

EXPOSURE DRAFT OF PROPOSED ISRE 2410 (REVISED), REVIEW OF INTERIM FINANCIAL INFORMATION PERFORMED BY THE INDEPENDENT AUDITOR OF THE ENTITY'S ANNUAL FINANCIAL STATEMENTS

Response Form

Guide for Respondents

Comments are requested by **September 3, 2026**. *Note that requests for extensions of time cannot be accommodated due to the timeline for finalization of this proposed revised standard.*

This form is for providing comments on the Exposure Draft of proposed International Standard on Review Engagements™ (ISRE) 2410, *Review of Interim Financial Information Performed by the Independent Auditor of the Entity's Annual Financial Statements* (ED-2410), in response to the questions set out in the Explanatory Memorandum (EM) to ED-2410. It also allows for respondent details, demographics and other comments to be provided. Use of this form will facilitate the IAASB's analysis of the responses.

You may respond to all questions or only those questions for which you have specific comments.

To assist our consideration and analysis of your comments, please:

- For each question, start by indicating your overall response using the drop-down menu under each question. Include any detailed comments below that, as indicated.
- When providing comments, respond directly to the questions and:
 - Provide the rationale for your answers. If you disagree with the proposals in ED-2410, please provide specific reasons for your disagreement and include specific suggestions for changes (including specific wording) that may be needed to the requirements, application material or appendices. If you agree with the proposals, it will be helpful for the IAASB to be made aware of this view as support for the IAASB's proposals cannot always be inferred when not stated.
 - Be specific about the sections, headings or paragraphs in ED-2410 to which your responses relate.
 - Refrain from inserting tables or text boxes in your responses.

It is not necessary to include a cover letter containing a summary of your key issues. The response form provides the opportunity to include any other views you wish to place on the public record, should you choose to do so. All responses will be considered a matter of public record and will ultimately be posted on the IAASB website.

Use the “**Submit Comment**” button on [the web page for proposed ISRE 2410 \(Revised\)](#) to upload the completed form.

Responses to IAASB's Request for Comments in the EM for ED-2410, Review of Interim Financial Information Performed by the Independent Auditor of the Entity's Annual Financial Statements

PART A: Respondent Details and Demographic information

Your organization's name (or your name if you are making a submission in your personal capacity)	CNCC
Name(s) of person(s) responsible for this submission (or leave blank if the same as above)	Cédric GELARD
Name(s) of contact(s) for this submission (or leave blank if the same as above)	
E-mail address(es) of contact(s)	cedric.gelard@cncc.fr
Geographical profile that best represents your situation (i.e., the geographical perspective from which are you providing feedback on ED-2410). Select the most appropriate option.	Europe
	If "Other", please clarify
The stakeholder group to which you belong (i.e., the perspective from which are you providing feedback on ED-2410). Select the most appropriate option.	Professional accountancy or professional organization (PAO)
	If "Other", please specify
Should you choose to do so, you may include information about your organization (or yourself, as applicable).	

Should you choose to do so, you may provide overall views or additional background to your submission. **Please note that this is optional.** The IAASB's preference is that you incorporate all your views in your comments to the questions (also, Question 16 in Part B allows for raising any other matters in relation to ED-2410).

Information, if any, not already included in responding to the questions in Part B:

Click or tap here to enter text.

PART B: Responses to Questions in the EM for ED-2410

For each question, please start with your overall response by selecting one of the items in the drop-down list under the question. Provide your detailed comments, if any, below as indicated.

Overall Impact

1. Do you agree that ED-2410 is **responsive to the public interest**, considering the qualitative standard-setting characteristics and the standard-setting actions in the project proposal?
(See Section I-A and the Appendix in the EM)

Overall response: Agree, with comments below

Detailed comments (if any):

The CNCC welcomes this proposed revision of ISRE 2410; as stated in our responses to previous consultations on the work plan, CNCC has long advocated for a revision of this standard in order to clarify it and draft it using terminology in line with other audit and review standards.

2. Do you agree that ED-2410 strikes **an appropriate balance** between the work effort required to express a limited assurance conclusion on the interim review engagement, and more robust requirements in the public interest in certain areas (e.g., going concern, fraud and non-compliance with laws and regulations)? You are invited to include as part of your response insights on **the implications or effects** of implementing the proposed standard.

