

**ESEF:
BLOCK TAGGING AND THE WAY
FORWARDS**

*with the participation of
ESMA and the UK FRC*

15 November 2022 – 2-4pm CET

A XBRL EUROPE WEBINAR



Tagging of Disclosures with text blocks – views of ESEF BPTF

- Pierre Hamon
- AMANA France
- Member of XBRL France

Two topics



TECHNICAL ISSUE



MAPPING ISSUES

Technical issue

- ESEF reporting manual has followed XBRL Europe recommendation
 - *Issuers shall set the iXBRL @escaped attribute to “true”, if the human readable content contains a “<” or “&” character to ensure that the resulting fact value is always valid for its data type.*
 - *In all other cases, the @escaped attribute may be set to either “false” or “true” to result in valid XHTML string.*
 - There are diverging views on how the tables should be formatted in the xbrl extracted instances.
-

A table in iXBRL - ESEF

Table in iXBRL from a PDF source

HTML view: human readable

D.3.1. Property, plant and equipment owned		
Property, plant and equipment owned by Sanofi is comprised of the following items:		
(€ million)	Land	Buildings
Gross value at January 1, 2019	283	6,883
Acquisitions and other increases	—	10
Disposals and other decreases	(3)	(42)
Currency translation differences	6	80
Transfers ^(a)	(31)	351
Gross value at December 31, 2019	255	7,282
Changes in scope of consolidation	—	6
Acquisitions and other increases	—	16
Disposals and other decreases	(11)	(173)
Currency translation differences	(13)	(264)
Transfers ^(a)	5	(39)
Gross value at December 31, 2020	236	6,828
Changes in scope of consolidation	—	11
Acquisitions and other increases	—	10
Disposals and other decreases	(3)	(75)
Currency translation differences	6	169

XBRL tag

Concept	
(ifrs-full) Disclosure of property, plant and equipment [text block]	
The entire disclosure for property, plant and equipment.	
Dimensions	
Date	1 Jan 2021 to 31 Dec 2021
Fact Value	D.3.1. Property, plant and equipment owned Property, plant and equipment owned by Sanofi is comprised of the following [...]
Accuracy	n/a
Change	n/a
Entity	[LEI] 549300YWW20LH6LGU05
Concept	ifrs-full:DisclosureOfPropertyPlantAndEqui...

XBRL instance made human readable (in iXBRL viewer)

D.3.1. Property, plant and equipment owned
Property, plant and equipment owned by Sanofi is comprised of the following items: (€ million) Land Buildings Machinery and equipment Fixtures, fittings and other Property, plant and equipment in process Total Gross value at January 1, 2019 283 6,883 10,468 2,579 2,484 22,697 Acquisitions and other increases — 10 50 56 1,145 1,261 Disposals and other decreases (3) (42) (148) (114) (12) (319) Currency translation differences 6 80 64 17 33 200 Transfers (a) (31) 351 619 49 (1,259) (271) Gross value at December 31, 2019 255 7,282 11,053 2,587 2,391 23,568 Changes in scope of consolidation — 6 3 1 — 10 Acquisitions and other increases — 16 40 46 1,208 1,310 Disposals and other decreases (11) (173) (177) (123) (3) (487) Currency translation differences (13) (264) (276) (67) (91) (711) Transfers (a) 5 (39) 484 80 (1,051) (521) Gross value at December 31, 2020 236 6,828 11,127 2,524 2,454 23,169 Changes in scope of consolidation — 11 15 2 2 30 Acquisitions and other increases — 10 51 39 1,404 1,504 Disposals and other decreases (3) (75) (153) (80) (3) (314) Currency translation differences 6 169 155 34 79 443 Transfers (a) 1 227 453 136 (839) (22) Gross value at December 31, 2021 240 7,170 11,648 2,655 3,097 24,810 Accumulated depreciation & impairment at January 1, 2019 (3,796) (7,230) (1,914) (87) (13,046) Depreciation expense — (357) (586) (194) — (1,137) Impairment losses, net of reversals (4) (33) (4) (2) (55) (98) Disposals and other decreases 2 54 140

