Mr. Tom Seidenstein
Chair of IAASB

Submitted by email

Subject: Accountancy Europe accompanying letter to Exposure Draft ISRE 2410 (Revised), Review of Interim Financial Information Performed by the Independent Auditor of the Entity's Annual Financial Statements

Dear Mr. Seidenstein,

Accountancy Europe is pleased to provide its views in response to the IAASB's exposure draft of proposed ISRE 2410 (Revised). We welcome the initiative to revise and modernise this longstanding standard to reflect developments in practice and the broader IAASB standards. We acknowledge the IAASB's efforts to strengthen requirements in key areas such as fraud, non-compliance with laws and regulations, and going concern.

However, we have identified several substantive considerations that merit careful attention.

First, we observe that the modernisation through clarified drafting conventions and restructuring of ISRE 2410 has resulted in a significantly longer and more detailed standard, increasing from approximately 10 to 24 pages and from 60 to 110 numbered paragraphs (excluding the introduction and appendices). While the modernisation and increased length of the standard should not in themselves be equated with an increase in work effort, certain proposed requirements may result in additional work in practice, particularly in relation to going concern.

We believe that these changes will result in increased work effort, longer timeframes to perform the review, and likely cost increases for companies without any change to the level of assurance provided. The timeliness of interim reporting is an important public interest consideration and should be carefully balanced against the work effort associated with the proposed requirements.

We encourage the IAASB to actively seek the views of preparers on the practical implications of the proposed changes including whether the additional work effort and associated costs could affect their willingness to obtain an interim review. An interim review is not required under EU law and if undertaken, it is often due to national requirements which differ within the EU, market practice or voluntary contractual arrangements. Any increase in cost may lead to a reduction in companies opting for an interim review, which would be contrary to the public interest.

Second, several aspects of ED-2410 rely on the auditor's existing knowledge obtained through the annual audit engagement, yet the standard does not sufficiently explain how the two engagements interrelate or how knowledge from the audit is expected to be leveraged in the interim review. We encourage the IAASB to provide clearer guidance on this relationship, including how auditors should leverage knowledge from ongoing audit engagements. This would better reflect the nature of recurring engagements, help avoid unnecessary duplication of work, and reinforce the distinction between a review engagement and an audit.

Third, we recognise that it is appropriate for ED-2410 to address the auditor's responsibilities relating to going concern. We do however not believe that the proposed requirements are, in all respects, appropriate and proportionate to the circumstances of a limited assurance interim review engagement. We strongly encourage the IAASB to ensure that the proposed requirements remain proportionate to the nature of a limited assurance engagement and do not inadvertently blur the distinction between a review and an audit. We also recommend that going concern requirements align with interim financial reporting frameworks and management's reporting obligations.

In particular, the standard and the auditor's report should make clear that the procedures performed in relation to going concern in an interim review are less extensive than those performed in an audit and should not create the impression that a higher level of assurance is being provided in relation to going concern.

We do not support the introduction of a separate going concern section in the auditor’s interim review report. We consider that such a separate section is not justified in the context of a limited assurance engagement and could blur the distinction between limited and reasonable assurance engagements and create an expectation gap regarding the level of assurance provided.

If the IAASB nevertheless decides to retain a separate section, its wording and presentation should be clearly differentiated from the corresponding reporting in an audit report and should explicitly reflect the limited assurance nature of the engagement.

In this respect, we propose in our detailed response alternative wording based on ISRE (UK) 2410 (Revised), which makes clear that review procedures are less extensive than those performed in an audit and which more appropriately reflects management's responsibility in relation to material uncertainties related to going concern.

For group interim review engagements, we encourage the IAASB to strengthen requirements relating to communication between group and component auditors by placing greater emphasis on two-way communication. We also recommend that the requirements relating to the review of the financial information and the related application material more clearly refer back to the materiality determined during planning to ensure consistency between the planning and evaluation phases.

We thank you for this opportunity to comment on this important project. Our detailed response form provides further commentary on each of the IAASB's proposals. We encourage the IAASB to carefully consider the cumulative effect of the proposed requirements to ensure that the work effort remains consistent with the objective of providing limited assurance while continuing to serve the needs of users of interim financial information.

