2 July 2023

The International Auditing and Standard Board
Via its website www.iaasb.org

Honourable Chairman and Board Members:

Re: ED 570 Going Concern – Comments.

We are pleased to submit our comments on ED-570.

We are grateful to IAASB as international regulators of accounting profession for its leadership. We appreciate tremendous efforts of your team members and other stakeholders, in bringing out this Exposure Draft of great public interest. The ED establishes best practices on the continuity of an entity and its reporting by an auditor. Its importance is clear for all the audits conducted worldwide.

It will be a pleasure to see our collective efforts as inputs to a more realistic Standard understood clearly by all stakeholders.

Summary of Recommendations:

1. We are hitting the nail from the wrong head. Its for the preparers of financial statements to disclose that the financial statements are prepared on the principle of going concern. Also, that there are no conditions prevailing (other than those disclosed) for TCWG to curtail or liquidate the entity for next twelve months (from the date of approval of these f/s). Response 1/Enclosure 1

2. Substitute the term ‘going concern’ with the “continuing entity’ or the ‘Principle of Continuity of an Entity’ to address public interest and understanding. R2/R16

3. The requirements of an audit of a sme (including a macro entity) are not the same as listed entities. There is a need of ‘ISA for SMEs’. R3

4. The twelve-month period for the going concern shall commence on the signing of audit report rather than the date of approval of financial statement, if the difference between the two is more than a month. R7

5. We find it onerous for the auditor to find the intent and ability of third parties to carry out a specific course of action. R10

6. The profession has evolved positively in last 30 years. Acknowledge that necessary procedures add to the cost of the audit and result in delays. R16

7. Substitute ‘material uncertainty relating to the going concern’ with ‘Critical Observation/Note on Continuity of Entity’ R13
8. Extend the requirement to all audits irrespective of size or form of ownership. R14
9. The language of the proposed ED-570 is a matter of public interest. It’s a matter of public interest that we express in a simple and user-friendly language.

Overall Questions

1. Do you agree that the proposals in ED-570 are responsive to the public interest, considering the qualitative standard-setting characteristics and project objectives that support the public interest as set out in Appendix 1?

Response 1: Yes, in relative sense (an improvement from extant ISA 570). No, because they do not address adequate disclosures about continuity of an entity in the financial statements.

Who is more suited to provide assurance on no need to curtail activities or liquidate the entity for the next twelve months? Management or auditor? Place: financial statement or audit report or both?

The potential effects of inherent limitations on the auditor’s ability to detect material misstatements are greater for future events or conditions that may cause an entity to cease to continue as a going concern.¹

We submitted a write-up to the Institute of Chartered Accountants of Pakistan (Enclosure 1) in 2017 on this topic. Point 4 of Enclosure 1 is about disclosing negative assurance by TCWG is relevant².

2. Do you believe that the proposals in ED-570, considered collectively, will enhance and strengthen the auditor’s judgments and work relating to going concern in an audit of financial statements, including enhancing transparency through communicating and reporting about the auditor’s responsibilities and work?

Response 2. Yes.

The proposals in ED 570 are relatively more elaborate than extant ISA-570.

We believe that the proposals in ED-570 enhances and strengthens the auditor’s judgement and work on going concern in an audit of financial statement.

¹ ISA 200
² ‘There should be a negative assurance about the going concern assessment by the directors in the financial statements. ‘There are no material uncertainties that would lead your directors to believe that the company will no more be a going concern entity’. Also see the write-up on last page of Enclosure 1.
The proposals include commencing of twelve-month period from the date of approval of financial statements, early communication of auditor with TCWG and exclusive reporting on the status of going concern.

Bridge expectation gap by stating in the audit report that: our opinion is based on the conditions existing at the time of signing of this Report, there are no material uncertainties to report on status of the entity as a continuing entity.”

We also consider substituting the term “going concern” with “continuing entity” on the grounds that it is readily understandable and easy to translate in other languages.

3. Do you believe the proposed standard is scalable to entities of different sizes and complexities, recognizing that general purpose financial statements are prepared using the going concern basis of accounting and that going concern matters are relevant to all entities?

Response 3. No.

We rather consider emulating the International Accounting Standard Board issuing ‘IFRS for SMEs’. We consider the proposed ‘ISAs for SME’ to be more focused, less diluted.

