

**Independence Standards for Sustainability Assurance Engagements Outside the
International Independence Standards in IESSA**

Project Team's Final Report and Recommendations

EXECUTIVE SUMMARY

In January 2025, the IESBA issued the [International Ethics Standards for Sustainability Assurance™ \(including International Independence Standards™\)](#) (IESSA™) as a global ethics benchmark for assurance engagements on sustainability information. While the ethics provisions in the IESSA apply to all sustainability assurance engagements (SAEs), the International Independence Standards (IIS) in the IESSA apply only to SAEs that have the same level of public interest as an audit of financial statements. For other SAEs, professional accountants (PAs) are required to apply the independence provisions in Part 4B¹ of the *International Code of Ethics for Professional Accountants (Including the International Independence Standards)* (the Code); sustainability assurance practitioners who are not PAs are encouraged to comply with Part 4B.

The IESBA established a new Project Team (PT) to undertake fact-finding regarding the landscape of SAEs that fall outside the scope of the IIS in the IESSA and approved the PT's Terms of Reference in September 2025. The objective of the workstream was to determine whether there is a sufficient basis for the IESBA to initiate a project to develop independence standards applicable to such engagements, and whether those standards should be profession-agnostic.

The PT's work occurred during a period of significant change in the sustainability reporting and assurance ecosystem following the issuance of relevant global and national standards, as well as evolving regulatory approaches across jurisdictions working at different speeds.

The PT conducted targeted information-gathering activities with stakeholders, including jurisdictional standard setters (JSS), sustainability assurance practitioners and professional accountancy organizations (PAOs). The PT also considered insights from available datasets and research regarding global sustainability assurance practices, including insights from the International Federation of Accountants' (IFAC) State of Play in Sustainability Assurance.

Based on the information available, the PT's concluded that the global expansion of mandatory sustainability reporting and assurance is slowing down, and laws and regulations addressing such reporting and assurance in many jurisdictions only focus on the largest entities. SAEs outside the scope of the IIS in the IESSA are still being undertaken in a range of contexts, including engagements based on special-purpose reporting frameworks, voluntary disclosures, or reports intended for a limited group of users. The PT's activities highlighted the limited availability of comprehensive data on such engagements.

Given the diversity of SAEs outside the IIS in the IESSA, the PT also found that there are significant differences in the nature of SAEs to which Part 4B is or will be applied across the different jurisdictions.

¹ Part 4B, Independence for Assurance Engagements Other Than Audit, Review and Sustainability Assurance Engagements Addressed in Part 5.

PT's Recommendations

Based on the information gathered, the PT has not identified evidence indicating that the current independence provisions in Part 4B of the Code are insufficient to address SAEs outside the scope of the IIS in the IESSA. The PT also did not identify a clear public interest driver, such as a regulatory mandate or market concern, that would warrant the development of new or enhanced independence requirements for such SAEs.

Accordingly, the PT recommends that the IESBA does not initiate a standard-setting project at this stage and, instead, continue monitoring developments in sustainability assurance practice through existing mechanisms, including the work of the IESSA Implementation Monitoring Advisory Group (IIMAG). The PT recommends that the IESBA should defer further consideration of this topic until there is clearer evidence of questions or challenges in practice and regulatory direction over SAEs within the scope of Part 4B.

