

White Paper: SBR projects in Europe
—
The Trends

Results of the survey in 2017/2018
from SBR WG of XBRL Europe

Interim Report

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Executive Summary

This interim report, “SBR projects in Europe – The Trends”, presents a general picture of the Standard Business Reporting (SBR) approach and of the implementation of the approach within Europe.

In business reporting, the Standard Business Reporting approach (or “cross-domain approach”) is categorizing the (level of) standardization of data, processes and technology between domains, these being, amongst others, mainly filing annual reports to the Business Register or equivalent, filing declarations to the Tax Administration and sending company data to the Bureau of Statistics.

In the Tallinn-declaration the ministers in charge of eGovernment policy and coordination from 32 countries of the European Union (EU) and the European Free Trade Area (EFTA), called upon the European Commission to further explore possibilities of Standard Business Reporting in view of the implementation of the European Securities and Markets Authority (ESMA) European Single Electronic Format (ESEF). The primary goal is to make company data comparable, transparent and accessible digitally to reduce administrative burdens.

The first focus of the SBR approach is on defining the common data sets between the various domains as a common data dictionary. The second focus is on IT transformation (implementation of the data definitions in software and implementing secure and standardized exchange of data sets).

The initial conclusions reveal the following trends:

- The first full cross-domain approach was initiated in the NL in 2007 regarding Taxes and Annual Accounts for small and medium-sized companies and took 8 years to be thoroughly implemented. The program is working on expanding the approach with more reports and more agencies.
- SBR is now (2018) addressed as a cross-domain approach in 7 countries in Europe (DE, EE, FI, NL, RU, SE, UA) according to their answers to the survey.
- The interpretation of “cross domain approach” varies per country.
- The cross-domain approach takes a large amount of time to harmonize the data definitions and to implement them, voluntarily, in all elements of the administrative chains.
- Implementation of the cross-domain approach appears to be easier when the country is able to harmonize the data definitions used in national legislation or, even better, to use international definitions.
- Implementation of the cross-domain approach appears to be easier when the country is at the very early stages of any electronic filing.

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0. Preamble

This interim report, “SBR projects in Europe – The Trends”, presents a general picture of the Standard Business Reporting (SBR) approach and of the implementation of the approach within Europe.

In business reporting, the Standard Business Reporting approach (or “cross-domain approach”) is categorizing the (level of) standardization of data, processes and technology between domains, these being, amongst others, mainly filing annual reports to the Business Register or equivalent, filing declarations to the Tax Administration and sending company data to the Bureau of Statistics.

In the Tallinn-declaration the ministers in charge of eGovernment policy and coordination from 32 countries of the European Union (EU) and the European Free Trade Area (EFTA), called upon the European Commission to further explore possibilities of Standard Business Reporting in view of the implementation of the European Securities and Markets Authority (ESMA) European Single Electronic Format (ESEF). The primary goal is to make company data comparable, transparent and accessible digitally to reduce administrative burdens.

The first focus of the SBR approach is on defining the common data sets between the various domains as a common data dictionary. The second focus is on IT transformation (implementation of the data definitions in software and implementing secure and standardized exchange of data sets).

The aim of publishing this interim report as a White Paper, is to give to a larger possible audience a snapshot view of the SBR implementation in the European countries and thus to disseminate the SBR concepts as much as possible in Europe. And as a consequence to attract new members in the group as to increase the exchange of information on the topic and awareness of its benefits.

This snapshot view has been possible due to the analysis and first conclusions of a survey carried out in 2017 and beginning of 2018 by the XBRL Europe Working Group. The survey has been answered by a limited amount of European countries and this is why this document is an interim Report. The information from the surveys has been enriched with the knowledge already available at the participants of the Working Group and the additional information gathered by interviews and desk research.

The initial conclusions reveal the following trends:

- The first full cross-domain approach was initiated in the NL in 2007 regarding Taxes and Annual Accounts for small and medium-sized companies and took 8 years to be thoroughly implemented. The program is working on expanding the approach with more reports and more agencies.
- SBR is now (2018) addressed as a cross-domain approach in 7 countries in Europe (DE, EE, FI, NL, RU, SE, UA) according to their answers to the survey.
- The interpretation of “cross domain approach” varies per country.
- The cross-domain approach takes a large amount of time to harmonize the data definitions and to implement them, voluntarily, in all elements of the administrative chains.
- Implementation of the cross-domain approach appears to be easier when the country is able to harmonize the data definitions used in national legislation or, even better, to use international definitions.
- Implementation of the cross-domain approach appears to be easier when the country is at the very early stages of any electronic filing.

