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**Re: Exposure Draft: Proposed International Standard on
Auditing 500 (Revised), Audit Evidence, and Proposed Conforming
and Consequential Amendments to Other ISAs**

Dear Willie,

We would like to thank you for the opportunity to provide the IAASB with our comments on the “Exposure Draft: Proposed International Standard on Auditing 500 (Revised), Audit Evidence, and Proposed Conforming and Consequential Amendments to Other ISAs”, hereinafter referred to as “the draft”.

In Appendix 1 to this letter, we respond to the individual questions posed in the Explanatory Memorandum of the Draft. We have also provided some comments by paragraph in Appendix 2 to this letter. Furthermore, we have a few general issues that we would like to address in this letter below.

On the whole, we take the view that the Draft provides an appropriate principles-based reference framework for auditors when making judgments about audit evidence throughout the audit. However, we have identified a number of issues that we describe in the responses to the questions in Appendix 1 to this comment letter that indicate that some improvements may be needed. In particular, the linkage of the concept of sufficiency and appropriateness of evidence to ISA 315 could be improved, and wording and concepts could be made more precise and less redundant. A definition of persuasiveness of audit evidence would help auditors use that concept when it is used in the

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requirements. We also believe that the definition of professional skepticism and of sufficiency of audit evidence can be improved to help auditors better understand the concepts, so they are applied properly.

We would be pleased to provide you with further information if you have any additional questions about our response and would be pleased to be able to discuss our views with you.

Yours truly,



Melanie Sack
Deputy CEO
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Wolfgang Böhm
Technical Director Assurance Standards,
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Appendix 1:

Responses to the Questions Posed in the Request for Comments of the Explanatory Memorandum

Overall Questions

1. Is the purpose and scope of ED-500 clear? In this regard:

- a) Does ED-500 provide an appropriate principles-based reference framework for auditors when making judgments about audit evidence throughout the audit?**

On the whole, we take the view that the draft provides an appropriate principles-based reference framework for auditors when making judgments about audit evidence throughout the audit. However, we have identified a number of issues that we describe in the responses to the questions below and in our comments in Appendix 2 to this comment letter that indicate that some improvements may be needed.

- b) Are the relationships to, or linkages with, other ISAs clear and appropriate?**

Given the nature of the requirements and application material in the draft, as well as the introductory material in paragraph 2 and 3, the application material in paragraph A2, and Appendix to the draft explaining the relationship among the standards, we believe that, with the exception of the issues addressed immediately below and in our response to Question 10 below, the relationships and linkages with other ISAs are clear and appropriate.

There appears to be a disconnect between the requirement in ISA 315 (Revised 2019) paragraph 13, which requires the design and performance of risk assessment procedures to obtain audit evidence that provides an appropriate basis for 13 (a) and (b), and paragraphs 8 and 9 of the draft, which relate to sufficient appropriate evidence (in paragraph 9, in particular the appropriateness of information to be used as audit evidence through an evaluation of relevance and reliability). In particular, the concepts of sufficiency and appropriateness (relevance and reliability) apply to risk assessment procedures, but there is no link in ISA 315 between providing an

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appropriate basis and the sufficiency and appropriateness of the evidence for that purpose obtained through risk assessment procedures. We recognize that the IAASB sought to avoid using the term sufficient appropriate audit evidence in relation to risk assessment procedures, but that would not preclude the IAASB from addressing in ISA 315 the sufficiency and appropriateness of the audit evidence obtained for providing the appropriate basis in paragraph 13 of ISA 315.

2. What are your views about whether the proposed revisions in ED-500, when considered collectively as explained in paragraph 10 above, will lead to enhanced auditor judgments when obtaining and evaluating audit evidence?

On the whole, we believe that the proposed revisions in the draft when considered collectively will lead to enhanced auditor judgments when obtaining and evaluating audit evidence. However, we believe that such enhancement will only be incremental, rather than considerable, because, on the whole, auditors have already been making good judgments when obtaining and evaluating audit evidence. Nevertheless, the framework for making such judgments may help auditors who have had difficulty in this area to improve their judgments.

