

Supplement C to Agenda Item 3-A

Note: This supplement has been prepared for information only. A comprehensive summary of the significant comments received on the August 2015 exposure draft (ED), Proposed ISA 810 (Revised), *Engagements to Report on Summary Financial Statements*, and the Drafting Team’s related analysis of significant issues are presented at the [December 2015 IAASB meeting](#). All comment letters on the ED can be accessed [here](#).

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ED PROPOSED ISA 810 (REVISED) – Compilation of Question 2 Responses

Whether respondents believe any further changes to ISA 810 are necessary as a result of the new and revised Auditor Reporting standards. If so, the IAASB would like to understand respondents’ rationale as to why these further changes are needed as well as views as to when the Board should develop and propose such changes in light of its other priorities.

#	Source	Comment
1.	AICPA	We do not believe that any further changes to ISA 810 are necessary as a result of the new and revised Auditor Reporting standards. However, we believe that the content in paragraphs 25-26, and related application material in paragraph A21, of proposed ISA 810 (Revised) on auditor association is important information to continue to include in ISA 810 (Revised) in order to address auditor association matters.
2.	BDO	Given the nature of the proposed amendments, we do not foresee at this stage any specific matters that would indicate the need for further changes to ISA 810 (Revised).
3.	CAANZ	None.
4.	CAASB	We do not believe any further changes to ISA 810 are necessary as a result of the new and revised Auditor Reporting standards.
5.	CAI	None.
6.	CNCC	Please refer to our comments on question 1.
7.	CPAA	We have not identified any further changes to ISA 810 which we consider necessary.
8.	DJuvenal	No, I think that the IFAC-IAASB’s needs to improve the importance of material evidence in the financial statements elaborated by organizations with high quality and responsibility to result better transparency in the Auditor’s Report.
9.	DTT	DTTL believes that paragraph 24 should be amended to further clarify the auditor’s responsibilities and related work effort, when a material inconsistency has been identified between the other information and the summary financial statements <u>contained in the same document</u> . The application guidance in paragraph A20 indicates only that ISA 720 (Revised), <i>The Auditor’s Responsibilities Related to Other Information</i> , adapted as necessary, may assist the auditor in addressing these circumstances. DTTL also recommends that an Illustrative example be

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		<p>included in the Appendix to proposed ISA 810 (Revised) that highlights how the auditor addresses an uncorrected material misstatement of other information in the auditor’s report on the summary financial statements, which relates to a material inconsistency that has been identified between the other information and the summary financial statement contained in the same document.</p> <p style="text-align: center;">APPENDIX 2</p> <p style="text-align: center;">EDITORIAL COMMENTS AND RECOMMENDATIONS</p> <hr/> <p>DTTL has other editorial comments and recommendations with respect to proposed ISA 810 (Revised) as enumerated below. In these comments, recommended additional text is shown using <u>bold underline</u>; recommended deletions to the text are shown using double strike through.</p> <p><u>Paragraph 9</u></p> <p>DTTL noted that in Illustrations 1 and 5 the circumstances include a reference to “established criteria,” while for Illustrations 2, 3 and 4 there is a reference to “applied” criteria. Paragraph 9 includes specific phrases to use in the auditor’s opinion when the auditor concludes that an unmodified opinion on the summary financial statements is appropriate. DTTL believes that the phrases should be amended as follows to also reflect the wording for “established criteria.”</p> <p style="padding-left: 40px;">9. When the auditor has concluded that an unmodified opinion on the summary financial statements is appropriate, the auditor’s opinion shall, unless otherwise required by law or regulation, use one of the following phrases: (Ref: Par. A9)</p> <p style="padding-left: 40px;">(a) The <u>accompanying</u> financial statements are consistent, in all material respects, with the audited financial statements, [in accordance with <u>describe the established criteria, or on the basis of</u> describe <i>the applied criteria</i>]; or</p> <p style="padding-left: 40px;">(b) The <u>accompanying</u> summary financial statements are a fair summary of the audited financial statements, [in accordance with <u>describe the established criteria, or on the basis of</u> describe <i>the applied criteria</i>]</p> <p><u>Paragraph 14</u></p> <p>For the purposes of consistency with ISA 700 (Revised), <i>Forming an Opinion and Reporting on Financial Statements</i>, and the headings reflected in the Illustrative examples, DTTL recommends that paragraph 14 be broken down into sub-headings as follows:</p> <ul style="list-style-type: none"> • Paragraphs 14(c), (d) and (e) should be grouped under “Opinion”. • Paragraphs 14(f) and (g) should be grouped under “Summary Financial Statements”.