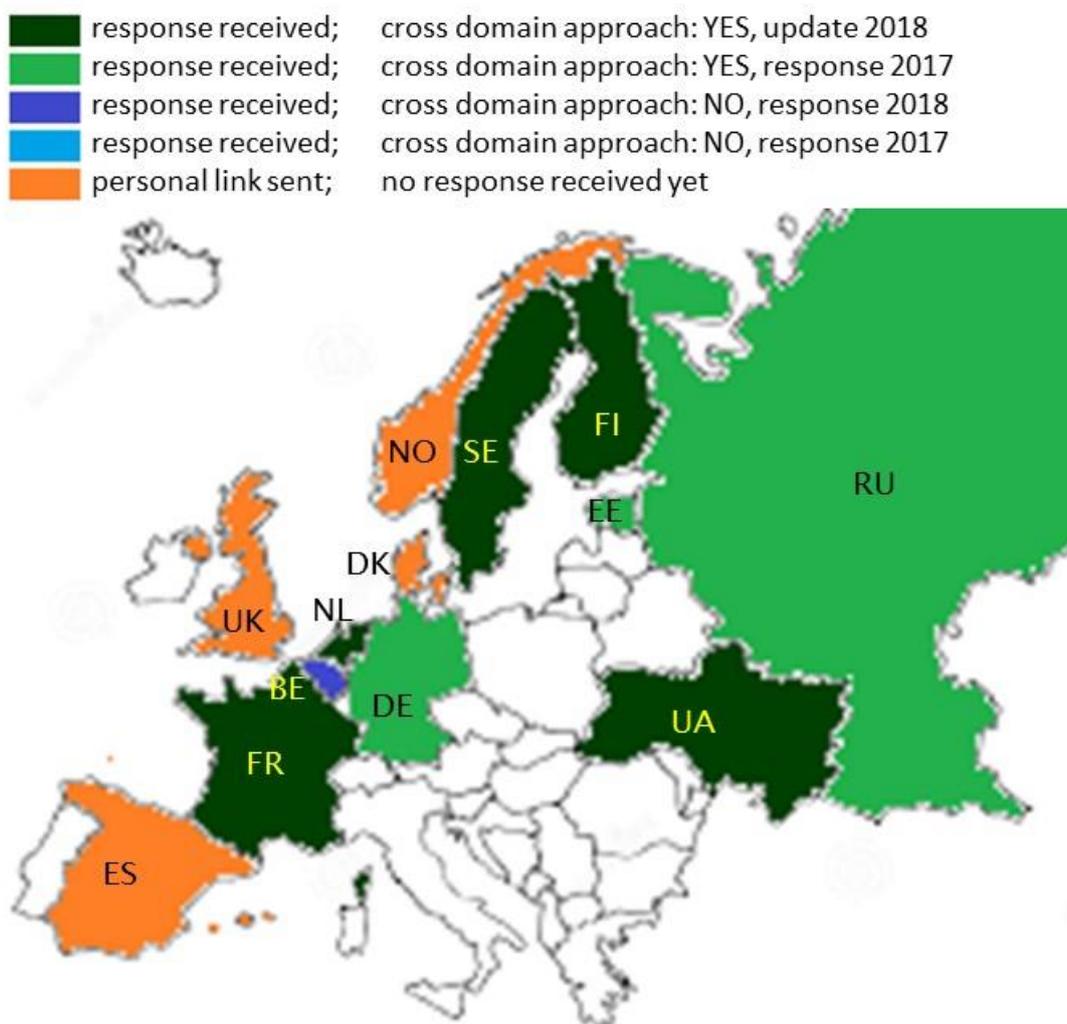
The report has been written by the XBRL Europe SBR working group co-chaired by Elina Koskentalo from XBRL Finland and Frans Hietbrink from XBRL Netherlands.