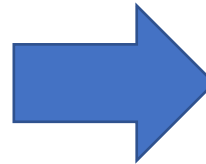
Fact Value

A table in iXBRL - ESEF

XBRL extracted data: 40 208 characters of code for this tag

Extracted XBRL instance

```
</xbrli:context>
<ifrs-full:DisclosureOfPropertyPlantAndEquipmentExplanatory contextRef="c-1" id="fact-1">D.3.1.
Property, plant and equipment owned<span class="_2fb"
xmlns="http://www.w3.org/1999/xhtml">&lt; &lt;/span>&lt;Property<span class="_6"
xmlns="http://www.w3.org/1999/xhtml" />&lt;, plant and equipment owned by Sanofi is comprised
of the following items:<span class="_2fb" xmlns="http://www.w3.org/1999/xhtml">&lt;
&lt;/span>&lt;(&,- million)<span class="_1a9" xmlns="http://www.w3.org/1999/xhtml">&lt;
&lt;/span>&lt;&lt;span class="ff2 fc3" xmlns="http://www.w3.org/1999/xhtml">&lt;Land&lt;span
class="_197">&lt; &lt;/span>&lt;Buildings&lt;span class="_2fb">&lt;
&lt;/span>&lt;&lt;/span>&lt;Machinery&lt;span class="_2fb"
xmlns="http://www.w3.org/1999/xhtml">&lt; &lt;/span>&lt;and&lt;span class="_2fb"
xmlns="http://www.w3.org/1999/xhtml">&lt; &lt;/span>&lt;equipment&lt;span class="_2fb"
xmlns="http://www.w3.org/1999/xhtml">&lt; &lt;/span>&lt;Fixtures,&lt;span class="_2fb"
xmlns="http://www.w3.org/1999/xhtml">&lt; &lt;/span>&lt;fittings and&lt;span class="_2fb"
xmlns="http://www.w3.org/1999/xhtml">&lt; &lt;/span>&lt;other&lt;span class="_2fb"
xmlns="http://www.w3.org/1999/xhtml">&lt; &lt;/span>&lt;Property, plant&lt;span class="_2fb"
xmlns="http://www.w3.org/1999/xhtml">&lt; &lt;/span>&lt;and equipment&lt;span class="_2fb"
xmlns="http://www.w3.org/1999/xhtml">&lt; &lt;/span>&lt;in process&lt;span class="_b8"
xmlns="http://www.w3.org/1999/xhtml">&lt; &lt;/span>&lt;Total&lt;span class="_2fb"
xmlns="http://www.w3.org/1999/xhtml">&lt; &lt;/span>&lt;Gross value at January 1, 2019&lt;span
class="_b8" xmlns="http://www.w3.org/1999/xhtml">&lt; &lt;/span>&lt; &lt;span class="_da"
xmlns="http://www.w3.org/1999/xhtml">&lt; &lt;/span>&lt;283 &lt;span class="_62"
xmlns="http://www.w3.org/1999/xhtml">&lt; &lt;/span>&lt;&lt;span class="_134"
```

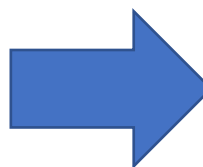


Made human readable in Excel

	Shown Value					
D.3.1. Property, plant and equipment owned						
Property, plant and equipment owned by Sanofi is comprised of the following items:						
(€ million)						
Land Buildings						
Machinery						
and						
equipment						
Fixtures,						
fittings and						
other						
Property, plant						
and equipment						
in process						
Total						
Gross value at January 1, 2019	283	6,883	10,468	2,579	2,484	22,697
Acquisitions and other increases	—	10	50	56	1,145	1,261
Disposals and other decreases	(3)	(42)	(148)	(114)	(12)	(319)
Currency translation differences	6	80	64	17	33	200
Transfers						
(a)						
(31)	351	619	49	(1,259)	(271)	
Gross value at December 31, 2019	255	7,282	11,053	2,587	2,391	23,568
Changes in scope of consolidation	—	6	3	1	—	10
Acquisitions and other increases	—	16	40	46	1,208	1,310
Disposals and other decreases	(11)	(173)	(177)	(123)	(3)	(487)
Currency translation differences	(13)	(264)	(276)	(67)	(91)	(711)
Transfers						
(a)						
5	(39)	484	80	(1,051)	(521)	
Gross value at December 31, 2020	236	6,828	11,127	2,524	2,454	23,169
Changes in scope of consolidation	—	11	15	2	2	30