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		<ul style="list-style-type: none"> • Paragraph 14(h) should be under “The Audited Financial Statements and Our Report Thereon” • Paragraph 14(i) should be under “Management’s Responsibility for the Summary Financial Statements” • Paragraph 14(j) should be under “Auditor’s Responsibility” <p><i>Paragraphs 12, 14(g) and Illustration 1</i></p> <p>It was noted in paragraph 12 that the statement to be included in the auditor’s report on the summary financial statements includes the following phrase “...that may require adjustment of, or disclosure in, the audited financial statements.” This phrase is not included in the elements listed in paragraph 14(g), nor in Illustration 1 under the heading “Summary Financial Statements.” DTTL recommends that the phrase be consistently used throughout proposed ISA 810 (Revised).</p> <p><i>Paragraph 14(i)</i></p> <p>The wording in this element should more closely reflect that in the Illustrative examples, as well as be amended to distinguish between established and applied criteria. DTTL recommends the following edits:</p> <p style="padding-left: 40px;">14(i) A description of management’s responsibility for the summary financial statements, explaining that management is responsible for the preparation of athe summary of the audited financial statements [in accordance with <i>describe the established criteria, or on the basis of describe</i> the applied criteria].</p> <p><i>Paragraph 14(j) and All Illustrations</i></p> <p>The description of the auditor’s responsibilities is misleading as it indicates that the auditor’s responsibility is to express an opinion on the summary financial statements based on the procedures. This description could be misunderstood by the user to mean that the auditor is actually expressing an opinion on the summary financial statements, rather than assuring that they are consistent, in all material respects, with the audited financial statements. Accordingly, DTTL believes the description in paragraph 14(j), and the related wording in the Illustrative examples, should be as amended follows:</p> <p style="padding-left: 40px;">14(j) A statement that the auditor is responsible for expressing an opinion on <i>whether</i> the summary financial statements <i>are consistent, in all material respects, with [or are a fair summary of] the audited financial statements</i> based on the procedures required by this ISA.</p> <p><i>Paragraph 18</i></p> <p>In order to conform to the preferred layout in Illustration 4, the required elements in paragraph 18 should be reordered. DTTL</p>

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		<p>recommends that sub-paragraph 18(c) should be moved to before sub-paragraph 18(a).</p> <p><i>Illustration 1</i></p> <p>DTTL noted the addition of the following sentence to Illustration 1 as it relates to KAM: “Key audit matters are those matters that, in our professional judgment, were of most significance in our audit of the financial statements of the current period.” DTTL believes that because this sentence is not one of the required elements, it should be deleted.</p> <p><i>Minor Editorial Comments</i></p> <p>The minor editorial comments are highlighted below:</p> <p><i>Paragraph 17(c)</i></p> <p>The section heading “Material Uncertainty Related to Going Concern” referred to in paragraph 17(c) should be <i>italicized</i>, consistent with the presentation elsewhere in proposed ISA 810 (Revised).</p> <p><i>Illustrations of Reports on Summary Financial Statements</i></p> <p>It was noted that for Illustrations 2, 3, 4 and 5 a new circumstance was added whereby the auditor’s report on the summary financial statements is dated the same as the date of the auditor’s report on the financial statements from which the summary financial statements are derived. This circumstance was inadvertently omitted from the summary descriptions of each of the applicable Illustrations immediately following the heading “Appendix.”</p> <p><i>Illustration 1</i></p> <p><u>Summary Financial Statements</u></p> <p>... The summary financial statements, and the audited financial statements, do not reflect the effects of events that occurred subsequent to the date of our report on the audited financial statements.</p> <p><u>The Audited Financial Statements and Our Report Thereon</u></p> <p>...</p> <ul style="list-style-type: none"> • A <i>Material Uncertainty Related to Going Concern</i> section that draws ... <p><i>Illustrations 1, 2 and 3</i></p>

