



Our Ref.: C/AASC

Sent electronically through the IAASB Website (www.iaasb.org)

23 August 2023

International Auditing and Assurance Standards Board
529 Fifth Avenue, 6th Floor,
New York NY 10017
USA

Dear Sirs,

IAASB Exposure Draft, Proposed ISA 570 (Revised 202X), *Going Concern* and Proposed Conforming and Consequential Amendments to Other ISAs

The Hong Kong Institute of Certified Public Accountants (HKICPA) is the only statutory body in Hong Kong that sets auditing and assurance standards, ethical standards, financial reporting standards as well as sustainability disclosure standards for professional accountants in Hong Kong. We welcome the opportunity to provide our comments on the captioned IAASB Exposure Draft (ED or ED-570).

We fully support the IAASB's commitment to revising the standard so as to ensure it remains fit-for-purpose. We have observed that the proposed enhancements to the existing standard would promote consistent practices and behaviours, as well as facilitate effective responses to identified risks of material misstatement related to going concern.

However, we have concerns relating to the change in the commencement date of the twelve-month period of management's assessment of going concern, as well as the proposed explicit statements in the auditor's report to conclude on management's appropriateness of the use of the going concern basis of accounting. These proposals will create misalignment between the responsibilities of the preparers and auditors, leading to practical difficulties and unintended consequences. We have provided detailed explanations of our views on these matters in our responses to Q7 and Q13 in the attachment. We urge the IAASB to conduct further research and consider all potential consequences before moving forward with the proposals. Moreover, we believe that the IAASB should continue to collaborate with accounting standards setters, including the IASB, and other bodies that set the framework for financial reporting, and encourage them to include the equivalent requirement as preparers' responsibilities in their preparation of financial statements.

We also have concerns on the enhanced requirements for auditors to evaluate management's assessment of going concern in all circumstances, regardless of whether events or conditions have been identified that may cast significant doubt on the entity's ability to continue as a going concern. This appears to deviate from the risk-based approach of ISAs and could increase the auditor's work effort, even though the conclusion may be the same as what would have been determined under the extant standard.



Our responses to the specific questions are included in the attachment. We trust that our comments are of assistance to you. If you have any questions regarding the matters raised above, please contact Selene Ho, Deputy Director of the Standard Setting Department (selene@hki CPA.org.hk).

Yours faithfully,

Cecilia Kwei
Director, Standard Setting Department

Work undertaken by the HKICPA in forming its views

The HKICPA:

- (a) issued an Invitation to Comment on ED-570 on 27 April 2023 to members of the HKICPA and all other interested parties;
- (b) invited HKICPA members working in the auditing sector to participate in a Hong Kong specific online survey with yes/no questions on the attributes of the ED;
- (c) developed an introductory video to provide an overview of the proposed changes so as to promote the ED and encourage responses to the online survey;
- (d) sought input from the HKICPA's Small and Medium Practices Committee which comprises practitioners and technical experts from small and medium-sized practices in Hong Kong; and
- (e) developed its views through its Auditing and Assurance Standards Committee, having reflected on feedback obtained from stakeholders. The Committee comprises of academics, regulators and practitioners from small, medium and large accounting firms.

This comment letter outlines the HKICPA's views and summarizes our stakeholders' primary comments on the ED.

Detailed comments on ED-570

Overall Questions

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

On balance, we agree that the proposals in ED-570 are responsive to the public interest. However, we have an impression that many of the proposed changes apply a "one size fits all" approach, which may not be efficient and effective, especially in the context of auditing private entities.

In our responses to Q7 and Q14 below, we suggest a differential approach for listed entities and other entities in (i) the commencement date of the twelve-month period of management's assessment of going concern; and (ii) the disclosure of the auditor's work relating to going concern, recognizing that their resources, management's abilities and potential users of the financial statements and the auditor's report may differ significantly for the different types of entity.

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

We agree that the proposals will enhance and strengthen the auditor’s judgments and work relating to going concern in an audit of financial statements. However, we have concerns on some of the areas, such as the proposed timeline over which the going concern assessment is made and the use of explicit statements regarding going concern in the auditor’s report. They are discussed more fully in our responses to Q7 and Q13 below.

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

Please refer to our responses to Q1 above.

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

We agree that ED-570 appropriately reinforces the auditor’s application of professional skepticism in relation to going concern.

Specific Questions

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

We support the IAASB’s decision to define the concept “Material Uncertainty (Related to Going Concern)” as it enhances understanding and drives consistency in practice. However, we note that the proposed definition does not define or describe the concept of “going concern”.