102 846 characters for making the xbrl data readable in the xbrl viewer


Interactive data viewer: human readable

[illegible]

	12 Months Ended		
	Dec. 31, 2021		
Property, plant and equipment			
<i>D.3.1. Property, plant and equipment owned</i>			
Property, plant and equipment owned by Sanofi is comprised of the following items:			
(€ million)	Land	Buildings	Machinery and equipment
Gross value at January 1, 2019	283	6,883	10,468
Acquisitions and other increases	—	10	50
Disposals and other decreases	(3)	(42)	(148)
Currency translation differences	6	80	64
Transfers ^(a)	(31)	351	619
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Changes in scope of consolidation	—	6	3
Acquisitions and other increases	—	16	40
Disposals and other decreases	(11)	(173)	(177)
Currency translation differences	(13)	(264)	(276)
Transfers ^(a)	5	(39)	484
Gross value at December 31, 2020	236	6,828	11,127
Changes in scope of consolidation	—	11	15

Machine readable data

In both environments, the machine readable data (for automated consumption and comparisons) would result from the detail tagging of the values in the tables and/or text.



	al
22,697	
1,261	
(319)	
200	
(271)	
23,568	
10	
1,310	
(487)	
(711)	
(521)	
23,169	
30	
1,504	
(314)	
443	
(22)	
24,810	
(13,046)	
(1,137)	
(98)	


Property, plant and equipment


Concept

- (ifrs-full) Property, plant and equipment

The amount of tangible assets that: (a) are held for use in the production or supply of goods or services, for rental to others, or for administrative purposes; and (b) are expected to be used during more than one period.

Dimensions

- ☐ (ifrs-full) Carrying amount, accumulated depreciation, amortisation and impairment and gross carrying amount [axis] 
- ☒ (ifrs-full) Gross carrying amount [member]

Date	31 Dec 2018 
Fact Value	€ 22,697,000,000
Accuracy	-6 (millions)
Change	No prior fact
Entity	[CIK] 0001121404
Concept	ifrs-full:PropertyPlantAndEquipment

Technical issue

Today

Due to mechanics of producing XHTML documents, some narrative blocks extracted from such documents to an **XBRL instance may not be formatted in a manner that is exactly the same as the full document when looked at in isolation (such as, but not limited to, lost table structures, applied styles, different line breaks).**

The way forward

XBRL

The limitations in these transformation mechanics are known and understood by the XBRL community who will be monitoring the evolution and **possible improvements in these mechanics.**

ESMA

ESMA should give more precise guidance on **what is really expected from issuers and how text blocks are expected to be consumed.**

Mapping issues

RTS

- **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 2023 **that correspond** to the elements in the Table II of the Annex.

ESEF Manual

- **Multiple block tags:** Preparers have to consider the accounting meaning of a taxonomy element when selecting the appropriate block tag for marking up such disclosure. This is particularly important for cases where **there are multiple block tags that can match a given disclosure**.
- **Nested block tags:** In case of a disclosure corresponding to more than one element **of different granularity (with narrower and wider elements)**, preparers should use each of them and **multi tag the information** to the extent that corresponds with the underlying accounting meaning of the information.