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		<p><u>Opinion</u></p> <p>...</p> <p>In our opinion, the accompanying summary financial statements are consistent, in all material respects, with (or a fair summary of) the<u>the</u> audited financial statements, in accordance with [describe established criteria].</p>
10.	EYG	We do not believe that further changes to ISA 810 are necessary as a result of the new and revised Auditor Reporting standards.
11.	FSR	Is should be considered to require some mandatory sequencing of the elements in the Auditor's report on summary financial statements in paragraph 14 to promote consistency. This could especially be relevant in regards to where the opinion should be placed.
12.	HC	None.
13.	HKICPA	It would be useful if the IAASB could develop example wording for uncorrected material misstatement of other information for inclusion in the auditor's report on summary financial statements given the ISA 720 (Revised) is one of the key revised standard and a new requirement under paragraph 17(i).
14.	IBR-IRE	None.
15.	ICAG	We do not believe any further changes are required to ISA 810 as a result of the new and revised Auditor Reporting standards.
16.	ICAP	The proposed amendments are sufficient to align ISA 810 with the new and revised Auditor Reporting standards.
17.	ICAZ	We do not believe any further changes to ISA 810 are necessary as a result of the new and revised Auditor Reporting standards as the issues arising from those have been dealt with appropriately. We are in agreement with changing the order of the auditor's report on the summary financial statements to match that in the auditor's report on the full financial statements.
18.	IDW	We do not believe any further changes to ISA 810 are necessary as a result of the new and revised Auditor Reporting standards: the issues arising from those standards (going concern section, other information section, and key audit matters) have been dealt with appropriately. We also agree that changing the order of the auditor's report on the summary financial statements to match that in the auditor's report on the full financial statements is appropriate.
19.	INCP	INCP considers that no further changes should be made to the revised ISA 810. We consider that within the scope of ISA 810 are included the required guidelines for the auditor to issue a report on summary financial statements in compliance with the established objectives in the revised ISAs.
20.	IPA	The IPA <i>supports</i> the revision to ISA 810 to the extent it aligns with the new and revised auditor reporting standards.

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		<p>However, the IPA believes the proposed standard is deficient in the following areas:</p> <p>Other Information in Documents Containing Summary Financial Statements</p> <p>The IPA is of the opinion that summary financial statements are almost invariably accompanying other information and, in some jurisdictions, represent the primary financial reporting to investors. As such, the IPA is of the view the proposed guidance in the revised ISA 810 should explicitly address the requirements of the revised ISA 720 “The Auditor’s Responsibilities Related to Other Information”, particularly, the requirement to include an “Other Information” section in the audit report.</p> <p>Alternative Non-GAAP measures of Financial Performance</p> <p>The IPA believes that both ISA 720 and ISA 810 are flawed in that they do not address the reporting of non-GAAP performance measures in information accompanying the financial report. By non-GAAP measures, the IPA means substitutes for profit and loss reported under IFRS, which are used by management and those charged by governance to report and discuss financial performance of the entity in information accompanying the financial report.</p> <p>The IPA believes that the use of such alternative performance measures (APM) are inconsistent with the amounts reported in the financial and as such mention should be made in the audit report when such APM are used.</p> <p>Given the prominence of such alternative performance measures, as a matter of urgency the IPA would recommend amendments be made to both ISA 720 and ISA 810 to explicitly deal with APM.</p> <p>The IPA believes that where APM are included in other information accompanying the financial report the “Other Information” paragraph of the audit report explicitly disclaim responsibility for such APM and state they have not been subject to audit and as such the no opinion appropriateness, accuracy or comparability of such measure can be made.</p> <p>Further, the IPA believes that the IAASB deals with the matter more fully by instigating a project to amend ISA 720 and ISA 810 for addressing such APM in a manner consistent with the frameworks in the proposed ESMA APM guidelines and/or ASIC Regulatory Guide 230 “Disclosing non-IFRS Financial Information.</p> <p>The IPA believes the amendments proposed to ISA 810 appropriately reflect the changes arising from the new and revised Auditor Reporting standards. However, the IPA does not believe the requirements of the revised ISA 720 have been adequately addressed.</p> <p>The IPA is of the opinion that summary financial statements are almost invariably accompanying other information and in some jurisdictions represent the primary financial reporting to investors. As such the IPA is of the view the proposed guidance (including the example report formats in the appendix) in the revised ISA 810 should explicitly address the requirements of the revised ISA 720 “The Auditor’s Responsibilities Related to Other Information”, particularly, the requirement to include an “Other Information” section in the audit report. The illustrative examples in the revised standard should also be similarly amended.</p>

