



NO. 05 ————— SUSTAINABILITY REPORTING SERIES

Prove It

Data, controls, and assurance

Prove It

Data, controls, and assurance



By Tyler J. Butler



75%

of large companies in a 22-jurisdiction study got assurance on their sustainability disclosures in 2024 (IFAC, AICPA and CIMA)¹

Dec 15

2026: ISSA 5000, the global sustainability assurance standard, applies to reporting periods that begin on or after this date (IAASB)²

58%

of U.S. public firms' self-reported emissions figures were later revised (Cohen, Rouen and Sachdeva, Nature Climate Change)³

01

When someone asks you to prove it

Your assurance provider's request list lands on a Tuesday. One line asks for the meter readings behind one site's electricity figure, who entered them, and proof that someone else reviewed the total. You know the number is right. You are less sure you can show how it got there.

This volume is about that gap, between a number you trust and a number you can evidence. Assurance is an independent check on what you report, and for large companies it is now the norm.¹

The check itself is changing. One global assurance standard, ISSA 5000, takes effect for periods beginning on or after December 15, 2026.² No. 04, The Rulebook, covers which reporting rules apply to you. This one covers who checks, how hard they look, which standard they follow, and what to have ready.

IN THIS GUIDE

- | | |
|---|--|
| 01 When someone asks you to prove it | 06 What providers ask for, and the controls behind it |
| 02 How common assurance is, and who provides it | 07 Data, AI, and why numbers get restated |
| 03 Limited versus reasonable, in plain words | 08 Getting assurance-ready in a year |
| 04 The standards behind the assurance report | 09 What to watch next |
| 05 Where it is required, and where it is your call | |

02

How common assurance is, and who provides it

Four terms first.

Assurance

An independent practitioner examines what you report and issues a written conclusion. U.S. standards, from the American Institute of CPAs (AICPA), call the same kind of work attestation.

Verification

The word used in ISO 14064-3, and by many providers outside the audit profession, for checking a greenhouse gas statement.

Restatement

Changing a figure you already published, because the method changed or the figure was wrong. Also called a prior-year adjustment.

ICSR

Internal control over sustainability reporting: the owners, checks and records that make a number reliable before anyone outside looks at it.

The two studies below cover different companies and years, so never read them as one trend line.

Globally. The International Federation of Accountants (IFAC), with AICPA and the Chartered Institute of Management Accountants (CIMA), reviews about 1,400 large companies in 22 jurisdictions. For 2024, 75 percent obtained assurance on their sustainability disclosures, up from 73 percent a year earlier and 51 percent in 2019.^{1,4} Most of that work was limited assurance, and audit firms performed 59 percent of the engagements.¹

Assurance went from half of large companies to three in four

Share of companies in the IFAC, AICPA and CIMA global study that obtained assurance on sustainability disclosures, by data year. Each dot is one year's figure. The latest year is in red.

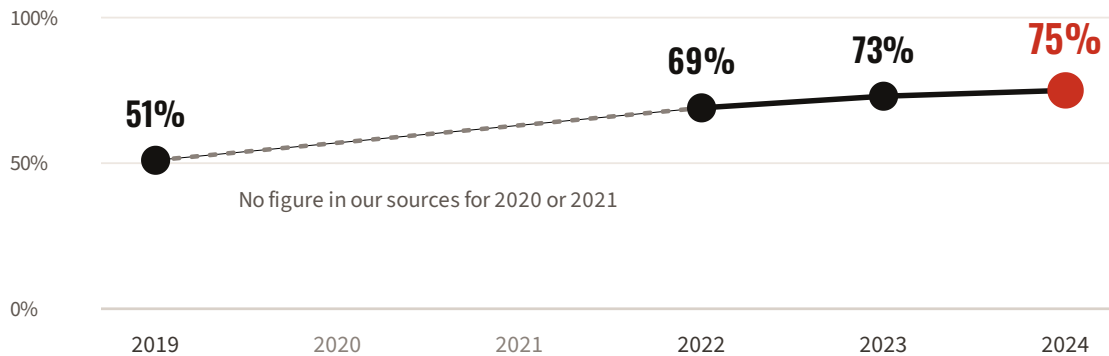


Figure 1. The dotted line spans years with no figure in our sources. Source: IFAC, AICPA and CIMA.^{1, 4}