I. BACKGROUND

Relevant Ethics and Independence Requirements for SAEs

1. The IESBA issued the IESSA in January 2025. The IESSA is included in the Code as Part 5 and will be effective from December 2026.
2. The ethics provisions in the IESSA (Sections 5100 to 5390) apply to all SAEs and other professional services performed for the same sustainability assurance client. However, the IESBA determined that, as a first step in developing independence standards for SAEs, the IIS in the IESSA should be scoped only to SAEs with the same level of public interest as audits of financial statements.
3. The IIS in the IESSA apply only to SAEs where the sustainability information on which the sustainability assurance practitioner expresses an opinion:
 - (a) Is reported in accordance with a general purpose framework; *and*
 - (b) Is
 - (i) Required to be provided in accordance with law or regulation; *or*
 - (ii) Publicly disclosed to support decision-making by investors or other users.²
4. Regarding SAEs that are not within the scope of the IIS in the IESSA, Part 4B of the Code sets out independence provisions applicable to professional accountants (PAs). Such SAEs include, for example, SAEs:
 - Where the sustainability information on which the sustainability assurance practitioner expresses an opinion is reported solely in accordance with:
 - A framework designed to meet the information needs of specified users; *or*
 - Entity-developed criteria.
 - For which the sustainability assurance report is a restricted use and distribution report.³
5. Although Part 4B is currently applicable to PAs only, other practitioners are encouraged to comply with its provisions when performing SAEs outside of the scope of the IIS in the IESSA.
6. The IESSA was developed in close coordination with the International Auditing and Assurance Standards Board (IAASB), and it is fully interoperable with [International Standard on Sustainability Assurance \(ISSA\) 5000, General Requirements for Sustainability Assurance Engagements](#) (ISSA 5000). ISSA 5000 applies to all SAEs. ISSA 5000 is premised on the basis that the engagement team and the engagement quality reviewer (for those engagements where one has been appointed) are subject to the Code's provisions related to SAEs, or professional requirements, or requirements in law or regulation that are at least as demanding. Depending on the type of SAE, either the IESSA or Part 4B will provide the relevant independence requirements in the context of ISSA 5000.⁴
7. The definition of "sustainability assurance engagement" clarifies that it only covers engagements in which a sustainability assurance practitioner aims to obtain sufficient appropriate evidence in order

² IESSA, paragraph 5400.3c

³ IESSA, paragraph 5400.3e

⁴ ISSA 5000, paragraph 34

to express a conclusion designed to enhance the degree of confidence of the intended users about the sustainability information. Such engagements do not include certification engagements that are designed to confirm compliance with the specifications set out in relevant certification standards and do not meet the definition of an SAE. Consequently, neither the IESSA nor Part 4B applies to such certification engagements.

Project Team Established

8. During the public consultation on the exposure draft of the IESSA, a significant body of respondents supported the proposed scope for the IIS in the IESSA. However, some respondents were of the view that if the provisions of Part 4B were not also applicable to non-PAs performing SAEs within its scope, there would not be a level playing field. They therefore encouraged the IESBA to consider developing a profession-agnostic Part 4B for SAEs that are not within the scope of the IIS in the IESSA.⁵
9. Informed by the consultation on the exposure draft, and as part of its [Strategy and Work Plan 2024-2027 \(SWP\)](#), the IESBA agreed to consider how the Code might be enhanced, whether through revision of the extant Part 4B or the development of a Part 4B-equivalent to the IIS in the IESSA, to ensure that all independence standards for SAEs are addressed in the Code. This proposal had been assessed as having a high priority, due to commence after the finalization and issuance of the IESSA.
10. In June 2025, the IESBA considered the recent trend towards deregulation with respect to sustainability reporting in some major jurisdictions and its implications for the IESBA's 2024-2027 SWP. As a result of the discussion, the IESBA agreed to establish a project team (PT) to gather more information regarding the nature and extent of SAEs outside the scope of the IIS in the IESSA that are being performed in practice.
11. In September 2025, the IESBA established the Project Team and approved its [Terms of Reference](#). The objectives of the PT were to:
 - (a) Undertake fact-finding with a view to establishing a basis for a recommendation to the IESBA as to:
 - (i) Whether to undertake a project to develop independence standards for SAEs outside the scope of the IIS in the IESSA; and
 - (ii) Whether the approach to such a project should be profession-agnostic; and
 - (b) Subject to there being a sufficient basis for doing so,
 - (i) Identify options for the approach to developing such independence standards and their pros and cons from the point of view of maximizing the adoption and implementation of those standards; and
 - (ii) Highlight questions of principle or judgment on which the IESBA's direction is needed before commencing any such project.⁶

⁵ See paragraph 74 in Agenda Item 2B for the 2024 September IESBA meeting.

⁶ For example, whether or not the independence provisions should address the value chain.

