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)	CPA Australia
Name(s) of person(s) responsible for this submission (or leave blank if the same as above)	Tiffany Tan Audit and Assurance Lead
Name(s) of contact(s) for this submission (or leave blank if the same as above)	
E-mail address(es) of contact(s)	tiffany.tan@cpaaustralia.com.au
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.	Asia Pacific
	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).	CPA Australia is one of the world's largest professional accounting bodies, with more than 176,000 members across over 100 countries and regions. Our membership spans the full breadth of the Australian and international economies, from large multinational organisations and publicly listed entities to small-and-medium enterprises, government and not-for-profit entities. We represent members working in public practice, including in audit and assurance, as well as in industry and commerce, government and academia. This diverse membership base, including practitioners who perform interim review engagements under ASRE 2410 *Review of a Financial Report Performed by the Independent Auditor of the Entity* (ASRE 2410) in Australia and NZ SRE 2410 *Review of a Financial Report Performed by the Independent Auditor of the Entity* (NZ SRE 2410) in New Zealand, informs our comments on ED-2410.

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:

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):

We support the International Auditing and Assurance Standards Board (IAASB)'s objective of modernising ISRE 2410 *Review of Interim Financial Information Performed by the Independent Auditor of the Entity's Annual Financial Statements* (ISRE 2410) and enhancing the consistency, quality and transparency of interim review engagements. However, we are concerned that certain requirements and reporting proposals, particularly those relating to going concern, risk blurring the distinction between a limited assurance review engagement and a reasonable assurance audit engagement. See our response to Question 12 for our detailed comments on this issue.

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 support the IAASB's efforts to strengthen key public interest areas within interim review engagements. Given the exposure draft for ISRE 2410 (ED-2410) is more closely aligned with the extant Australian and New Zealand interim review standards, many of the proposals are broadly consistent with current practice in Australia and New Zealand.

However, as outlined throughout our responses to the questions below, we have concerns that certain proposals may not be appropriately calibrated to a limited assurance engagement and risk blurring the distinction between a review engagement and a reasonable assurance audit engagement.

We therefore encourage the IAASB to further refine these areas and more clearly articulate within the standard itself the intended work effort and reporting outcomes. Doing so would help preserve the distinction between limited and reasonable assurance engagements and support more consistent application in practice.

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 comments below**

Detailed comments (if any):

We agree the Introduction is generally clear.

However, we recommend further clarifications:

- *Clarifying the intended engagement context:* We suggest additional paragraph be added to 'An Interim Review Engagement' section to more clearly acknowledge that ISRE 2410 is principally designed for circumstances where the auditor performing the interim review is also the auditor of the entity's annual financial statements and therefore will ordinarily have a foundational understanding of the entity and its environment. In limited circumstances, however, the interim review may be the first engagement performed following appointment as auditor. To improve clarity, we recommend including a cross-reference to the guidance on first-time interim review engagements in paragraphs A77–A79, making it clear that the standard remains applicable in those limited circumstances and directing practitioners to the relevant application paragraphs.
- *Auditor-as-practitioner lens:* Consistently, paragraphs 8–9 could more clearly convey that the auditor ordinarily commences the interim review engagement with substantial knowledge obtained through their role as the auditor of the entity's annual financial statements. The auditor's existing knowledge of the entity, built through the annual audit, is a feature of an ISRE 2410 engagement that the auditor draws on and updates when designing review procedures. The lighter procedures required at interim dates, compared to an audit-level risk assessment, primarily reflect the limited assurance objective of a review engagement rather than being solely attributable to this existing knowledge.

Clarifying these points would help mitigate the risk that the ED-2410 is interpreted as requiring a standalone risk assessment process for every interim review engagement.

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 comments below**

Detailed comments (if any):

We agree that inquiries, analytical procedures and any other procedures performed for the purpose of the engagement should all be described as "review procedures". The framing is helpful and consistent with the International Framework for Assurance Engagements.