3. What are your views about whether ED-500 has an appropriate balance of requirements and application material (see paragraph 11 above)?

We believe that the nature and extent of requirements are appropriate and are in favor of the principles-based nature of the requirements. In that sense, the balance of requirements and application material is appropriate. We do believe that the extent of application material to be somewhat too long and believe that there are a number of instances of repetition that can be removed.

4. Do you agree that ED-500 is appropriately balanced with respect to technology by reinforcing a principles-based approach that is not prescriptive but accommodates the use of technology by the entity

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and the auditor, including the use of automated tools and techniques?

Given that the project to develop the draft did not intend to address how to design and perform audit procedures through the use of automated tools and techniques, we believe that the draft is appropriately balanced with respect to technology using a principles-based, non-prescriptive approach that accommodates the use of technology. However, we believe that a project in relation to the design and performance of audit procedures through the use of automated tools and techniques ought to be considered in future.

5. Do the requirements and application material in ED-500 appropriately reinforce the exercise of professional skepticism in obtaining and evaluating audit evidence?

In our view, most of the requirements and guidance in the draft are related to reinforcing the exercise of professional skepticism in obtaining and evaluating audit evidence. In particular, the strengthening of the evaluation of the relevance and reliability of audit evidence in the requirement in paragraph 9 (b) by requiring a consideration of the attributes of relevance and reliability will reinforce the exercise of professional skepticism. The same applies to the requirement to design and perform audit procedures in an unbiased manner as set forth in paragraph 8 (a), evaluating the competence, capabilities and objectivity of an expert in paragraph 11 (a), dealing with doubts about the relevance or reliability of audit evidence in paragraph 12, and dealing with inconsistent audit evidence in paragraph 14.

However, we have identified a number of issues that we believe would improve auditor understanding of these matters and thereby also further aid auditors in exercising professional skepticism.

First, we note that the definition of professional skepticism includes a critical assessment of audit evidence. However, this definition does not aid auditors in their consideration of what about evidence is being critically assessed. The application material in paragraph A22 of ISA 200 speaks of questioning inconsistent evidence and the reliability of documents, etc. and the consideration of the sufficiency and appropriateness of audit evidence. We note that the reliability of documents (which represent evidence), and hence appropriateness of evidence, and the sufficiency and appropriateness of evidence all relate to the persuasiveness of evidence. Dealing with inconsistent

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evidence also relates to questions about the reliability of that evidence and hence the persuasiveness of evidence.

We note that one of the recommendations of the IAASB's Professional Skepticism Subgroup in paragraph 33 of its Board Agenda paper entitled "Professional Skepticism: Issues and Recommendations" submitted to the Board for its June 2017 meeting was for the definition of professional skepticism to be augmented to clarify that it is the persuasiveness of audit evidence that is being critically assessed. As we note in our response to Question 7 below, this may need to be supported by a definition of persuasiveness. We therefore urge the IAASB to clarify in the definition of professional skepticism that the persuasiveness of audit evidence is being critically assessed. While making these changes, in line with the use of verbs for auditor actions as set forth in the CUSP Project, we also suggest that the word "assessment" be replaced with "evaluation". The new definition of professional skepticism would therefore read as follows: "An attitude that includes a questioning mind, being alert to conditions which may indicate possible misstatement due to error or fraud, and a critical evaluation of the persuasiveness of audit evidence". We believe this change would improve auditor exercise of professional skepticism by directing auditors as to what about audit evidence ought to be critically evaluated.