Should you wish to discuss any aspect of this letter, please contact Endrin Bitraj at endrin@accountancyeurope.eu.

Eelco van der Enden

Chief Executive

ABOUT ACCOUNTANCY EUROPE

Accountancy Europe unites 49 professional organisations from 35 countries that represent close to **1 million** professional accountants, auditors and advisors. Accountancy Europe translates their daily experience to inform the public policy debate in Europe and beyond.

Accountancy Europe is in the EU Transparency Register (No 4713568401-18).

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)	Accountancy Europe
Name(s) of person(s) responsible for this submission (or leave blank if the same as above)	Endrin Bitraj
Name(s) of contact(s) for this submission (or leave blank if the same as above)	Endrin Bitraj
E-mail address(es) of contact(s)	endrin@accountancyeurope.eu
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.	Other (if none of the groups above apply to you)
	Accountancy Europe unites 49 professional organisations from 35 countries that represent 1 million qualified accountants, auditors and advisors.
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:

In addition to our responses to the questions in Part B, we also submitted a letter to the IAASB CEO highlighting our key concerns. Please find the letter here: https://accountancyeurope.eu/consultation-response/iaasb-exposure-draft-isre-2410-revised/

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: **Neither agree/disagree, but see comments below**

Detailed comments (if any):

Accountancy Europe considers that revising and modernising ISRE 2410 is responsive to the public interest. The existing standard is longstanding and updating it to reflect developments in practice and in the broader IAASB standards is appropriate.

However, we believe that the public interest assessment should give greater consideration to the defining characteristics of an interim review engagement. Interim financial information is intended to be made available on a *timely basis*, and the engagement provides *limited* rather than reasonable assurance.

We observe that the modernisation and restructuring of ISRE 2410 has resulted in a significantly longer and more detailed standard, increasing from approximately 10 to 24 pages and from 60 to 110 numbered paragraphs (excluding the introduction and appendices). We understand that the extant ISRE 2410 predates the IAASB's clarified drafting conventions which would justify modernisation. While the modernisation and increased length of the standard should not in themselves be equated with an increase in work effort, certain proposed requirements may result in additional work in practice, particularly in relation to going concern.

It is therefore important that the cumulative effect of the proposed requirements remains proportionate to the level of assurance provided and does not blur the distinction between an interim review and an audit.

The timeliness of interim reporting is itself an important public interest consideration and should be carefully balanced against the work effort associated with the proposed requirements.

In particular, we encourage the IAASB to consider the perspectives of preparers in further outreach, as the review of interim financial information is not required under EU law and is often undertaken as a result of national requirements, voluntary market practice or contractual arrangements. Greater transparency about how the proposed changes respond to identified user and preparer needs would further support the public interest rationale for the revisions.

The IAASB should also ensure that the revised standard does not increasingly resemble an audit standard in a way that could blur the distinction between limited and reasonable assurance. This could create an expectation gap, with users perceiving an interim review as providing a level of assurance closer to that of an audit.

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: **Disagree, with comments below**

Detailed comments (if any):

We do not believe that the proposed standard, taken as a whole, fully strikes the appropriate balance between the work effort required and the limited assurance to be provided by an interim review engagement.

While the modernisation and increased length of the standard should not in themselves be equated with an increase in work effort, certain proposed requirements will result in additional work in practice. This is particularly the case in relation to going concern, where we are concerned that the extent of the proposed requirements will move the engagement closer to the work effort and expectations associated with an audit, notwithstanding that the engagement continues to provide limited assurance.

We therefore encourage the IAASB to consider whether the overall balance between the benefits of the proposed requirements and the additional effort and costs they may entail is appropriate, particularly given the need for interim reviews to provide timely assurance on interim financial information. In doing so, the IAASB should ensure that any additional work effort is proportionate to the limited assurance conclusion being expressed and that the requirements do not create an expectation gap regarding the level of assurance provided.

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 comments below**

Detailed comments (if any):

Accountancy Europe supports the proposed treatment of professional scepticism and professional judgment and agrees that these concepts are fundamental to a high-quality interim review engagement.

We also support the alignment with the concepts used in other IAASB standards, which promotes consistency across the IAASB's assurance framework.