II. PT's Activities

12. In accordance with its Terms of Reference, between Q4 2025 and Q1 2026, the PT undertook several information-gathering activities to better understand the characteristics of SAEs outside the scope of the IIS in the IESSA. These activities included:
 - Structured engagement with JSS through dedicated sessions at the November 2025 and April 2026 [IESBA-JSS Liaison Group](#) meetings along with a distribution of a targeted questionnaire,
 - Targeted outreach and questionnaires to sustainability assurance practitioners, including members of the IIMAG and the ISSA 5000 Technical Implementation Contact Group;
 - Targeted outreach to key regional PAOs through a questionnaire incorporated into their progress report on the implementation of the IESSA and ISSA 5000; and
 - Collaboration with IFAC on available datasets and insights from the IFAC State of Play in Sustainability Assurance.
13. Appendix 1 to this document includes a summary of the PT's outreach activities.
14. The PT also considered potential options for commissioning academic research to gain deeper insights into the nature of SAEs performed by non-PAs. However, based on the current information available about such engagements, the PT came to the view that any such research would likely focus on engagements already within, or expected to be within, the scope of the IESSA. It would therefore be unlikely that academic research would be able to provide sufficiently meaningful or decision-useful insights beyond those obtainable through existing data sources and stakeholder engagement.
15. Given the technical nature of the scope and subject matter of the information gathering, and its connection with the status of adoption of the IESSA in specific jurisdictions, the PT believed it would be most beneficial to target practitioners, professional bodies, and standard setters that have been involved in monitoring the implementation of IESSA.

Challenges

Changes in Regulatory Landscape

16. Since the publication of the IESSA, the PT observed that the sustainability reporting and assurance ecosystem continues to evolve rapidly and is characterized by a high degree of dynamism and uncertainty in the regulatory environment. Jurisdictions are progressing at different speeds, including phased implementation of reporting requirements in some jurisdictions and continued reliance on voluntary assurance in others. Recent developments have also led to relaxation of previously announced requirements and timelines, with some jurisdictions focused on regulations addressing the largest listed entities.
17. These changes are significant in the context of the PT's focus on the landscape after the effective date of the IESSA as they affect both the volume and the character of SAEs that may remain outside the scope of the IIS in the IESSA.
18. In addition, based on the information received from the IESBA-JSS Liaison Group, jurisdictions are taking varied approaches to whether they expand their oversight of, and allow, non-PAs to perform SAEs.

Challenges Related to Information Gathering

19. In undertaking its information gathering, the PT has encountered challenges related to the availability and maturity of information on SAEs outside the scope of the IIS in the IESSA. Information on such engagements is often incomplete or unavailable due to the voluntary nature of the disclosures. In addition, practices are still evolving across jurisdictions and practitioner communities.
20. Furthermore, the PT found that there is a lack of consistency in how SAEs covered by Part 4B, and sustainability certification engagements—i.e., those not governed by the Code's provisions—are presented to stakeholders. This inconsistency has complicated efforts to pinpoint which SAEs would fall under Part 4B, particularly in the case of sustainability assurance practitioners who are not PAs.

Matters for PT's Consideration

21. One of the key objectives of the PT's information gathering objective was to understand the types of SAE addressed by Part 4B and the independence risks they present, as a basis for assessing whether the existing provisions remain appropriate. The PT intended to understand whether after December 2026, the effective date of the IESSA:
 - (a) The population and significance of those SAEs that would remain within the scope of Part 4B would warrant priority action;
 - (b) The developments in sustainability assurance standards – including ISSA 5000, which sets out an updated set of requirements for SAEs compared to ISAE 3000 (Revised)⁷ and recognizes the specificities of SAEs – give rise to independence considerations which are not fully addressed by Part 4B, and whether any such gaps are material in practice; and
 - (c) Any potential IESBA response should extend beyond PAs and, if so, what considerations may be relevant to adoption and implementation across different practitioner communities.

Information from IFAC's State of Play Report on Sustainability

22. In order to gather insights into the landscape of sustainability reporting and assurance, IFAC and AICPA-CIMA have performed six years of benchmarking and analysis of global practice in sustainability disclosure and its assurance.⁸ The State of Play captures and analyzes the extent to which companies are reporting and obtaining assurance over their sustainability disclosures, which assurance standards are being used, and which firms are providing the assurance service. Although a limitation of the dataset is that it primarily captures companies whose SAEs would most likely fall within the scope of IIS in the IESSA, this dataset is important because it is the best currently available data. Accordingly, although this data does not serve as a proxy for SAEs outside the scope of the IIS in the IESSA, the PT was able to draw some inferences on future assurance practice based on the available information on the current market, before the effective date of the IESSA.

⁷ International Standard on Assurance Engagements (ISAE) 3000 (Revised), *Assurance Engagements Other than Audits or Reviews of Historical Financial Information*

⁸ See [The State of Play in Sustainability Assurance](#) for previous reports.