Second, we note that in some cases the Draft uses the pairs "corroborate vs. contradict" and in other cases it uses the pair "consistent vs. inconsistent" to refer to information that is not aligned with other information. In line with the recommendation in the Board Agenda Paper from the IAASB's Professional Skepticism Subgroup in entitled "Professional Skepticism—Issues and Recommendations: Requirement to Seek Contradictory Evidence" submitted to the Board for its June 2017 meeting, we believe that the use of the pair of terms "consistent vs. inconsistent" is superior to the use of "corroborate vs. contradict" because the term "contradictory" is limited to cases in which the inconsistencies between information are diametrically opposed, as opposed to also considering inconsistencies that are not diametrically opposed. We believe that using the pair "inconsistency" vs. consistency" would improve the exercise of professional skepticism by prompting auditors to consider a wider range of inconsistencies beyond those that are diametrically opposed and may in fact help improve auditor identification of possible or suspected fraud. Using two different pairs of terms within one standard also begs the question as to why some requirements take a narrow view (contradictory) and others take a wider view (inconsistent). We recognize that the Board was hesitant to move towards changing the use of terms when the change was originally proposed but believe that the consistent use of terms and an improvement in the exercise of professional skepticism in

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relation to the evaluation of audit evidence through the use of superior terms ought to be addressed as part of the audit evidence project. In addition, regardless of whether the terms consistent/inconsistent or corroborative/contradictory are used, these terms should always be used in conjunction with what audit evidence is consistent/inconsistent with (other audit evidence or assertions in the financial statements).

Third, while the wording in paragraph 12 with respect to “doubts about relevance or reliability of information” and “resolving doubts” have been in ISA 500 for a long time, we do not believe that the wording is conducive to auditor understanding the nature of the decisions and work effort that auditors need to take or undertake, respectively, and how these decisions and work effort may affect their exercise of professional skepticism. We note that there is effectively no such thing a “no doubt” and that the threshold “beyond any reasonable doubt” used in the burden of proof of criminal trials goes beyond the degree to which auditors should be required to reduce their doubts. Consequently, the words in paragraph 12 “if the auditor has doubts” and “necessary to resolve the doubts” appear to indicate the need to have no doubt, which would be equivalent to obtaining absolute assurance. The requirement in paragraph 9 correctly refers to evaluating the relevance and reliability of information, which indicates these are matters of degree, not to whether the information is relevant and reliable, which would not be correct. The application material in paragraphs A54 and A56 clarifies that both relevance and reliability relate to degrees – that is, the degree to which information relates to meeting the purpose of the audit procedure and the degree to which auditor may depend upon information, respectively. This implies that both relevance and reliability are both matters of degree, where the threshold as to whether information is sufficiently relevant or reliable depends upon the purpose for which the information is being used.

For these reasons, we suggest changing the wording in paragraph 12 to read “If the auditor regards the information intended to be used as audit evidence to be not as relevant or reliable as needed to fulfill the purpose for which it is being used”. In addition, paragraph 12 (a) would need to read “Determine whether modifications or additions to audit procedures are necessary to conclude whether the information intended to be used as audit evidence is as relevant or reliable as needed to fulfill the purpose for which it is being used”. As a consequence, paragraph 12 (b) would need to be changed to read: “If the auditor is unable to conclude whether the information intended to be used as audit evidence is as relevant or reliable as needed to fulfill the purpose for which it is being used, consider...”.

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Specific Questions

6. Do you support the revised definition of audit evidence? In particular, do you agree with the “input-output model” that information can become audit evidence only after audit procedures are applied to it?

We support the revised definition of audit evidence for the following reasons:

- The definition is more principles-based in that it no longer seeks to cover the various sources of evidence.
- The definition clarifies that information is not considered to be audit evidence unless audit procedures have been applied to the information, in particular, procedures with respect to evaluating the relevance and reliability of that information for the intended purpose of the audit procedures. This ensures that no information is drawn upon as audit evidence that has not been subject to such an evaluation, which thereby prevents information from being audit evidence when it is not sufficiently relevant and reliable.
- It supports the input-output model of information to be used as audit evidence being converted into the output of audit evidence.
- The wording that such information is used to draw conclusions that form the basis for the auditor’s opinion and report is more precise than the wording about arriving at conclusions upon which the audit opinion is based in current ISA 500.