In the United States. The Center for Audit Quality (CAQ) studies the S&P 500. Its latest edition (July 2025) covers 2023, when 362 companies obtained assurance or verification over certain metrics, or 73 percent of those that reported.^{5, 6} All but two of the 362 had their greenhouse gas emissions assured, and most chose limited assurance. Only 24 percent of the assured companies used a public company auditor.⁵

Audit firms lead globally. In the S&P 500, most assurance comes from other providers

Two separate studies with different samples, units and years, shown together for contrast only. Read each panel on its own.

STUDY 1 · GLOBAL · 2024 DATA

COUNTS ENGAGEMENTS

59% of sustainability assurance engagements were performed by audit firms



Audit firms

Other providers

STUDY 2 · U.S. S&P 500 · 2023 DATA

COUNTS COMPANIES

24% of the S&P 500 companies that obtained assurance used a public company auditor



Public company auditors

Other providers

Figure 2. Sources: IFAC, AICPA and CIMA (global, 2024 data);¹ Center for Audit Quality (S&P 500, 2023 data).⁵

IN PRACTICE When your board asks whether peers get assurance, the answer for large U.S. companies is yes, mostly on emissions and mostly at the limited level. Before you answer, check your closest peers' latest reports for which metrics they had assured, at what level, and by whom.

03

Limited versus reasonable, in plain words

The two levels differ in how much risk of a wrong conclusion the practitioner accepts. That sets how much work gets done and how the conclusion is worded.

In a reasonable assurance engagement, the practitioner reduces that risk to "an acceptably low level" and expresses an opinion. In a limited assurance engagement, the risk is reduced to a level that is acceptable but "greater than for a reasonable assurance engagement." The conclusion then says whether anything came to the practitioner's attention that suggests the information is materially misstated. The procedures are lighter, but they must still be planned to reach a level of assurance that is "meaningful."⁷

The quoted wording comes from the definitions in ISSA 5000, the global standard covered in section 04.

Limited assurance is a lighter check than reasonable assurance, with a differently worded conclusion

The two levels of assurance side by side: how much work is done, how the conclusion reads, and how much risk of a wrong conclusion the practitioner accepts.

LIMITED ASSURANCE

U.S. attestation term: review

DEPTH OF WORK

Lighter procedures, less testing

HOW THE CONCLUSION READS

Nothing came to our attention that suggests a material misstatement.

RISK OF A WRONG CONCLUSION

Acceptable, but higher

REASONABLE ASSURANCE

U.S. attestation term: examination

DEPTH OF WORK

More procedures, more testing

HOW THE CONCLUSION READS

In our opinion, the information is fairly stated in all material respects.

RISK OF A WRONG CONCLUSION

Acceptably low

Figure 3. Our plain-language paraphrase. Actual reports follow the wording of the standard used. Definitions: ISSA 5000, the international sustainability assurance standard.⁷ U.S. terms: AICPA attestation standards, as described by the Journal of Accountancy.⁸

Limited assurance means less testing and less comfort for the reader. It is still an independent check.

IN PRACTICE Read the conclusion paragraph of your current assurance report. If it says nothing came to the provider's attention, you have limited assurance. Describe it that way, and never as "audited."

The standards behind the assurance report

Every assurance report names the standard the provider followed. These are the ones you will see, with their status as of October 2026.

STANDARD	ISSUED BY	WHAT TO KNOW
ISSA 5000	International Auditing and Assurance Standards Board (IAASB)	Approved in September 2024. ⁹ Effective for periods beginning on or after December 15, 2026, with early application permitted. Covers limited and reasonable assurance, works with any suitable reporting framework, and is written for accountants and non-accountants. ²
ISAE 3000 (Revised) and ISAE 3410	IAASB	The general assurance standard and its companion for greenhouse gas statements, in use before ISSA 5000. The IAASB says ISSA 5000 "incorporates elements of" both. ⁹
AT-C 105, 205 and 210	AICPA (United States)	An examination (AT-C 205) gives reasonable assurance; a review (AT-C 210) gives limited assurance. Two proposed sustainability sections built on ISSA 5000, AT-C 325 and 330, closed for comment on June 30, 2026, as reported by the Journal of Accountancy. ⁸
AA1000AS v3	AccountAbility	Names its two levels High and Moderate. Type 1 covers adherence to the AccountAbility Principles; Type 2 adds specified performance information. ¹⁰
ISO 14064-3:2019	ISO	A verification standard for greenhouse gas statements. California regulatory staff propose to accept it with added accreditation requirements, as reported by Sullivan & Cromwell. ¹¹
IESSA	IESBA, the global ethics standard setter	Ethics rules for sustainability assurance, for accountants and other practitioners. Effective on the same date as ISSA 5000; provisions on value chain components follow on July 1, 2028. ¹²