The report will be updated when the Working Group is able to receive more information from other European countries.

1. Introduction

1.1. Introduction to the SBR Working Group

The SBR Working Group of XBRL Europe started in November 2016 with the development of a survey to collect information regarding the implementation of Standard Business Reporting (or “cross-domain approach”), categorizing the (level of) standardization of data definitions, processes and technology. The first version of the survey was published in April 2017 and has been answered by eight countries¹. In April 2018 an updated version was published. So far five countries² have updated their response and one additional country³ has used the updated version to answer for the first time.



The survey is divided into 5 parts:

- ➔ general information about scope of standardization
 - which reports
 - standardization of data definitions
 - standardization of filing processes

¹ Estonia, Finland, France, Germany, Netherlands, Russia, Sweden, Ukraine

² Finland, France, Netherlands, Sweden, Ukraine

³ Belgium

- more detailed information about:
 - assurance
 - semantic standards
 - technical standards
 - chart of accounts
 - interface technologies
 - aggregated versus transactional data
- governance
- motivators
- (expected) progress

The limited number of survey-reports and the variety of answers make it difficult to draw strong conclusions. To collect additional information the SBR WG is working on Issue Papers related to:

- [Assurance – version from April 2018](#)
- [Audit Files – version from August 2018](#)
- [Chart of Accounts – version from April 2018](#)
- [Entity Identifiers – version from April 2018](#)
- [Interface Technologies – version from April 2018](#)

The additional information is gathered by conducting interviews and by desk research.

Because of the time span between the time the SBR WG received the answers to the surveys and conducted the interviews it is very well possible that some of the information (and therefore some of the conclusions) are outdated. The SBR WG will work on this while preparing the next version this report.

1.2. Introduction to SBR

Standard Business Reporting (SBR) provides governments and businesses with an unequivocal, cost-effective, secure and adaptable method for the exchange of business information between organisations in a reporting chain based on open standards.

The first focus of the SBR approach is on defining the common data sets between the various domains as a common data dictionary. The second focus is on IT transformation (implementation of the data definitions in software and implementing secure and standardized exchange of data sets).

Before the introduction of a cross-domain approach, which is the basis of the SBR approach, companies were asked by various government agencies to deliver the same information in multiple ways. For the same data definitions, different data sets were used. With the introduction of a cross-domain approach, similar data sets are used for similar data definitions, so companies can deliver the requested information with the proverbial click of the mouse. This leaves them with more time to focus on their business, while increasing data quality..

At its core, SBR is about the reuse of information. Although different regulators want different sets of data at different points in time, thanks to SBR, they can all come from the same (financial) source. With the use of a taxonomy, the basis for the re-use of definitions can be strongly rooted. With SBR it is not only possible for the regulators to request aggregated information: private parties can also use the data (definitions) to supply their stakeholders with relevant information.

1.3. Some thoughts about the Cross Domain Approach

The key principle of SBR (and other cross domain approaches) is to standardize on data definitions, processes and technology. A cross domain approach does not have to be tied to a specific technology, but rather adopts as much as possible proven, widely used, open technologies which support the exchange of structured data, data definitions and enable the unequivocal design and definition of processes.

To implement a cross domain approach the policy makers can choose to aim for a full blown cross-domain approach or to omit some elements of such an approach:

- is it possible to include all reports of each agency in the taxonomy? are some reports driven by demands from supra-national organizations such as the OECD⁴? do ESEF and IFRS have a fit with the data and process architecture?
- is it possible to connect all participants using the same technology? or have some partners already invested in another technology, such as a swift-network?
- is it possible to involve all the relevant stakeholders from all the possible domains?

To implement a cross domain approach the policy makers can also choose to design and develop the key-elements of the approach themselves or to look for available solutions:

- is it possible to re-use international standards for a Taxonomy? are some reports driven by local regulation like GAAP or Tax regulations? can the local legislation be changed in such a way that international standards such as IFRS or European Statistics can be used?
- is it possible to use technology such as networks, portals or assurance-solutions which have been developed in other countries?

⁴ The Country-by-country-reports demanded by the OECD have to be in XML-format according to an OECD-XSD. A consequence of this is that one is not allowed to use XBRL for CbC-reporting by companies as the (unchanged) reports must be sent to other OECD-countries in XML.