For the reasons noted above, we also agree with the input-output model that information can become audit evidence only after audit procedures have been applied to it.

7. Does the application material appropriately describe the interrelationship of the sufficiency, appropriateness and persuasiveness of audit evidence?

Before we address the application material relating to the interrelationship between sufficiency, appropriateness and persuasiveness of audit evidence, we would like to provide our views on the definitions of sufficiency and appropriateness, which have an impact on the content of the application material. We believe that the relationship between sufficiency and appropriateness of audit evidence is not appropriately reflected in the definitions

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of sufficiency and appropriateness of audit evidence. In line with the application material in paragraph A14 in the Draft, which states that obtaining more audit evidence may not compensate for its poor quality (i.e., appropriateness), we note that it is almost pointless to speak of the sufficiency of audit evidence when that evidence is not appropriate. It sends the wrong message to practitioners when the definition of sufficiency is not attached to the appropriateness of evidence. For these reasons we believe that the definition of sufficiency should be changed to read: “Sufficiency (of appropriate audit evidence) – The measure of the quantity of appropriate audit evidence in providing support for the conclusions...”. The related application material would need to be augmented accordingly. These changes do not imply that the term of art “sufficient appropriate audit evidence” needs to be changed in any way.

In this vein, we believe that more than just a description of the relationship between the persuasiveness of audit evidence and its sufficiency and appropriateness is needed because the term “persuasiveness” is central to requirements set forth in, for example, ISAs 330 and 540. Given the central importance of the requirements using the concept of persuasiveness and therefore in line with the CUSP principles, we believe that the concept of persuasiveness needs to be clarified by means of a definition. We believe that the proposed related application material in paragraph A6 (“sufficiency and appropriateness together affect the persuasiveness of audit evidence”) provides an appropriate basis for such a definition but needs further clarification. We suggest the following definition: “Persuasiveness (of audit evidence) – The combined sufficiency and appropriateness of audit evidence. Audit evidence is persuasive in a particular circumstance when it is appropriate and sufficient.” The related application material would need to be adjusted accordingly. This definition would lead auditors to understanding exactly what is meant by persuasiveness when they are applying the noted requirements and related application material.

8. Will the requirements and application material in ED-500 support an appropriate evaluation of the relevance and reliability of information intended to be used as audit evidence?

We support the requirement in paragraph 9 for an evaluation of the relevance and reliability of information intended to be used as audit evidence, in particular the fact that the evaluation includes a consideration of the sources of audit evidence and of the attributes of relevance and reliability. In particular, we support a consideration of the attributes because an evaluation of these would

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lead to a checklist approach that would not be appropriate in many circumstances. However, we believe that all of the attributes are always applicable – it is just that in some circumstances some attributes are significant, and some are not, and therefore the auditor would consider only those that are significant in the circumstances. We therefore suggest that the phrase “that are applicable in the circumstances” be replaced with “that are significant in the circumstances”.

Subject to minor technical and editorial comments in Appendix 2 to the comment letter and any conforming amendments resulting from our proposed change in wording to the requirement in paragraph 9, we also support the application material on the evaluation of relevance and reliability of information intended to be used as audit evidence.

9. Do you agree with the separate conditional requirement to obtain audit evidence about the accuracy and completeness of information when those attributes are applicable in the circumstances?