Overall response: Neither agree/disagree, but see comments below

Detailed comments (if any):

We have no comments regarding the work effort required to express a limited assurance conclusion on the interim financial information.

However, we disagree with the work effort and the wording used in the conclusion relating to going concern – with its double negative – We have concerns that users of the assurance reports may interpret it as directly providing a limited assurance on the entity's ability to continue as a going concern, which goes beyond the scope of the review of interim information.

We also believe that as such, the wording of the section on going concern could lead readers to understand that the same work effort has been performed on going concern in a review engagement than in an audit. We believe that the wording of this section should make it clear that review procedures are less extensive than an audit and that the primary responsibility of identifying and disclosing material uncertainties belongs to management. Therefore, with regard to the Conclusions relating to going concern, we propose an alternative wording based on ISRE (UK) 2410 (Revised) – Appendix 4 “Examples of Review Reports on Interim Financial Information”, namely (we have highlighted the wording that we believe are needed in the review report to reflect our comments above) : ***“Based on our review procedures, which are less extensive than those performed in an audit as described in the Basis of Conclusion section of this report, nothing has come to our attention to suggest that management have inappropriately adopted the going concern basis of accounting or that management have identified material uncertainties relating to***

going concern that are not appropriately disclosed. This conclusion is based on the review procedures performed in accordance with this ISRE; however future events or conditions may cause the entity to cease to continue as a going concern.

The wording of the UK is clearer since it reminds the reader that it is management who decides to prepare the financial statement under the going concern basis of accounting and to disclose material uncertainties, if any.

Professional Skepticism and Professional Judgment

3. Does ED-2410 appropriately address the foundational concepts of professional skepticism and professional judgment, and the importance of applying these concepts throughout the interim review engagement? If not, what more might be needed in this regard?
- (See Section I-B, paragraph 22(a) in the EM)*

Overall response: **Yes (with no further comments)**

Detailed comments (if any):

Click or tap here to enter text.

Fundamental Principles of an Interim Review Engagement

4. Does the Introduction section of ED-2410 provide a clear description of the nature and purpose of an interim review engagement, and how it differs from an audit of financial statements, to provide foundational context for the work effort needed to achieve the objective of the engagement?
- (See Section I-B in the EM)*

Overall response: **Yes (with no further comments)**

Detailed comments (if any):

Click or tap here to enter text.

5. Is ED-2410 sufficiently clear that while the auditor performs primarily inquiries and analytical procedures, *all procedures* performed for the purpose of achieving the overall objective of the interim review engagement are “review procedures”? If not, what suggestions do you have to make this clearer?
- (See Section I-F, paras. 44-47 in the EM)*

Overall response: **Yes (with no further comments)**

Detailed comments (if any):

Click or tap here to enter text.

Approaching an Interim Review Engagement in Accordance with ED-2410

6. Is it sufficiently clear that, for recurring engagements, the auditor leverages the knowledge and understanding obtained from previous annual audits and interim review engagements for the entity? If not, what suggestions do you have to make this clearer?

(See Section I-B and Section I-F, paragraphs 44-52 in the EM)

Overall response: **Yes (with no further comments)**

Detailed comments (if any):

Click or tap here to enter text.

7. Do you agree with the considerations that apply when the review of interim financial information is the first engagement performed for the audit client? If not, what suggestions do you have for additional considerations related to first-time interim review engagements?

(See Section I-F, paras. 48-52 in the EM)

Overall response: **Agree (with no further comments)**

Detailed comments (if any):

Click or tap here to enter text.

Materiality

8. Do you agree with the requirement for the auditor to determine materiality for the interim review engagement, and the related application material that describes the relevant principles that apply? If not, what would you suggest?

(See Section I-F, paragraphs 41-43 in the EM)

Overall response: **Agree (with no further comments)**

Detailed comments (if any):

Click or tap here to enter text.

Group Interim Review Engagements

9. Overall, do you agree that ED-2410 is capable of being applied for the review of interim financial information of groups? If not, please explain your reasons, and provide suggestions for additional requirements or application material that might be needed.

