

Mr James Gunn
Technical Director
IAASB
545 Fifth Avenue, 14th Floor
New York, New York 10017
USA

18 November, 2013

Re: IAASB Exposure Draft (ED) "Reporting on Audited Financial Statements: Proposed New and Revised International Standards on Auditing (ISA's)"

Dear Mr Gunn,

SRA is pleased to provide you with its comments on the above mentioned ED. SRA is the representative organization of 370 middle-sized audit firms in the Netherlands.

We concur with the comment letter provided to you by the Federation of European Accountants (FEE), taking into account the following additional remarks regarding the consultation questions:

- Question 2, 8 and 9: We agree with FEE that going concern issues should always be reported in a separate paragraph. The same applies to Emphasis of Matter (EOM) and Other Matters (OM) paragraphs. As a consequence should - in our view - be considered by the IAASB to exclude going concern issues and issues, reported in EOM and OM paragraphs, from the definition of KAM, included in the standard, in order to provide a clear requirement in the standard for reporting of these categories of issues on the one hand and KAM on the other hand. In this regard it should also be taken into consideration that KAM reporting is only required for listed entities.
- Question 5: It should be considered by the IAASB whether applying KAM reporting voluntarily is consistent with the confidentiality requirements in the Code of Ethics. In this situation it would seem that there is no basis for such reporting in law and regulations as it is voluntarily, not mandatory; a specific consent of the client is also not available. As a result there would be a breach of the confidentiality requirements. This issue should - in our view - be dealt with in the standard.

Yours sincerely,

P.Dinkgreve,
Chairman SRA