We do not support the separate conditional requirement to obtain audit evidence about the accuracy and completeness of information when those attributes are applicable in the circumstances because this requirement suffers from three flaws:

- As noted in our response to Question 8 above, all of the attributes of reliability are always applicable in some way, but they are all not equally significant to the auditor’s evaluation of reliability: the nature and extent of consideration depends upon their significance in the circumstances to the auditor’s evaluation. Depending upon the significance of an attribute in a particular case, an auditor’s consideration could range from only briefly thinking about the impact of an attribute on the evaluation to seeking further information about the impact of an attribute on the evaluation. For this reason, having a requirement state that more needs to be done (e.g., obtaining audit evidence) for particular attributes, such as accuracy and completeness, when these are applicable is not only redundant, but misleading, and is not principles-based. It seems to us that the application material should clarify the possible range of procedures that auditors can use in their consideration of attributes given their significance in the circumstances.
- It is unclear to us why audit evidence should be obtained for significant or applicable attributes of accuracy and completeness, but not for other

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attributes. It seems to us that there is no justification for the need to obtain audit evidence for only these two attributes.

- The design of the requirement in 10 together with paragraph 9 (b) leads to infinite regress (an infinite loop) to justify reliability through obtaining evidence as follows:
 1. The auditor evaluates the reliability of information intended to be used as audit evidence under paragraph 9.
 2. To perform this evaluation the auditor considers the attributes of reliability that are applicable in the circumstances under paragraph 9 (b).
 3. If the auditor considers that the accuracy and completeness attributes are applicable in accordance with paragraph 9 (b), the auditor is required by paragraph 10 to **obtain audit evidence** about the accuracy and completeness of the information.
 4. Audit evidence is defined as information, to which audit procedures have been applied.
 5. Hence, before the information intended to be used as audit evidence about accuracy and completeness represents audit evidence, the auditor is required to apply paragraph 9, including considering the applicable attributes of reliability, under paragraph 9 (b), to apply audit procedures on that information.
 6. If the auditor considers the accuracy and completeness attributes applicable, the auditor shall again under paragraph 10 **obtain audit evidence** about accuracy and completeness of that information.
 7. Back to step 4 and so on, ad infinitum.

While this infinite loop is in extant ISA 500, we do not believe it to be appropriate to retain an infinite loop in standards once they have been identified because auditors will not be able to determine when they can cease obtaining audit evidence.

If the IAASB were to choose to retain paragraph 10 even though we believe it is superfluous, the infinite loop would need to be eliminated. Using our suggested wording for paragraph 9 in our response to Question 8, paragraph 10 would then read:

“If the auditor considers that the accuracy and completeness attributes are significant in accordance with paragraph 9 (b), the auditor shall obtain information about the accuracy and completeness of the information intended to be used as audit evidence.”

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10. Do you agree with the new “stand back” requirement for the auditor to evaluate audit evidence obtained from the audit procedures performed as a basis for concluding in accordance with ISA 330 that sufficient appropriate audit evidence has been obtained?

We note that paragraphs 35 and 37 of ISA 315 (Revised 2019) already require a stand-back and therefore paragraph 13 is limited to ISA 330. On this basis, such a stand-back that is directly related to only ISA 330 and not ISA 315 ought to be placed in ISA 330 – not in ISA 500. It really ought to be placed just prior to paragraph 26 of ISA 330. This applies particularly to the requirement in paragraph 13 (a) of the draft. It seems to us that paragraph 13 (b) is redundant, since it is already covered, at least in part, by the second sentence of paragraph 26 of ISA 330. For these reasons, we believe that both 13 (a) and 13 (b) ought to be incorporated into ISA 330 at the noted places.

In line with our second issue in our response to Question 5, we note that in 13 (b) the wording can be reduced to consistent or inconsistent without reference to corroborate or contradict.

11. Are there any other matters you would like to raise regarding ED-500? If so, please clearly indicate the requirement(s) or application material, or the theme or topic, to which your comment(s) relate.

There are four additional major substantive issues that we would like to address in response to this question.

