

## **Questionnaire and invitation to comment on the Draft ESRS Set 1 XBRL Taxonomy**

### **EFRAG Public Consultation – 8 February 2024**

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This questionnaire supports the development of the Draft ESRS Set 1 XBRL Taxonomy. The purpose of this consultation is to collect feedback on this taxonomy from a variety of stakeholders.

EFRAG has been tasked by the European Commission (EC) to develop the digital taxonomy ('taxonomy' or 'XBRL taxonomy' in this document) for ESRS Set 1 issued as Delegated Act in July 2023 ('ESRS Set 1' in this document). The taxonomy released by EFRAG following this consultation represents the correct digital transposition of the human-readable ESRS Set 1 in EFRAG's opinion as the advisor to the European Commission that developed those standards. Once finalised, this taxonomy will be the basis for the European Securities and Market Authority (ESMA) to develop draft Regulatory Technical Standards (RTS) for tagging the ESRS sustainability statement. The tagging rules will finally be adopted by the EC by way of a Delegated Act (DA) amending Commission Delegated Regulation (EU) 2019/815 on the European Single Electronic Format (hereafter 'ESEF Regulation').

The Draft ESRS Set 1 XBRL Taxonomy has been developed by EFRAG based on the Draft ESRS XBRL Taxonomy Methodology and Architecture<sup>1</sup> (hereafter 'methodology paper') approved in April 2023 by the SRB.

A document entitled 'Explanatory Note and Basis for Conclusions' accompanies the release of the taxonomy for consultation. It illustrates the basis for conclusions and applied methodology and includes technical options exercises for the preparation of the taxonomy. It also includes an illustration of the XBRL taxonomy in Excel (Annex 1) and illustrative examples of XBRL reports (Annex 2) to support the implementation of the draft taxonomy and obtain more informed feedback in this consultation. These two documents are not submitted to EFRAG due process and are not authoritative.

The feedback received in this consultation will be considered by EFRAG in the finalization of this deliverable and, where appropriate, adjustments will be made in the final version of the taxonomy.

The main material that EFRAG is issuing for consultation is the technical XBRL taxonomy itself, which is provided on an EFRAG webpage as a XBRL Taxonomy Package:

- [Draft ESRS Set 1 XBRL Taxonomy Package technical files \(ZIP, 1.0 Mb\)](#)

The XBRL taxonomy can also be used by loading the following entry points in compliant XBRL software:

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<sup>1</sup> Draft ESRS XBRL Taxonomy Methodology and Architecture, as approved by the SRB on the 26 April 2023: <https://efrag.org/Assets/Download?assetUrl=%2Fsites%2Fwebpublishing%2FMeeting%20Documents%2F2302240950097339%2F04.02%20-%20Draft%20ESRS%20XBRL%20Taxonomy%20Architecture%20and%20Methodology%20%28final%29.pdf>

- ESRS All (importing ESRS Core with all topics and disclosure requirements, including presentation and definition linkbases and validation rules):  
[https://xbrl.efrag.org/taxonomy/draft-esrs/2023-07-31/esrs\\_all.xsd](https://xbrl.efrag.org/taxonomy/draft-esrs/2023-07-31/esrs_all.xsd)
- ESRS Core (concepts, labels and references only):  
[https://xbrl.efrag.org/taxonomy/draft-esrs/2023-07-31/common/esrs\\_cor.xsd](https://xbrl.efrag.org/taxonomy/draft-esrs/2023-07-31/common/esrs_cor.xsd)

The following documents are provided as accompanying documentation and shall be read in conjunction with the consultation questions to help respondents frame their responses. Those documents are not submitted to EFRAG's due process and are not authoritative:

- [Draft ESRS Set 1 XBRL Taxonomy Explanatory Note and Basis for Conclusions \(PDF, 1.6 Mb\)](#)
- [Annex 1: Draft ESRS Set 1 XBRL Taxonomy Illustrated in Excel \(XLSX, 314 Kb\)](#)
- [Annex 2: Illustrative examples of XBRL Reports \(ZIP, 3.3Mb\)](#)

The deadline for submitting answers is by 8 April 2024

Respondents should provide their responses to the public consultation questions by using the [Draft ESRS Set 1 XBRL Taxonomy online questionnaire](#). Detailed instructions are provided in the introduction of the online questionnaire.

For responses to be analysed in a structured and comparable way, EFRAG encourages submissions via the online questionnaire rather than issuing comment letters. For specific aspects not covered in questions from the online questionnaires, respondents may attach a letter or another type of document to their responses in the online questionnaires.

## **SURVEY INTRODUCTION**

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Thank you for taking the time to complete this survey.