To reinforce the review/audit distinction in ED-2410, we recommend:

- *Paragraph 44:* To expressly confirm that inquiries and analytical procedures are the primary review procedures and that other review procedures are performed only when, in the auditor's professional judgment, they are necessary to obtain evidence for the review conclusion linking to paragraphs 70 and 90.
- *"Areas" of the interim financial information:* Although the IAASB has concluded that it is not necessary to define or describe the tern 'areas', paragraph 43 could benefit from a short example illustrating that "areas" is a flexible concept and not equivalent to "classes of transactions, account balances and disclosures" in the ISAs.
- *Application paragraphs A80-A98:* The guidance provided in the application paragraphs on inquiries and analytical procedures should be labelled clearly so that they are not read as a minimum baseline that is then expanded by firm methodologies into audit-equivalent effort. For example, paragraph A90 appears to draw heavily on concepts used in substantive analytical procedures in audit engagement. While the paragraph appropriately notes that expectations in an interim review are ordinarily less precise than those developed for audit purposes, the overall drafting risks being perceived as an "audit-lite" approach.

We recommend further clarifying that the objective remains a limited assurance engagement and that audit-level expectations are not intended.

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 comments below**

Detailed comments (if any):

The auditor-as-practitioner lens is one of the defining features of an ISRE 2410 engagement. In its current form, however, the leverage principle is largely explained in the Explanatory Memorandum (EM) rather than being clearly stated in the standard or the ED-2410 itself. Elevating and consolidating this principle within ED-2410 and cross-referring to it from the key procedural areas would materially improve clarity, promote consistent application, and reinforce that the interim review is a limited assurance engagement that draws upon, rather than duplicates, work performed for the annual audit. This is consistence with our response to Question 4 and Question 5 above.

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 comments below**

Detailed comments (if any):

We agree that the considerations for first-time interim review engagements are generally appropriate and proportionate, especially as articulated in paragraphs 48-52 of the EM. We also support the IAASB's decision to address these circumstances through targeted application material rather than introducing separate requirements specific to first-time engagements.

However, the EM does not form part of ISRE 2410 when issued. Where important operating concept such as “an auditor may determine that it is not necessary to perform the same procedures that an auditor would perform in an audit in accordance with the ISAs" (EM paragraph 49) are left in the EM rather than reflected in the standard, this concept may not be applied consistently in practice.

For first-time interim review engagements, this is an important reminder because a practitioner without prior annual audit knowledge is the most exposed to defaulting to an audit-level approach. Bringing the key concepts of EM paragraph 49 into A77–A79 (and reinforcing the cross-references to A72 and A92) would materially reduce this risk without changing the intended substance of the review standard.

This also reinforce the importance of clarifying a review engagement context in the Introduction: An Interim Review Engagement section of ED-2410 and linking first-time interim review engagements provisions in paragraphs A77–A79 as per our response to Question 4.

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 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 comments below**

Detailed comments (if any):

The enhancements to fraud and NOCLAR requirements are broadly appropriate and reflect existing practice under ASRE 2410 in Australia and NZ SRE 2410 in New Zealand. We support the more explicit inquiries, responses when fraud or NOCLAR is identified, and clearer communication expectations.

To avoid unintended audit-style expectations at the interim review engagement, we recommend:

- *Leverage principle:* As noted in our response to Question 6, ED-2410 should expressly acknowledge and consolidate the leverage principle so that fraud and NOCLAR procedures are clearly understood as building on the auditor's existing knowledge from the annual audit, rather than a fresh, standalone risk assessment at each interim date.
- *Paragraph 55 – reliability of written representations:* paragraph 55(b) states that the reliability of written representations "may be called into question" when fraud is identified. The application material paragraph A101 should clarify that this may not be the case in all circumstances and that the auditor should apply professional judgment consistent with the limited assurance nature of the engagement.

