Department for Business and Trade
Old Admiralty Building
London
SW1A 2 DY

17 September 2025

Dear Board Members,

Please find enclosed our response to: **Developing an oversight regime for assurance of sustainability-related financial disclosures**

This response has been prepared by the 100 Group Stakeholder Communications and Reporting Committee. The 100 Group membership represents around 90% of the FTSE100 market cap as well as a number of equally significant sized unlisted businesses. While this response is intended to speak on behalf of the Group as a whole, the views expressed are not necessarily those of individual members nor their respective employers.

We thank you for the opportunity to comment on your proposal and would invite any further dialogue which you would deem of value.

We agree with the government's proposal to create a voluntary registration regime for sustainability assurance and agree with the government taking a profession-agnostic approach to sustainability assurance to help increase competition within the assurance market, whilst ensuring that there are appropriate safeguards around quality and capabilities. The proposed creation of a registration regime operated by the Audit, Reporting and Governance Authority (ARGA) would appear to be aligned with these objectives. ARGA will need to find the right balance in setting appropriately rigorous standards to ensure that member firms have the requisite skills and capabilities and ensuring that it is possible for a variety of firms to obtain accreditation.

We consider that firms should be registered as sustainability assurance providers as they will be the contracting party and have the liability to deliver the assurance according to standards, rather than individual employees.

We agree that the UK's registration regime should recognise 'sustainability assurance providers' as being capable of providing high-quality assurance over multiple reporting standards to be able to serve the many multi-national companies in the UK. We also agree that sustainability assurance providers must follow UK-equivalent standards to ISSA 5000 but also recommend allowing the ISAE3000 and ISAE3410 standards as well in the early adoption period.

We consider that Assurance of disclosures is desirable in the long term, although consider this should start with limited and not reasonable assurance. It is also important that any implementation of assurance for UK SRS disclosures should involve a phased approach with opportunities for firms to engage in disclosure and assurance voluntarily at firms without risk of legal or financial repercussions for non-compliance in their first year of disclosure. This will help preparers, assurers and users of SRS develop best practice in a safe environment. Timelines should be very carefully considered to ensure firms can develop their expertise and get the appropriate processes and reporting capacity in place.

We consider there must be a recognition that sustainability data is not comparable to financial data at present, and that it presents its own unique challenges when it comes to assurance. Preparers should have the time and space to work through these challenges with their assurance providers and not be rushed into e.g. reasonable assurance before the underlying systems, processes and skillsets can be put in place in a proportionate and pragmatic manner.

We consider there needs to be a balance between ensuring that users of sustainability statements have confidence in what is being reported by means of assurance, and the time/cost burden placed on reporters of obtaining this assurance.

We hope you find that they provide helpful insight as you move to the next stage of the project and invite you to contact us via our secretariat Claire Gallimore (secretariat@the100group.co.uk) should you wish to discuss any of our comments in further detail.

Yours sincerely,

Stephen Daintith,
Chair of the 100 Group Stakeholder Communications and Reporting Committee