Sustainability Disclosure and Assurance in Europe: Six Years of Progress, One Inflection Point

By Paul Thompson

Data from the IFAC and AICPA & CIMA *State of Play* series — the most comprehensive ongoing benchmarking of corporate sustainability disclosure and assurance practice globally — shows European companies pulling steadily ahead of their global peers over the past six years. Drawing on the series' six annual reports (2019–2024), covering the largest exchange-listed companies in France, Germany, Italy, Spain, Türkiye, and the UK, the picture is one of accelerating convergence toward universal disclosure and near-universal assurance in the EU — with Türkiye and the UK closing the gap rapidly, and global averages trailing Europe by a widening margin on assurance.

Disclosure: Europe Reached the Ceiling Early

European companies have been reporting some sustainability information at very high rates throughout the period, but the trajectory to 100% was faster than the global average. The six-country European average disclosure rate rose from 93% in 2019 to effectively universal by 2024, against a global average that moved from 91% to 97% over the same period.

Table 1: Europe versus Global Averages (% of Companies)

	2019	2020	2021	2022	2023	**2024**
ESG Reporting Companies	Europe 93 Global 91	Europe 95 Global 92	Europe 97 Global 95	Europe 100 Global 98	Europe 98 Global 98	**Europe 100** **Global 97**
Rate of ESG Assurance	Europe 68 Global 51	Europe 76 Global 59	Europe 82 Global 64	Europe 88 Global 69	Europe 89 Global 73	**Europe 93** **Global 75**

Source: Global data extracted and Europe data calculated from State of Play series, IFAC

Within Europe, the EU four — France, Germany, Italy, and Spain — reached 100% disclosure as a group by 2022 and have maintained it. France and Spain had already been at or near 100% since 2019. Germany, the slowest of the EU four, closed the gap from 94% in 2019 to 100% by 2022. Türkiye started furthest back at 72% in 2019 but reached 98% by 2024. The UK, at 99% throughout most of the period, sat at 100% by 2022.

On disclosure, there is little further to say: large-listed European companies report sustainability information as a matter of course and have done so for some years. The more important question — both in the data and in terms of what this means for the profession — is assurance.

Assurance: Europe Leads by a Widening Margin

The divergence between European and global assurance rates is more pronounced, and the trend is clearer. Europe's six-country average rose from 68% in 2019 to 93% in 2024 — a 25-percentage point gain over six years. The global average rose from 51% to 75% over the same period, a gain of 24 points in absolute terms but from a much lower base.

Table 2: ESG Reporting Companies - European Country by Country Averages (% of Companies)

	2019	2020	2021	2022	2023	**2024**
France	100	100	100	100	100	**100**
Germany	94	94	99	100	100	**100**
Italy	98	98	100	100	100	**100**
Spain	96	98	98	100	100	**100**
Average – EU (n=4)	**97**	**97.5**	**99.3**	**100**	**100**	**100**
Turkey	72	82	88	98	90	**98**
UK	99	98	99	100	100	**100**
Average – Europe (n=6)	**93**	**95**	**97**	**99.7**	**98.3**	**99.7**

Source: Country data extracted and Europe data calculated from State of Play series, IFAC

The EU four as a group reached an average assurance rate of 97% in 2024, against a global average of 75% — a gap of 22 percentage points. Three of the four (France, Italy, and Spain) have been at or near 100% assurance since 2022, with France sustaining 96–100% throughout the entire period. This remarkable consistency reflects a long-standing French statutory requirement for third-party verification of sustainability information that predates the EU's Corporate Sustainability Reporting Directive (CSRD), as well as Italy and Spain's mature assurance ecosystems. Germany, at 88% by 2024, is the outlier within the EU four — still strong by any global benchmark, but with a meaningful gap to the other three that likely reflects historical differences in voluntary assurance uptake rather than any structural absence.