ISSA 5000 is the one to learn. The IAASB's adoption list, updated in September 2026, shows 24 adopting jurisdictions by our count. The United States is marked as in progress.²

IN PRACTICE Ask your provider which standard your next engagement will follow and when they switch to ISSA 5000. For a calendar-year reporter, the first period that starts after the effective date is 2027.

Where it is required, and where it is your call

EUROPEAN UNION

As of October 2026, the EU's Corporate Sustainability Reporting Directive covers companies with more than 1,000 employees and net turnover above EUR 450 million.^{13,14} They need limited assurance on their sustainability statement.^{13,14} The planned step up to reasonable assurance is gone. The European Commission says its power to adopt such standards "has indeed been removed."¹⁴

The Commission must adopt an EU limited assurance standard by July 1, 2027. In January 2026 it asked the Committee of European Auditing Oversight Bodies for advice by September 30, 2026 on "EU specific add-ons (and possible carve-outs) to ISSA 5000."¹⁴ We had not seen that advice published as of early October 2026.

CALIFORNIA

SB 253 is the state's emissions reporting law. Its text, as republished by public.law, sets limited assurance "beginning in 2026" and reasonable assurance "beginning in 2030," both over Scope 1 and 2 emissions (direct emissions and purchased energy).¹⁵ Limited assurance over Scope 3 (value chain emissions) also begins in 2030.¹⁵

The first filing works differently. Reports are due under the California Air Resources Board's (CARB) revised deadline of November 10, 2026, pending final state approval. No assurance is required for that filing.^{11,16}

CARB staff propose limited assurance over Scope 1 and 2 starting in 2027, with a formal rulemaking expected later in 2026, as reported by Mayer Brown and Sullivan & Cromwell.^{11,16} That is a proposal as of October 2026. Staff would accept AA1000AS v3, AT-C 210 and ISO 14064-3:2019.¹¹ They would also accept ISAE 3410 with ISAE 3000 (Revised) for engagements starting before December 15, 2026, and ISSA 5000 from that date.¹¹

U.S. FEDERAL AND THE UNITED KINGDOM

No federal assurance requirement is in effect. The Securities and Exchange Commission's (SEC) 2024 climate rule, which included an attestation report on emissions, never took effect. The SEC proposed rescinding it in 2026 and had taken no final action as of October 2026.¹⁷

In the UK, the Financial Conduct Authority's final rules of September 30, 2026 leave assurance voluntary. Listed companies must say whether they obtained it and, if so, name the provider, the level and the standard used. The rules apply to accounting periods beginning on or after January 1, 2027.¹⁸

VOLUNTARY, WITH A PUSH

Where no rule applies, assurance is your call. Voluntary schemes are starting to ask for it. Version 2.0 of the Science Based Targets initiative's (SBTi) Corporate Net-Zero Standard sorts companies into Category A and Category B by turnover, geography, emissions and employee count. It "introduces mandatory limited assurance requirements for Category A companies covering inventories and target-setting metrics."¹⁹ No. 06, Carbon, Nature, and the Value Chain, covers that standard.

06

What providers ask for, and the controls behind it

Most of this section is our own practical guidance. No standard prescribes it, and your provider's process may differ.

A request list looks long, but it tends to ask the same things about every metric. Expect questions on the definition and boundary, the raw data source, who calculated the figure and with which factors, who reviewed it, and what it reconciles to.

We suggest a walkthrough as the quickest way to see where you stand. Pick one metric and follow it from source record to published figure, asking for evidence at each stop.