1.4. Summary of conclusions

In this document we try to draw some conclusions regarding:

- Cross-domain approach
- Filing of Tax declarations
- Reporting of Annual accounts
- Supervisory reporting

1.4.1. Cross-domain approach

Just a few countries (EE, FI, NL) have a cross-domain approach containing areas such as annual accounts, tax declarations, and statistical reports.

- In the UK there is a collaboration between annual accounts and corporate income tax declaration.
- Some countries (DE, RU, SE, UA) focus on a variety of types of annual accounts and have no focus (yet) on tax declarations.
- In DE and NL there is collaboration between annual accounts and credit rating reports.
- In UA: accounting reporting supports as well information for tax, statistics and other non accounting purposes (“tax” excludes declarations).

Depending on the scope and status of their programs and the culture in their countries, choices have been made to use either programs which are mostly lead by government or those that are based upon public-private cooperation.

1.4.2. Tax declarations

Just a few countries (EE, NL, UK) make Tax declarations part of their approach:

- EE: is heavily experimenting with XBRL GL.
- NL: the approach uses XBRL and includes both tax declarations and tax demand forms, both corporate and personal income tax, and also wages (in XML), VAT and allowances. The approach is widened to all kind of other taxes (inheritance tax, gift tax).
- UK: company filings to HMRC contain tax reports as well as accounts.

1.4.3. Annual accounts reporting

In most countries annual account reporting is part of their approach:

- In FI and NL the reporting of annual accounts is part of the SBR approach for all annual accounts except for listed companies. These companies follow IFRS-based reporting that is not supported by the SBR approach at the moment.
- UA includes quarterly and half year reports as well. All are included in the SBR approach, and are IFRS based. The SBR taxonomy is a national extension to the standard IFRS taxonomy.

1.4.4. Supervisory reporting

Some countries⁵ state that reporting to EBA and EIOPA is part of their cross-domain approach.

Exceptions are:

- EE: reporting to EIOPA is not part of the cross-domain approach
- FI: EBA and EIOPA supervisory reporting is not part of their SBR-program; the reports are not part of the SBR taxonomy but in the future may be integrated as the DPM methodology and European taxonomy architecture are applied to the SBR taxonomy too.
- NL: EBA and EIOPA supervisory reporting is not part of the SBR-program; the reports are not part of the Netherlands taxonomy and are not filed through the national digital gateway Digipoort.
- SE: EBA and EIOPA supervisory reporting is not part of the SBR approach.
- UA EBA and EIOPA supervisory reporting is not part of the SBR approach; the reports are not part of the Ukrainian taxonomy and are not filed through the national digital gateway.

⁵ BE, EE, FR, DE, RU, SE

2. Documentation

2.1. Survey reports

1. [Analysis 2018-07-17 version 2018-june](#)
2. EE [SBR v6 - Estonia 2017-10-13](#)
3. FI [SBR v6 - Finland 2018-05-17](#)
4. FR [SBR v6 - France 2017-07-13](#)
5. DE [SBR v6 - Germany 2017-11-03](#)
6. NL [SBR v6 - Netherlands 2018-05-17](#)
7. RU [SBR v6 - Russia 2017-07-18](#)
8. SE [SBR v6 - Sweden 2018-07-19](#)
9. UA [SBR v6 - Ukraine 2018-05-17](#)

2.2. Documents

1. NL 2018: [XBRL Case Study – Dutch Tax Administration](#)
2. UK 2015: [Company Reporting in the UK – an XBRL Success Story](#)

2.3. Websites

1. BE <https://financien.belgium.be/nl/E-services/biztax/technische-documentatie#q2>
2. EE <https://www.xbrl.org/estonia-to-shed-paper-with-reporting-3-0/>

3. Analysis on Cross-domain Reporting

3.1. Cross-domain Approach

As mentioned in the introduction the key principle of SBR is to standardize on data definitions, processes and technology. SBR is not tied to a specific technology, but rather adopts proven, widely used, open technologies which support the exchange of structured data, data definitions and enable the unequivocal design and definition of processes.