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		Furthermore, the proposed guidance (ISA 810.24) does not address the issue of the information accompanying the summary financial information being inconsistent with the full financial statements and the proposed standard should be amended to deal with such circumstances.
21.	IRBA	<p>1. Refer to paragraph 14 on elements of the auditor’s report.</p> <p>For purposes of achieving a sufficient degree of symmetry and consistency between ISA 810 (Revised) and ISA 700 (Revised), as discussed in the explanatory memorandum (par. 25-26), it will be appropriate to require that the first section of the auditor’s report should include the auditor’s opinion, and have the heading “Opinion”.</p> <p>Although a specific ordering of elements is not prescribed, consistency within the standard could be enhanced by re-ordering the elements presented in paragraph 14 to represent a more logical communication sequence (as illustrated in the Appendices to the standard).</p> <p>2. Refer to paragraph 18 (c) on adverse opinions or disclaimer of opinions.</p> <p>We recommend that paragraph 18(c) be split to account for the adverse opinion and the disclaimer of opinion separately as indicated below:</p> <p style="padding-left: 40px;">(c) (a) State that, as a result of the adverse opinion or disclaimer of opinion, it is inappropriate to express an opinion on the summary financial statements.</p> <p style="padding-left: 40px;"><u>(d) State that, as a result of the adverse opinion, the accompanying summary financial statements are not consistent with (or a fair summary of) the audited financial statements of [...] in accordance with [describe established criteria].</u></p> <p>3. Refer to paragraph 18.</p> <p>We recommend that paragraph 18 should follow the same order of the illustrative reports numbers 4 and 5 contained in the Appendix of ISA 810 (Revised) (see mark-ups below). We have included the suggested additional paragraph as indicated in point 2 above:</p> <p>“When the auditor’s report on the audited financial statements contains an adverse opinion or a disclaimer of opinion, the auditor’s report on the summary financial statements shall, in addition to the elements in paragraph 14:</p> <p style="padding-left: 40px;">(e) (a) State that, as a result of the adverse opinion or disclaimer of opinion, it is inappropriate to express an opinion on the summary financial statements.</p> <p style="padding-left: 40px;"><u>(e) (b) State that, as a result of the adverse opinion the accompanying summary financial statements are not consistent with (or a fair summary of) the audited financial statements of [...] in accordance with [describe established criteria].</u></p> <p style="padding-left: 40px;">(b) (c) Describe the basis for that adverse opinion or disclaimer of opinion; and</p> <p style="padding-left: 40px;">(a) (d) State that the auditor’s report on the audited financial statements contains an adverse opinion or disclaimer of opinion an unmodified opinion.</p> <p style="padding-left: 40px;">(c) State that, as a result of the adverse opinion or disclaimer of opinion, it is inappropriate to express an opinion on the summary</p>