EFRAG invites all stakeholders to respond to the public consultation questions by answering the following survey. Technical documents can be attached and submitted to EFRAG after completing the questionnaire. EFRAG considers responses most helpful when they

- (a) focus on the implementation of the digital XBRL taxonomy and are not related to the ESRS disclosure requirements themselves;
- (b) refer to concrete ESRS paragraphs and/or XBRL elements provided in the XBRL taxonomy using technical names or labels;
- (c) provide a clear rationale in case of disagreement, giving the perspectives of preparers and users of the digital ESRS statements equal weight; and
- (d) provide detailed suggestions and recommendations if the respondent proposes other approaches.

EFRAG is consulting on the most appropriate approach to transpose the content of the ESRS into a digital format. EFRAG is not consulting on the content of the ESRS itself, their structure and the articulation of disclosures in datapoints in those standards.

While EFRAG encourages stakeholders from every group to participate in the public consultation, not all questions might be equally answered as easily by all stakeholders, especially very technical questions, which can be skipped by respondents who are not familiarised with XBRL specifications. EFRAG recommends reading this Explanatory Note and referring to the detailed explanations and background information for each question.

\* Denotes that the information has to be provided.

## **INFORMATION ON SURVEY PARTICIPANT**

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**First Name:** \_\_\_\_\_

**Last Name:** \_\_\_\_\_

**Email address:** \_\_\_\_\_

**Name of the organization:** \_\_\_\_\_

**Survey respondents are mainly constituted by which group? (Please choose only one – see the definitions below.)**

- **Preparers**
- **Users**
- **Software vendors**
- **Consultants**
- **National or European authorities/Standard Setters**
- **Auditors/assurance providers**
- **XBRL experts**
- **Other (please specify):** \_\_\_\_\_

### **Definitions of the different groups**

- **Preparers** are defined as those who prepare a sustainability report using the Draft ESRS Set 1 XBRL Taxonomy.
- **Users** are identified as those using the sustainability information produced with the Draft ESRS Set 1 XBRL Taxonomy (in particular, investors, lenders, data providers, etc.).
- **Software vendors** are solution or platform providers that enable the preparation of digital sustainability disclosures in XBRL.
- **Consultants** are defined as providers of advice to preparers in relation to the ESRS.

**Main country of operations (choose from menu):**

**Survey instructions**

You will now be able to save your responses before the final submission. **Please note that EFRAG only considers completed surveys – partially completed submissions cannot be technically processed. You will receive an email with your responses on the submission.**

## Consultation questionnaire and invitation to comment

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1. Given the mandate received by EFRAG as described in the Explanatory Note and Basis for Conclusions and its role in developing the draft ESRS, EFRAG has developed this draft XBRL taxonomy as the correct or most appropriate transposition of the first set of ESRS into a digital XBRL format, considering the usability of the XBRL taxonomy from the user's perspective (i.e., the perspective of the stakeholder group that will ultimately use the digitally tagged ESRS statements).

**Q1: Do you agree that the digital Draft ESRS Set 1 XBRL Taxonomy adequately represents the ESRS disclosure requirements?**

Yes/No/Please explain your answer

2. While the XBRL taxonomy is also useful for preparers to structure the ESRS sustainability statement (see section 6.2. of the Explanatory Note and Basis for Conclusions), the digitally tagged ESRS bring benefits particularly to the users (analysts, data providers, financial institutions, investors, regulators, etc.). Therefore, the user perspective has been considered for the implementation (as laid out in the first five chapters of the Explanatory Note), and interviews with users have been conducted on specific implementation details (see Appendix 2 of the Explanatory Note and Basis for Conclusions).

**Q2: Do you agree that the Draft ESRS XBRL Taxonomy as currently designed meets the needs of users (analysts, data providers, financial institutions, investors, regulators, etc.)? If not, what could be improved?**

Yes/No/Please explain your answer

3. The Draft ESRS Set 1 XBRL Taxonomy has implemented a hierarchy of XBRL elements, grouping and structuring the disclosure requirements and datapoints into a tree, as described in section 6.5. of the Explanatory Note and Basis for Conclusions. This hierarchy is not only helpful in terms of navigation, but it also provides useful relationships between different levels of narrative XBRL elements (text blocks). At the same time, the introduction of overlapping duplicated XBRL elements was avoided, and XBRL elements have been reused wherever possible as described in section A1.3. of the Explanatory Note.