23. This study reviewed the largest companies in 22 jurisdictions⁹ by market capitalization as of April 2024 for fiscal years 2019-2023 and covered 1,536 reports. The largest 100 or so companies were reviewed in the six largest economies (mainland China, Germany, India, Japan, UK, and USA) and at least the 50 largest companies were selected for the other jurisdictions.
24. The PT considered insights from The State of Play on sustainability disclosure and assurance, which is based on publicly available information and covers reporting periods through 2024.¹⁰ The analysis of IFAC's State of Play data for 2024 yielded the following observations with respect to the PT's information gathering:¹¹
- PAs performed approximately 59% of the SAEs and predominantly used ISAE 3000 (Revised). Other service providers (OSPs) represented approximately 41% of the market; however, they only used ISAE 3000 (Revised) 37% of the time. (See Figure 1 on *Application of IAASB Standards and the Code* in Appendix 2 to this document.)
 - OSP activity is also concentrated in a limited number of jurisdictions, with the majority of OSP assurance reports from five countries accounting for approximately 67% of activity, indicating that non-PA participation is both regionally and jurisdictionally uneven. (See Figure 2 on *Other Service Provider Sustainability Reports by Country* in Appendix 2 to this document.)
 - Where OSPs perform engagements, the applicable ethical frameworks are often unclear or not disclosed. Approximately 73% of reports do not specify an ethics framework, with only limited reference to the IESBA Code (approximately 13%). This is notable in the context of engagements performed under ISAE 3000 (Revised), which presumes the application of the Code or other professional requirements that are at least as demanding. This suggests potential inconsistency in the application and transparency of ethical frameworks in practice by OSPs. See the table below on standards used by OSPs.

Assurance and Other Standards References in Conclusions			Ethics Standards References in ISAE 3000 (Revised) Assurance Conclusions		
Standards	#	%	Standards	#	%
ISAE 3000 (Revised)	176	37%	IESBA Code	22	13%
ISAE 3410	40	8%	IFIA ¹² Code	11	6%
AA1000	114	24%	ISO/IEC 17021	15	9%

⁹ *From Americas:* Argentina, Brazil, Canada, Mexico, USA; *From EMEA:* France, Germany, Italy, Russia, Saudi Arabia, South Africa, Spain, Turkey, United Kingdom; *From Asia-Pacific:* Australia, China's mainland, Hong Kong, S.A.R., India, Indonesia, Japan, Singapore, South Korea

¹⁰ State of Play data for information reported by companies for fiscal years ending in 2024 has not yet been published by IFAC and AICPA-CIMA.

¹¹ IFAC and AICPA-CIMA's report (including 2024 data) is not public information as of the date of this report to the IESBA.

¹² IFIA – International Federation of Inspection Agencies

Assurance and Other Standards References in Conclusions			Ethics Standards References in ISAE 3000 (Revised) Assurance Conclusions		
Standards	#	%	Standards	#	%
ISO 14064-3 ¹³	213	45%	TIC ¹⁴ Code	0	0%
Other Standards or None	24	5%	Not Disclosed	128	73%

Survey Responses

25. As part of the information gathering, the PT developed questionnaires for targeted outreach to gather information regarding the characteristics and the extent of SAEs that will fall within the scope of Part 4B after the effective date of the IESSA, in line with the issues for PT's consideration in paragraph 21 above.¹⁵
26. The questionnaires were tailored to the specific stakeholder, including JSS, professional bodies, and sustainability assurance practitioners, and they were circulated to:
- (a) 17 JSS from the [IESBA-JSS Liaison Group](#);
 - (b) 6 key regional bodies¹⁶ for further distribution within their network/region; and
 - (c) 11 [IIMAG members](#) and 13 [TICG](#) Members
27. By April 2026, the PT had received 20 responses:
- 13 respondents are JSS, out of which 4 are from Asia-Pacific, 5 from Europe, 2 from North America, 1 from Africa, and 1 from South America.
 - 6 respondents are practitioners, including 3 accounting firms and 3 other service providers. From the practitioners, 2 are from Asia Pacific and 2 from North America (US), while 2 responded from a global point of view.
 - 1 response from a PAO.
28. Appendix 3 provides the list of respondents to the PT's survey.
29. The analysis of questionnaire responses revealed that SAEs within the scope of Part 4B span a wide range of maturity levels across jurisdictions from a practice perspective. Respondents highlighted that sustainability reporting and assurance practices vary significantly, leading to a differing extent of

¹³ The PT has factually reported the data from the IFAC State of Play report and has not made, and would not be able to make, any determination as to whether engagements performed in accordance with ISO standards are sustainability assurance engagements as defined in ISSA 5000.

