statements taken as a whole and, accordingly, the auditor would express an opinion only as to whether the component audited is prepared, in all material respects, in accordance with the identified basis of accounting. Given our comments in paragraph 17 to the use of the term “taken as a whole” and its relationship to an override, and the fact that these issues in relation to ISA 800 will be addressed as part of a separate IAASB project, we believe this sentence ought to be deleted. We would like to point out that, in accordance with our general comments, the decision to use “taken as a whole”, “fair presentation”, or “true and fair view” is a matter based upon the financial reporting framework applied and therefore the work of the IAASB Task Force on ISA 800 ought not to be prejudged in this manner.
15	CICA	18	MB	15	In addition, paragraph 15 indicates that the auditor's report would include a statement that indicates the applicable financial reporting framework or refers to an agreement that specifies the basis of accounting used. This suggests that when the basis of accounting used is not an applicable financial reporting framework, there must be an agreement that sets out the basis of accounting. Paragraph 12 does not refer to the need for such agreement, only that the component might be prepared to meet the information needs of specified users and have limited distribution. More guidance is required with respect to this situation - in particular: •whether the auditor can accept such an engagement when there is not an agreement, •whether the agreement needs to be in writing, and •who should be the parties to the agreement.