

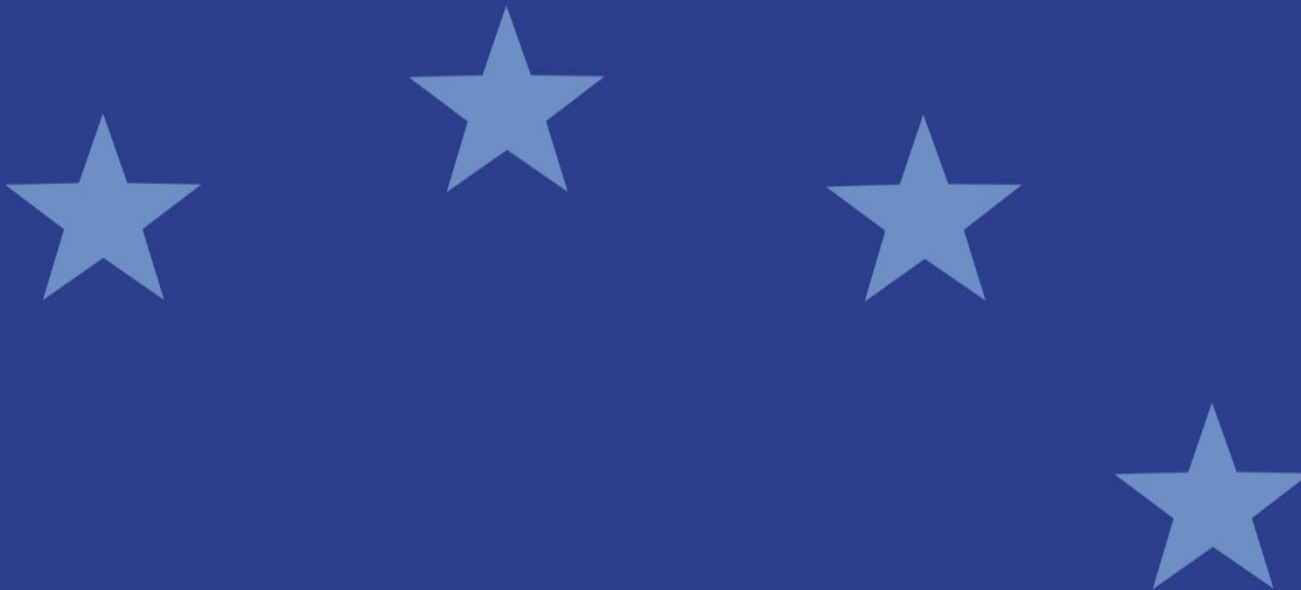


European Securities and
Markets Authority

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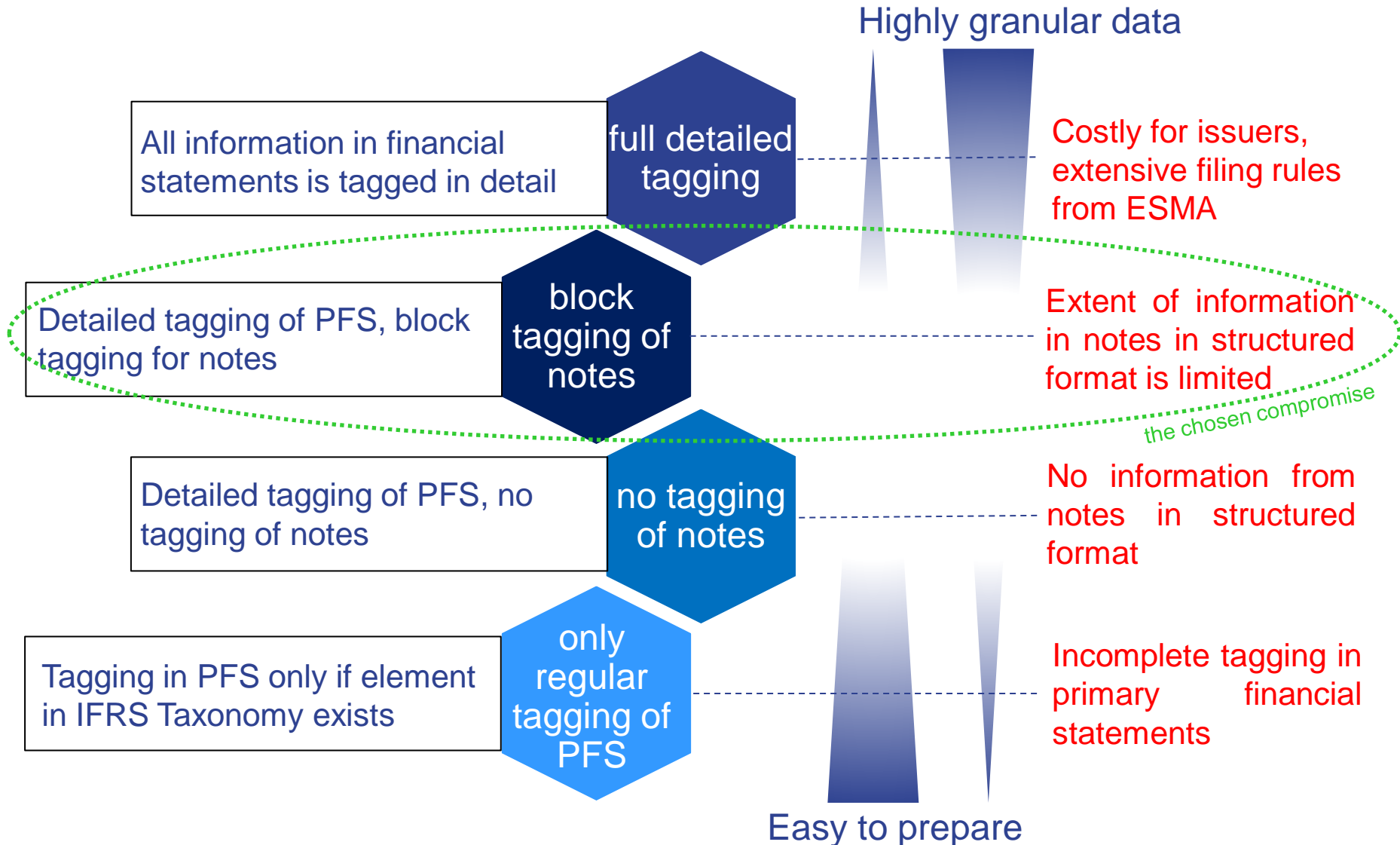
14 June 2022