A walkthrough follows one number from source to report

Our illustration: one site's purchased electricity on its way to a reported Scope 2 figure. Read left to right. Under each stop is the evidence a provider is likely to ask for.



Figure 4. Collaboration for Good illustration. No standard sets these steps, and your provider's may differ.

Evidence like that comes from controls you run all year. COSO, the body behind the internal control framework finance teams already use, published guidance in March 2023 on internal control over sustainability reporting. It interprets each of the 17 principles in its 2013 framework for sustainability information.²⁰

You do not need all 17 on day one. The five steps below are our suggested starting sequence, in our own shorthand. COSO does not set them out this way.

- 1

Set ownership
Name an owner and a reviewer for every reported metric, and a senior sponsor for the whole set. Bring in finance or internal audit early.
- 2

Map where each number can go wrong
Walk each metric from source to report. Mark manual entry, unit conversions, estimates, and boundary changes such as acquisitions.
- 3

Put a check at each risk point
Use second-person review, reconciliations to finance or operations data, locked emission factors, and a change log.
- 4

Write it down and keep the evidence
Keep a short methodology per metric. Save proof of each check when it happens, in one place.
- 5

Test and fix
Each year, have someone outside the reporting team test a sample before the provider does. Log what failed and fix the cause.

07

Data, AI, and why numbers get restated

Teams name the data itself as the weak point. The surveys below agree, but read the labels. Each comes from a firm that sells reporting services or software.

WHAT THE SURVEY FOUND	WHO ASKED, AND WHEN
57 percent cited data quality as their top challenge; 88 percent put it in their top three	Deloitte, consultancy survey of 300 public company executives, January 2024 ²¹
Use of AI for sustainability reporting almost tripled in a year, to 28 percent from 11 percent	PwC, consultancy survey of 496 companies, 2025 ²²
26 percent said internal AI audits detected AI errors that had reached external audiences or the board	Workiva, vendor survey of 2,272 respondents across corporate reporting, May 2026 ²³

Our view is that the tool matters less than the controls around it. A spreadsheet with restricted access, version history, locked formulas and a named reviewer can hold up in an assurance

engagement. A software platform can fall short if nobody checks what goes into it.

Treat AI the same way. Record where it drafted or filled in a figure, have a named person check the output against the source, and keep that evidence.

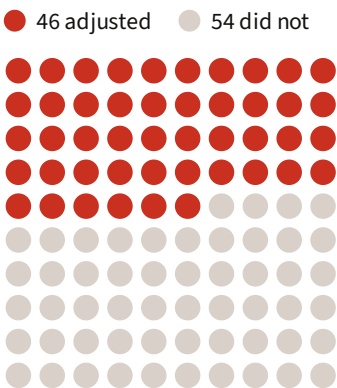
WHY NUMBERS CHANGE AFTER PUBLICATION

Deloitte UK reviewed the most recent reports that FTSE 100 companies, the UK's 100 largest listed companies, had published as of December 31, 2024. It found that 46 made material prior-year adjustments, 69 adjustments in all. The most frequent reason was a change in method, and errors accounted for about a quarter.²⁴

Nearly half of the FTSE 100 adjusted prior-year sustainability figures

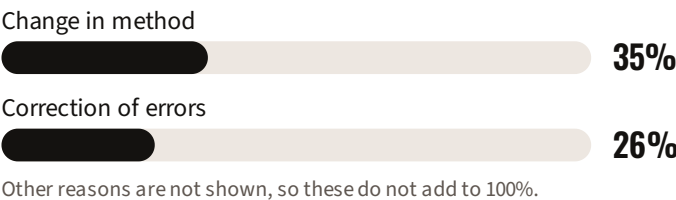
Deloitte UK's review of the most recent reports that FTSE 100 companies (the UK's 100 largest listed companies) had published as of December 31, 2024. Each dot is one company. Each bar is a share of the 69 material prior-year adjustments that the 46 companies made.