However, we encourage the IAASB to clarify that the exercise of professional scepticism in an interim review should be considered in the context of a limited assurance engagement. While professional scepticism is equally important in both engagements, its application should be proportionate to the objective and nature of the engagement. The standard should make clear that inquiry and analytical procedures may provide sufficient appropriate evidence in a review engagement, unlike in an audit where more extensive procedures may be necessary.

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 comments below**

Detailed comments (if any):

Accountancy Europe believes that the Introduction section provides a generally clear description of the nature and purpose of an interim review engagement. However, we encourage the IAASB to further explain the relationship between an interim review engagement and the audit of the annual financial statements.

Several aspects of the proposed standard rely on the auditor's existing knowledge obtained through the annual audit engagement. Further explanation of how the two engagements interrelate and how knowledge from the audit is expected to be leveraged in the interim review would help users and practitioners better understand the nature of the engagement and the rationale for the work effort required.

We also encourage the IAASB to emphasise more clearly that an interim review is a limited assurance engagement and how it differs from a reasonable assurance audit. This distinction is fundamental to understanding the objective, scope and work effort of the engagement and should remain clear throughout the standard.

> 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: **Neither yes/no, but see comments below**

Detailed comments (if any):

We consider that the definition of "review procedures" correctly reflects the intention that an interim review engagement consists primarily of inquiry and analytical procedures and that other review procedures performed for the purposes of the review are also "review procedures".

The definition of review procedures in ED-2410.13(i) clearly states that review procedures are "the procedures, primarily inquiries and analytical procedures…" and there are several references in the application material making this clear, in addition to the statement included in the assurance report.

We are concerned that the definition is not consistently applied later on in the ED, which suggests that the standard is drifting towards more other review procedures rather than remaining with primarily inquiry and analytical procedures. Paragraph 44, for instance refers to "…inquiries, analytical procedures and other review procedures". This suggests that "other review procedures" are just as prevalent as each of inquiries and analytical procedures in a review engagement, which undermines the premise that review engagements consist primarily of inquiries and analytical review procedures. It would be more consistent and appropriate if paragraph 44 were simply to refer to "…review procedures" as a defined term.

Similarly, in paragraph A82 the reference to "… procedures other than inquiries, analytical procedures, and the procedures specifically required by this ISRE…" would be simpler and more consistent, as well as more appropriate if it referred to "…review procedures".

In A102 the bullet "Reading correspondence, if any, with the relevant licensing or regulatory authorities" is not a typical review procedure. We suggest "inquiring about issues with relevant licensing and regulatory authorities", instead.

The examples in A112 also appear to go beyond normal review procedures and would only come into play when the auditor believes that the financial information may be materially misstated and the "deep dive" applies due to (for the first example) the auditor having indications that the intent and ability of the party may not be given, and (for the second example) the auditor having indications that the calculation is not accurate or not applied in accordance with the assumptions and methods selected. The procedures could be better provided as examples of procedures that would apply in the "deep dive" in relation to going concern matters as application material to paragraph 70.

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: **No, with comments below**

Detailed comments (if any):

Accountancy Europe does not believe this is sufficiently clear. We encourage the IAASB to explain more explicitly how knowledge and understanding obtained from previous and ongoing audit engagements are expected to be leveraged in an interim review engagement.

The proposed standard would benefit from a clearer explanation of the relationship between the interim review engagement and the audit of the annual financial statements, including how the auditor's existing knowledge of the entity contributes to the planning and performance of the review. This would better reflect the nature of recurring engagements and help avoid unnecessary duplication of work.

Clarifying this linkage would also help reinforce the distinction between a limited assurance review engagement and an audit and explain the different work effort involved in recurring and first-time engagements.

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 comments below**

Detailed comments (if any):

Accountancy Europe agrees with the requirement for the auditor to determine materiality for the interim review engagement and with the related application material describing the relevant principles.

The notion of materiality is highly important in determining the nature and extent of procedures performed and in evaluating identified misstatements. We suggest that the evaluation requirements and related application material more clearly refer back to the materiality determined during planning.

Such clarification would help ensure consistency between the planning and evaluation phases of the review engagement and support the appropriate exercise of professional judgment.

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 no further comments)**

Detailed comments (if any):

Click or tap here to enter text.

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 comments below**

Detailed comments (if any):

Accountancy Europe agrees that the proposed requirements addressing group interim review engagements are generally appropriate.