¹⁴ TIC – Testing, Inspection and Certification

¹⁵ The PT's survey did not constitute a public consultation, as it only served to facilitate the PT's targeted outreach with certain stakeholders and the information gathering.

¹⁶ Accountancy Europe, Grupo Latinoamericano de Emisores de Normas de Información Financiera (GLENIF), Pan African Federation of Accountants (PAFA), Confederation of Asian and Pacific Accountants (CAPA), Association of Southeast Asian Nations Federation of Accountants (AFA) and Institute of Chartered Accountants of the Caribbean (ICAC)

use of Part 4B for SAEs — particularly for voluntary engagements. Examples cited include assurance of green bonds, sustainability-linked loans, supply chain assessments, customer-specific sustainability certifications, and voluntary GHG emissions assurance, with practitioners relying on frameworks such as ISAE 3000, ISO standards, and various national standards.

30. The responses also demonstrate differing expectations regarding the extent of future reliance on Part 4B. Some respondents anticipate that only a limited category of engagements will remain under Part 4B over time, as the IESSA will be adopted and applied in more jurisdictions. Others expect a more significant continuing role for Part 4B, particularly in jurisdictions with slower adoption timelines and different regulatory structures. The PT also noted that the use of the IESSA and the Code for SAEs performed by non-PAs remains largely confined to mandatory requirements.
31. Several key challenges emerged in analyzing the responses. Respondents flagged that much of the relevant information needed for a thorough assessment is not yet available, making definitive conclusions premature. There were also open questions about the scope of the IIS in Part 5 — particularly around what constitutes a "general-purpose" framework.
32. On the question of whether Part 4B adequately covers independence issues for SAEs, a significant body of respondents indicated that it does, raising no gaps in the current provisions. However, many of these same respondents acknowledged that it may simply be too early to identify any gaps. A few practitioners suggested that instead of developing new independence requirements, the IESBA consider developing dedicated non-authoritative guidance to support the practical application of Part 4B to these SAEs.
33. A few respondents flagged specific areas that may warrant further consideration within Part 4B as it relates to SAEs. These include non-assurance services, the role of network firms, complexities around group engagements, and the treatment of information sourced from the value chain — all of which could present unique independence considerations in the sustainability context.

III. Analysis and PT's Recommendation

34. The evolving regulatory landscape for sustainability reporting and assurance has implications for the PT's work, particularly in assessing the population, characteristics, and level of public interest of SAEs that will remain within the scope of Part 4B after the effective date of the IESSA.
35. The information-gathering activities have indicated that practices are developing at different rates across jurisdictions. In the case of SAEs outside the scope of the IIS in the IESSA, most commonly the voluntary engagements, there are differing levels of maturity in sustainability reporting and assurance, as well as variation in the ethical frameworks applied by practitioners, especially practitioners who are non-PAs. This heterogeneity made it difficult for the PT to establish a clear and stable baseline for evaluating the nature and extent of such engagements.
36. Nevertheless, the PT has not identified evidence indicating that the independence provisions in Part 4B are insufficient to address SAEs outside the scope of the IIS in the IESSA or that there is any area of immediate risk or public interest concern that would require a priority standard-setting response.
37. Evidence relating to these engagements remains limited and reflects a market that is still evolving as jurisdictions and practitioners implement ISSA 5000 and the IESSA. Accordingly, current practices may not yet be indicative of the market's longer-term structure, and further evidence is expected to emerge over time, as the legal and regulatory framework continues to develop and mature in jurisdictions.

38. In light of the current limitations in available information and acknowledging that practices may continue to evolve following the effective date of the IESSA, the PT has not identified a clear public interest driver that would warrant further standard-setting with respect to SAEs outside the scope of the IIS in the IESSA at this stage.
39. The PT therefore recommends that the IESBA not initiate at this time a standard-setting project to develop independence standards for SAEs outside the scope of the IIS in the IESSA. Consistent with the Public Interest Framework's emphasis on evidence-based standard-setting, the PT considers that starting such a project now would be premature, given the limited availability of evidence and the evolving nature of sustainability assurance practices.
40. Instead, the PT recommends that the IESBA continue monitoring developments in the sustainability assurance landscape and practice through the IIMAG, including:
 - Reviewing emerging evidence regarding SAEs as ISSA 5000 and the IESSA are implemented; and
 - Reassessing the need for further work in the future if evidence emerges indicating a public interest need.
41. In the PT's view, the existing independence provisions in Part 4B, together with continued monitoring through the IIMAG, provide an appropriate basis and framework for the IESBA to remain responsive to emerging issues with respect to SAEs not addressed in the IIS in the IESSA.
42. This approach would enable the Board to remain agile and alert to developments in the sustainability assurance ecosystem, while focusing standard-setting resources on areas with greater public interest need.