To implement a cross domain approach the policy makers can choose to aim for a full blown cross domain approach or to omit some elements of such an approach:

- is it possible to include all reports of each agency in the taxonomy? are some reports driven by demands from supra-national organizations such as the OECD⁶?
- is it possible to connect all participants using the same technology? or have some partners already invested in another technology, such as a swift-network?
- is it possible to involve all the relevant stakeholders from all the possible domains?

Using the limited material available it is not possible to conclude any consistent certain trend, but we can present information about the following countries that are implementing a partial cross-domain approach.

- In BE there is no cross-domain-approach.
- EE has been on digitalisation road for years. Electronic annual reporting was made mandatory in 2010. There are domain-specific projects such as eHealth or eTaxOffice where electronic filing has been moving mainstream. Estonia has long history with electronic identification, e-services and has connected many public institutional IT-systems with X-road.
- In FI there are two main cross-domain approaches;
 - annual accounts related reportings covering tax, statistics and financial statements (XBRL, iXBRL)
 - transactional reporting (XBRL GL)
 - payroll related reporting to different stakeholders (tax, pension institutions, statistics etc.) (proprietary definitions used)
- In FR there is a cross-domain approach based on the Tax returns for micro to large entities which are made in EDI. The Tax returns (cleaned from confidential information) in EDI or the paper/PDF version are used and partly used (sometimes rekeyed) by the French Statistics, in Annual accounts filed to Business Register and to Banks, and the central balance sheet office of Banque de France.
- In NL the Dutch government launched the Netherlands Taxonomy Project (NTP) in 2004, using the then relatively new standard XBRL to codify data definitions for tax, annual reporting and statistics reporting, and facilitate the exchange of reports. In 2009, the SBR program was initiated by four ministries (Interior Affairs, Economic Affairs, Finance and Justice), with public agencies (Tax Administration, Central Bureau of Statistics, Chamber of Commerce and Industry) in a direct role.

Three major banks use SBR for receiving credit reports. Educational organisations and housing corporations will use SBR for sending their annual reports (and more) to their regulator.
- In SE the current implementation of digital annual reports to the Companies Registrations office is an important corner-stone in the Swedish SBR project. Evaluation of the case for broader implementation including the information chains for tax and statistics is currently ongoing.
- In UA, under the Accounting Law passed in October 2017 (Mandate), the scope of public interest entities that are obliged to report their financial statements using the Ukrainian IFRS Taxonomy in the Financial Reporting System includes: “enterprises-securities issuers, whose securities are

⁶ The Country-by-country-reports demanded by the OECD have to be in XML-format according to an OECD-XSD. A consequence of this is that one is not allowed to use XBRL for Dutch companies as the (unchanged) reports must be sent to other OECD countries in XML.

admitted to stock trading, banks, insurers, non-state pension funds, other financial institutions (except other financial institutions and non-state pension funds that are classified as micro enterprises and small enterprises) and enterprises that in accordance with this Law are classified as large enterprises”. The scope includes quarterly, half year and annual accounts. These financial reports will be forwarded to the National Securities and Exchange Commission, the financial regulators for banking and insurance, and several departments of the Ministry of Finance including Statistics and Tax.

- ➔ In UK “companies have been required since April 2011 to file their annual accounts and corporation tax return in iXBRL to the tax authority, HMRC.” “The UK business register, Companies House, which collects and publishes accounts from all UK entities, has encouraged voluntary filing of accounts in XBRL for a decade. It began accepting simple, small company accounts that followed a standard pattern in XBRL in 2005. It upgraded its systems from 2011 to handle all accounts in iXBRL.”

3.2. Governance

	Belgium	Estonia	Finland	France	Germany	Netherlands	Russia	Sweden	Ukraine	UK
Data receiving parties		5	4	2	5	5	0	5	5	5
Filers (companies)		1	2	2	0	1	5	0	2	0
Data submitters		4	5	2	5	5	0	2	0	5
XBRL-community		0	5	2	5	4	0	5	1	5
Data analysts		0	4	2	5	0	0	4	0	?
Software vendors		1	4	2	5	5	5	3	1	5
Ministries		3	4	2	5	2	5	2	5	5