The sooner we realize as a profession, the better it is that the audit of small and medium sized entities differs than the other entities. An effort to list the requirement under one umbrella is likely to creates a better understanding and compliance.

We see the audit process in three distinct classes. (a) Universal requirement of certain procedures; (b) Unique requirements of sme only (c) Peculiar requirements of other than smes only.

Going concern (continuing of an entity) is a matter applicable to all entities. However, we recommend a dedicated space for smes.

4. Do the requirements and application material of ED-570 appropriately reinforce the auditor’s application of professional skepticism in relation to going concern?

Response 4. Yes.

The ED-570 expresses that audit evidence may be corroborative or contradictory.

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3 In designing and performing the audit procedures required by paragraph 17, the auditor shall do so in a manner that is not biased towards obtaining audit evidence that may be corroborative or towards excluding audit evidence that may be contradictory. ISA 570. Para 18
ISA 315 requires the auditor to design and perform risk assessment procedures in a manner that is not biased towards obtaining audit evidence that may be corroborative or towards excluding audit evidence that may be contradictory. Designing and performing risk assessment procedures in an unbiased manner may assist the auditor in identifying potentially contradictory information.

Similarly, ISA 210 Appendix 1 clearly says that the auditor will carry out one’s responsibilities with professional skepticism. However, the meaning of the term not explained there.

We consider these to adequately reflect the concept.

**Specific Questions**

5. **Do you support the definition of Material Uncertainty (Related to Going Concern)? In particular, do you support the application material to the definition clarifying the phrase “may cast significant doubt”?**

Response 5. Yes, as in Para 10 of the proposed ED.

6. **Does ED-570 appropriately build on the foundational requirements in ISA 315 (Revised 2019) in addressing risk assessment procedures and related activities, to support a more robust identification by the auditor of events or conditions that may cast significant doubt on the entity’s ability to continue as a going concern?**

Response 6. Yes. Both documents appear to be consistent.

7. **Do you support the change in the commencement date of the twelve-month period of management’s assessment of going concern, from the date of the financial statements (in extant ISA 570 (Revised)) to the date of approval of the financial statements (as proposed in paragraph 21 of ED-570)? When responding consider the flexibility provided in paragraphs 22 and A43–A44 of ED-570 in circumstances where management is unwilling to make or extend its assessment. If you are not supportive of the proposal(s), what alternative(s) would you suggest (please describe why you believe such alternative(s) would be more appropriate and practicable)?**

Response 7: Yes.
We fully support that the twelve-month period of management’s assessment of going concern shall commence from the date of approval of the financial statements, as proposed by para 21 of ED-570.

The management is clearly responsible for the financial statements. International Accounting Standard (IAS) 1 requires management to make an assessment of an entity’s ability to continue as a going concern. It is therefore logical that they take the responsibility for the going concern.

When it comes to the public interest is it more appropriate to commence the twelve-month period from the date of the report of the auditor? Unless the Member Body makes it difficult to back-date, the profession attaches great importance to the date of the report of the auditor.

The date of the approval of financial statement and the report of the auditor may be the same but not necessary. The auditor issues report after the approval of the financial statement. What if the duration between the two dates is wide?

We consider the date of the report of the auditor carries more significance. If there is a long duration between the two dates, we recommend that the date of audit report appears to be more significant in this context.

8. Do you support the enhanced approach in ED-570 that requires the auditor to design and perform audit procedures to evaluate management’s assessment of going concern in all circumstances and irrespective of whether events or conditions have been identified that may cast significant doubt on the entity’s ability to continue as a going concern?

Response 8. Yes.

We fully support that the auditor designs and performs audit procedures to evaluate management’s assessment of going concern in all circumstances. In case none is provided or one that is not satisfactory, the fact may be reported by the auditor.

Management is responsible to discharge this duty every year\(^4\). Corporate planning considers internal and external conditions existing at the time is important for all

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\(^4\) See Enclosure 1. ‘Anchoring role of the management. The management is in the best position to make an assessment about going concern status because of the level of information available to it by virtue of its day to day running of an entity. Such information may not be available to the auditors unless shared by the management.’
entities. A five-year rolling corporate plan may be a part of solution. We expect the auditor to play a major role in such issues for its small clients.