However, we encourage the IAASB to strengthen the requirements relating to communication between the group auditor and component auditors by placing greater emphasis on two-way communication. While the proposed requirements address communications from the group auditor to component auditors, they do not explicitly require the group auditor to inquire whether component auditors are aware of any matters that may be relevant to the interim review engagement.

We suggest including a requirement, or related application material, that emphasises the importance of obtaining relevant information from component auditors. Such two-way communication would help ensure that relevant matters identified at component level are appropriately considered by the group auditor.

At the same time, the communication requirements should remain proportionate and take into account the short timeframe typically available for interim reporting. Overly extensive communication requirements could unintentionally delay the completion of the interim review and the timely reporting of interim financial information to users.

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: **Disagree, with comments below**

Detailed comments (if any):

We believe the standard should provide greater clarity on when further procedures are required and how their nature and extent should be determined, taking into account the auditor's existing knowledge from the annual audit. In particular, heightened fraud or NOCLAR risks identified during the audit should inform the interim review procedures.

However, the effort to identify fraud or NOCLAR in an interim review should remain proportionate to the nature of a limited assurance engagement and should be clearly distinguished from the work effort required in an audit. The standard should be more clearly distinguish between the normal review procedures and the further procedures required when a matter comes to the auditor's attention. Once fraud or NOCLAR has been identified, however, the auditor's response and communication in relation to the identified matter should not necessarily differ from those in an audit.

We also question the need to repeat certain fraud and NOCLAR requirements already applicable to the auditor through ISA 240 and, where relevant, the IESBA Code. Given that ISRE 2410 is performed by the auditor of the annual financial statements, the standard should instead clarify how these existing responsibilities apply in the context of the limited assurance interim review. This would help maintain proportionality and avoid creating an expectation that the work effort to identify fraud or NOCLAR in an interim review is equivalent to that of an audit.

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: **<u>Disagree, with comments below</u>**

Detailed comments (if any):

Accountancy Europe recognises that it is appropriate for ED-2410 to address the auditor's responsibilities relating to going concern in an interim review engagement. However, we do not believe that the proposed requirements are, in all respects, appropriate and proportionate to the circumstances of a limited assurance interim review engagement. We therefore encourage the IAASB to reconsider those requirements that may result in work effort approaching that of an audit.

We also encourage the IAASB to further explain the relationship between the auditor's responsibilities in the interim review engagement and those arising from the audit of the annual financial statements. Given that the engagement is performed by the auditor of the entity's annual financial statements, greater clarity on how the auditor's existing knowledge and responsibilities are expected to be leveraged would be helpful.

More generally, the cumulative effect of the proposed requirements should be carefully considered to ensure that the work effort remains consistent with the objective of providing limited assurance while continuing to serve the needs of users of interim financial information. As we note below in Question 13, we are not convinced that a separate section is justified. If the board determines it should remain, the standard and the auditor's interim review report should at least make clear that the procedures performed in relation to going concern in an interim review are less extensive than those performed in an audit and should not create the impression that a higher level of assurance is being provided in relation to going concern.

With regard to the conclusions relating to going concern, we propose alternative wording based on ISRE (UK) 2410 (Revised), Appendix 4 “Examples of Review Reports on Interim Financial Information”:

“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.”

We believe that this wording more clearly distinguishes the level of work effort in an interim review from that of an audit and appropriately reflects management’s responsibility in relation to the identification of material uncertainties related to going concern.

We also encourage the IAASB to consider whether the proposed going concern requirements are appropriately aligned with the underlying interim financial reporting frameworks and the related reporting obligations applicable to management. As a general principle, the auditor’s review procedures should be linked to information that management is required to prepare and report under the applicable reporting framework. In this respect, it should be acknowledged that in many financial reporting frameworks (including IFRS), there are no or very limited going concern reporting obligations for companies.

Finally, we question the requirement in paragraph 109 to follow up on material uncertainties identified in a previous audit or interim review. This appears to go beyond the corresponding requirements applicable in an audit and may result in a disproportionate work effort in the context of a limited assurance engagement. We therefore recommend that the IAASB reconsider this requirement.