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		<p data-bbox="485 253 730 277">financial statements.</p> <p data-bbox="342 302 2018 362">4. Refer to paragraph 24 on other information in documents containing summary financial statements. Overall, the auditor's responsibilities in this regard are not clear and this may lead to divergence in practice.</p> <p data-bbox="415 383 2018 667">a) Paragraph 24 only addresses the auditor's responsibility in relation to other information in the context of whether there exists any material inconsistency between the other information and the summary financial statements. ISA 720 (Revised) has expanded the auditor's responsibility in terms of the auditor having to evaluate whether the other information (in relation to the audited financial statements) is materially inconsistent with the financial statements concerned or the auditor's knowledge obtained in the audit or otherwise appears to be materially misstated. Since the auditor of the summary financial statements already possesses audit knowledge about the audited financial statements, it would be appropriate to instill the principle that the auditor's overall and collective knowledge about the entity and its financial statements should provide the context for evaluating the other information in documents containing summary financial statements.</p> <p data-bbox="415 688 2018 748">b) The standard should be clarified in terms of what the appropriate action would be in the following circumstances (especially since this is a standalone standard and the aim is to achieve consistency with the Auditor Reporting Standards):</p> <ul data-bbox="485 769 2018 1024" style="list-style-type: none"> <li data-bbox="485 769 2018 870">• If the auditor concludes that a material misstatement in the summary financial statements exists, the auditor shall consider the impact on the opinion of the summary financial statements in accordance with paragraph 19 and the impact on the auditor's report on the audited financial statements in accordance with paragraph 13. <li data-bbox="485 891 2018 1024">• If the auditor concludes that the other information needs to be revised, the auditor shall discuss the matter with management and, if appropriate, with those charged with governance. If, at the time of reporting, an uncorrected material misstatement of the other information remains, the auditor shall describe the uncorrected material misstatement of the other information in the auditor's report. <p data-bbox="415 1045 2018 1179">c) Also, we suggest introducing a separate section in the auditor's report on the summary financial statements that would provide transparency about the auditor's responsibilities relating to other information presented with the summary financial statements to ensure that there is clear understanding that the audit opinion does not cover the other information and that the auditor does not express any form of assurance conclusion thereon.</p> <p data-bbox="415 1200 2018 1227">d) We are of the view that the IAASB should give further consideration to providing an illustrative example that addresses:</p> <ul data-bbox="485 1248 2018 1390" style="list-style-type: none"> <li data-bbox="485 1248 2018 1308">• The prevalent use of other formats in which audited summary financial statements may be included, for example, the integrated report <IR>; and <li data-bbox="485 1330 2018 1390">• The risk of association with other information and how this may be addressed in relation to the requirements contained in ISA 720 (Revised), <i>The Auditor's Responsibilities Relating to Other Information</i>.

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		<ul style="list-style-type: none"> <li data-bbox="485 253 2022 391">• The risk of the auditor being associated with other information may potentially be addressed by including the wording used in ISA 720 (Revised), Appendix 2, Illustration 1, in the related auditor’s report of the summary financial statements in relation to the auditor’s consideration of other information and related management’s responsibility, taking into consideration that ISA 810 is a standalone standard. <p data-bbox="338 410 915 440">5. Illustration 1 – affects all illustrative reports</p> <p data-bbox="411 456 2022 521">We note that the statement of management’s responsibility only mentions that of preparing a summary of the audited financial statements in accordance with the applicable criteria.</p> <p data-bbox="411 537 2022 675">We question whether this statement of management’s responsibility should include reference to the fact that management is also responsible for such internal control as management determines is necessary to enable the preparation of summary financial statements that are free from material misstatement, whether due to fraud or error when there are management controls in place in preparing the summary financial statements.</p> <p data-bbox="338 695 915 724">6. Illustration 1 – affects all illustrative reports</p> <p data-bbox="411 740 2022 805">We recommend the following changes to the Auditor’s Responsibility paragraph in the illustrative reports (shown as mark-ups below) to ensure that there is no misunderstanding as to the opinion which the auditor is expressing:</p> <p data-bbox="485 821 772 850"><i>“Auditor’s Responsibility</i></p> <p data-bbox="485 867 2022 967"><i>Our responsibility is to express an opinion on <u>whether the summary financial statements are consistent, in all material respects, with the audited financial statements</u> based on our procedures, which were conducted in accordance with International Standard on Auditing (ISA) 810 (Revised), Engagements to Report on Summary Financial Statements.”</i></p> <p data-bbox="338 987 569 1016">7. Illustration 3:</p> <p data-bbox="411 1032 2022 1170">For consistency in the treatment of the opinion-section in the auditor’s report, the last line of the first paragraph in the opinion-section, “We expressed a qualified audit opinion on those financial statements in our report dated February 15, 20X2 (see below)”, should be removed and combined with the wording that is already included in the second paragraph of the opinion-section. We propose that the second paragraph reads as follows (our suggested amendments are indicated by underlined text):</p> <p data-bbox="485 1187 2022 1325">“In our opinion, the accompanying summary financial statements are consistent, in all material respects, with (or a <i>fair summary of</i>) those audited financial statements, on the basis described in Note X. However, <u>since we expressed a qualified audit opinion on those audited financial statements in our report dated February 15, 20X2</u>, the summary financial statements are misstated to the equivalent extent as the audited financial statements of ABC Company for the year ended December 31, 20X1.”</p> <p data-bbox="411 1341 2022 1406">Furthermore, we recommend the following changes to illustration 3 to more closely align with the form and content of the wording in Illustration 4 (shown as mark-ups below):</p>