Here I recall my experience as Job Incharge that while reviewing my working papers of a financial institution, I was asked if I have seen any corporate plans for continuity? No, I said. I reverted to the client to ask for one. I was made fun of. I was told that there are many divisions of the Bank, which one would I like to see? Where is it mentioned that doing this is important?

I went back to the office with the same question. The higher up in Finance was phoned to provide a copy of plans of selected credit lines availed from foreign financial institutions as a pre-condition of a signed audit report. The scrupulous in us checked continuity plan since long. Good its official now!\(^5\)

The above shows that he concerns of the auditor about the going concern are addressed at the last of the outstanding issues whereas it is not a side topic.

9. Does ED-570 appropriately incorporate the concepts introduced from ISA 540 (Revised) for the auditor’s evaluation of the method, assumptions, and data used in management’s assessment of going concern?

Response 9. We have not been able to come to with our views on this topic.

10. Do you support the enhanced requirements and application material, as part of evaluating management’s plans for future actions, for the auditor to evaluate whether management has the intent and ability to carry out specific courses of action, as well as to evaluate the intent and ability of third parties or related parties, including the entity’s owner-manager, to maintain or provide the necessary financial support?

Response 10. No.

We support that the auditor evaluates management’s plans for future actions and the intent and its ability to carry out specific courses of action. However, we do not support extending the requirement to the auditor to evaluate the intent and ability of third parties or related parties, except the entity’s owner-manager, to maintain and provide the necessary financial support.

\(^5\) Where management has not yet performed an assessment of the entity’s ability to continue as a going concern, the auditor shall request management to make its assessment. ED-570. Para16.
The principle we follow is that the more remote third party and related party, the more difficult it is for the auditor to evaluate through objective means the intent and ability to provide the necessary financial support. One exception to this rule is the role of owner-manager.

11. Will the enhanced requirements and application material to communicate with TCWG encourage early transparent dialogue among the auditor, management and TCWG, and result in enhanced two-way communication with TCWG about matters related to going concern?

Response 11. Yes.

We fully support the enhanced communication with TCWG about matters related to going concern at the earliest.

Unless the auditor makes a communication on this issue, the management and the TCWG may not be expected to be aware about the position of auditor on this issue.

It makes sense that the issue and its related aspects must be communicated formally by writing by auditor as soon as possible.

12. Do you support the new requirement and application material for the auditor to report to an appropriate authority outside of the entity where law, regulation or relevant ethical requirements require or establish responsibilities for such reporting?

Response 12. Yes.

The proposed ED suggests suitable steps prior to doing so.

13. This question relates to the implications for the auditor’s report for audits of financial statements of all entities, i.e., to communicate in a separate section in the auditor’s report, under the heading “Going Concern” or “Material Uncertainty Related to Going Concern”, explicit statements about the auditor’s conclusions on the appropriateness of management’s use of the going concern basis of accounting and on whether a material uncertainty has been identified.

Do you support the requirements and application material that facilitate enhanced transparency about the auditor’s responsibilities and work relating to going concern, and do they provide useful information for intended users of the audited financial statements? Do the proposals enable greater consistency and comparability across auditor’s reports globally?

We feel that we must consciously try prioritize public interest and reduce the expectation gap by substituting ‘material uncertainty related to going concern’ with ‘Critical Observation/Note on Continuity of (the name of Entity)’.

We find the term is difficult to understand by a user of financial statement.

14. This question relates to the additional implications for the auditor’s report for audits of financial statements of listed entities, i.e., to also describe how the auditor evaluated management’s assessment of going concern when events or conditions have been identified that may cast significant doubt on the entity’s ability to continue as a going concern (both when no material uncertainty exists or when a material uncertainty exists).

Do you support the requirements and application material that facilitate further enhanced transparency about the auditor’s responsibilities and work relating to going concern? Should this be extended to also apply to audits of financial statements of entities other than listed entities?

Response 14. Yes.

We would like to see the requirement extended to each audit.

15. Is it clear that ED-570 addresses all implications for the auditor’s report relating to the auditor’s required conclusions and related communications about going concern (i.e., auditor reporting is in accordance with ED-570 and not in accordance with ISA 701 or any other ISA)?