Issue: «multi tag the information with narrower and wider elements»

- The role [000000] is a flat list and have no indication of « wider / narrower » elements:
 - 96 accounting policies
 - 135 disclosures
 - This results in many different interpretations that are confusing for preparers, auditors and regulatory bodies.
 - *“Nightmare!”*
 - *“Some interpretations require tagging of a sentence or a table with 8 or 9 text block tags”*
-

2022 – further guidance

- Consensus: The ESEF reporting manual is not considered as « legally binding ». It is a useful tool to assist in the application of ESEF obligations

Country	Regulator	Auditors
FRANCE	The guidance of the AMF reproduces the ESEF reporting manual but AMF will be flexible in its application.	Will issue guidance.
GERMANY		Q &A will be issued in Nov. on tagging scope and technical implementation.
NETHERLAND	Includes challenges and recommendations. Not much on blocktagging but an interesting remark: “Consider more detailed tagging of the notes.”	
UK	Guidance is being considered.	
Portugal, Finland	No further guidance is expected.	

Hierarchy of text blocks for disclosures and accounting policies

- The proposed hierarchy cannot be considered as an “official” or “regulatory” document.
 - Made to ease the navigation in the role [000000] and to disclose the possible nesting of text blocks
 - The text blocks are logically grouped according to their content by reference to specific IFRS requirements (underlying IFRS as expressed in the reference link in the taxonomy),
 - The “minimal” number of nested text blocks.
 - The aims of this hierarchy are:
 - To help issuers do the tagging for their 2022 ESEF report,
 - To propose to ESMA to change the ESEF regulation for future years to require only a certain level of block tagging,
 - To provide to IFRS Foundation ideas how it could be implemented in the IFRS taxonomy.
-

Proposed hierarchy

DisclosureOfFinancialInstrumentsExplanatory	IFRS,7,,
DescriptionOfAccountingPolicyForFinancialInstrumentsExplanatory	
DescriptionOfAccountingPolicyForDerecognitionOfFinancialInstrumentsExplanatory	
DescriptionOfAccountingPolicyForOffsettingOfFinancialInstrumentsExplanatory	
DescriptionOfAccountingPolicyForRecognisingDifferenceBetweenFairValueAtInitialRecognitionAndAmountDeterminedUsing	IFRS,7,28,a
DescriptionOfAccountingPolicyForFinancialGuaranteesExplanatory	
DescriptionOfAccountingPolicyForFinancialAssetsExplanatory	
DescriptionOfAccountingPolicyForHeldtomaturityInvestmentsExplanatory	
DisclosureOfFinancialInstrumentsHeldForTradingExplanatory	
DisclosureOfFinancialAssetsHeldForTradingExplanatory	
DisclosureOfFinancialLiabilitiesHeldForTradingExplanatory	
DisclosureOfAvailableforsaleAssetsExplanatory	
DescriptionOfAccountingPolicyForAvailableforsaleFinancialAssetsExplanatory	
DisclosureOfCreditRiskExplanatory	IFRS,7,,
DisclosureOfAllowanceForCreditLossesExplanatory	
DisclosureOfReclassificationOfFinancialInstrumentsExplanatory	
DescriptionOfAccountingPolicyForReclassificationOfFinancialInstrumentsExplanatory	
DisclosureOfLiquidityRiskExplanatory	
DisclosureOfMarketRiskExplanatory	
DisclosureOfFairValueOfFinancialInstrumentsExplanatory	
DisclosureOfFinancialInstrumentsAtFairValueThroughProfitOrLossExplanatory	
DescriptionOfAccountingPolicyForFinancialInstrumentsAtFairValueThroughProfitOrLossExplanatory	
DisclosureOfFinancialInstrumentsDesignatedAtFairValueThroughProfitOrLossExplanatory	
DisclosureOfDerivativeFinancialInstrumentsExplanatory	
DescriptionOfAccountingPolicyForDerivativeFinancialInstrumentsAndHedgingExplanatory	
DescriptionOfAccountingPolicyForDerivativeFinancialInstrumentsExplanatory	
DescriptionOfAccountingPolicyForHedgingExplanatory	
DisclosureOfBorrowingsExplanatory	
DescriptionOfAccountingPolicyForFinancialLiabilitiesExplanatory	
DescriptionOfAccountingPolicyForBorrowingsExplanatory	
DisclosureOfDebtSecuritiesExplanatory	
DisclosureOfFinancialRiskManagementExplanatory	
DisclosureOfLoansAndAdvancesToBanksExplanatory	
DisclosureOfLoansAndAdvancesToCustomersExplanatory	
DescriptionOfAccountingPolicyForLoansAndReceivablesExplanatory	