Figure 1: parties involved in implementation

Depending on the scope of their programs and the culture in their countries, choices have been made to use either programs which are mostly lead by government or which are based upon public-private cooperation:

- ➔ NL: In 2009, the SBR program was initiated by four ministries (Interior Affairs, Economic Affairs, Finance and Justice), with public agencies (Tax Administration, Central Bureau of Statistics, Chamber of Commerce and Industry) and three major banks in a direct role. Right from the start, private sector associations and companies were also involved in the decision-making bodies and the working groups.
- ➔ UK: “Underlying ... technical features is a cooperative approach to governance and use of XBRL in the UK. Committees which oversee the development of taxonomies bring together representatives of government, regulators, other official agencies, accounting firms and software providers.”
- ➔ UK: “XBRL development at the FRC is overseen by a governance committee which includes representatives from HMRC, Companies House, the Department of Business (the government ministry in charge of business affairs), the Institute of Chartered Accountants in England and Wales (ICAEW), a number of large accountancy firms and representatives of XBRL UK and XBRL Ireland. This committee sets strategy, consulting with other agencies when necessary. A technical committee made up of representatives of accountancy firms, software developers, HMRC and other bodies monitors the detailed development of taxonomy content and design. Final taxonomy approval rests with the FRC. XBRL UK, the UK jurisdiction of XBRL International, provides general support for development and use of XBRL in the UK. Bringing together accounting firms, software companies, government departments and other agencies, it supplies a forum for preparers and consumers of financial information to discuss XBRL implementation and plans for its expansion. It helps to foster effective coordination on XBRL in the UK.”

3.3. XBRL

	Belgium	Estonia	Finland	France	Germany	Netherlands	Russia	Sweden	Ukraine
XBRL	yes	yes	yes	yes	yes	yes	no	yes	yes
inline XBRL	no	no	yes		no	no	no	yes	yes
XBRL GL	no	yes	yes		no	no	no	no	no
XML	yes	yes	no		yes	yes	yes	yes	no
EDI	no	yes	no	yes	no	no	yes	no	no
others		HL7: Healthcare	Proprietary format for payrollng						

Figure 2: XBRL- standards

In every European country preparation begun to implement the ESMA-regulation, using iXBRL.

Additional information:

- ➔ In BE XBRL is used for Annual reporting, Tax declarations
- ➔ In FR EDI is used as a standard both for many agencies, including Tax reporting. XBRL is used for EBA/EIOPA.
- ➔ In NL XBRL is used for Annual reporting (to the Business Register and to industry-specific regulators), Tax declarations, Statistical reporting, Credit revisioning. XML is used for Wage Tax
- ➔ In UA XBRL and iXBRL will be used for Annual and Quarterly reporting to the Securities Commission and to industry-specific regulators, statistics, and tax.

4. Analysis on Tax reporting

	Belgium	Estonia	Finland	France	Germany	Netherlands	Russia	Sweden	Ukraine
Corporate income tax	no	yes	yes	yes	no	yes	no	yes	no
VAT	no	yes	no	yes	no	yes	no	yes	no
Wage tax	no	yes	yes	yes	no	no	no	yes	no
Personal taxes	no	yes	no	yes	no	yes	no	yes	no

Figure 3: standardization on data dictionary

	Belgium	Estonia	Finland	France	Germany	Netherlands	Russia	Sweden	Ukraine
Corporate income tax	yes	yes	no	yes	no	yes	no	no	no
VAT	yes	yes	no	yes	no	yes	no	no	no
Wage tax	yes	yes	yes	yes	no	no	no	no	no
Personal taxes	no	yes	no	yes	no	yes	no	no	no

Figure 4: standardization on data format

Just a few countries (EE, NL) make Tax declarations part of their cross domain approach.