HOW MANY COMPANIES



WHY THEY ADJUSTED

Share of the 69 adjustments, by reason



WHAT THEY ADJUSTED

Share of the 69 adjustments, by type of figure

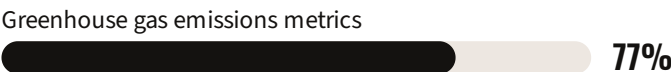


Figure 5. Source: Deloitte UK.²⁴

We read the two causes differently. A restatement for a better method is normal maintenance. A restatement for an error means a control failed. Say which one it is when you publish the change.

🕒 WHAT THE RESEARCH SAYS

Ballou, Chen, Grenier and Heitger, Journal of Accounting and Public Policy, 2018. Study of restatements in corporate social responsibility reports.²⁵

Assurance improved the numbers. With either type of provider it led to better definitions, scopes and methods. Accounting firms spotted past inaccuracies earlier than other providers and prevented future ones.

🕒 ANOTHER VIEW

Cohen, Rouen and Sachdeva, Nature Climate Change, 2026. Analysis of U.S. public firms' self-reported emissions and later revisions.³

58 percent of self-reported emissions figures were later revised, and understatements were more common than overstatements. Assurance did not explain which figures were revised. Neither did changes to measurement method.

WHY IT MATTERS Both findings can hold. Assurance sharpens methods and catches some problems, and it has not stopped emissions figures from being revised. In our view the fix sits upstream, in your controls.

A restatement for a better method is normal maintenance. A restatement for an error means a control failed.

Getting assurance-ready in a year

In our view, twelve months is enough if the first engagement is narrow. Start where nearly every assured S&P 500 company starts, with greenhouse gas emissions.⁵ The plan below is our suggested schedule. No standard or regulator sets it, so adjust it to your reporting calendar.

WHEN	WHAT YOU DO	WHAT YOU HAVE AT THE END
Months 1 to 3	Decide scope: which metrics, which level, which standard. Run the walkthrough in section 06 on each metric and list the gaps. Talk to two or three providers.	A scoped metric list and a gap list
Months 4 to 6	Assign owners and reviewers. Write a methodology per metric. Add checks where the gaps are.	Methodologies and a control list
Months 7 to 9	Dry run on last year's data, done by internal audit or as a readiness review by a provider. Fix what it finds.	A findings log, closed out
Months 10 to 12	Close the year with evidence saved as you go. Hand the provider a complete evidence file on day one.	An evidence file and an assurance report

On cost, one reference point is a December 2025 study prepared for EFRAG, the body that drafts the EU's reporting standards. It surveyed the first companies to report under those standards and put assurance costs at EUR 115,000 for smaller companies and EUR 1 million for larger ones.²⁶ That compares with estimated total first-year costs of EUR 287,000 for preparers below 10,000 employees and EUR 1.97 million above.²⁶ Those estimates cover a full EU sustainability statement, far wider than an emissions-only engagement, so get your own quotes early.

🎯 WHAT THE RESEARCH SAYS

Casey and Grenier, Auditing: A Journal of Practice & Theory, 2015. Study of U.S. firms with and without assurance on corporate social responsibility reports.²⁷

Assurance was associated with a lower cost of equity capital and with smaller, less scattered analyst forecast errors. The effects were stronger when an accounting firm provided the assurance.

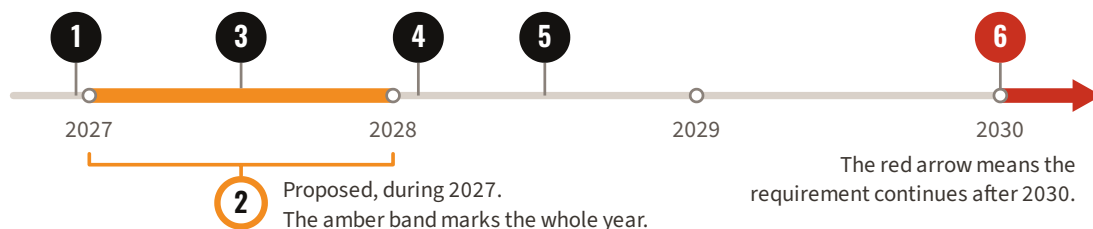
Why it matters. It helps when you ask for budget. The study shows an association in older U.S. data, so present it as supporting evidence and stop short of promising a return.

What to watch next

Six dates shape the next four years. One is a staff proposal, and the last comes from California's statute, with the detailed rules still to be written.