This includes when a material uncertainty related to going concern exists or when, for audits of financial statements of listed entities, events or conditions have been identified that may cast significant doubt on the entity’s ability to continue as a going concern but, based on the audit evidence obtained, the auditor concludes that no material uncertainty exists.

Response 15. Yes.

We consider it right the course of action the Board took to keep the matter of going concern separate with the ISA-701 or any other ISA.

We are clear that ED-570 is a stand-alone document relating to the going concern.
16. Are there any other matters you would like to raise in relation to ED-570? If so, please clearly indicate the requirement(s) or application material, or the theme or topic, to which your comment(s) relate.

Response 16. Yes.

16.1 Public interest>> Expectation Gap is a street full of entity management, auditor and users. It’s a mutual responsibility of all to converge to an acceptable point.

The management shall disclose two aspects about the going concern in the financial statement: basis of preparation and twelve-month period of no intention to liquidate business. Auditor to carry out its evaluation and reporting of conditions as on date of financial position. Users to understand audit is no guarantee of going concern.

16.2 Revise terms >> Who would have thought that the term Balance Sheet will be replaced? Using the same principle of continuity of an entity for next twelve months is much understandable than the term ‘going concern’. Look out for better terms for ‘going concern’ and ‘material uncertainty relating to going concern’.

16.3 Cost of Audit>>> With each increase in audit requirements, we expect the survival of sole practitioner to be in jeopardy.

As the profession moves forward, quite naturally cost of audit rises. Our observation is the cost of an audit rises with each year whereas fees do not.

The competition is compelling many to the low balling in the audit fees. For the profession to develop on sustainable basis, conditions are to be conducive for professionally competent and professionally minded.

16.4 Language of the Standard>> We see it as a matter of public interest that IAASB publications (this Standard too) are less sleep-inducing and more understandable.

After going through ‘CUSP Drafting Principles and Guidelines (Draft) April 2022‘ we have become even more conscious of liberty taken in formulating. (This document requires changes).

With some effort there are many sentences that may be stated in line.

Here I must mention using Artificial Intelligence to see how it transformed the readability of some of the paras of ED-570.
General Comments

17. 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 the ED-570.

(b) Effective Date—Given the need for national due process and translation, as applicable, and the need to coordinate effective dates with the fraud project, the IAASB believes that an appropriate effective date for the standard would be for financial reporting periods beginning approximately 18 months after approval of the final standard. 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.

Response 17.

17 (a) The official version of proposed Standard will be in English. We consider it a matter of public interest to make this Standard more understandable to all stakeholders. The English used in the Standard may be simplified and friendly.

Two measures suggested above in response 16 is to use the term principle of continuity of entity (instead or in addition to going concern) and the other is to use the term ‘Risk of non-continuity of the entity’ to fine tune or replace the term ‘material uncertainty.

The most likely way to make the translations closest to the finalized Standard is to fine tune its English version.

17(b) We expect the proposed ED to be an effective Standard by the start to mid-2025 in Pakistan.

I wish that the national due process of adopting an ISA in Pakistan was less bureaucratic more compatible with the Board, unless revoked in writing.

Sincerely

Altafa Noor Ali
Chartered Accountant
Enclosure 1: Extracts from a letter written to the Institute of Chartered Accountants of Pakistan on Going Concern on 26-4-17

A summary of our comments follows-

1. Anchoring role of management: The management is in the best position to make an assessment about going concern status because of the level of information available to it by virtue of its day to day running of an entity. Such information may not be available to the auditors unless shared by the management.

The role of the Board and dependency of auditor on it requires a prominent expression in the Guide. The management makes an assessment of the going concern of the entity; the auditor evaluates such assertion and reports, where applicable.

(Read this text with Q)

2. Non-going concern entities. ‘The Guide aims to help the auditor in performing an evaluation of appropriateness of the company’s going concern assumption during the audit of financial statements. To enable management and auditors to be better informed of the audit implications of going concern issues, the Guide also explains the nature and range of possible auditor’s opinions relating to going concern issues’. We recommend compiling a separate guidance comprising ‘Going Concern Accounting’ and the ‘Guideline on the basis of preparation statements for companies of financial that are not considered going concern’.

Regain focus by confining the Guide as its name states to the auditor, not management responsibilities.