First, in relation to paragraph 11 (a), we note that the application material provides the link between the terms used in 11 (a) and in paragraph 9. Since these two requirements are so closely linked, we suggest that the link between the terms be made explicit within paragraph 11 (a) as follows:

“Evaluate the credibility, including the competence and capabilities, of that expert and whether the expert is free from bias (i.e., is objective);”

Second, we note that the movement of the definition of “accounting records” from ISA 500 to ISA 200 was not accompanied by a significant improvement in the definition. The definition continues to be circular (“records” is defined by “records”) and includes a long list of examples of accounting records, which does not belong in a definition, but in application material to a definition. We suggest a principles-based definition as follows:

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“Any documentation of the entity providing a basis for the preparation of the financial statements”.

Third, we note that the standard uses the terms “information” and “data” interchangeably, or at least not consistently. Information and data are not the same thing: data is a series of symbols or signs used to convey information, whereas information is the conveyance of meaning to a recipient. We suggest that ISA 500 and the other ISAs use the terms with their correct meaning.

Fourth, we note that there are important differences between the inability to obtain sufficient appropriate audit evidence that leads to a scope limitation and the inherent limitations of an audit. Paragraph A12 deals with the issue of scope limitations, but not all inability to obtain evidence are automatically scope limitations if the limitations on obtaining evidence are generally accepted or otherwise inherent. It would be useful for auditors if ISA 500 were to explain the distinction.

Request for General Comments

12. The IAASB is also seeking comments on the matters set out below:

- a) **Translations—Recognizing that many respondents may intend to translate the final ISA for adoption in their own environments, the IAASB welcomes comment on potential translation issues respondents note in reviewing ED-500.**

We have not identified any potential translation issues at this time. However, once we seek to translate the final standard, translation issues may arise.

- b) **Effective Date—Recognizing that ED-500 is a substantive revision, and given the need for national due process and translation, as applicable, the IAASB believes that an appropriate effective date for the standard would be for financial reporting periods beginning approximately 18 months after approval of a final ISA. Earlier application would be permitted and encouraged. The IAASB welcomes comments on whether this would provide a sufficient period to support effective implementation of the ISA.**

National translation, augmentation for local laws and regulations, national exposure periods, and approval can take up to 12 months. This means that at a

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national level, effectively only 6 months would be available for most entities between an adopted standard and the effective date. For this reason, we are in favor of a 24-month period between approval and effective date.

Appendix 2: Other Comments by Paragraph

2. The reference to paragraph A5 should be moved to paragraph 3, as paragraph 3 deals with ISA 330, as does paragraph A5.
- A3. In the second sentence, it is not clear what the difference is between an automated tool or technique being more effective or providing more persuasive audit evidence. If there is no difference, then “be more effective can be deleted. The third sentence suggests that an automated tool or technique may be “more effective” in analyzing, processing, organizing, structuring, or presenting large volumes of data or information. In our view, automated tools and techniques may be more efficient at these tasks, but not necessarily more effective than manual procedures.
- A4. The second comment in A3 applies to the first bullet in this paragraph as well (i.e., efficiency as opposed to effectiveness). We note that the second and third bullet points, unlike the first bullet point, appear to be missing a verb. In the third bullet, we suggest that the word “multiple” be replaced with “different”, since the word “multiple” suggests that there are more than two pieces of evidence, when in fact there may only be two. The word “different” can refer to two or more, as the case may be.
- A5. As noted in the comment to paragraph 2, the reference in this paragraph should be to paragraph 3. The reference to ISA 330 should be to paragraph A64, not A62.
- A6-A8. We refer to our response to paragraph 7, in which we note the need for a definition of persuasiveness (of audit evidence).
- A9. In the second bullet point, the use of the word “multiple suggests that if one source is not enough, then more than one additional source is needed. To avoid this connotation, we suggest changing the words to read “from an additional source or sources”. In the last bullet point to avoid the same connotations with the word “multiple”, we suggest that the word “multiple” be replaced by “different”.
- A10. The reference to paragraph A50 in ISA 200 (actually, it should be to paragraph A53) is one-sided. The rest of the paragraph in ISA 200

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explains that there is a balance to be struck between reliability and cost, etc. For this reason, paragraph A10 needs to be more balanced by including the rest of paragraph A53 of ISA 200.