Table 3: Rate of Sustainability Assurance - European Country by Country Averages (% of Companies)

	2019	2020	2021	2022	2023	**2024**
France	96	98	98	100	100	**100**
Germany	63	70	74	85	84	**88**
Italy	73	90	94	100	100	**100**
Spain	85	86	94	100	100	**100**
Average – EU (n=4)	**79.2**	**86**	**90**	**96.3**	**96**	**97**
Türkiye	33	44	52	61	67	**86**
UK	55	68	82	84	85	**86**
Average – Europe (n=6)	**67.5**	**76**	**82.3**	**88.3**	**89.3**	**93.3**

Source: Country data extracted and Europe data calculated from State of Play series, IFAC

Two country-level stories deserve particular attention. Türkiye recorded the largest single absolute gain in the dataset — assurance rates jumped from 67% in 2023 to 86% in 2024, a 19-percentage point increase in a single year. This coincides directly with Türkiye's adoption of mandatory sustainability reporting and assurance requirements based on ISSB Standards (incorporated as TSRS 1 and TSRS 2) for 2024. The *State of Play* report identifies this as a textbook illustration of the role regulation plays in delivering credible, decision-useful sustainability information: a year of mandate did in one step what years of voluntary market development could not. The UK's trajectory is different but also notable: starting at just 55% in 2019 — significantly below the EU four — it has climbed 31 percentage points to 86% in 2024, driven by growing voluntary market uptake and, from 2022, TCFD-aligned climate reporting requirements for large UK companies.

Discussion: Mandate Works, and the Gap with the Rest of the World is Growing

The European data illustrates two things clearly. First, the relationship between disclosure and assurance is not automatic — disclosure rates in Europe were already high in 2019, but assurance rates varied considerably, with Germany at 63% and the UK at 55% despite reporting rates above 94%. What has driven assurance rates up — and toward convergence — is a combination of regulatory requirement (France's longstanding verification regime, Italy and Spain's market response to incoming CSRD requirements, Türkiye's TSRS mandate) and market expectation. Second, the gap between European and global assurance rates has not closed over time; if anything, the data suggests it is widening. As more jurisdictions globally move toward voluntary assurance, Europe's regulatory push means European companies are moving faster. The global average of 75% in 2024 is where France, Italy, and Spain were in the early 2020s.

It is also worth noting what the high-level figures do not capture. The *State of Play* data flags that across all 22 jurisdictions, 83% of assurance globally remains at the limited level — a proportion unlikely to be dramatically different in Europe, where CSRD's initial requirement is explicitly for limited assurance. High assurance rates in the EU four in 2024 therefore reflect a regime that is broad in coverage but still early-stage in rigor. The pathway to reasonable assurance — which CSRD envisages as a future step — will require a step-change in audit firm methodology, investment in sustainability assurance expertise, and potentially a transition to the IAASB's new International Standard on Sustainability Assurance (ISSA 5000), which became available for early adoption in 2025.

Outlook

Several developments will shape the next phase of this data. Within the EU, the conclusion of the Omnibus simplification of the original CSRD and the European Sustainability Reporting Standards (ESRS) have created much needed clarity about the final shape of the sustainability reporting regime. In the UK, the government's planned UK Sustainability Reporting Standards — closely aligned with the ISSB's IFRS S1 and S2 — are expected to introduce a mandatory framework that could replicate the kind of step-change seen in Türkiye's 2024 data. Globally, 33% of companies across all 22 jurisdictions already referenced the use or future use of ISSB Standards in 2024, up from 16% in 2023, suggesting that the voluntary-to-mandatory transition is underway more broadly.

For the profession, the European trajectory points toward a future in which the question is no longer whether sustainability assurance will be required but what quality of assurance will be demanded — and by whom. The next edition of the *State of Play* series will be the first to capture the early-adoption period for ISSA 5000, and it will provide the first real evidence of how quickly practice converges around the new standard. Given Europe's head start on both disclosure and assurance coverage, it is well placed to demonstrate what mature, integrated sustainability assurance can look like — but the move from limited to reasonable assurance remains the profession's most significant near-term challenge on this agenda.

Data in this article is drawn from tables compiled from the IFAC and AICPA & CIMA State of Play: Sustainability Disclosure and Assurance series. The European averages, calculated by this article's author, cover France, Germany, Italy, Spain, Türkiye, and the UK. Full series available at ifac.org.