Absent a clear leverage principle, paragraphs 52–57 risk being read as requiring the auditor to run a standalone ISA 240 *The Auditor's Responsibilities Relating to Fraud in an Audit of a Financial Report* or ISA 250 *Consideration of Laws and Regulations in an Audit of a Financial Report*-style process at each interim date, a level of effort that may be disproportionate to a limited assurance engagement performed by the entity's annual auditor.

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>Neither agree/disagree, but see comments below</u>**

Detailed comments (if any):

We support the IAASB's objective of enhancing the auditor's responsibilities relating to going concern in an interim review engagement, recognising the public interest significance of going concern and the heightened stakeholder expectations that informed the development of ISA 570 *Going Concern* (ISA 570 (Revised 2024). We also acknowledge the IAASB's stated intention in the EM that the proposed requirements are intended to maintain proportionality and support a limited assurance conclusion rather than a reasonable assurance conclusion.

However, we are concerned that this intended calibration is not always evident in the requirements themselves. While the EM explains that paragraphs 58–65 are not intended to enable the auditor to conclude with a reasonable level of assurance on management's use of the going concern basis of accounting, several aspects of the proposed requirements closely mirror the structure and concepts of ISA 570 (Revised 2024), creating a risk that the work effort is interpreted and implemented in a manner more consistent with a reasonable assurance engagement.

In particular:

- *Misalignment between ED-2410 and the financial reporting framework (paragraphs 58–60):* We are concerned that the proposed requirements may place greater going concern responsibilities on the auditor than are reflected in the underlying financial reporting framework. First, IAS 34 *Interim Financial Reporting* (IAS 34) does not generally require explicit going concern disclosures in interim financial information unless relevant circumstances exist, yet the auditor may be required to obtain and evaluate information and communicate going concern-related conclusions in the interim review report even where management has made no corresponding disclosures. Secondly, IAS 1 *Presentation of Financial Statements* (IAS 1) paragraph 26 requires management to consider a period of at least twelve months from the end of the reporting period, whereas ED-2410 requires the auditor to request an assessment covering at least twelve months from the date of approval of the interim financial information. These differences create a mismatch between management's reporting responsibilities and the auditor's review responsibilities, contributing to increased work effort and a potential expectations gap.
- *Additional procedures:* Paragraph 63(c) refers to "other procedures" without clearly indicating that these are other *review* procedures. We recommend the word 'review' be included in paragraph 63(c). If "other procedures" is intended to go beyond "other review procedures", then we recommend clarifying that such "other procedures" are performed only when matters come to the auditor's attention through

inquiries, analytical procedures or other review procedures, and are not intended to introduce audit-style corroborative testing by default.

- *Adequacy of disclosures (paragraph 65):* Consistent with our comments above regarding the potential misalignment between ED-2410 and the underlying financial reporting framework, we support consideration of the adequacy of going concern disclosures but believe the standard should more clearly acknowledge that this evaluation is undertaken in the context of a limited assurance engagement and the disclosures required by the applicable financial reporting framework. Otherwise, there is a risk that auditors may be expected to assess disclosures using an approach more closely aligned with ISA 570 (Revised 2024) than is appropriate for an interim review engagement.

More broadly, we recommend ED-2410 more clearly articulate the intended calibration of the auditor's work effort relating to going concern. Consistent with the EM, the objective of the auditor's procedures should be to determine whether anything has come to the auditor's attention that affects the auditor's judgments regarding going concern, rather than to conclude with a reasonable level of assurance on management's assessment. This could be achieved by reinforcing, in both the requirements and application material, that inquiries and analytical procedures remain the primary review procedures, and that additional review procedures are only performed when matters come to the auditor's attention through the review. In this regard, the IAASB should confirm that inquiry of management's assessment is ordinarily sufficient where such an assessment has been performed, with paragraph 70 providing the escalation pathway where concerns arise. Such clarification would better align the requirements with the limited assurance nature of an interim review engagement and reinforce the distinction from an audit.