- A14. This paragraph seems to be focused on the quantity of audit evidence obtained to respond to assessed risks of material misstatement, rather than also addressing the quantity of audit evidence obtained through risk assessment procedures. The paragraph should be augmented to cover both. In the last sub-bullet of the last bullet, the comma and word “in” after “inspect” are superfluous and can be deleted.
- A17. In the example, the word “Only” should be inserted at the beginning of the first bullet point to clarify that what is meant is that inquiry alone is not sufficient.
- A19. In the second bullet point, in line with the CUSP principles and the IAASB Glossary of Terms, the word “assessed” should be replaced with “evaluate”. In the last bullet point, since the word “undue” relates to both weight and reliance, the word “undue” should be placed prior to the word “weight”.
- A20. The first bullet would provide a more powerful message if the words “existence of risks” in both instances in the bullet were to be replaced with “non-existence of risks”.
- A21. In line with our comments above, we suggest that the word “multiple” in both instances be replaced with “different”.
- A23. In line with our comment on paragraph A3, we suggest that “may be more effective or” be deleted.
- A25. In line with the wording used in paragraphs A38 and A44 of ISA 200 and Appendix 3 of ISA 530, the term “appropriately low level” should be changed to “acceptable level”. A new term such as “appropriately low level” should not be used unless there is an important reason to introduce a new term.
- A30. At the end of the second bullet, the words “by value” need to be added, since it is not a large proportion of the population, but a large proportion of the population by value.
- A38. The sentence in the example is not a full sentence.
- A47. Since an internal expert is a member of the engagement team, the term “auditor’s expert” should be changed to “auditor’s external expert”. To

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make the example a full sentence, the introductory phrase should end with “may include”.

- A48. In the example box, the word “data” should be changed to “information”, since the examples are information and not data. Since “independence” is not defined for sources, we suggest that the term “Independent” in the fourth last bullet point be replaced with “Unrelated”.
- A50. The use of “it” in the last sentence is unclear: we suggest that “it” be replaced with “The source of the information” if that is meant. In the last sentence there is a comma missing after “matters” and a superfluous comma after “information”.
- A51. In line with our comments above, the word “multiple” should be replaced with “different”. In the example box, a verb is missing in the introductory phrase. We suggest adding “may include” at the end of that phrase.
- A64. It is unclear to us how the second and third bullets in the example box relate to accuracy and completeness.
- A87. Since other ISAs do address the auditor’s evaluation of whether sufficient appropriate audit evidence has been obtained for specific topics, it is a statement of fact and the word “may” should be deleted.
- A88. In line with the wording used in paragraphs A38 and A44 of ISA 200 and Appendix 3 of ISA 530, the term “appropriately low level” should be changed to “acceptable level”. A new term such as “appropriately low level” should not be used unless there is an important reason to introduce a new term.

Appendix

7. The word “checking” is colloquial. For this reason, we suggest replacing that word with “redoing the calculation to determine”
13. The use of the word “corroborate” in the introductory sentence in the example and in the second bullet of the example is biased towards corroboration. We therefore suggest that the word “corroborate” be replaced with “obtain evidence about”.

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Conforming Amendments

ISA 200

A30. We do not see the need for having deleted the sentence beginning with “In addition” because the absence of information can be information.

ISA 240

A18. The use of the term “corroborate” is not neutral and therefore “to corroborate“ should be replaced with “regarding”.

ISA 540

A82. The first sentence suggests that both evidence corroborating and contradicting assertions always exist. We therefore suggest that the word “any” be inserted prior to the word “evidence”. We also believe that “supports and corroborates” is redundant and suggest that “supports and” be deleted.

A107. The use of “taking into consideration” is not in line with the CUSP principles. We therefore suggest that it be replaced with “given” or “considering”.

ISA 805

A8. It seems to us that the word “information” added through the conforming amendment ought to be “audit evidence”.