



10 October 2025

Graeme Pinfold  
Chair  
New Zealand Auditing and Assurance Standards Board  
Level 6  
154 Featherston Street  
Wellington 6011

Tēnā koe Graeme

**Proposed alignment with international standards - Sustainability Assurance, Ethics and Independence, and Using Work of an External Expert**

Thank you for the opportunity to comment on the consultation document titled “Alignment with international standards”.

As the Auditor-General is the climate-related disclosures assurance practitioner for an assurance engagement required for the purposes of Part 7A of the Financial Markets Conduct Act 2013 by a climate reporting entity that is a public entity, our submission reflects the perspective of mandatory assurance of greenhouse gas (‘GHG’) emissions disclosures.

Overall, we support alignment with international standards, and adoption of tailored ethical and independence requirements relevant to sustainability assurance engagements.

Below are our comments on the proposed new assurance engagement standard and related amendments to the temporary assurance standard for GHG disclosure engagements.

***ISSA (NZ) 5000 General Requirements for Sustainability Assurance Engagements***

We agree with your Board’s proposal to adopt ISSA (NZ) 5000 in New Zealand for reporting periods beginning on or after 15 December 2026, aligned with the application date of the international standard.

We agree that adoption of ISSA (NZ) 5000 enables practitioners to remain aligned with international standards that reflect the most up to date international thinking on sustainability assurance. We note that ISSA (NZ) 5000 contains application material relating to value chain components. The New Zealand member firms of global networks will benefit from moving their methodologies to align with ISSA 5000. Further, alignment with Australia will be beneficial for assurance practitioners who may want to use this standard for Trans-Tasman engagements.

***Amendments to NZ SAE 1 Assurance Engagements over Greenhouse Gas Emissions Disclosures***

We support adding ISSA (NZ) 5000 as an option for the mandatory assurance of GHG emissions disclosures within NZ SAE 1. We agree that the use of ISSA (NZ) 5000 should not be mandated.

We also support retaining ISAE (NZ) 3410 *Assurance Engagements on Greenhouse Gas Statements* as an option in NZ SAE 1. In our opinion, ISAE (NZ) 3410, being a topic-specific standard for GHG emissions assurance, provides practical and useful guidance. Therefore, there is value in retaining ISAE (NZ) 3410. Assurance practitioners in New Zealand have invested in methodologies, tools, and templates, that align with the requirements of ISAE (NZ) 3410. In particular, our inhouse provider (which does not have global firms' support) will benefit from continuing to use ISAE (NZ) 3410 until an ISSA (NZ) 5000 methodology is more broadly developed.

We agree that your Board should defer any decision to withdraw ISAE (NZ) 3410 to a later date, preferably until future decisions on NZ SAE 1 are made. We encourage your Board to monitor how the international standard is adopted and applied in practice as global reporting and assurance of sustainability information continue to evolve. We also think that your Board should not withdraw or replace NZ SAE 1 before the New Zealand Government announces changes to the regulatory disclosure regime. Certainty is essential for both climate reporting entities and assurance practitioners.

If you have any questions, please contact me at [miranda.bigginsoag.parliament.nz](mailto:miranda.bigginsoag.parliament.nz).

Nāku noa nā

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