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

Detailed comments (if any):

We do not support the introduction of a separate going concern section in all interim review reports. While we acknowledge the IAASB's objective of enhancing transparency in response to heightened stakeholder expectations regarding going concern, we are concerned that the proposed reporting model adopts significant elements of the reporting architecture introduced in ISA 570 (Revised 2024), despite the fundamentally different nature of an interim review engagement.

The EM explains that the work effort in paragraphs 58–65 is intended to support the proposed going concern statements in the interim review report. In our view, this illustrates a key concern with the proposals, that is, the reporting requirements appear to be driving the work effort rather than the work effort being calibrated to the nature of a limited assurance engagement.

Our concerns regarding the proposed reporting model are also linked to the misalignment issues identified in our response to Question 12. The proposed reporting requirements build on that expanded work effort by requiring the auditor to communicate explicit conclusions regarding going concern in the interim review report, increasing the risk that users perceive the auditor as providing assurance closer to an audit opinion than a limited assurance review conclusion.

An interim review conclusion and an audit opinion are fundamentally different. An audit opinion is supported by procedures designed to obtain reasonable assurance, whereas an interim review conclusion is based primarily on inquiries and analytical procedures and is expressed in the form of whether anything has come to the auditor's attention. Although the proposed wording has been adapted for a limited assurance engagement, requiring explicit going concern statements in all interim review reports risks blurring this distinction and may create an expectation among users that the auditor has performed work more akin to an audit.

A further concern is that many users of financial reports do not have a detailed understanding of the distinction between a review conclusion and an audit opinion. For many users, particularly retail investors and other less sophisticated users, a report issued by an auditor is simply perceived as an "auditor's report". As a result, aligning the structure and content of the interim review report too closely with the reporting model in ISA 570 (Revised 2024) risks creating an expectation that a similar level of work effort and assurance has been performed especially on going concern. In our view, the reporting model should help users understand the distinction between limited assurance and reasonable assurance engagements, rather than further blur that distinction.

We therefore encourage the IAASB to reconsider whether the proposed reporting model appropriately reflects the nature and objective of an interim review engagement, particularly in circumstances where no events or conditions have been identified that may cast significant doubt on the entity's ability to continue as a going concern.

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):

We do not support the proposed requirement to include explicit statements regarding management's use of the going concern basis of accounting in all interim review reports (paragraph 108), particularly where no events or conditions have been identified that may cast significant doubt on the entity's ability to continue as a going concern and no material uncertainty exists.

This is compounded by the financial reporting framework misalignment identified in our response to Question 12, where management is not required to provide corresponding going concern disclosures, users may struggle to understand why the auditor must make explicit statements on the going concern basis of accounting and no material uncertainty exists. This information mismatch may widen the expectations gap regarding the level of assurance provided by the review engagement.

More fundamentally, we question the appropriateness of seeking to align the reporting model for an interim review engagement with that of an audit engagement. The distinction between a review conclusion and an audit opinion is not merely a matter of wording; it reflects fundamentally different objectives, work effort and levels of assurance. In our view, the reporting model should reinforce those differences for users rather than replicate audit-style reporting outcomes in a limited assurance context.

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

Detailed comments (if any):

Click or tap here to enter text.

(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 comments below**

Detailed comments (if any):

We support the objective of paragraph 111 in drawing users' attention to going concern matters that are fundamental to understanding the interim financial information, even where it relates to circumstances other than a material uncertainty.

However, we consider it important that paragraph 111 remains a narrowly applied communication mechanism and does not evolve into an interim-review equivalent of a Key Audit Matter (KAM) regime. The application material should clearly emphasise that the auditor's determination is made in the context of a limited assurance engagement and does not involve the same depth of work effort, evaluation or reporting considerations that apply in an audit engagement.