Going concern is a fundamental assumption in the preparation of financial statements and an accounting concept. While different financial reporting frameworks may use different terminologies to describe going concern, the underlying principles would be aligned. To facilitate understanding, we suggest that the IAASB develop application materials providing guidance on the concept of “going concern”, similar to how paragraphs A4 and A5 of ED-570 provide guidance to the terms “material uncertainty” and “may cast significant doubt”.

According to paragraph A5 of ED-570, “*may cast significant doubt is used in circumstances... that the entity will be unable to meet its obligations and continue its operations for the foreseeable future unless management takes remedial actions to mitigate the effects of these events or conditions.*” From our reading, the phrase “takes remedial actions” implies actions to be taken in the future and involves auditors evaluating management’s plans for future actions. Although paragraph A5 provides examples, ED-570 does not define the term “remedial action” nor provide context as to the timing of the “remedial action”. To improve clarity and ensure coherence of the standard, we suggest replacing “unless management takes remedial actions” in paragraph A5

with “unless management makes plans for future actions”. This would be consistent with the drafting and concept in paragraph 26.

We also recommend linking paragraph A5 with the requirements in paragraph 26 to emphasize the importance of evaluating management’s plans for future actions in determining whether there is significant doubt about the entity’s ability to continue as a going concern. This would provide useful clarification to the determination of “may cast significant doubt” and enhance the coherence of the standard.

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

We agree that ED-570 appropriately builds on the foundational requirements in ISA 315 (Revised 2019) in addressing risk assessment procedures and related activities, to enhance the robustness of the auditor’s procedures on the entity’s ability to continue as a going concern.

From a drafting perspective, we suggest that the understanding covered by paragraph 12(b) and (c) of ED-570 be specific to identifying events or conditions that may cast significant doubt on the entity’s ability to continue as a going concern. This would also ensure consistency with the drafting in paragraph 12(a).

We also encourage the IAASB to issue practical guidance to ED-570 to assist implementation in practice, which would include the application of ISA 315 (Revised 2019) in assessing the entity’s ability to continue as a going concern.

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

We support the spirit of the proposed changes which would enhance the robustness of the auditor’s evaluation of an entity’s going concern. However, we are mindful that a misalignment between ED-570 and the financial reporting framework (such as IAS 1, *Presentation of Financial Statements*) would create potential difficulties in practice.

In Hong Kong, an audit of financial statements is a statutory requirement for all companies (including private companies), except for dormant companies. Management are required to prepare audited financial statements within three to nine months after the end of the reporting period, while some companies may take a longer time in certain circumstances. Accordingly, the proposal in ED-570 would require management to provide their going concern assessment to auditors covering up to almost 24 months after the end of the reporting period. For private companies, the approval date of financial statements is often subject to change and may not be known upfront with certainty. Any deferral of the approval date would require the auditor to

reassess management's going concern assessment taking into account the deferred period, often within a tight deadline, which could create confusion and involve additional work effort out of proportion to the benefit that may be achieved.

Paragraph 38 of the explanatory memorandum states that some jurisdictions have amended their national equivalent auditing standards to require auditors to evaluate an entity's going concern assessment commencing from the approval date of the financial statements. We note that some of these jurisdictions also require preparers to evaluate the entity's going concern using the same timeframe. However, in Hong Kong, preparers are not subject to additional requirements on the timeframe used in assessing the entity's going concern. While auditors could request management to extend the period used in their going concern assessment and include a clause in the engagement letter on the period covered by management's going concern assessment, we are mindful that this is not a necessary pre-condition for an audit engagement and preparers are not subject to ISAs. In practice, most private entities, especially the small and medium-sized ones, apply the minimum prescribed requirement in their preparation of financial statements, which is to assess the entity's ability to continue as a going concern for the twelve months from the end of the reporting period (paragraph 12 of IAS 1).

Some of our stakeholders consider that the "flexibility" provided in paragraph 22 of ED-570 implies that the IAASB has recognized the potential practical difficulties in implementing the proposed timeline over which the auditors' going concern assessment is made. We believe it would not be meaningful and efficient to impose a requirement that cannot be widely applied in practice. Therefore, we urge the IAASB to conduct research on whether jurisdictions that currently use or intend to use ISAs¹ have imposed national requirements for preparers to commence their going concern assessments for at least twelve months from the financial statements' approval date. Based on the findings, we request the IAASB to reconsider the proposal.

