

13 February 2012

Manager Financial Services Unit Retail Investor Division The Treasury Langton Crescent Parkes ACT 2600

Email: RetailCorporateBonds@treasury.gov.au

Sir / Madam

Discussion paper:

Development of the retail corporate bond market: streamlining disclosure and liability requirements

The Institute of Chartered Accountants in Australia (Institute) is pleased to have the opportunity to respond to the above discussion paper.

The Institute is the professional body for Chartered Accountants in Australia and around the world. Established by Royal Charter in 1928, we have a long tradition as a leading voice of professional accountants.

Our 70,000 members serve the public interest through their obligation to uphold high standards of service within many facets of the economy; in public practice and commerce, and sectors including government, not-for-profit and academia throughout Australia and internationally.

Our comments are limited to the proposed conditions set out in paragraph 24 of the paper, which include one that "... the auditor's report on the most recent annual financial report, and any subsequent half-yearly financial report, is unmodified".

We note that when the legislation is drafted care should be taken to ensure that the requirements regarding audit reports are aligned with those contained in the auditing standards issued by the Auditing and Assurance Standards Board (AUASB). That is, the distinction between modifications to the *opinion* contained in the audit report, and to other modifications to the audit report itself, should be clear.

We would welcome the opportunity to provide further input to Treasury if required. Please feel free to contact the Institute's Head of Audit, Andrew Stringer at andrew.stringer@charteredaccountants.com.au or +61 2 9290 5566 should you wish.

Yours sincerely

GPO Box 9985 in your capital city

Customer Service Centre 1300 137 322

NSW

33 Erskine Street Sydney NSW 2000 Phone 61 2 9290 1344 Fax 61 2 9262 1512

ACT

L10, 60 Marcus Clarke Street Canberra ACT 2601 Phone 61 2 6122 6100 Fax 61 2 6122 6122

Qld

L32, 345 Queen Street Brisbane Qld 4000 **Phone** 61 7 3233 6500 **Fax** 61 7 3233 6555

SA / NT

L11, 1 King William Street Adelaide SA 5000 Phone 61 8 8113 5500 Fax 61 8 8231 1982

Vic / Tas

L3, 600 Bourke Street Melbourne Vic 3000 **Phone** 61 3 9641 7400 **Fax** 61 3 9670 3143

WA

Ground, 28 The Esplanade Perth WA 6000 **Phone** 61 8 9420 0400 **Fax** 61 8 9321 5141



General Manager – Leadership & Quality Institute of Chartered Accountants in Australia



