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EUROPEAN COMMISSION
DIRECTORATE-GENERAL FOR FINANCIAL STABILITY, FINANCIAL SERVICES AND CAPITAL MARKETS UNION

Financial Markets
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Brussels
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Subject: Update on the request for a technical advice for the development of EU specific add-ons and carve-outs (if applicable) to be included in the Delegated Act adopting limited assurance sustainability standards based on the final version of ISSA 5000.

Dear Mr Prodromides,

On 7 March 2024, the Commission sent the CEAOB a letter requesting to design and adopt non-binding assurance guidelines and a technical advice for the development of EU specific add-ons and carve-outs (if applicable) to be included in the Delegated Act on limited assurance standards based on the final version of ISSA 5000.

Following a public consultation, on 30 September 2024, the CEAOB published its guidelines on limited assurance on sustainability reporting. The Commission welcomes the guidelines and recognises their valuable contribution towards more consistent practices across the EU market and burden reduction.

On 26 February 2025, the Commission published its Omnibus simplification package proposal with the aim of streamlining the CSRD regulatory framework making it more proportionate and easier to implement by EU companies, without undermining the policy objectives and overall ambition of the European Green Deal.

The Commission proposal essentially contained two changes on the sustainability assurance topic, namely:

1. The Commission proposed to remove the deadline for the adoption of a Delegated Act for limited assurance standards and to first issue (by 2026) Commission guidelines targeted on specific topics to clarify the necessary procedures that assurance providers need to perform as part of their limited assurance engagement

2. The Commission proposed to remove the empowerment for the adoption of reasonable assurance standards altogether to clarify that reasonable assurance will not be mandated for sustainability reporting in the coming years.

On 13 March 2025, the Commission sent the CEAOB a second letter inviting to reorientate its focus and provide technical advice for the development of targeted assurance guidelines.

On 8 December 2025, the co-legislators reached political agreement on the Omnibus simplification package.

As regards the two points above related to the sustainability assurance topic, the agreed text states that:

1. The Commission is required to adopt a Delegated Act for limited assurance standards by 1 July 2027 to set out the procedures that the assurance providers shall perform in order to draw his, her or its conclusions on the assurance of sustainability reporting, including engagement planning, risk consideration and response to risks and type of conclusions to be included in the assurance report on sustainability reporting, or, where relevant, in the audit report.

2. The Commission's empowerment for the adoption of reasonable assurance standards has indeed been removed.

In this context, the Commission would like to update its request to the CEAOB. The CEAOB is invited to re-focus on the preparation of technical advice for the development of EU specific add-ons (and possible carve-outs) to ISSA 5000 to be used for the preparation of the Delegated Act adopting limited assurance sustainability standards.

Carve-outs could cover items which are not applicable in or contradictory with EU legal provisions, if any, and those specific to reasonable assurance. Add-ons could cover items not covered by ISSA 5000. Examples of such elements include: the assurance opinion on compliance of the sustainability reporting with the requirements to markup sustainability reporting, and with the reporting requirements provided for in Article 8 of Regulation (EU) 2020/852. Add-ons could also cover necessary specifications or clarifications to facilitate the implementation of ISSA 5000 provisions within the EU context, for example, the double materiality and fair presentation requirements.

The list of topics above is not exhaustive, and other items might be identified during the detailed analysis of the ISSA 5000 text. In the context of this work, the CEAOB should keep in mind the need to ensure that the assurance of sustainability reporting remains proportionate and does not impose unnecessary burden on the reporting company. Moreover, the assurance opinion on sustainability reporting will influence the confidence in sustainability report and assurance providers should have an appropriate standard to perform their work before expressing their conclusions.

To facilitate interoperability with the international standards, the technical advice should clearly identify carve-outs and add-ons based on the text of ISSA 5000.

We would welcome to receive this technical advice by 30 September 2026.

Yours sincerely,

Electronically signed

Martin MERLIN

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Electronically signed on 27/01/2026 11:32 (UTC+01) in accordance with Article 11 of Commission Decision (EU) 2021/2121