(See Section I-F, paragraphs 37-40 in the EM)

Overall response: Agree, with comments below

Detailed comments (if any):

There is no need to add any further requirements – the standard is capable of being applied for the review of interim financial information of groups and must remain flexible.

10. Are the requirements in ED-2410 that address specific considerations related to group interim review engagements appropriate? If not, please explain your reasons, and provide suggestions for additional requirements or application material that might be needed.

(See Section I-F, paragraphs 37-40 in the EM)

Overall response: Yes (with no further comments)

Detailed comments (if any):

Click or tap here to enter text.

Fraud and Non-Compliance with Laws and Regulations (NOCLAR)

11. Do you agree that the work effort requirements related to fraud and NOCLAR are appropriate and proportionate to the circumstances of an interim review engagement, recognizing that the engagement is performed by the auditor of the entity's annual financial statements and has responsibilities related to fraud and NOCLAR in the context of that engagement? If not, please explain your reasons, and provide suggestions for the auditor's approach to fraud and NOCLAR in an interim review engagement.

(See Section I-F, paras. 54-56 in the EM)

Overall response: Agree (with no further comments)

Detailed comments (if any):

Click or tap here to enter text.

Going Concern

Questions 12 and 13 below address both the auditor's work effort related to going concern in an interim review engagement and transparency about going concern in the interim review report.

12. Do you agree that the work effort requirements related to going concern are appropriate and proportionate to the circumstances of an interim review engagement, recognizing that the engagement is performed by the auditor of the entity's annual financial statements and has responsibilities related to going concern in the context of that engagement? If not, please explain your reasons and provide suggestions for how ED-2410 should address the auditor's responsibilities related to going concern in an interim review engagement.

(See Section I-F, paras. 57-61 in the EM)

Overall response: **Disagree, with comments below**

Detailed comments (if any):

As mentioned in our answer to question 2, we believe that the wording of the section on going concern could lead readers to understand that the same work effort has been performed on going concern in a review engagement than in an audit. We believe that the wording of this section should make it clear that review procedures are less extensive than an audit and that the primary responsibility of identifying and disclosing material uncertainties belongs to management.

13. Do you agree with the proposals to introduce a new separate section relating to going concern in the auditor's interim review report? If not, please explain your reasons and provide suggestions for how ED-2410 should address transparency about going concern in the interim review report.

(See Section I-H, paragraphs 74-79 in the EM)

Overall response: **Disagree, with comments below**

Detailed comments (if any):

Please refer to answers to questions 2 and 12.

Overall, we believe that a review is not sufficient to provide to the reader what can be perceived as a limited assurance on the entity's ability to continue as a going concern for the next 12 months. It is misleading. In a limited assurance engagement, it would have been more appropriate to remain implicit on-going concern, rather than to go explicit.

With regard to the Conclusions relating to going concern, we propose an alternative wording based on ISRE (UK) 2410 (Revised) – Appendix 4 "Examples of Review Reports on Interim Financial Information", namely: *"Based on our review procedures, which are less extensive than those performed in an audit as described in the Basis of Conclusion section of this report, nothing has come to our attention to suggest that management have inappropriately adopted the going concern basis of accounting or that management have identified material uncertainties relating to going concern that are not appropriately disclosed. This conclusion is based on the review procedures performed in accordance with this ISRE; however future events or conditions may cause the entity to cease to continue as a going concern."*

Additionally, we draw your attention to the fact that interim financial information frameworks have often very few information on expectations from the preparers on going concern and do not require specific disclosures from management on going concern. We encourage the IAASB to continue the dialogue with IASB on this matter.

In particular:

- (a) Do you agree with the proposed required statements, appropriately worded for a limited assurance engagement, relating to the going concern basis of accounting and whether a material uncertainty exists? If not, please explain your reasons and provide suggestions for how such statements should be worded in the interim review report.

Overall response: **Disagree, with comments below**

Detailed comments (if any):

Please refer to answers to questions 2, 12 and 13.