Six assurance dates fall between December 2026 and 2030

Dates for assurance standards and requirements, as of October 2026, drawn to scale in time. Numbers above the line are single dates. Number 2, below it, is a proposal for a whole year.



1 • Dec 15, 2026. ISSA 5000 and the IESSA ethics standards apply to periods beginning on or after this date.^{2, 12}

3 • July 1, 2027. Deadline for the European Commission to adopt the EU limited assurance standard.¹⁴

5 • July 1, 2028. IESSA provisions on value chain components take effect.¹²

2 • During 2027 (proposed). California: CARB staff propose limited assurance over Scope 1 and 2, as reported by Mayer Brown.¹⁶

4 • Jan 31, 2028. After this date SBTi takes new submissions only under Version 2.0, with its limited assurance requirement.¹⁹

6 • From 2030. California statute: reasonable assurance over Scope 1 and 2, limited assurance over Scope 3.¹⁵

● Scheduled date ○ — Proposal, and the period it covers ● — In statute from 2030 onward, rules pending

Figure 6. ISSA 5000 is the global sustainability assurance standard. IESSA is the International Ethics Standards for Sustainability Assurance. CARB is the California Air Resources Board. SBTi is the Science Based Targets initiative. Sources: IAASB, IESBA, European Commission, SBTi, California Health and Safety Code, and Mayer Brown for the CARB staff proposal.^{2, 12, 14, 15, 16, 19}

↑ RISING

AI in the reporting process

PwC found AI use for sustainability reporting at 28 percent, up from 11 percent a year earlier.²² Workiva's vendor survey suggests the checks on it lag (section 07).²³

✓ FALLING

U.S. reporting rates

G&A Institute counts 93.9 percent of S&P 500 companies reporting in 2025, down from 97.8 percent in 2024. It also says more reporters obtained external assurance, without giving a figure in its release.²⁸

— HOLDING

Limited assurance as the default

Most assurance in the global study was limited.¹ The EU has removed its planned move to reasonable assurance.¹⁴

● SCHEDULED DATE

December 15, 2026

ISSA 5000 and IESSA take effect.^{2, 12} The IAASB's adoption list shows national versions following in Japan (April 1, 2027) and Canada (December 15, 2027).²

COLLABORATION FOR GOOD OUTLOOK

Our read is that the level of assurance is settling at limited for the next few years, while the standard behind it converges on ISSA 5000. The EU's standard is to be built on it, and CARB staff and the AICPA both propose to draw on it. For a U.S. team, the likely pressure over the next 12 to 24 months comes from California and voluntary schemes such as SBTi, with no federal requirement in effect.

Suppose your Scope 1 and 2 figures could pass a limited assurance engagement under ISSA 5000 for the 2027 reporting year. You would probably be covered for most of what is scheduled. Scope 3 and reasonable assurance sit further out, and those dates may move as California's rulemaking proceeds.

Our analysis, based on the sources cited in this section. Not a prediction from any single source.

TALK IT THROUGH

1. Which published metrics could we trace today from source record to reported figure, with evidence at every stop?
2. Who owns each metric, who reviews it, and where is that written down?
3. Is our current assurance limited or reasonable, over which metrics, and under which standard? When does our provider move to ISSA 5000?
4. Which figures have we restated in the last three years, and was each a method change or an error?
5. If California or a customer asked for assurance over Scope 1 and 2 next year, what would we fix first?

START THIS WEEK

- ☐ Pull your latest assurance report and note the level, the standard, and the metrics covered.
- ☐ Run a walkthrough on one metric, from source record to published figure. List every stop with no evidence.
- ☐ Write a one-page methodology for your Scope 1 and 2 figures: boundary, sources, factors and their versions.
- ☐ Name an owner and a reviewer for each metric. List every place a manual spreadsheet step or an AI tool touches a reported number.
- ☐ Put December 15, 2026 and July 1, 2027 on the team calendar, and ask your provider about ISSA 5000.

