ED-2410 RESPONSE FORM

May 2026

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)	Chartered Accountants Ireland
Name(s) of person(s) responsible for this submission (or leave blank if the same as above)	Orlena Everard
Name(s) of contact(s) for this submission (or leave blank if the same as above)	
E-mail address(es) of contact(s)	orlena.everard@charteredaccountants.ie
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: **<u>Agree (with no further comments)</u>**

Detailed comments (if any):

Click or tap here to enter text.

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: **<u>Agree (with no further comments)</u>**

Detailed comments (if any):

Click or tap here to enter text.

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

Detailed comments (if any): The application guidance (A19) should be expanded to specifically consider professional scepticism of individuals that the engagement team is making inquiries of and that the engagement team members making the inquiries are appropriately experienced to do so.

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 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):

We recommend deleting paragraphs 69 and A119 of ED-2410. Given the requirement in paragraph 68 of ED-2410 and the absence of a corresponding requirement in ISA 600 similar to paragraph 69 of ED-2410, we do not believe paragraphs 69 or A119 of ED-2410 are necessary.

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 comments below**

Detailed comments (if any):

We generally agree that the proposed requirements relating to fraud and NOCLAR are appropriate and proportionate for an interim review engagement, recognizing the engagement is performed by the auditor of the annual financial statements.

However, we would like to suggest that the IAASB clarifies or revises paragraph 54 of ED-2410 so the "unless clearly inconsequential" wording applies to both paragraphs 54(a) and 54(b) of ED-2410 or remove "including about the entity's process to investigate the matter and any remedial actions taken" from paragraph 54(a) of ED-2410.

This is because, in practice, the auditor may be able to conclude at an early stage that an item is clearly inconsequential and requiring follow-up inquiries in each such instance may be disproportionate for an interim review.

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: **Agree, with comments below**

Detailed comments (if any):

We agree that the work effort requirements related to going concern are appropriate and proportionate to the circumstances of an interim review engagement. However, we note the word 'evidence', which is used in several places in the basis for conclusion and going concern paragraphs in the interim review report, requires further clarification to improve transparency for users of the report. The term and use of the word 'evidence' could result in lack of clarity as it could be conveyed to incorrectly mean audit evidence, which in the case of interim reviews is not relevant. To ensure there is no confusion by users of the interim review report, we recommend that the report includes the following wording 'based on review procedures performed' rather than 'based on the evidence obtained' throughout the basis for conclusion and the going concern paragraphs.

Please refer to detailed comments included in our response to question 14 below regarding additional wording clarification needed around the use of the word 'evidence' in the interim review report.

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: **Agree, with comments below**

Detailed comments (if any):

We agree with the proposals to introduce a new separate section related to going concern in the auditor's interim review report. However, we do have a comment and recommendation regarding additional wording clarification needed around the use of the word 'evidence' in the interim review report. We note the word 'evidence', which is used in several places in the basis for conclusion and going concern paragraphs in the interim review report, requires further clarification to improve transparency for users of the report. The term and use of the word 'evidence' could result in lack of clarity as it could be conveyed to incorrectly mean audit evidence, which in the case of interim reviews is not relevant. To ensure there is no confusion by users of the interim review report, we recommend that the report includes the following wording 'based on review procedures performed' rather than 'based on the evidence obtained' throughout the basis for conclusion and the going concern paragraphs.

For further information, please refer to our response to question 14.

	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: **Agree, with comments below**

Detailed comments (if any):

We agree with the proposed required going concern statements for a limited assurance review. However, we do have a comment and recommendation regarding wording in the interim review report. We note the word 'evidence', which is used in several places in the basis for conclusion and going concern paragraphs in the interim review report, requires further clarification to improve transparency for users of the report. The term and use of the word 'evidence' could result in lack of clarity as it could be conveyed to incorrectly mean audit evidence, which in the case of interim reviews is not relevant. To ensure there is no confusion by users of the interim review report, we recommend that the report includes the following wording 'based on review procedures performed' rather than 'based on the evidence obtained' throughout the basis for conclusion and the going concern paragraphs.

For further information, please refer to our response to question 14.

In addition, we do have concerns that the statements do not adequately address a situation where it is a first-time interim review engagement and the practitioner was not the auditor in the prior year. We suggest further clarity is added to the standard and the application material to support practitioners in the case of a first-time interim review engagement. We also recommend that Illustration 1 in Appendix 2 is amended to remove the first paragraph in its entirety. Please see our response in 13 (b).