With regard to the Conclusions relating to going concern, we propose an alternative wording based on ISRE (UK) 2410 (Revised) – Appendix 4 “Examples of Review Reports on Interim Financial Information”, namely: *“Based on our review procedures, which are less extensive than those performed in an audit as described in the Basis of Conclusion section of this report, nothing has come to our attention to suggest that management have inappropriately adopted the going concern basis of accounting or that management have identified material uncertainties relating to going concern that are not appropriately disclosed. This conclusion is based on the review procedures performed in accordance with this ISRE; however future events or conditions may cause the entity to cease to continue as a going concern.”*

- (b) Do you agree that the circumstances addressed in the requirements in paragraphs 108-111 of ED-2410 capture the most frequently encountered scenarios in practice? If not, please explain your reasons and provide suggestions for any other scenarios that should be addressed in ED-2410.

Overall response: **Disagree, with comments below**

Detailed comments (if any):

Paragraph 109 of ED-2410 imposes an obligation to follow up on material uncertainties related to going concern identified in the previous annual accounts, whereas no such obligation exists in ISA 570 revised relating to the audit of annual accounts.

Furthermore, it creates a specific, formalized follow-up of material uncertainty related to going concern from the most recent annual audit report into the interim review report (including specific references back to the prior auditor’s report and the prior financial statements) that does not exist for modified opinions (no explicit requirement in ISA 705 to follow up on previous modifications). This appears to be inconsistent.

As the annual financial statements, and the related auditor’s report, are not always public in all jurisdictions; requiring explicit reference to them in the interim review report may therefore be problematic.

Moreover, the approach appears overengineered compared to the current ISA framework and existing practice and may not be operational in all circumstances (e.g., when the auditor was not the prior period auditor, or where there is no continuity between engagements).

More broadly, it introduces a general notion of “follow-up” across reporting periods that is not clearly developed elsewhere in the ISAs or ISREs. We do not consider it consistent to impose stricter requirements for a review of interim financial information than for an audit of annual financial statements.

- (c) Do you agree with the requirement in paragraph 111 of ED-2410 to include a reference in the interim review report to disclosure(s) of a going concern matter, other than a material uncertainty (for example, a “close call”) only when the matter is, in the auditor’s professional judgment, of such importance that it is fundamental to users’ understanding of the interim financial information, and to do so in a manner akin to an emphasis of matter paragraph? If not, please explain your reasons and provide suggestions for how such matters should be addressed in ED-2410.

Overall response: **Agree (with no further comments)**

Detailed comments (if any):

Click or tap here to enter text.

The Auditor’s Interim Review Report

General

14. Do you agree with the proposed new structure of the auditor’s interim review report? In particular, consider whether the new structure may be clearer for intended users of the report since it is consistent with the structure of the auditor’s report on the financial statements. If not, please explain your reasons, including any suggestions for how the interim review report can be made clearer for intended users.

(See Section I-H, paragraphs 65-68 in the EM)

Overall response: **Agree, with comments below**

Detailed comments (if any):

The Exposure Draft (paragraph 117) provides for the possibility of including a specific paragraph entitled ‘Emphasis of matter’ in the report if it is necessary to draw users’ attention to a matter presented or disclosed in the interim financial information but does not provide an example of how this should be worded.

We believe it would be useful to include at least one example of a report with an ‘Emphasis of Matter’ paragraph.

The Auditor's Interim Review Conclusion

15. Do you foresee any practical consequences from the approach in ED-2410 that the auditor's interim review conclusion would differ, depending on whether the applicable financial reporting framework is a fair presentation framework or a compliance framework, as defined in paragraph 13(b) of ED-2410? Please be as specific as possible in describing any potential issues and suggestions for how the IAASB may address them.

(See Section I-H, paragraphs 69-73 in the EM)

Overall response: **No (with no further comments)**

Detailed comments (if any):

Click or tap here to enter text.

Other Matters

16. Are there any other matters you would like to raise in relation to ED-2410? If so, please clearly indicate the specific paragraph numbers of any requirements, application material, or Appendix, to which your comments relate. If you provide views on other matters, please use subheadings in your response to clearly identify and distinguish different matters.