ESEF: Tagging the notes



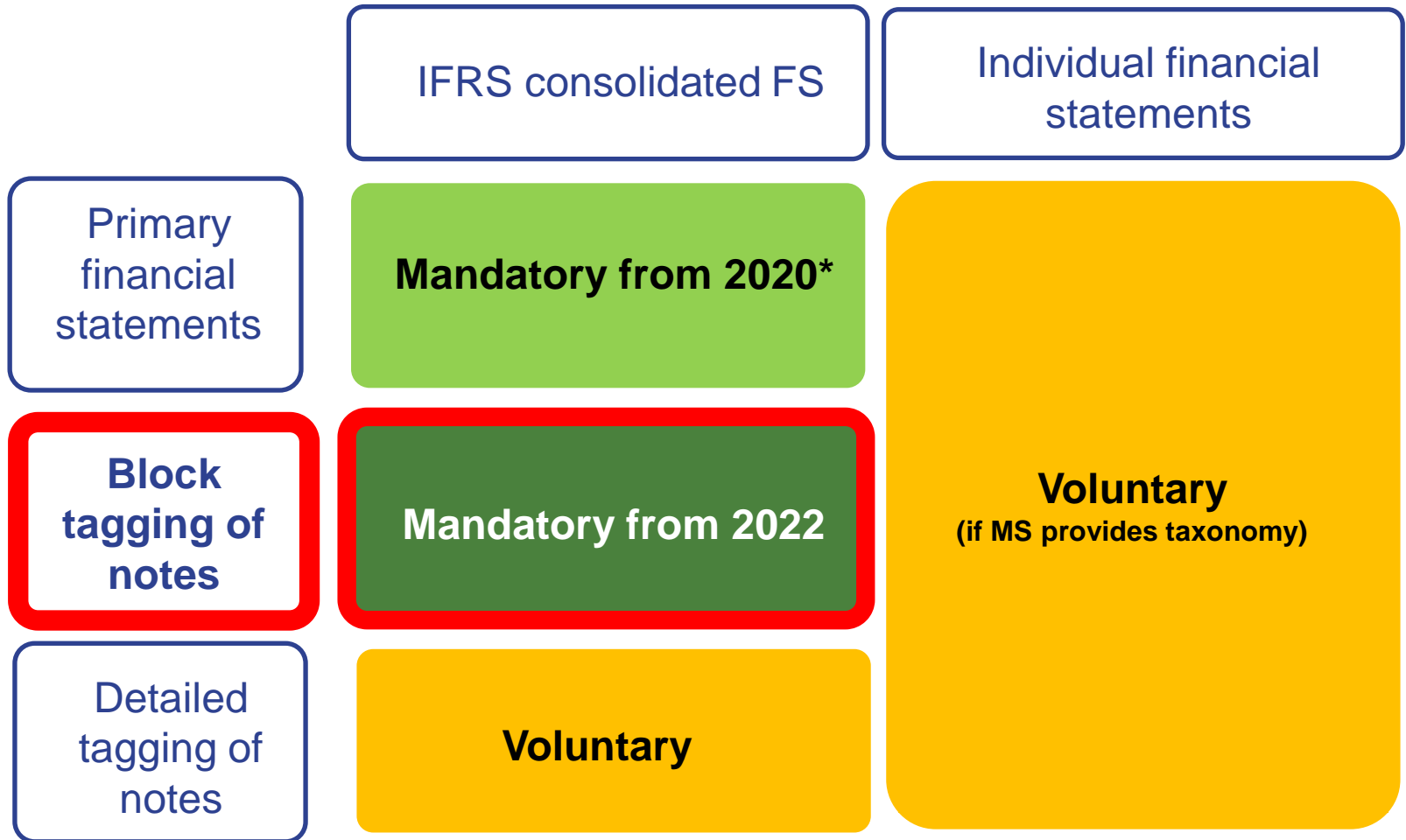
ESMA32-60-858

Level of tagging required by ESEF RTS





Level of tagging required by ESEF RTS



Relevant Articles for mandatory marking up of notes

Article 4. 2. Issuers shall, as a minimum, mark up the disclosures specified in Annex II where those disclosures are present in those IFRS consolidated financial statements.”



Annex II. 3. Issuers shall mark up **all disclosures** made in IFRS consolidated financial statements or made by cross-reference therein to other parts of the annual financial reports for financial years beginning on or after 1 January 2022 **that correspond to the elements in Table 2 of this Annex.**”



Table 2 Mandatory elements of the core taxonomy to be marked up
Includes ~ 230 block tags for the Notes
→ IFRS Taxonomy List of notes and List of accounting policies



Other articles to bear in mind when marking up of notes

Recital 10. With regard to the notes to IFRS consolidated financial statements, a **standard of block tagging** should apply **where whole sections of those notes are each to be marked up using singles taxonomy elements.**

The requirement of block tagging, however, should not limit the discretion of issuers to mark up notes to IFRS consolidated financial statements with a higher level of granularity

Annex IV. 3. When marking up disclosures, issuers shall use the core taxonomy element with **the closest accounting meaning** to the disclosure being marked up. Where there appears to be a choice of core taxonomy elements, issuers should select the element with the narrowest accounting meaning and/or scope.



Level of granularity & multiple layers of block tagging

- The list of mandatory elements to be marked up (Table 2 Annex II) includes elements of different granularity: wider and narrower elements that can be grouped by topic.