Appendix 1

PT's Action Plan

The tables below set out the Part 4B Project Team's (PT) action plan for its information gathering in accordance with its [Terms of Reference](#).

A. Engagement with Jurisdictional Standard Setters (JSS)

Engagement with members of the IESBA-Jurisdictional Standard Setters (JSS) Liaison Group from jurisdictions where the [International Ethics Standards for Sustainability Assurance \(including International Independence Standards\) \(IESSA\)](#), has been, or is planned to be, adopted and implemented.

Action	Details	Outcome and Next Steps
JSS November 3-4, 2025 Meeting	45-minute session at the November 2025 JSS virtual meeting. Objectives of the session: <ul style="list-style-type: none">• To consider an update on a new workstream• To exchange views on, and provide input to, the PT's information gathering work	Input considered as part of the information gathering work.
JSS Questionnaire	The PT and the Adoption and Implementation Working Group (A&I WG) developed a questionnaire and circulated it to the IESBA-JSS Liaison Group in early January, with a comment deadline until February 9, 2026.	A preliminary overview of responses was provided at the March 2026 IESBA meeting. Full analysis of the responses forms part of the PT's final report.
JSS April 2026 Meeting (Follow-Up Discussion)	Objectives of the session: <ul style="list-style-type: none">• Provide an overview of questionnaire results• Discuss the way forward	The PT will report back on the discussion at the June 2026 IESBA meeting.

B. Targeted Outreach to Practitioners

Targeted outreach to members of the IESSA Implementation Monitoring Advisory Group (IIMAG), the ISSA 5000 Technical Implementation Contact Group (TICG), and other practitioners to gather information regarding SAEs performed by sustainability assurance practitioners (SAPs).

Action	Details	Outcome and Next Steps
Engagement with IIMAG and TICG	The PT developed a questionnaire focusing on SAPs' practices and circulated it to IIMAG and ISSA 5000 TICG members in early January for input by February 9, 2026.	A preliminary overview of responses was provided at the March 2026 IESBA meeting. Full analysis of the responses forms part of the PT's final report.
Outreach to other SAPs	Call with Matt Honey, EY Partner & APESB sustainability task force member, and Karen Troester, EY on November 11, 2025 to discuss the extent of use of Part 4B for SAEs by professional accountants (PAs).	Stakeholder input informed the development of the questionnaire for SAPs.
	Call with Janwook Lee, Korean Standards Association on October 7, 2025.	Stakeholder input informed the PT's approach to information gathering from non-PA SAPs.
TIC Council	Call with Marc Boissonnet (ESG Director) and Alberto Monje Gama (Sustainability Policy Manager) in November 2025.	Stakeholder input informed the PT's approach to information gathering from non-PA SAPs.

C. Collaboration with IFAC and other professional bodies

Collaboration with IFAC's sustainability research team and other professional bodies to gather relevant information.

Action	Details	
Engagement with IFAC	The PT held meetings with David Madon (IFAC Director) to discuss the IFAC State of Play dataset and scope for collaboration.	Relevant information from the IFAC State of Play dataset forms part of the PT's final report.

Action	Details	
Outreach to other Professional Bodies	<p>The PT developed a questionnaire that it circulated to key regional professional bodies:</p> <ul style="list-style-type: none"> • Accountancy Europe (ACE) • Pan African Federation of Accountants (PAFA) • Saudi Organization for Chartered and Professional Accountants (SOCPA) • Group of Latin American Financial Reporting Standards Issuers (GLENIF) • Confederation of Asian and Pacific Accountants (CAPA) and ASEAN Federation of Accountants (AFA) <p>The questionnaire accompanied information-gathering on the implementation of ISSA 5000 and the IESSA, with a comment deadline until February 20, 2026.</p>	Full analysis of the responses forms part of the PT's final report.