From a drafting perspective, we consider paragraph 22 of ED-570 is unclear regarding the intended flexibility to enable the auditor to obtain sufficient appropriate audit evidence and issue an unmodified opinion when management is able to provide additional information to support the appropriateness of their use of the going concern basis of accounting, even when the period used in management's assessment is less than twelve months from the date of approval of the financial statements. Therefore, we recommend that the IAASB revisit the drafting of paragraph 22 and A43 to A45 by incorporating the guidance outlined in paragraphs 42 and 43 of the explanatory memorandum. This will ensure that the intended flexibility is clearly set out in the standard.

In the event the IAASB does not plan to make a corresponding change with respect to the proposed commencement date requirement to the stand-alone standard for audits of less complex entities (ISA for LCE), there will be differential treatments under the two standards, despite that both standards will enable auditors to provide reasonable assurance. This could result in non-listed entities that apply ISA for LCE or ISA 570 (Revised 202X) being treated differently in their audits.

In order to minimise the potential impact of the proposal to non-listed entities, we would suggest a differential approach to apply the requirement to listed entities only, as they are of higher public

¹ According to the IAASB [Public Report 2021](#), as of December 2021, 130 jurisdictions worldwide used or were committed to using the ISAs.



interest concern and risk profile. In general, listed companies are subject to a tightened reporting timetable compared with non-listed entities. For instance, companies listed on The Stock Exchange of Hong Kong are required to publish their audited financial statements within three months after the end of the financial period. The stringent reporting timetable of listed companies would enable auditors to determine the period to be covered by their going concern assessment with greater certainty at the earlier stages of the audit and liaise with management upfront. Also, due to the complexity of their operations and financing arrangements, preparers of listed entities are likely to prepare their financial budgets or forecasts pertaining to a longer period than the minimum required by the financial reporting standards. This longer period would likely coincide with the period proposed in paragraph 22 of ED-570 for the purposes of the auditors' going concern evaluation.

We also encourage the IAASB to continue engaging with the IASB to ensure consistency between the financial reporting and auditing standards, including the commencement date of the entity's going concern assessment from the preparer and auditor perspective. If the inconsistency is not addressed, the IAASB should consider other actions such as reconsidering the commencement date in the context of ED-570 and providing guidance to address the practical difficulties that may be encountered in practice.

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

The risk-based approach of ISAs recognizes a spectrum of risk for auditors to design and perform appropriate audit procedures specific to the risk rather than its categorization. For example, paragraph 21 of ISA 330 requires greater auditor effort for significant risks, while paragraph 28 of ISA 600 (Revised) requires the group engagement partner to specifically consider areas of higher assessed risks of material misstatement, significant risks, and areas involving significant judgment.

When there is no material uncertainty or significant doubt on the entity's ability to continue as a going concern, it is unclear what objective is to be achieved by performing in-depth procedures to evaluate management's assessment of going concern. Applying the enhanced approach in these circumstances would be no different from performing a no-purpose test, which is not consistent with the risk-based approach of an audit engagement. It would also increase the auditor's work effort, even though the conclusion may be the same as what would have been determined under the extant standard.

Accordingly, we do not support the enhanced approach as it appears excessive. Instead, we suggest that the IAASB retain the current approach, where auditors design and perform audit procedures to evaluate management's assessment of going concern only when they identify events or conditions that may cast significant doubt on the entity's ability to continue as a going concern, which is consistent with the risk-based approach.



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

We agree that ED-570 appropriately incorporates the concepts from ISA 540 (Revised) for the auditor’s evaluation of the method, assumptions, and data used in management’s assessment of going concern.

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

It is unclear what extent of procedures is required to evaluate the intent and ability of third parties or related parties to provide the necessary financial support. For example, it is unclear whether guarantees or letters of support with terms such as “unconditional support” or “fully supportive” of the entity’s operations and financial obligations would be sufficient and appropriate to establish the intent of their support. Additionally, it is unclear whether the auditor should assess the going concern of those parties that are entities to establish their ability to support the going concern of the auditee.

We are also mindful that, due to confidentiality or other legitimate reasons, third parties or owner-managers (who may be natural persons) may not provide their financial information or answer the auditor’s inquiries as suggested in paragraph A53 of ED-570. Moreover, it is unclear how far auditors should go in verifying a third party’s intent and ability to support the entity, such as whether due diligence exercises or anti-money laundering related procedures should be conducted to verify the validity of their sources of financial support. Therefore, we urge the IAASB to clarify the extent of procedures required and provide guidance for auditors to address the potential uncertainties and practical difficulties that may arise.