**Q3: Do you agree with the hierarchy provided in the presentation linkbase of the Draft ESRS XBRL taxonomy, including the Level 1, 2 and 3 of narrative textblock tags (as explained in Section 6.5. of the Explanatory Note and Basis for Conclusions)? And if not, what could be improved?**

Yes/No/Please explain your answer

**Q4: Do you agree with the way EFRAG has reused XBRL elements in the Draft ESRS XBRL Taxonomy to avoid double-tagging, as described in Section 6.6. of the Explanatory Note and Basis for Conclusions, and as implemented for ESRS MDR elements?**

Yes/No/Please explain your answer

4. The ESRS XBRL taxonomy contains semi-narrative XBRL elements (Boolean ‘Yes/No’ elements and enumeration ‘dropdowns’), in most cases representing the terms ‘shall/may disclose . . . whether and how . . .’ Those are specifically important for the users of the ESRS disclosures since those facts are often extracted manually from narrative disclosures and converted into binary data (i.e., 0 or 1), as demonstrated by users in Appendix 2 of the Explanatory Note and Basis for Conclusions. A SR TEG meeting has been dedicated to discussing technical and conditional Booleans and resulted in the elimination of a number of those XBRL elements.<sup>2</sup> In this regard, EFRAG would be interested in the views of stakeholders on conditional and technical Booleans as laid out in section A1.1. of the Explanatory Note and Basis for Conclusions.

**Q5a: Do you agree that the implementation of semi-narrative elements (yes/no Booleans, drop-down enumerations) enriches the narrative disclosures and is therefore particularly relevant for users?**

Yes/No/Please explain your answer

**Q5b: Do you agree that the technical and conditional Booleans as described in Section A1.1. of the Explanatory Note and Basis for Conclusions provide a clear benefit for users since they allow for tagging of positive and negative confirmations?**

Yes/No/Please explain your answer

5. The Draft ESRS Set 1 XBRL Taxonomy provides a number of explicit and typed dimensions for disaggregation of digital disclosures. Those dimensions can be used to tag Impacts, Risks, and Opportunities (IROs) as well as Policies, Actions, and Targets (PAT) as per ESRS 2 (see section 6.6. of the Explanatory Note). Additionally, typed dimensions enable the tagging of companies’ additions to ESRS datapoints and even entity-specific disclosures or disclosures stemming from other legislation and generally accepted sustainability statements (see section 6.9. of the Explanatory Note and Basis for Conclusions). While the use of those XBRL dimensions is

<sup>2</sup> SR TEG meeting 5 December 2023, agenda item 03, <https://efrag.org/Meetings/2305101050307353/EFRAG-SR-TEG-Meeting-05-December-2023>

common practice and straightforward, the specific implementation of optional disaggregation requires a very specific technical solution, as described in section A1.6. of the Explanatory Note and Basis for Conclusions. Due to the very technical nature of questions 6a and 6b, they should be answered by respondents familiar with the XBRL specifications only.

**Q6a (XBRL experts only): Do you agree with the dimensional modelling of the ESRS XBRL taxonomy and, in particular, with the implementation of typed dimensions for IROs, policies, actions, targets and metrics as described in Section A1.6. of the Explanatory Note and Basis for Conclusions?**

Yes/No/Please explain your answer

**Q6b (XBRL experts only): Do you agree with the introduction of open hypercubes for optional disaggregation as described in Section A1.6. of the Explanatory Note and Basis for Conclusions? If not, how should it be improved?**

Yes/No/Please explain your answer

**Q7: Do you agree with the approach that minimises the need for XBRL taxonomy extensions, therefore supporting comparability across preparers and relevance by providing mechanisms for tagging the following disclosures, as described in Section 6.9 of the Explanatory Note and Basis for Conclusions?**

- 1 IROs, Policies, Actions and Resources, Targets and Metrics.
- 2 Additions to ESRS datapoints.
- 3 Disclosures stemming from other legislations or generally accepted sustainability standards and frameworks.
- 4 Other entity-specific disclosures, including metrics.

**If not, how should it be improved?**

Yes/No/Please explain your answer

6. The Draft ESRS Set 1 XBRL Taxonomy comes with three validation rules (implemented as Formula 1.0 assertions) that can be evaluated in ESRS XBRL reports (see section 6.8. of the Explanatory Note and Basis for Conclusions). All three validation rules signal missing facts, which are supposed to be tagged in an XBRL report but using different severity levels per the following rules:

- a) missing facts for EU datapoints are signalled as ERRORS,

- b) missing ESRS 2 MDR facts that are outside of the materiality assessment are signalled as WARNINGS, and for
  - c) missing facts on metrics are signalled as INFORMATION (OK) for those that are *deemed to be not material*.
7. EFRAG recommends reviewing those validation rules and adding more rules in order to improve the quality of the digital disclosures as soon as the first digital XBRL reports are available.

**Q8: Do you think that the validation rules implemented in the Draft ESRS XBRL Taxonomy as described in Section 6.8. of the Explanatory Note and Basis for Conclusions are appropriate? If not, please explain why and/or which additional validation rules or consistency checks should be implemented.**

Yes/No/Please explain your answer

8. Lastly, EFRAG welcomes other comments or suggestions.

**Q9: Do you have any other comments or suggestions?**

[Comment box]

**Q10: Upload of technical attachments to the survey responses.**

[Browse upload]