Sources

1. IFAC, AICPA and CIMA, "The State of Play: Sustainability Disclosure and Assurance (Six-Year Trends and Analysis, 2019-2024)," IFAC news release, June 29, 2026. <https://www.ifac.org/news-events/2026-06/onset-mandatory-sustainability-requirements-begins-impact-global-reporting-study-ifac-aicpa-and-cima>
2. International Auditing and Assurance Standards Board (IAASB), International Standard on Sustainability Assurance (ISSA) 5000, overview page with jurisdiction adoption list (updated September 2026). <https://www.iaasb.org/focus-areas/understanding-international-standard-sustainability-assurance-5000>
3. Cohen, L., Rouen, E., and Sachdeva, K., "Widespread revisions of self-reported emissions by major US corporations," Nature Climate Change 16, no. 1 (2026): 33-36. <https://doi.org/10.1038/s41558-025-02494-9>
4. IFAC, AICPA and CIMA, "The State of Play: Sustainability Disclosure and Assurance (Five-Year Trends and Analysis, 2019-2023)," IFAC news release, May 12, 2025. <https://www.ifac.org/news-events/2025-05/more-global-companies-look-for-assurance-sustainability-reporting-study-ifac-aicpa-cima-shows>
5. Center for Audit Quality, "S&P 500 Companies' Sustainability Reporting and Assurance Practices," July 21, 2025. <https://www.thecaq.org/aia-sp500-sustainability-reporting-assurance-2025>
6. Center for Audit Quality, Audit Committee Insights, July 2025. <https://www.thecaq.org/audit-committee-insights-july-2025>
7. IAASB, International Standard on Sustainability Assurance (ISSA) 5000, "General Requirements for Sustainability Assurance Engagements," final standard, November 2024, definitions of reasonable and limited assurance engagements. <https://ifacweb.blob.core.windows.net/publicfiles/2025-01/IAASB-International-Standard-on-Sustainability-Assurance-ISSA-5000.pdf>
8. Glynn, M., Goldman, A., and Bailey, S. A., "Proposed new sustainability information AT-C sections," Journal of Accountancy, May 7, 2026. <https://www.journalofaccountancy.com/issues/2026/may/proposed-new-sustainability-information-at-c-sections/>
9. IAASB, "Sustainability Assurance: Frequently Asked Questions: Relevance of ISSA 5000 to Assurance on Sustainability Reports in the European Union," November 2025. <https://ifacweb.blob.core.windows.net/publicfiles/2025-11/IAASB-ISSA-5000-FAQ-Relevant-to-European-Union.pdf>
10. AccountAbility, AA1000 Assurance Standard v3, 2020. https://cdn.prod.website-files.com/66c88eda3115d0e65f9857df/66ecbeae05237c0558f22737_AA1000-Assurance-Standard-English.pdf
11. Sullivan & Cromwell, "California Air Resources Board Holds Public Workshop on Emissions Reporting under SB 253 Beginning in 2027," July 23, 2026. <https://www.sullcrom.com/insights/memo/2026/July/CARB-Holds-Public-Workshop-SB-253-Reporting>
12. International Ethics Standards Board for Accountants (IESBA), global ethics sustainability standards page, covering the International Ethics Standards for Sustainability Assurance (IESSA). <https://www.ethicsboard.org/focus-areas/global-ethics-sustainability-standards>
13. Directive (EU) 2026/470 of the European Parliament and of the Council, February 24, 2026, EUR-Lex. <https://eur-lex.europa.eu/eli/dir/2026/470/oj/eng>
14. European Commission, letter to the Committee of European Auditing Oversight Bodies on limited assurance standards for sustainability reporting, January 27, 2026. https://finance.ec.europa.eu/document/download/a41f3678-d774-40be-884f-2caecabb4b93_en?filename=260127-ceaob-letter-limited-assurance-sustainability-standards_en.pdf