Overall response: **Yes, as further explained below**

Detailed comments (if any):

We are surprised by the absence of a requirement to perform an Engagement Quality Review (EQR) in the context of the review of interim financial information of listed/PIE entities. In practice such EQR is often conducted on review engagement of interim financial information of listed/PIE entities.

Paragraph 34(f) of ISQM 1 only mandates EQR for some audit engagements and requires that: *"The firm establishes policies or procedures that address engagement quality reviews in accordance with ISQM 2, and require an engagement quality review for:*

- (i) *Audits of financial statements of listed entities;*
- (ii) *Audits or other engagements for which an engagement quality review is required by law or regulation; and (Ref: Para. A133);*
- (iii) *Audits or other engagements for which the firm determines that an engagement quality review is an appropriate response to address one or more quality risk(s). (Ref: Para. A134-A137)".*

We believe that when an EQR is appointed on the audit of annual financial statements, it should be required to also appoint an EQR on the review of interim information of the same entity.

Currently, firms could comply with ISQM1 by appointing an EQR only for annual audits, and it could happen that the EQR disagrees with an accounting treatment of a judgment already included in interim financial information which has been reviewed. This situation is not in the public interest. However, we understand that it is a current practice in audit firms to appoint an EQR for review engagements of listed/PIE clients for which the firm performs also the annual audit: this should be reflected in ISQM1.

Translations

17. Recognizing that many respondents may intend to translate the final standard 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 paragraph numbers of any requirements, application material, or specific illustrations or appendices to which your comments relate.

Overall response: No

Detailed comments (if any):

Click or tap here to enter text.

Effective Date

18. The IAASB believes that an appropriate implementation period would be approximately 18 months after the expected date of approval of the proposed revised standard. Do you agree that this will provide a sufficient period to support effective implementation of the proposed standard? If not, what do you propose and why?

(See Section I-I, paragraphs 85-86 in the EM)

Overall response: Agree, with comments below

Detailed comments (if any):

Since the priority of the French auditing profession is to finalize the adoption of the ISAs, the implementation of the proposed ISRE 2410 revised may be delayed in France.

Questions to Inform the International Ethics Standards Board for Accountants (IESBA)

The IESBA is seeking views from respondents related to the application of the IESBA Code. Respondents for whom these questions are relevant are encouraged to answer these questions to inform the IESBA's consideration of the need for any future actions.

(See the Introduction, paragraphs 12-14, and Section I-C in the EM)

Group Interim Review Engagements

E.1. Recognizing that ED-2410 requires the auditor to comply with relevant ethical requirements, including those related to independence, when performing an interim review engagement:

- (a) Given the context set out in Section I-C, paragraph 28, in the EM and taking into account that Part 4A of the Code applies to both audit and review engagements unless otherwise stated, do you believe there is a need to clarify the application of Section 405 with respect to group review engagements, including group interim reviews? If so, please explain why. Also explain what clarifications would be useful and whether they should be made inside or outside the Code.

Overall response: **No (with no further comments)**

Detailed comments (if any):

Click or tap here to enter text.

Non-compliance or Suspected Non-compliance with Laws and Regulations

E.1. Recognizing that ED-2410 requires the auditor to comply with relevant ethical requirements, including those related to independence, when performing an interim review engagement:

- (b) Do you believe the application of the Code as described in Section I-C, paragraph 29, in the EM is clear when information concerning non-compliance or suspected non-compliance with laws and regulations comes to the auditor's attention when performing an interim review engagement? If not, please explain why. Also explain what clarifications would be useful and whether they should be made inside or outside the Code.

Overall response: **Yes (with no further comments)**

Detailed comments (if any):

Click or tap here to enter text.

This document was prepared by the Staff of the International Auditing and Assurance Standards Board (IAASB).

The objective of the IAASB is to serve the public interest by setting high-quality auditing, assurance, and other related services standards and by facilitating the convergence of international and national auditing and assurance standards, thereby enhancing the quality and consistency of practice throughout the world and strengthening public confidence in the global auditing and assurance profession.

The IAASB develops auditing and assurance standards and guidance under a shared standard-setting process involving the Public Interest Oversight Board, which oversees the activities of the IAASB, and the IAASB Stakeholder Advisory Council, which provides public interest input into the development of the standards and guidance.

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