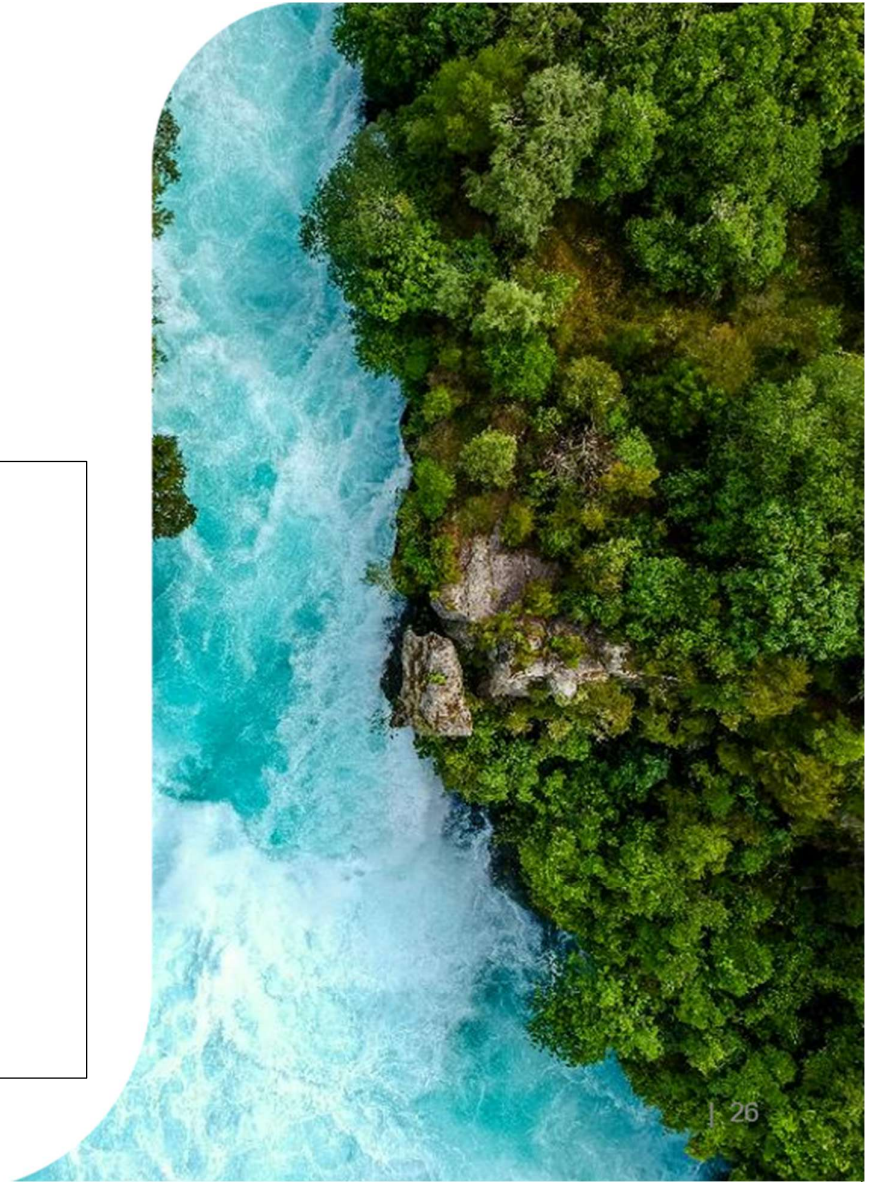


# Response to XRB consultation

October 2025



Consultation Question	Toitū Response	Support
Q1: Do you agree with the proposal to adopt ISSA (NZ) 5000 in New Zealand?	Toitū Envirocare supports the adoption of ISSA (NZ) 5000 as an available assurance standard within the New Zealand framework, noting that it provides an internationally aligned structure for sustainability assurance and will help ensure consistency across markets. Toitū recommends the XRB maintain flexibility by continuing to recognise ISO-based methodologies as equivalent and acceptable approaches under NZ SAE 1. This alignment would prevent unnecessary duplication of assurance systems and reduce transition burden on providers.	Yes
Q2: Is your firm intending to transition to ISSA (NZ) 5000 for sustainability assurance engagements? If yes, when?	Yes, Toitū plans on transitioning. While we recognise the value of ISSA (NZ) 5000 for broader sustainability engagements, full transition will depend on: <ul style="list-style-type: none"> <li>a) clear mapping between NZSAE1 and ISSA (NZ) requirements.</li> <li>b) updating our internal processes and documents to integrate the PES 1, 3, 4 and 5 and IESSA(NZ) standard requirements.</li> </ul> We anticipate a transition horizon between 2026–2027, allowing sufficient time for integration.	Yes
Q3: Do you agree with the proposed New Zealand changes to ISSA (NZ) 5000: (a) to clarify the scope; and (b) to address the existence of relationships that the assurance practitioner may have? Are there any other matters that you recommend that the XRB add to ISSA (NZ) 5000?	Toitū agrees with the proposed New Zealand-specific amendments clarifying that ISSA (NZ) 5000 applies to all sustainability assurance engagements, including limited and reasonable assurance. The additional scope clarification helps delineate ISSA (NZ) 5000 from NZ SAE 1. Toitū also supports the inclusion of requirements addressing relationships and independence.	Yes