D. International Accreditation Forum (IAF)

Liaison with the IAF with a view to undertaking a survey of SAPs who are not PAs.

Action	Details	Outcome and Next Steps
IAF Coordination and Survey	Call with Astone, Antonio; Emanuele Riva and Matt Gantley from IAF in November 2025.	Stakeholder input informed the PT's approach to information gathering from non-PA SAPs.

E. Research

Exploring commissioning academic or independent research to gain deeper insights into the nature of SAEs performed by non-PAs, the standards applied (e.g., ISAE 3000, ISO 17029, national standards), and the extent to which such practitioners apply the Code.

Action	Details	Outcome and Next Steps
Academic Partnership Exploration	Call with Donna Street (International Association for Accounting Education and Research (IAAER)), Linda Kidwell (Professor of Accounting at Uni. NSU Florida), and Warren Maroun (Professor of Accounting at University of Leeds (UK) and Witwatersrand (SA), former IAASB member) on November 5, 2025 regarding research on the sustainability assurance market.	Stakeholder input informed the PT's approach to information gathering from non-PA SAPs

Appendix 2

Figure 1: Application of IAASB Standards and the Code¹⁷

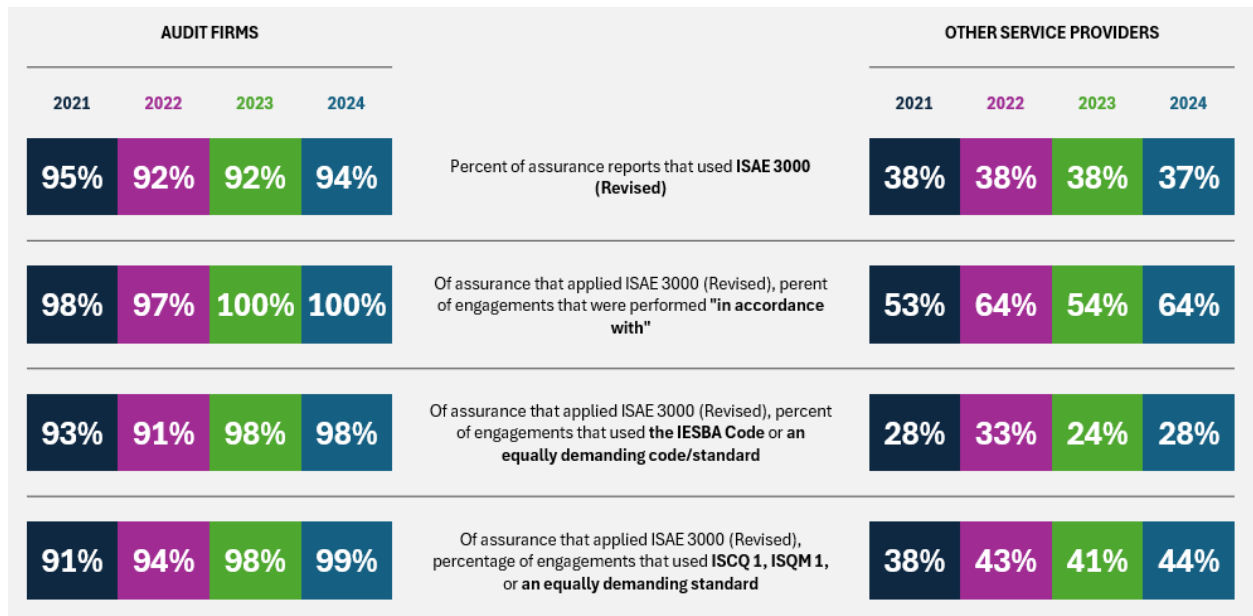
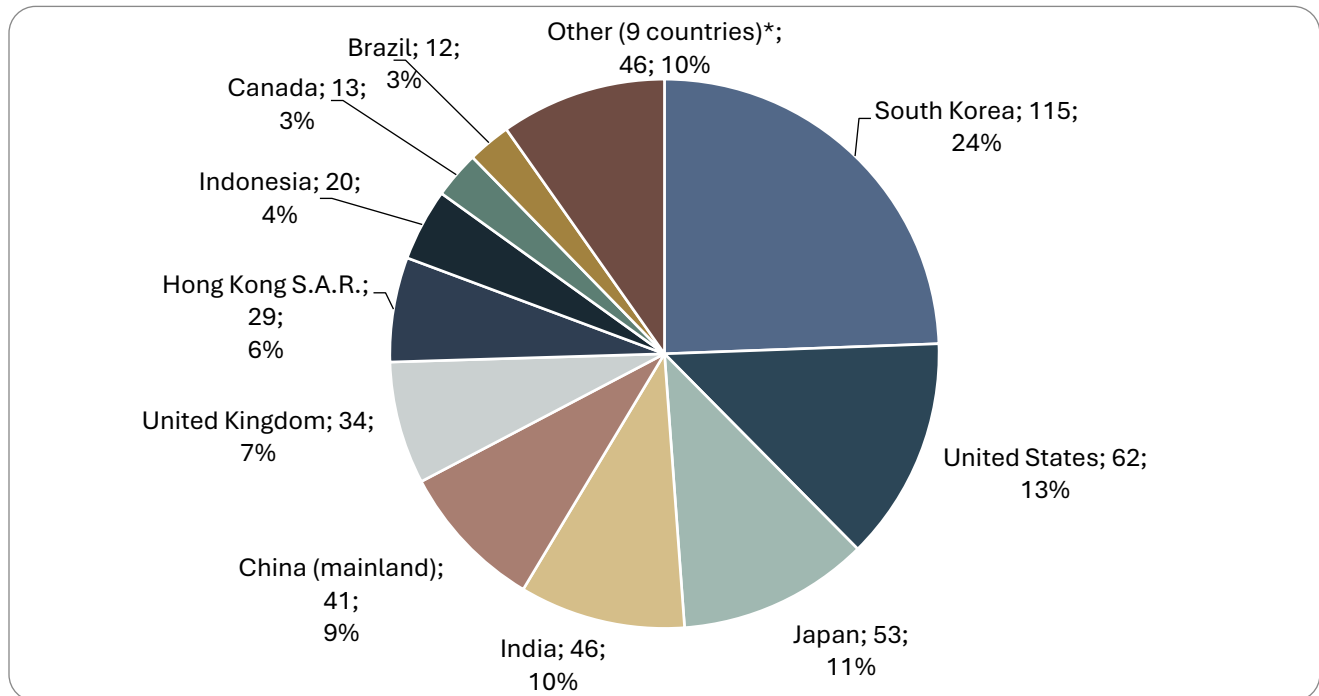