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		<p><u>“The Audited Financial Statements and Our Report Thereon</u></p> <p><u>In our report dated February 15, 20X2, we expressed a qualified audit opinion on the audited financial statements of ABC Company for the year ended December 31, 20X1.</u></p> <p>The basis for our misstatement of the audited financial statements is described in our qualified audit opinion was [describe basis for qualified audit opinion] in our report dated February 15, 20X2. Our qualified audit opinion stated that [describe qualified audit opinion] is based on the fact that the company’s inventories are carried in the statement of financial position in those financial statements at xxx...”</p> <p>8. Illustration 4: We suggest additional wording in the second paragraph of the Denial of Opinion section: “Because of the significance of the matter discussed in <i>The Audited Financial Statements and Our Report Thereon</i> section of our report below, it is inappropriate to express ...”</p> <p>9. Illustration 5: We suggest the following change in wording for the second paragraph of the Adverse Opinion section: “In our opinion, because of the significance of the matter discussed in the <i>Basis for Adverse Opinion</i> section <u>of our report below</u>, the accompanying summary financial statements are not consistent ...”</p>
22.	ISCA	None.
23.	JICPA	<p>We see no need for any substantial changes to ISA 810 as a result of the new and revised Auditor Reporting standards.</p> <p>We do, however, recommend the deletion of the following words as a conforming amendment to paragraph 3(b)(ii) of ISA 810 (Revised): “...that also describes the basis for that opinion.” We understand that the same words (“that also describes the basis for that opinion”) have been deleted from paragraph 6(b) of ISA 700 (Revised) because the New and Revised Auditor Reporting standards introduced the heading “Basis for Opinion.” This wording should also be deleted from paragraph 3(b)(ii) of ISA 810 (Revised), both for consistency and to avoid unnecessary confusion. Readers may wonder, for example, why the heading “Basis for Opinion,” which seems to be required by the Objectives paragraph (paragraph 3), does not appear in the illustrative examples in ISA 810 (Revised). We therefore propose following:</p> <p>“Objectives</p> <p>3. The objectives of the auditor are:</p> <p>(a) To determine whether it is appropriate to accept the engagement to report on summary financial statements; and</p> <p>(b) If engaged to report on summary financial statements:</p>