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

While the proposal would enhance two-way communication, we have concerns regarding the requirement in paragraph 39(c) for auditors to disclose to TCWG the audit procedures they have performed in relation to the entity’s ability to continue as a going concern. The nature and extent of audit procedures are determined by the professional judgment of auditors and are responsive to the assessed risk of material misstatement. Therefore, it is unclear what objective or benefits are to be achieved by communicating the audit procedures performed to TCWG.

Under paragraph 16(a) of ISA 260, auditors are required to communicate to TCWG their views about significant qualitative aspects of the entity’s accounting practices, including accounting policies, accounting estimates and financial statement disclosures. Meanwhile, the communication requirements in paragraph 38 of ISA 540 (Revised) which cover significant qualitative aspects of the entity’s accounting practices and significant deficiencies in internal

control are based on ISA 260. To ensure consistency across ISAs, we recommend that the IAASB revisit the proposed communication requirements in ED-570, particularly paragraph 39(c), by considering the requirements in ISA 260.

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

Auditors should comply with applicable laws or regulations. Accordingly, we support paragraph 40 of ED-570 to include a reference to applicable law or regulation for the auditor to report to an appropriate authority outside of the entity, as required by statute.

However, we have reservations about the reference to “relevant ethical requirements” in paragraph 40 of ED-570. Ethics requirements, such as the provisions of IESBA’s *International Code of Ethics for Professional Accountants (including International Independence Standards)* are principle-based and require the auditor’s professional judgment to determine whether a given circumstance should be escalated for reporting, and to whom the reporting should be made. Without clear guidelines, the inclusion of “relevant ethical requirements” in paragraph 40 of ED-570 would create confusion and uncertainty for auditors. For example, it is unclear whether a material uncertainty related to the entity’s going concern alone (which is not a non-compliance against laws or regulations) would trigger a reporting to an external party, and if so, who the external parties are, particularly when the entity’s use of the going concern basis of accounting remains appropriate (i.e., the auditor’s opinion is not modified). Therefore, we suggest either removing the reference to “relevant ethical requirements”, or that the IAASB provide clarification and/or guidance with illustrative examples to assist auditors in complying with the reporting requirement in respect of “relevant ethical requirements” in the context of paragraph 40.

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

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

Do the proposals enable greater consistency and comparability across auditor’s reports globally?

The nature and extent of information provided by the auditor is intended to be balanced in the context of the responsibilities of the respective parties². Accordingly, our stakeholders have expressed significant concerns and feel uneasy about providing an explicit conclusion on the entity’s appropriate use of the going concern basis of accounting without relating it to the corresponding assumptions or rationale used by management and disclosed in the financial statements. Without doubt, management has the primary responsibility to determine the

² Paragraph A34, ISA 701, *Communicating Key Audit Matters in the Independent Auditor’s Report*

appropriateness of an entity's use of the going concern basis of accounting, whereas auditors would provide their perspective and make the corresponding conclusion. Therefore, auditors should not be the original source to provide the conclusion on an entity's appropriate use of the going concern basis of accounting. This issue also relates to the underlying financial reporting disclosure requirements, which may require clarification or additional guidance from the accounting standard setters to achieve the desired enhancements for financial reporting and auditor's reporting. We therefore encourage the IAASB to collaborate with the accounting standard setters such as the IASB to put forward a requirement for preparers to provide an explicit explanation of the rationale for their going concern conclusion. This would help clarify the use of the going concern assumption to users of financial statements and the auditor's report.

Under the extant ISAs, an unmodified auditor's opinion would implicitly cover the auditor's conclusion that the entity's use of the going concern basis of accounting is appropriate. Unless preparers provide disclosures explaining their use of the going concern basis of accounting, the new statements proposed in paragraph 33(a) in the auditor's report alone may not be helpful to users of the financial statements, especially when there is no material uncertainty or significant doubt about the entity's ability to continue as a going concern. This is because users may not understand the criteria used by management on which the auditor's conclusion is based.

In addition to the above, we have concerns that the proposed statements could create confusion and unintended consequences in practice for the following reasons:

- The proposed structure of the auditor's report, which places the auditor's opinion on the financial statements and the going concern conclusion in close proximity, could create confusion and misunderstanding among users of the financial statements. It may give the impression that the auditor is providing a specific *opinion* on the entity's ability to continue as a going concern, when in fact the going concern *conclusion* is a separate assessment on the entity's use of going concern basis of accounting. The presentation could lead users to over-rely on the auditor's conclusion and potentially misinterpret the nature and extent of the auditor's responsibilities to an entity's going concern.
- The use of positive statements could be misinterpreted by users of the financial statements as auditors' assurance that the entity will continue as a going concern. However, this is not the intention of the auditor and is impossible to establish in practice. This could create unintended consequences and increase the risk (e.g., potential litigations) for auditors, and could potentially widen the expectation gap between auditors and users of the financial statements as users may rely on the statements as an assurance of the entity's future prospects.
- If separate going concern statements are included in the auditor's report, stakeholders may call for additional separate statements on other matters, which could potentially detract from the overall objective of an audit to express an assurance opinion on the financial statements as a whole. Going concern is only one of many elements in the preparation of financial statements, and while it is important, it is not the only consideration that users of the financial statements should take into account.