Additional information:

- ➔ EE “with a view to creating true end-to-end reporting, is heavily experimenting with XBRL GL, so that structured transactional reporting can roll up to not just XBRL financial statements but a range of other government reports. Currently, the Reporting 3.0 team is working on detailed analysis of salary and workforce data, covering some 380 reporting concepts used not just for tax but also for a range of other, largely statistical purposes. Their research shows that there is a mismatch between the statistical data sought from companies and official use of that data, which is something they are interested in highlighting, in terms of respondent burden. The broader goals of Reporting 3.0 are ambitious. Eventually they would like to move to a situation in which the Tax Department has sufficient data drawn from digital accounting records to ensure that they become the first country to get to “No tax declarations”. They are also investigating the extent to which co-operation with banks might allow complete tax reporting based on aggregation of bank statements for micro-companies.”
- ➔ In FR the Tax returns for micro to large entities are made, and transmitted in EDI, to the Tax administration, as well as the VAT declarations, lists of employees declarations and the wage taxes which are also. This represents more than 2 000 000 entities. The Tax returns (cleaned from confidential information) in EDI or the paper/PDF version are used and partly used (sometimes rekeyed) by the French Statistics, in Annual accounts filed to Business Register and to Banks, and the central balance sheet office of Banque de France.
- ➔ In the NL the Tax Administration is using the XBRL Taxonomy to receive all kind of Tax Declarations. The big exception is the area of Wage Taxes. While the processes are standardized with the other taxes the Data Format remains XML.
- ➔ In UK “HMRC is separately responsible for two other taxonomies used in the UK for tax reporting. One covers basic information relating to corporation tax. The other handles the ‘detailed profit and loss’ report, which contains an in-depth breakdown of certain income and expenses. Company filings to HMRC contain these tax reports as well as accounts.”
- ➔ In the UA, tax reporting isn’t in the cross-domain approach. Anyway, financial reporting in the SBR will be used by Ministry of Finance Tax departments, as such (there are no tax declarations in the SBR)

5. Analysis on Annual reporting

	Belgium	Estonia	Finland	France	Germany	Netherlands	Russia	Sweden	Ukraine
Micro	no	yes	yes	no	yes	yes	no	yes	no
Small	no	yes	yes	no	yes	yes	no	yes	no
Medium	no	yes	yes	no	yes	yes	no	no	no
Larrge	no	yes	yes	no	yes	yes	no	no	yes
Listed	no	yes	no	no	no	yes	no	no	yes

Figure 5: standardization on data dictionary

	Belgium	Estonia	Finland	France	Germany	Netherlands	Russia	Sweden	Ukraine
Micro	yes	yes	yes	no	yes	yes	no	no	no
Small	yes	yes	yes	no	yes	yes	no	no	no
Medium	yes	yes	yes	no	yes	yes	no	no	no
Large	yes	yes	yes	no	yes	yes	no	no	yes
Listed	yes	yes	yes	no	no	no	no	no	yes

Figure 6: standardization on data format

	Belgium	Estonia	Finland	France	Germany	Netherlands	Russia	Sweden	Ukraine
IFRS	yes	yes	no	yes	no	no	yes	no	yes
Local Gaap (based upon IFRS)	no	yes	no	no	no	no	yes	yes	no
Local GAAP (local definitions)	yes	yes	yes	yes	Yes	yes	yes	yes	no

Figure 7: accounting principles

In most countries Annual account reporting is part of their approach.

Additional information:

- ➔ In FI and NL the reporting of annual accounts is part of the SBR approach for all legal forms except for listed companies. These companies follow IFRS-based reporting that is not supported by the SBR approach at the moment.
- ➔ UA includes quarterly and half year reports as well. All are included in the SBR approach, and are IFRS based. The SBR taxonomy is a national extension to the standard IFRS taxonomy.

6. Analysis on Supervisory reporting

	Belgium	Estonia	Finland	France	Germany	Netherlands	Russia	Sweden	Ukraine
ESMA	yes	yes	no	no	yes	yes/no	no	no	no
EBA	yes	yes	no	yes	yes	no	yes	yes	no
EIOPA	yes	no	no	yes	yes	no	yes	yes	no

Figure 8: supervisory reporting

Some countries (see figure 8) state in their answers to the survey that reporting to EBA and EIOPA is part of their cross-domain approach.

Additional information:

- NL are using XBRL for EBA and EIOPA. Since 2 years, DNB started to build DPM-compatible taxonomies for national reports in the financial domain (e.g. SE reports: such as Balance Sheet Items, MFI Interest Rates, OTC, Country Risk Reporting). All (most) old-format reports (e-Line) will probably be replaced by XBRL (or XML) reports within 5 years.