3. Dormant company. ‘In case where the company is going to be maintained as a dormant company it would be usual to continue to prepare financial statements on a going concern basis’. We do not find a clean audit report in such situation to be an appropriate response. We call for additional disclosures for a dormant company in the financial statements and auditor report.

Significant curtailing of operations of an entity because of any reason is a red flag. Where a company is not operating in accordance with its objective or has become inactive during a period, the situation calls for a complete disclosure and a matter of emphasis paragraph. A company in which there is no transaction is self-evident that it has gone cold if not dead. The public interest demands that the auditor reports such situation in auditors’ report as a fact.

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6 Circular 3 of 2017, text reproduced as Enclosure 3.
7 Circular 3 of 2017 ‘Guideline on the basis of preparation statements for companies of financial that are not considered going concern’. This circular is also applicable to dormant companies but this is not mentioned in its title. We call for the clarification of 2.10 in Enclosure 3.
8 The Guide uses the term ‘company’ frequently. Replacing ‘company’ with the term ‘entities’ appears to be appropriate.
9 Para 2.6.2 Dormant company.
4. **Fundamental and assumption?** If it is fundamental, it cannot be an assumption: Our sense tells us that there should be a negative assurance about the going concern assessment by the directors in the financial statements. ‘There are no material uncertainties that would lead your directors to believe that the company will no more be a going concern entity’. A write-up carrying my views is on last page of Enclosure 1.

**Above text to be read with Q1 of ED570**

5. Concept description: Our search for the concept of going concern as a ‘basic business concept’ did not yield an authentic source. The going concern assumption is a fundamental principle in the preparation of the financial statements. It is an assumption in the sense that it is not expressly mentioned in the financial statements. Practically it is an assumption based on an assessment by the management and an evaluation by the auditor.

6. Terms defined differently: Another subtle but important contrast that the Guide fails to bring forth is that the ISA calls it ‘Going Concern Basis of Accounting’ whereas IAS 1 headlines it as ‘Going Concern’ whereas IAS 1 headlines it as ‘Going Concern’. No more it is being addressed as ‘Going Concern Assumption’ by either.

7. Foreseeable future: A confusion prevails in our mind about the concept of ‘foreseeable future’. The management is required to assess the company’s ability to continue as a going concern at the time of preparing the financial statements. Further it states: ‘the management’s going concern assessment should cover the company’s prospects for at least 12 months from the end of the reporting period’. These statements are contradictory. The cut-off date should be the ‘reporting date’ for this purpose. We wonder how would it otherwise synchronise with an entity’s budgeting cycle of twelve months if the period of foreseeable future for going concern purposes is to start from the date of authorisation of the financial statements.

8. 70-page Guide: The volume and therefore the content of the Guide appears to be superfluous. It appears to be a result of the enthusiasm to collate and consolidate the content; without making it priority to retain only the most relevant content and to discard the rest, thereby keeping the volume of the Guide less intimidating. A serious effort is required to purge such content and to edit the rest to make it much concise.

9. 16-page checklist: We expect that the purpose of this Guide is to help a busy professional short of time. There is not much evidence, however, to support it. Even for an earnest auditor we find

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10 See 1.1 Going concern and its significance, first para. Kindly discard the use of the term ‘inherent presumption’. It is an unwarranted innovation.


12 ISA 570 (Revised), headline para 2.

13 IAS 1 Presentation of Financial Statements, headline para 25.

14 Para 2.6.1 ‘Timing of assessment’. Also, 2.6.1 Subsequent events: ‘Regarding going concern, the management’s assessment should be based on the relevant conditions that are known and available at the issuance date, rather than at the reporting date.

15 Para 2.6.1 ‘Assessment period’
the prospect of filling out a 16 page checklist\(^{16}\) in the Guide for each of its client close to fantasy.

10. Understandable guidance for other stakeholders: Do we think that the accounting staff at the client of SMP have the capability to benefit from this Guide? A part of the Guide may be in Urdu. Reach out to the invisible stakeholders and uphold public interest. Make the Guide meant for the practicing members understandable to a wider audience. This will be a relief for many small and medium size practices having clients and accounting staff who do not understand English. The same may be true for many practitioners as well.