The entire disclosure

IFRS reference

Accounting policies

Common practice

The hierarchy helps nestings and continuations

DisclosureOfOtherAssetsExplanatory
DisclosureOfRestrictedCashAndCashEquivalentsExplanatory
DisclosureOfCashAndCashEquivalentsExplanatory
DisclosureOfNoncurrentAssetsHeldForSaleAndDiscontinuedOperationsExplanatory
DisclosureOfShareCapitalReservesAndOtherEquityInterestExplanatory
DisclosureOfObjectivesPoliciesAndProcessesForManagingCapitalExplanatory
DescriptionOfAccountingPolicyForWarrantsExplanatory
DisclosureOfProvisionsExplanatory
DescriptionOfAccountingPolicyForProvisionsExplanatory
DescriptionOfAccountingPolicyForDecommissioningRestorationAndRehabilitationProvisionsExplanatory
DisclosureOfLeasesExplanatory
DescriptionOfAccountingPolicyForLeasesExplanatory
DisclosureOfLeasePrepaymentsExplanatory
DisclosureOfGovernmentGrantsExplanatory
DisclosureOfTradeAndOtherPayablesExplanatory
DescriptionOfAccountingPolicyForTaxesOtherThanIncomeTaxExplanatory
DisclosureOfAccruedExpensesAndOtherLiabilitiesExplanatory
DisclosureOfDeferredIncomeExplanatory
DisclosureOfDepositsFromBanksExplanatory
DisclosureOfDepositsFromCustomersExplanatory
DisclosureOfOtherLiabilitiesExplanatory
DisclosureOfRevenueExplanatory
DisclosureOfRevenueFromContractsWithCustomersExplanatory
DescriptionOfAccountingPolicyForRecognitionOfRevenue
DescriptionOfAccountingPolicyForDiscountsAndRebatesExplanatory
DescriptionOfAccountingPolicyForCustomerAcquisitionCostsExplanatory
DescriptionOfAccountingPolicyForCustomerLoyaltyProgrammesExplanatory
DescriptionOfAccountingPolicyForFranchiseFeesExplanatory
DisclosureOfInterestIncomeExpenseExplanatory
DisclosureOfCostOfSalesExplanatory
DisclosureOfFeeAndCommissionIncomeExpenseExplanatory
DisclosureOfTradingIncomeExpenseExplanatory

DisclosureOfLeasesExplanatory

DescriptionOfAccountingPolicyForLeasesExplanatory

DisclosureOfLeasePrepaymentsExplanatory

continuation



DisclosureOfRevenueExplanatory

DescriptionOfAccountingPolicyForRecognitionOfRevenue

DescriptionOfAccountingPolicyForCustomerAcquisitionCostsExplanat



French company – Tagging for 20-F

One Note -> One tag

- Accounting policies
 - B.8. Financial instruments
- Disclosures
 - D.7. Other non-current assets
 - D.12. Financial assets and liabilities measured at fair value
 - D.20. Derivative financial instruments and market risks

[Report extract](#)

Description of accounting policy for financial instruments [text block]

12 months ending 12/31/2021

[Click to see Fact](#)

Disclosure of other non-current assets [text block]

12 months ending 12/31/2021

[Click to see Fact](#)



Disclosure Of Financial Assets And Liabilities At Fair Value Explanatory [Text Block]

12 months ending 12/31/2021

[Click to see Fact](#)

Disclosure of derivative financial instruments [text block]

12 months ending 12/31/2021

[Click to see Fact](#)

Same issuer – same report- Tagging for ESEF

One Section -> One tag

[Report extract](#)