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):

While we support greater transparency regarding going concern matters, we are concerned that introducing a separate Going Concern section could bring the interim review report closer to the reporting model used for audits.

The value of an engagement under ISRE 2410 lies in providing timely limited assurance on interim financial information. A dedicated Going Concern section could blur the distinction between limited and reasonable assurance engagements and may create expectations among users that go beyond the intended scope of an interim review. If a separate Going Concern section is introduced, it should therefore be clearly differentiated from the equivalent section in an audit report and should make clear that the review procedures performed in relation to going concern are less extensive than those performed in an audit.

We therefore encourage the IAASB to consider whether a separate Going Concern section is necessary and, if so, how it could be designed to enhance transparency while preserving the distinct nature and scope of an interim review engagement. In this regard, we refer to our response to Question 12 and our proposed alternative wording based on ISRE (UK) 2410 (Revised), which more clearly reflects the limited assurance nature of the engagement and management's responsibility in relation to material uncertainties related to going concern.

We also encourage the IAASB to consider the interaction between the proposed reporting requirements and the applicable financial reporting framework. In particular, there may be circumstances where the auditor is required to report explicitly on going concern in the interim review report while the applicable financial reporting framework does not impose corresponding requirements on management in relation to interim financial information.

If a separate Going Concern section is introduced in ISRE 2410, corresponding conforming amendments should also be considered for ISRE 2400 to ensure consistency between the two standards.

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):

As explained in our response to Question 13, we have concerns regarding the introduction of a separate Going Concern section in the interim review report. Should the IAASB decide to retain this proposal, we do not support the proposed wording for the required statements on the use of the going concern basis of accounting and the existence of any material uncertainty.

Auditors do not perform a full going concern assessment in accordance with ISA 570 in an interim review engagement. Presenting going concern matters in a separate section of the interim review report could nevertheless give users the impression that such an assessment has been performed, potentially creating expectations that go beyond the scope of an ISRE 2410 engagement. It is therefore important that the wording makes clear that the review procedures performed in relation to going concern are less extensive than those performed in an audit.

As explained in our response to Question 12, we propose alternative wording based on ISRE (UK) 2410 (Revised), Appendix 4.

(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):

We have not identified additional frequently encountered scenarios that should be addressed in ED-2410. However, we have concerns regarding the scenario addressed in paragraph 109, which requires the auditor to follow up material uncertainties related to going concern identified in a previous audit or interim review.

As noted in our response to Question 12, this appears to go beyond the corresponding requirements applicable in an audit, as ISA 570 does not contain an equivalent explicit requirement to follow up a material uncertainty solely because it was identified in a previous period. We therefore encourage the IAASB to reconsider whether this requirement is necessary and proportionate in the context of limited assurance engagement.

(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: **Disagree, with comments below**

Detailed comments (if any):

We do not support the proposed requirement to include a reference to a going concern "close call" in the interim review report. It is difficult to see how an auditor could conclude that such a matter is fundamental to users' understanding without performing a more extensive going concern assessment akin to ISA 570, which would significantly increase the work effort and cost of a limited assurance engagement.

We are also concerned that this proposal may blur the respective responsibilities of management and the auditor, particularly where the auditor comments on matters that management is not required to disclose. More broadly, elevating going concern above other matters in the interim review report risks creating an expectation gap by bringing the reporting model closer to that of an audit.

Any reporting on going concern in an interim review should clearly reflect that the procedures performed, and consequently the level of assurance obtained, are less extensive than in an audit.

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 no further comments)**

Detailed comments (if any):

Click or tap here to enter text.

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: **No other matters to raise**

Detailed comments (if any):

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 no further comments)**

Detailed comments (if any):

Click or tap here to enter text.

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 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 comments below**

Detailed comments (if any):

Accountancy Europe has not identified specific issues in practice that would require clarification of the application of Section 405 in the context of group review engagements. Accordingly, we do not currently see a need for amendments to the IESBA Code. However, if implementation issues would emerge, non-authoritative guidance may be helpful.

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 comments below**

Detailed comments (if any):

Accountancy Europe has not identified specific issues in practice that would require clarification of the application of Section 405 in the context of group review engagements. Accordingly, we do not currently see a need for amendments to the IESBA Code. However, if implementation issues emerge, non-authoritative guidance may be helpful.

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.