Furthermore, we have concerns regarding the proposed reporting illustrated in Appendix 3 to Appendix 6 of ED-570, when the auditor concludes that management's use of the going concern basis of accounting is appropriate, but reports that a material uncertainty exists:

Extract from Appendix 3 of ED-570

Material Uncertainty Related to Going Concern

We have concluded that managements' use of the going concern basis of accounting in the preparation of the financial statements is appropriate. However, we draw attention to Note X in the financial statements... As stated in Note X, these events or conditions, along with other matters as set forth in Note X, indicate that a material uncertainty exists that may cast significant doubt on the Company's ability to continue as a going concern.

Our opinion is not modified in respect of this matter.

We consider the proposed reporting may be confusing to users without in-depth knowledge of ED-570 and relevant technical terminology. For instance, users may equate the statement regarding the appropriate use of the going concern basis of accounting to indicating a certainty that the entity will continue in the foreseeable future. Also, they may be confused between the conclusion statement in the first sentence, and the material uncertainty reported in the last sentence. This confusion is partly due to the lack of disclosure on management's explanation for their going concern rationale, plans for future actions to address the material uncertainty and conclusion for using the going concern basis of accounting, as we pointed out in our responses above. Therefore, we urge the IAASB to revisit the proposed wordings to mitigate the potential confusion in practice, taking into account that preparers are not required to disclose the rationale for their use of going concern basis of accounting even if a material uncertainty exists.

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

Do you support the requirements and application material that facilitate further enhanced transparency about the auditor's responsibilities and work relating to going concern?

Should this be extended to also apply to audits of financial statements of entities other than listed entities?

Paragraph 15 of extant ISA 701 states that "...a *material uncertainty related to events or conditions that may cast significant doubt on the entity's ability to continue as a going concern in accordance with HKSA 570 (Revised), are by their nature key audit matters.*" Similarly, paragraph A41 of extant ISA 701 refers to the possible inclusion of a key audit matter relating to going concern related matters, when a material uncertainty does not exist.

Therefore, we are supportive to requiring auditors of listed entities to describe how they evaluated management's assessment of going concern when there is identified material uncertainty, or significant doubt (but no material uncertainty exists), for alignment with the disclosure requirements of key audit matters in ISA 701.

However, to ensure coherence of the ISAs, we suggest that the IAASB revisit the drafting of paragraphs 33(b)(ii) and 34(d) of ED-570, which requires auditors to "*Describe how the auditor*



evaluated management's assessment of the entity's ability to continue as a going concern" in the auditor's report, against that of paragraph 13(b) of ISA 701, which requires auditors to describe "How the (key audit) matter was addressed in the audit".

Additionally, it would be helpful if the IAASB could provide example descriptions for inclusion in the auditor's report, illustrating the application of guidance in paragraphs A73 to A77 of ED-570.

Under ISA 701, auditors of listed entities are required to disclose key audit matters in their reports, while auditors of other entities may do so on a voluntary basis. Therefore, we believe that the requirement to describe the auditor's evaluation of management's assessment of going concern when there is material uncertainty or significant doubt should only apply to listed entities, without extending it to other entities. This would also ensure the scalability of the standard. However, in the context of ED-570, we suggest that the IAASB could consider adopting a similar approach as paragraph 5 of ISA 701 for auditors of other entities to disclose their evaluation when they decide to do so.

15. Is it clear that ED-570 addresses all implications for the auditor's report relating to the auditor's required conclusions and related communications about going concern (i.e., auditor reporting is in accordance with ED-570 and not in accordance with ISA 701 or any other ISA)? This includes when a material uncertainty related to going concern exists or when, for audits of financial statements of listed entities, events or conditions have been identified that may cast significant doubt on the entity's ability to continue as a going concern but, based on the audit evidence obtained, the auditor concludes that no material uncertainty exists.

We do not have any comments.

16. Are there any other matters you would like to raise in relation to ED-570? If so, please clearly indicate the requirement(s) or application material, or the theme or topic, to which your comment(s) relate.

We do not have any further comments.