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Q4: Do you agree with the proposal to adopt the IESSA (NZ) in New Zealand?	<p>Toitū recognises the importance of ethical and independence standards for sustainability assurance engagements and supports the adoption of IESSA (NZ) as part of international and local alignment.</p> <p>However, Toitū notes that IESSA (NZ) introduces requirements beyond those currently embedded in ISO 14065/17029 accreditation systems. We request that the XRB provide transition support and mapping guidance between IESSA (NZ) and ISO impartiality/competence standards to enable verification bodies to adapt without duplicating controls or compromising existing accreditation systems.</p>	Yes
Q5: Is your firm intending to transition to the IESSA (NZ) for sustainability assurance engagements? If yes, when?	<p>Toitū's current system of independence and ethics is based on ISO 14065, ISO 17029, ISO 14066, and JAS-ANZ accreditation requirements as well as the requirements of NZSAE1.</p> <p>Transitioning to IESSA (NZ) would require reconfiguring policies and procedures to meet PES-based definitions as well as creating new ones. We would need time to implement the changes and provide updated training. We anticipate performing this transition during 2026–2027, aiming for readiness in line with our readiness for ISSA 5000, with full implementation before 1 July 2028 (for value-chain component independence provisions).</p>	Yes
Q6: Do you agree with the proposed New Zealand changes to IESSA (NZ): (a) to clarify the scope; and (b) to replicate amendments in PES 1? Are there any other matters that you	<p>Toitū agrees with the proposed changes clarifying scope and aligning with PES 1. The deferred effective date for value-chain component independence is practical.</p> <p>However, we recommend the XRB provide detailed examples of "value-chain component practitioners" and guidance on assessing independence when relying on external verifiers within complex supply chains.</p>	Yes

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recommend the XRB add to IESSA (NZ)?	With smaller verification firms assuring parts of the value chain, we suggest acknowledging that ISO-verification bodies already meet impartiality and conflict of interest requirements, (however this may not be at the level required in the IESSA) and request review and guidance on how these verifiers could be verified within the context of these requirements.	
Q7: Do you agree with the proposal to adopt the Revisions to the Code Addressing Using the Work of an External Expert in New Zealand?	<p>Toitū supports adoption of the new section on using the work of external experts, as it formalises a robust approach to competence, capabilities, and objectivity—principles already embedded in ISO 14064-3 and ISO 14066.</p> <p>We request clarification that competence evaluation can rely on existing ISO 14066 evidence. Implementation guidance would be helpful to avoid duplication for ISO-verification bodies who already assess and document expert competence and impartiality.</p>	Yes
Q8: Are there any New Zealand changes that you recommend the XRB add to the standard Addressing Using the Work of an External Expert?	We suggest adding guidance to explicitly recognise accredited laboratories, certification bodies, and registries as qualified external experts where they operate under ISO standards, or equivalent accreditation. This recognition would support interoperability between ISO-based systems and sustainability assurance engagements under IESSA or ISSA (NZ) 5000, maintaining consistency across the verification ecosystem.	Yes
Q9: Do you support adding a third option to NZ SAE 1 to enable assurance practitioners to apply ISSA (NZ) 5000 for mandatory GHG assurance engagements?	Toitū supports adding ISSA (NZ) 5000 as a third option within NZ SAE 1, as it enhances flexibility for practitioners and aligns New Zealand with international assurance trends. Maintaining ISO 14064-3 and ISAE (NZ) 3410 as parallel options is essential to accommodate both accredited verification bodies and financial assurance practitioners.	Yes

Consultation Question	Toitu Response	Support
Q10: Do you support the proposed conditional requirement for one-to-many reports being added to NZ SAE 1?	<p>Toitū supports the proposed NZ SAE 1 paragraph 26A on “one-to-many” reports, as it strengthens reliability where reliance is placed on another verifier’s assurance report (e.g., supply chain verifications).</p> <p>However, we request that the XRB issue practical examples or evaluation criteria defining what constitutes “adequate procedures” and an “acceptable standard” for these relied-upon reports. ISO 14065/17029-verification bodies should be explicitly recognised as meeting adequacy thresholds to avoid inconsistency between global and NZ frameworks.</p>	Yes
Q11: Do you agree that the XRB should defer any decision to withdraw ISAE (NZ) 3410 to a later date?	We have no comment or view.	
Q12: Do you agree with the proposed application date for assurance engagements on sustainability information reported for periods beginning on or after 15 December 2026?	<p>Toitū agrees with the proposed application date and welcomes the allowance for early adoption. The timeline aligns with international effective dates.</p> <p>We request the XRB provide transition guidance and NZ illustrative reporting examples to help ISO-accredited providers to transition to ISSA (NZ) 5000 assurance reports.</p>	Yes
Q13: Do you have any further comments?	No	