Disclosure of accounting policy for financial instruments		
<i>B.8.1. Non-derivative financial assets</i>		
Financial assets at fair value through other comprehensive income		
Financial assets at fair value through profit or loss	2	DescriptionOfAccountingPolicyForFinancialInstrumentsAtFairValueThroughProfitOrLossExplanatory
Fair value of equity investments in unquoted entities	3	DescriptionOfAccountingPolicyForFairValueMeasurementExplanatory
Financial assets measured at amortized cost	4	DescriptionOfAccountingPolicyForFinancialAssetsExplanatory
Impairment of financial assets measured at amortized cost	5	DescriptionOfAccountingPolicyForImpairmentOfFinancialAssetsExplanatory
<i>B.8.2. Derivative instruments</i>		
Policy on offsetting	6	DescriptionOfAccountingPolicyForDerivativeFinancialInstrumentsExplanatory
	7	DescriptionOfAccountingPolicyForOffsettingOfFinancialInstrumentsExplanatory
<i>B.8.3. Hedging</i>		
	8	DescriptionOfAccountingPolicyForHedgingExplanatory
<i>B.8.4. Non-derivative financial liabilities</i>		
Borrowings and debt	9	DescriptionOfAccountingPolicyForFinancialLiabilitiesExplanatory
	10	DescriptionOfAccountingPolicyForBorrowingsExplanatory
<i>B.8.5. Fair value of financial instruments</i>		
<i>B.8.6. Derecognition of financial instruments</i>		
<i>B.8.7. Risks relating to financial instruments</i>		
D.7. Other non-current assets	11	DisclosureOfOtherNoncurrentAssetsExplanatory
<i>D.7.1. Equity instruments at fair value through other comprehensive income</i>	12	DisclosureOfFairValueMeasurementExplanatory
<i>D.7.2. Debt instruments at fair value through other comprehensive income</i>	12	DisclosureOfFairValueMeasurementExplanatory
<i>D.7.3. Other financial assets at fair value through profit or loss</i>	Continuation	
	13	DisclosureOfFinancialInstrumentsAtFairValueThroughProfitOrLossExplanatory
D.12. Financial assets and liabilities measured at fair value	12	DisclosureOfFairValueMeasurementExplanatory
	Continuation	
D.20. Derivative financial instruments and market risks		
<i>D.20. Derivative financial instruments</i>	14	DisclosureOfDerivativeFinancialInstrumentsExplanatory
<i>D.20. Market risks</i>	15	DisclosureOfMarketRiskExplanatory