We also encourage the IAASB to ensure that the threshold for inclusion remains appropriately high. Excessive use of paragraph 111 may dilute the significance of communications relating to genuine going concern concerns and further blur the distinction between an interim review report and an auditor's report issued in accordance with ISA 700 *Forming an Opinion and Reporting on a Financial Report* (ISA 700) and ISA 570 (Revised 2024).

Consistent with our comments in Questions 12 and 13(a), any additional going concern communication should be carefully calibrated so that it does not further blur the distinction between a limited assurance review conclusion and a reasonable assurance audit opinion.

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

Detailed comments (if any):

We support the IAASB's objective of modernising the auditor's interim review report and enhancing transparency for users. Many aspects of the proposed report structure represent a positive improvement over extant ISRE 2410 and may assist in improving consistency and understandability across jurisdictions.

However, as discussed in our responses to Questions 12 and 13, we are particularly concerned by the proposed going concern reporting requirements especially in circumstances where no events or conditions have been identified that may cast significant doubt on the entity's ability to continue as a going concern and no material uncertainty exists in all interim review reports (paragraph 108). We do not support the inclusion of a separate going concern section containing affirmative statements regarding management's use of the going concern basis of accounting and whether a material uncertainty exists in all interim review reports. In our view, these reporting outcomes are more closely aligned to the objectives of ISA 570 (Revised 2024) and a reasonable assurance engagement than to a limited assurance review engagement.

We therefore encourage the IAASB to reconsider whether all aspects of the proposed reporting model are necessary for a limited assurance engagement and whether some elements have been overly influenced by developments in auditor reporting for reasonable assurance engagements. In our view, the report should assist users in understanding the unique nature of an interim review engagement and the limited assurance conclusion being expressed, rather than replicate the reporting architecture of an audit engagement.

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):

More broadly, our responses to Questions 12, 13 and 14 highlight a recurring theme, that is, many users of assurance reports do not have a detailed understanding of the distinction between a limited assurance conclusion and a reasonable assurance opinion. While this issue is not unique to ED-2410, it is an important consideration when evaluating proposals that may align the structure, content and messaging of an interim review report more closely with that of an audit report.

In practice, many users focus on the fact that a report has been issued by an auditor rather than on the specific form of conclusion expressed. As a result, differences in the level of assurance, work effort and evidence obtained are not always well understood, particularly by less sophisticated users. This creates a risk that reporting models which closely resemble audit reporting may unintentionally widen the expectations gap.

We acknowledge that this is a broader issue than ED-2410 itself and cannot be resolved solely through changes to this standard. However, we encourage the IAASB to continue exploring ways to improve users' understanding of the distinction between limited assurance and reasonable assurance engagements through education, implementation support and stakeholder outreach.

This will become increasingly important as assurance engagements expand beyond traditional financial reporting into areas such as sustainability reporting, where limited assurance engagements are expected to become more prevalent. Promoting a clearer understanding of the different levels of assurance will help support informed decision-making by users and maintain confidence in assurance reporting more broadly.

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: **No, with comments below**

Detailed comments (if any):

We do not believe further clarification of Section 405 is required. In practice, firms apply the same ethical requirements, including independence and network firm considerations, in the same manner whether the engagement is a group interim review or a group audit. Since Part 4A of the Code applies to both engagement types unless otherwise stated, there is no divergence in how a firm identifies or addresses relevant ethical requirements across the two engagements. Introducing separate or engagement-specific guidance may therefore add complexity without a corresponding practical benefit.

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):

We do not believe further clarification is required. In our view, the application of the Code as described in EM paragraph 29 is clear. Ultimately, we do not expect any divergence in practice in how a firm would respond to identified or suspected non-compliance with laws and regulations, whether this comes to the auditor's attention in the context of an interim review engagement or an audit engagement. The auditor's response is driven by the underlying nature and circumstances of the non-compliance itself, rather than the type of engagement in which it is identified.

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.