Figure 2: Other Service Provider Sustainability Reports by Country¹⁸



¹⁷ IFAC and AICPA-CIMA's report (including 2024 data) is not public information as of the date of this report to the IESBA.

¹⁸ Note: ~100 companies were reviewed in China (mainland), India, Japan, United Kingdom, United States, while ~50 companies were reviewed in the remaining jurisdictions. *Other (9 countries, ~10%) consists of: Mexico (2.5%), Singapore (1.9%), South Africa (1.9%), Australia (0.8%), Saudi Arabia (0.8%), Russia (0.6%), Spain (0.4%), Türkiye (0.4%), Argentina (0.2%)

Appendix 3

List of Respondents to PT's Questionnaire

Respondents (20)	Region
JSS (13)	
Accounting Professional & Ethical Standards Board (APESB) (AUS)	Asia-Pacific
American Institute of CPAs (AICPA) (US)	North America
Chartered Professional Accountants of Ontario (CPA Ontario) (CA)	North America
Délégation Internationale pour l'Audit et la Comptabilité (DIPAC) (FR)	Europe
External Reporting Board (XRB) (NZ)	Asia-Pacific
Hong Kong Institute of Certified Public Accountants (HKICPA) (HK)	Asia-Pacific
Independent Regulatory Board for Auditors (IRBA) (SA)	Africa
Instituto dos Auditores Independentes do Brasil (IBRACON) (BR)	South America
Institut der Wirtschaftsprüfer (IDW) (G)	Europe
Japanese Institute of Certified Public Accountants (JICPA) (J)	Asia-Pacific
Royal Netherlands Institute of Chartered Accountants (NBA) (NL)	Europe
UK Financial Reporting Council (UK FRC) (UK)	Europe
Wirtschaftsprüferkammer (WPK) (G)	Europe
PAO (1)	
Institute of Chartered Accountants of Barbados	North America
Practitioners (6)	
China Quality Certification Centre*	Asia-Pacific
Deloitte Australia	Asia-Pacific
DNV Global*	Global
ERM CV (US)*	North America
KPMG Global	Global
PwC US	North America

* Non-PA Practitioners