15. California Health and Safety Code section 38532, as republished by public law.
https://california.public.law/codes/health_and_safety_code_section_38532
16. Mayer Brown, "California Climate Disclosure Laws: CARB Finalizes Its Initial Rulemaking, Resets the 2026 Deadline, and Previews the 2027 Framework," August 5, 2026. <https://www.mayerbrown.com/en/insights/publications/2026/08/california-climate-disclosure-laws-carb-finalizes-its-initial-rulemaking-resets-the-2026-deadline-and-previews-the-2027-framework>
17. Securities and Exchange Commission, "Rescission of Climate-Related Disclosure Rules," proposed rule, Federal Register, June 3, 2026. <https://www.federalregister.gov/documents/2026/06/03/2026-11091/rescission-of-climate-related-disclosure-rules>
18. Financial Conduct Authority, PS26/19, "Aligning listed issuers' sustainability disclosures with international standards," September 30, 2026. <https://www.fca.org.uk/publications/policy-statements/ps26-19-aligning-listed-issuers-sustainability-disclosures-international-standards>
19. Science Based Targets initiative, Corporate Net-Zero Standard Version 2.0, main changes document, June 2026. <https://files.sciencebasedtargets.org/production/files/Corporate-Net-Zero-Standard-V2-Main-Changes-Document.pdf>
20. Committee of Sponsoring Organizations of the Treadway Commission (COSO), "Achieving Effective Internal Control over Sustainability Reporting (ICSR): Building Trust and Confidence through the COSO Internal Control-Integrated Framework," news release, March 30, 2023. <https://www.prnewswire.com/news-releases/coso-releases-new-achieving-effective-internal-control-over-sustainability-reporting-icsr-supplemental-guidance-301785711.html>
21. Deloitte, 2024 Sustainability Action Report, news release, July 18, 2024. <https://www.deloitte.com/us/en/about/press-room/new-deloitte-survey-us-companies-increase-focus-on-sustainability-talent-amid-ongoing-challenges-with-data-quality.html>
22. PwC, "Global Sustainability Reporting Survey: US Takeaways," October 17, 2025. <https://www.pwc.com/us/en/services/esg/library/sustainability-reporting-survey-us-takeaways.html>
23. Workiva, "2026 MidYear Executive Benchmark Survey: The Verification Gap," May 2026 (vendor survey). <https://www.workiva.com/resources/executive-benchmark-survey-verification-gap>
24. Deloitte UK, "Sustainability adjustments creep higher in reporting amongst UK's largest companies," news release, August 28, 2025. <https://www.deloitte.com/uk/en/about/press-room/sustainability-adjustments-creep-higher-in-reporting-amongst-uks-largest-companies.html>
25. Ballou, B., Chen, P.-C., Grenier, J. H., and Heitger, D. L., "Corporate social responsibility assurance and reporting quality: Evidence from restatements," *Journal of Accounting and Public Policy* 37, no. 2 (2018): 167-188. <https://doi.org/10.1016/j.jaccpubpol.2018.02.001>
26. EFRAG, "Cost Benefit Analysis of the Draft Amended European Sustainability Reporting Standards," prepared by Prometeia and Syntesia, December 2025. <https://www.efrag.org/sites/default/files/media/document/2025-12/Cost-benefit%20Analysis%20on%20Draft%20Amended%20ESRS.pdf>
27. Casey, R. J., and Grenier, J. H., "Understanding and Contributing to the Enigma of Corporate Social Responsibility (CSR) Assurance in the United States," *Auditing: A Journal of Practice & Theory* 34, no. 1 (2015): 97-130. <https://doi.org/10.2308/ajpt-50736>
28. G&A Institute, "G&A Releases 15th Edition of Sustainability Reporting Trends," news release on "2026 Sustainability Reporting in Focus," September 16, 2026. <https://www.prnewswire.com/news-releases/ga-releases-15th-edition-of-sustainability-reporting-trends-302880119.html>

ABOUT THE AUTHOR



Tyler J. Butler is the founder and CEO of Collaboration for Good, a social impact consultancy she founded in 2016. She has led corporate social responsibility and community investment at global technology companies, including a Fortune 500 company and the world's largest domain registrar. She is a certified GRI practitioner and has served on the Arizona Governor's Commission on Service and Volunteerism since 2015. Collaboration for Good led the development of the Arizona Sustainability Navigator, a statewide sustainability resource for small businesses, nonprofits, and government, built with contributions from public, philanthropic, and community partners.

This guide provides general information and is not legal, tax, accounting, or financial advice. Rules and standards change. Figures and rule status reflect sources available as of October 2026.

COLLABORATIONFORGOOD.COM · CONNECT@COLLABORATIONFORGOOD.COM · © 2026 COLLABORATION FOR GOOD