11. Single-place Guidance: Gather guidance/information in one place relevant to the small and medium size entities and for entities preparing consolidated financial statements.

   The scope of the Guide is applicable to entities that are classified as the sme to those who prepare consolidated financial statements. The guidance useful for one may not be relevant to the other. We recommend one-place guidance under separate headings.

12. Cite references: The Guide acknowledges that it contains few references from IFRS Interpretations Committee Staff Paper on going concern, UK Financial Reporting Council’s Guidance on Going Concern basis of accounting, audited financial statements of international companies and reference books/ guidance of international firms\(^{17}\). However, these sources have not been identified in the Guide. Quoting the sources in the revised Guide will be helpful to the users of the Guide to verify/check references on their own making the Guide more authentic.

Conclusion: In the light of above, edit and make revision to the contents. Shorten its length. Make its contents more focused to the title. Make orders by the SECP against the erring auditors case studies for finding out what went wrong and how it can be avoided. Devote adequate resources to the technical department; its quality of publications remain to be low. Recognise that the accounting staff at client as a stakeholder and facilitate by issuing some guidance in the national language as well.

Lastly, we thankfully acknowledge availing the facilities at the Members’ Library for preparing these comments.

Thank you.
Sincerely,
Altaf Noor Ali.

\(^{16}\) See Appendix 3 - Checklist of ISA 570 (Revised) Requirements starting on p.36 to p.51 = 16 pages.

\(^{17}\) See 1.5 Content and organization, last para.
Enclosure 1: Write-up by Altaf Noor Ali.

Going Concern

It must be in my first year of my audit training that I came across the term 'going concern'.

The concept of going concern is ever present but remains in the background when an entity prepares its financial statements (accounts). That is why it is said that accounts are prepared as a matter of course on a going concern assumption.

The concept of going concern assumes that the entity of which accounts are being prepared will continue to run normally in the foreseeable future and there will be no circumstances that one knows of that would compel an entity to close down its business or significantly curtail its activities. It will continue to run as in the last year.

Sometimes when macro economic conditions deteriorates, it may threaten the survival of some entities. It is primarily in these conditions that the assumption of going concern may not be applicable anymore.

In the normal circumstances the accounts are prepared under the historical cost convention or fair measurement or any appropriate accounting framework. However, when the going concern is revoked, the accounts can no more be prepared on such basis. Infact, the assets, liabilities and consequently equity will be reclassified to be stated on net estimated proceeds value.

The overall concept is therefore simple. If the circumstances of the entity are expected to remain the same as last year in the next year, you may prepare your accounts on the most appropriate basis. Whereas in case of extra ordinary circumstances that threaten the survival of an entity in the times ahead, the accounts will be prepared on the net proceed basis.

Going concern assumption simply means an expectation that the business of whose accounts are prepared will continue to run or function in the normal circumstances in say next twelve months.
Since my first year in audit training, I have always wondered that if going concern is such a fundamental matter in the preparing accounts, how come it is no expressly disclosed in the accounts?

A valid explanation is the principle of ‘management by exception’. It means only those matters that deviate from an agreed course are reported to the management. If you do not report, I will assume all is right. Secondly, if the accounts are presented on historical cost or modified basis, is it not a good inference that the going concern assumption is valid?

That is a weighty response. Personally, however, I never bought it!

If it is so fundamental why is it an assumption? I think that the accounts should say that the entity continues to be a going concern and there is no reason to believe that it will not be so by the time of next accounts. As simple as that!

The rebel inside me emerged when I appeared in my first professional accounting exam.

The make or break question in exam was one in which data was provided to us on whose basis we were required to prepare final accounts.

During the practice sessions on this topic, I invariably use to put up a novel headline called ‘Assumptions’ under which, among others, my first postulate was: ‘The accounts are prepared under the going concern assumption. There is no reason for the entity to close down or curtail its commercial activities in near future’.

Invariably - most of my seniors and fellows assessing my solution use to pause at this one. I use to see an invisible light blub flash in their head. Those who were daring use to give me an extra bonus mark for writing something appropriate but presently not a part of mandatory disclosures, with a smile.

Guess that my examiner must have also gone through something similar, for I passed. May be it was not because of it but I relish the thought!

I may have passed my exams, but the rebel on this issue continues to reside within me!