

Authorisation of sustainability assurance service providers – FAQs

INTRODUCTION

The EU Corporate Sustainability Reporting Directive (CSRD) sets out how certain companies will have to disclose information about their environmental, social and governance (ESG) activities in line with the [European Sustainability Reporting Standards \(ESRSs\)](#). It also requires third party assurance (limited assurance initially) on these ESG disclosures and provides for a regulatory regime for the education, training, authorisation and oversight of sustainability assurance service providers.

The CSRD was transposed into Irish law on 6 July 2024. ACCA with CAI, are engaging with DETE and IAASA in relation to the development of the regulatory framework for sustainability assurance service providers who are also statutory auditors. The immediate focus is on the implementation of the transitional arrangements which allow for ‘grandfathering’ of statutory auditors (RIs) as sustainability assurance service providers.

The FAQs set out below will be kept under review and amended where appropriate. Members and firms are encouraged to send any queries regarding the authorisation of SASPs to authorisation@accaglobal.com

FREQUENTLY ASKED QUESTIONS FOR THOSE SEEKING AUTHORISATION AS SASP

1 Who is eligible to apply to ACCA for authorisation as a SASP?

ACCA can accept applications for SASP authorisation from an individual who is:

- Authorised as a responsible individual (RI) in Ireland in an ACCA statutory audit firm; and,
- Where the individual is approved as an RI before 1 January 2026 – the individual has undertaken, and recorded, appropriate CPD to demonstrate the necessary competence for providing assurance on sustainability reporting;
- Where the individual is approved as an RI on or after 1 January 2026 – individual has met the necessary educational requirements including passing the relevant examination and has completed the required eight-month practical training in relevant sustainability matters.

2 I am not an approved RI but expect to seek authorisation as RI before 1 January 2026 – do I need to apply for RI status early to ensure I can avail of transitional provisions for SASP authorisation?

The statutory instrument indicates that the transitional provisions (grandfathering) will be available to any individual who is approved as an RI before 1 January 2026. The availability of the transitional provisions will not be dependent on any formal application to ACCA or CAI for SASP status prior to 1 January 2026. You will need to be an auditor prior to 1 January 2026 but you do not need to apply to be a SASP prior to 1 January 2026 to avail of the grandfathering provisions.

An ACCA member or statutory audit firm which anticipates designating a principal or employee as an RI in time for RI (and SASP) approval before 1 January 2026 should plan appropriately to ensure that all criteria required under ACCA’s Republic of Ireland Audit Regulations 2017 are met and that an application for statutory auditor (RI) status is submitted in a timely manner to allow appropriate consideration of the application by ACCA.

3 Is there a firm SASP registration akin to audit firm registration?

SASPs must be statutory auditors (RIs), and ACCA only approves RIs where the individual is designated by an ACCA statutory audit firm, it follows therefore that each SASP approved by ACCA will be linked to an Irish statutory audit firm.

4 How does a RI apply for SASP authorisation?

An ACCA Irish statutory audit firm can apply to designate eligible RIs at the firm as SASPs. The application process is described below:

During the transitional period (2024 and 2025):

The compliance principal at an Irish statutory audit firm can initiate the application process. The completed application form should be submitted to ACCA accompanied by a record of the relevant CPD undertaken by the RI to demonstrate the necessary knowledge of sustainability reporting and the assurance of sustainability reporting has been achieved. ACCA has a template for the documentation of CPD. As part of the application process, the audit compliance principal will be asked to provide

certain declarations on behalf of the firm regarding the SASP applications.

An invoice requesting payment of the SASP registration fee will be sent to the firm when the application is being processed by ACCA.

From 1 January 2026:

The application process will be revised as appropriate to include the post transitional qualification requirements.

5 What CPD must a SASP applicant undertake to demonstrate competence?

Individuals approved as RI before 1 January 2026 who wish to be approved as SASPs must undertake appropriate CPD to acquire the necessary knowledge of sustainability reporting and the assurance of sustainability reporting including the following subjects as they relate to assurance of sustainability reporting:

- Legal requirements and standards relating to the preparation of annual and consolidated sustainability reporting;
- Sustainability analysis;
- Due diligence processes with regard to sustainability matters;
- Legal requirements and assurance standards for sustainability reporting adopted pursuant to the CSRD and related Irish legislation (note the announcement by IAASA on the relevant assurance standards for sustainability reporting)

The relevant CPD can consist of both verifiable and unverifiable learning. ACCA expects a SASP applicant to have undertaken a minimum of 60 units of relevant CPD in the two years prior to their application, a portion of which should be verifiable CPD. SASP applicants may have acquired some of the necessary knowledge of sustainability reporting and the assurance of sustainability reporting via continuing education gained through practical work experience in this area. Work experience alone is unlikely to provide all aspects of relevant knowledge. ACCA has a template for the documentation of CPD.

6 What is the regulatory fee for SASP authorisation?

Each application for SASP status will be subject to a registration fee equivalent to the practising certificate application fee. From 2025, ongoing annual regulatory fees equivalent to the practising certificate renewal fee will also be payable by statutory audit firms whose RIs have SASP status. This annual regulatory fee will be waived in 2024.

7 If I am granted SASP authorisation will I get a 'certificate' from ACCA

No. ACCA will not issue a certificate to evidence SASP authorisation. ACCA will provide details of all individuals approved as SASP to the Companies Registration Office (CRO). A member of the public will be able to verify SASP status via the CRO's register.

8 What happens to my SASP authorisation if I relinquish my statutory auditor status?

If you surrender your approval as a statutory auditor, or in the event that it expires, is withdrawn or suspended, your approval as a SASP is similarly ceased, expired, withdrawn or suspended.

9 If I already hold RI status but I don't know currently whether I may wish to be an authorised SASP in the future, do I need to apply for SASP authorisation before 1 January 2026 to avail of the transitional (grandfathering) arrangements?

It is ACCA's understanding that Section 1635 provides that any person who is an approved RI before 1 January 2026 can avail of the transitional (grandfathering) arrangements on application for SASP authorisation at any time, as long as the person remains an RI at the time of application for SASP authorisation. As already described, successfully availing of grandfathering arrangements is dependent on demonstration of appropriate competence through relevant CPD.

10 What are IAASA's expectations in relation to the role of the recognised accountancy bodies (RABs) in the authorisation of SASPs?

IAASA has written to the CEOs of each of the two remaining RABs, including ACCA, setting out IAASA's expectations in relation to the approval, before 1 January 2026, of statutory auditors (RIs) to carry out assurance engagements of sustainability reporting. This letter has been published by IAASA. The processes described in the FAQs above reflect the expectations set out in the IAASA letter. ACCA continues to engage with IAASA in relation to CSRD topics.