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		<p>(i) To form an opinion on the summary financial statements based on an evaluation of the conclusions drawn from the evidence obtained; and</p> <p>(ii) To express clearly that opinion through a written report that also describes the basis for that opinion."</p>
24.	KICPA	Considering the nature and scope of the ISA 810, we believe that it would be proper to determine the necessity of additional amendment after examining the global adoption status of the ISA 810.
25.	KPMG	We recommend that the proposed revised standard introduce a requirement to include, in the ISA 810 auditor's report, a statement about the auditor's independence and other relevant ethical responsibilities, as well as disclosure of the name of the engagement partner in respect of the specific engagement to report on summary financial statements of listed entities, in order to align with the Auditor Reporting standards. We consider this appropriate since the auditor's report clearly states that it is the report of the independent auditor, and furthermore, because the standard is premised on the fact that the auditor in respect of the summary financial statements is also the auditor of the complete set of financial statements from which these are derived. This is because of the assurance skills and techniques that the auditor will need to apply in order to determine whether the summary financial statements are consistent with [or provide a fair summary of] in all material respects, the audited financial statements, and therefore it is important to acknowledge the critical attributes of independence, and other ethical qualities, that the auditor will bring to bear in the specific context of the ISA 810 engagement.
26.	LCA	None.
27.	MAOB	<p>(b) Availability of audited financial statements</p> <p>The AOB wishes to emphasise the importance of making the audited financial statements available to the intended users of the summary financial statements, in particular where KAM has been communicated in the auditor's report. This is in view of the new Para A15 in the proposed ISA 810 (Revised) which states that the auditor is not required to describe the individual KAM in the auditor's report on summary financial statements.</p>
28.	MIA	<p>We believe the conforming amendments proposed to ISA 810 (Revised) is sufficient taking into account the enhancements as a result of the new and revised Auditor Reporting standards.</p> <p>Further, we recommend the IAASB also consider including an example through the illustration of the Appendix to the proposed ISA 810 (Revised) of the statement required by paragraph 17(e) when the auditor's report on the audited financial statements includes a statement that describes an uncorrected material misstatement of the other information in accordance with ISA 720 (Revised), <i>The Auditor's Responsibilities Related to Other Information</i>.</p>
29.	MICPA	The Institute has no further comments in regards to this matter.

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30.	NBA	<p>In our response to ED ISA 800 and ISA 805 (Revised) we stated that other changes in the auditor's report relating to ISA 810 such as presenting the opinion section first, an explicit statement of the independency of the auditor, disclosure of the name of the engagement partner and improved description of the responsibilities of the auditor might be considered. In the ED ISA 810 the auditor's report is aligned with ISA 700 as far as the lay-out and the ordering is considered. However, the IAASB did not consider it necessary to require a statement about independence or disclosure of the name of the engagement partner as this information is available in the auditor's report on the financial statements. In the Netherlands the name of the engagement partner is also disclosed in an ISA 810 audit report. We recommend IAASB to reconsider the above and also incorporate the other changes in an ISA 810 audit report in order to be consistent with auditor's report on the financial statements.</p> <p>We do not consider any further changes necessary. In our opinion, the proposed limited changes to ISA 810 are sufficient. In this way, ISA 810 is aligned with the ISAs related to auditor reporting on the financial statements.</p>
31.	NZAuASB	<p>The NZAuASB agrees that an ISA 810 engagement is substantively different from the audit of financial statements and therefore agrees that limited amendments are appropriate, however consider some additional elements of the auditor reporting project should be carried forward to ISA 810 (Revised).</p> <p>The NZAuASB note that the IAASB has not mandated the positioning of the opinion section to come first, as required by ISA 700 (Revised). We note however that the opinion section has been moved in the illustrative report. We support moving the opinion first but acknowledge that ISA 810 may need to permit more flexibility in order to accommodate varying laws and regulations in different jurisdictions. On this basis we support the decision not to mandate the order of the report, but support the illustration which does so.</p> <p>The NZAuASB also note the requirement for the auditor to include an explicit statement of independence, with identification of the relevant ethical requirements, has not been carried forward to ISA 810 (Revised). We would recommend that this requirement should be added to ISA 810 (Revised). The importance of independence does not differ between an ISA 810 audit of summary financial statements or for an audit under ISA 700 of a complete set of financial statements, and even though this information is available in the auditor report on the financial statements, this is still a relevant factor in the audit of the summary financial statements. The NZAuASB therefore considers that the IAASB should require the auditor's report to include a statement that the auditor is independent of the entity in accordance with the relevant ethical requirements relating to the audit, and has fulfilled the auditor's other ethical responsibilities in accordance with these requirements.</p>
32.	PWC	<p>With respect to the second question posed in the exposure draft, we do not believe any additional changes to ISA 810 are necessary as a result of the revised auditor reporting standards.</p>
33.	SAICA	<p>See IRBA.</p>

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34.	SMP	In our opinion, no further changes to ISA 810 are necessary as a result of the new and revised Auditor Reporting standards. We also agree that a more fulsome project in relation to ISA 810 is not required and support the intention of the IAASB to not initiate one in the near future, especially when considered with the existing projects and priorities for the Board.