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

Detailed comments (if any):

The current scenarios do not deal with the situation where it is a first-time interim review engagement, and the practitioner was not the auditor in the prior year. We suggest the standard and the application material should include guidance to cover this scenario. For further details, please also refer to comments included for our response to question 13(a) above regarding first-time interim review engagements.

In addition, we do not agree with the inclusion of paragraph 109 (c) in ED-2410 referencing disclosures in the prior year financial statements. The events and conditions identified, and procedures performed during the interim review engagement should provide sufficient support for the interim review report without the need to reference related disclosures in the prior year financial statements and reference to the prior year auditor's report. We suggest paragraph 109 (c) is removed and that first paragraph of the 'Illustration 1' audit report in Appendix 2 of the ED is also removed, which references the prior year 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: **<u>Disagree, with comments below</u>**

Detailed comments (if any):

We do not agree with the requirement in paragraph 111 to include a reference to a going concern "close call" in the interim review report in a manner akin to an emphasis of matter paragraph. 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 similar to what is required per ISA 570, which would significantly increase the work effort and the cost of a limited assurance engagement.

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):

We do agree with the proposed new structure of the interim review report. However, we note the word 'evidence', which is used in several places in the basis for conclusion and going concern paragraphs in the interim review report, requires further clarification to improve transparency for users of the report. The term and use of the word 'evidence' could result in lack of clarity as it could be conveyed to incorrectly mean audit evidence, which in the case of interim reviews is not relevant.

To ensure there is no confusion by users of the interim review report, we recommend that the report includes the following wording 'based on review procedures performed' rather than 'based on the evidence obtained' throughout the basis for conclusion and the going concern paragraphs. This would require a change in three places in the interim review report wording including:

- **For the last sentence in the basis for conclusion paragraph**, we recommend this should read 'We believe that the review procedures performed are sufficient and appropriate to provide a basis for our conclusion'.
- **For the first going concern paragraph,** we recommend this should read 'Based on the review procedures performed, nothing has come to our attention…..'
- **In addition, for the second part of the going concern paragraph,** we recommend this should read 'Our statements are based on review procedures performed up to the date of our interim review report….'.

We recommend that the above wording is changed (where relevant) throughout the illustrative reports included in Appendix 1 of the ED-2410.

This would improve clarity for users of the interim review report to clearly convey that all work and evidence obtained is based on interim review procedures performed and that it is not related to audit evidence.

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 comments below**

Detailed comments (if any):

We agree with the IAASB determination that ED-2410 should be framework neutral.

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):

Agreeing the Terms of the Engagement:

We note that paragraphs 33-35 of ED-2410, which outline the requirements on 'agreeing the terms of the engagement' are silent in respect to going concern and the relevant management responsibilities in this regard. The changes being introduced regarding going concern are significant and therefore we believe that the requirements on engagement letters should include the requirement(s) and highlight the importance of obtaining agreement of management that they will conduct a going concern assessment. They should also confirm their responsibility for disclosing any material uncertainties relating to any events or conditions that may cast significant doubt upon the entity's ability to continue as a going concern, in making this assessment.

Other Information:

We recommend that a statement is added in the standard highlighting that the practitioner should consider the impact on the interim review report in cases where the practitioner becomes aware of a material misstatement in other information where management refuses to make an amendment. This would be in addition to considering the impact on the engagement (as currently noted in the ED-2410).

Therefore, we recommend that paragraph 88 in the ED-2410 is amended to include 'consideration of the impact on the interim review report'. This is to align with wording included in extant ISRE 2410 (paragraph 36).

In addition, we suggest that A136 in the application material is updated and that the following wording (per extant ISRE 2410) is added to enable practitioners to consider implications for the audit report in cases where other information is not corrected by management for material misstatements prior to taking other steps such as seeking legal advice:

'If an amendment is necessary in the other information and management refuses to make the amendment, the auditor considers including in the review report an additional paragraph describing the material inconsistency, or taking other actions, such as withholding the issuance of the review report or withdrawing from the engagement.'

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 response**

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: **Yes, with comments below**

Detailed comments (if any):

While Section 400.2 and the Glossary state that Part 4A of the Code applies to both audit and review engagements, Section 405 of the Code makes reference to group audits only. Therefore, if Part 4A of the Code is intended to also apply to group review engagements performed in accordance with ISRE 2410, clarification would be helpful.

We would suggest that the clarification be included within the Code:

- in the preamble to Section 405, to explicitly clarify the scope and terms to state that this Section equally applies to group review engagements performed in accordance with ISRE 2410.
- In addition, the 'Group Audit' related terms in the Glossary should also clarify the scope similar to 'Audit' related terms.

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.