Example:

- Disclosure of material accounting policy information
 - Description of accounting policy for financial instruments
 - Description of accounting policy for derivative financial instruments and hedging
 - Description of accounting policy for derivative financial instruments
 - Description of accounting policy for hedging

- One note could be block-tagged with several mandatory elements (multiple and/or embedded tagging)

ESEF RTS Annex II Table 2

- **Selection of tags and completeness of tagging:**
 - Application of all tags if such information is present in the notes vs application of selected/closest tags to tag entire note contents
 - Multiple/double tagging of tags with different granularity in Annex II
 - Inclusion of headers/titles of the note in the tagged content
 - Tagging with elements not part of the Annex II but part of Annex VI
 - Tagging with extension elements and their anchoring
- **Technical aspects:**
 - Guidance on application of continuation and exclude mechanisms
 - Retaining formatting of the underlying XHTML in block tags

XBRL.EU views on marking up of notes

1. What are your views on the different approaches to tag the notes? When a note (text block) corresponds to several elements of the taxonomy (some being wider than others), do you think it should be marked-up with each of those mandatory elements? If so, how? Or only the element with the closest accounting meaning should be used?
2. Do you see technical challenges in the implementation of the different approaches? In relation to, a) multiple/embedded tagging; b) continuation/exclude of iXBRL
3. Do you have any other issues/ experiences/challenges to highlight in relation to block tagging of notes?
4. Have you identified any other areas where further ESEF guidance should be provided?



Thank you!