	Multiple tagging	Nested in	Embedded in	
B.8. Financial instruments	1			DisclosureOfNotesAndOtherExplanatoryInformationExplanatory DisclosureOfSummaryOfSignificantAccountingPoliciesExplanatory DisclosureOfFinancialInstrumentsExplanatory DescriptionOfAccountingPolicyForFinancialInstrumentsExplanatory
<i>B.8.1. Non-derivative financial assets</i>				
Financial assets at fair value through other comprehensive income				
Financial assets at fair value through profit or loss	2			DisclosureOfFinancialInstrumentsAtFairValueThroughProfitOrLossExplanatory DescriptionOfAccountingPolicyForFinancialInstrumentsAtFairValueThroughProfitOrLossExplanatory
Fair value of equity investments in unquoted entities	3			DisclosureOfFairValueMeasurementExplanatory DescriptionOfAccountingPolicyForFairValueMeasurementExplanatory
Financial assets measured at amortized cost	4			DescriptionOfAccountingPolicyForFinancialAssetsExplanatory
Impairment of financial assets measured at amortized cost	5			DisclosureOfImpairmentOfAssetsExplanatory DescriptionOfAccountingPolicyForImpairmentOfFinancialAssetsExplanatory
<i>B.8.2. Derivative instruments</i>	6			DisclosureOfDerivativeFinancialInstrumentsExplanatory DescriptionOfAccountingPolicyForDerivativeFinancialInstrumentsExplanatory
Policy on offsetting	7			DescriptionOfAccountingPolicyForOffsettingOfFinancialInstrumentsExplanatory
<i>B.8.3. Hedging</i>	8			DescriptionOfAccountingPolicyForHedgingExplanatory
<i>B.8.4. Non-derivative financial liabilities</i>	9			DisclosureOfBorrowingsExplanatory DescriptionOfAccountingPolicyForFinancialLiabilitiesExplanatory
Borrowings and debt	10			DescriptionOfAccountingPolicyForBorrowingsExplanatory
<i>B.8.5. Fair value of financial instruments</i>	3 Continuation			DescriptionOfAccountingPolicyForFairValueMeasurementExplanatory
<i>B.8.6. Derecognition of financial instruments</i>				DescriptionOfAccountingPolicyForDerecognitionOfFinancialInstrumentsExplanatory
<i>B.8.7. Risks relating to financial instruments</i>				
D.7. Other non-current assets	11			DisclosureOfOtherNoncurrentAssetsExplanatory
<i>D.7.1. Equity instruments at fair value through other comprehensive income</i>	12			DisclosureOfFairValueMeasurementExplanatory
<i>D.7.2. Debt instruments at fair value through other comprehensive income</i>	12 Continuation			DisclosureOfFairValueMeasurementExplanatory
<i>D.7.3. Other financial assets at fair value through profit or loss</i>	13			DisclosureOfFinancialInstrumentsAtFairValueThroughProfitOrLossExplanatory
D.12. Financial assets and liabilities measured at fair value	12 Continuation			DisclosureOfFairValueMeasurementExplanatory
D.20. Derivative financial instruments and market risks				
<i>D.20. Derivative financial instruments</i>	14			DisclosureOfDerivativeFinancialInstrumentsExplanatory
<i>D.20. Market risks</i>	15			DisclosureOfMarketRiskExplanatory

Issues

Granularity of the tagging

- To what extent a p

We believe the tagging should be limited to the granularity expressed in the document (titles, subtitles, paragraphs) in relation with materiality

Accounting policies presented in a separate section of the financial statements

- Should they be do

We believe a minimal approach could be followed and the corresponding disclosure do not need to be tagged

What is the need for the headers?

- DisclosureOfNotes
- DisclosureOfSumm

We believe this high level of tagging is not really needed to over-tag all other tags as these are already classified in a specific role

Multiple
tagging

Nested in

Embedded
in

B.8. Financial instruments

B.8.1. Non-derivative financial assets

Financial assets at fair value through other comprehensive income

Financial assets at fair value through profit or loss

Fair value of equity investments in unquoted entities

Financial assets measured at amortized cost

Impairment of financial assets measured at amortized cost

B.8.2. Derivative instruments

Policy on offsetting

B.8.3. Hedging

B.8.4. Non-derivative financial liabilities

Borrowings and debt

B.8.5. Fair value of financial instruments

B.8.6. Derecognition of financial instruments

B.8.7. Risks relating to financial instruments

D.7. Other non-current assets

D.7.1. Equity instruments at fair value through other comprehensive income

D.7.2. Debt instruments at fair value through other comprehensive income

D.7.3. Other financial assets at fair value through profit or loss

D.12. Financial assets and liabilities measured at fair value

D.20. Derivative financial instruments and market risks

D.20. Derivative financial instruments

D.20. Market risks

1

DescriptionOfAccountingPolicyForFinancialInstrumentsExplanatory

2

DescriptionOfAccountingPolicyForFinancialInstrumentsAtFairValueThroughProfitOrLossExplanatory

3

DescriptionOfAccountingPolicyForFairValueMeasurementExplanatory

4

DescriptionOfAccountingPolicyForFinancialAssetsExplanatory

5

DescriptionOfAccountingPolicyForImpairmentOfFinancialAssetsExplanatory

6

DescriptionOfAccountingPolicyForDerivativeFinancialInstrumentsExplanatory

7

DescriptionOfAccountingPolicyForOffsettingOfFinancialInstrumentsExplanatory

8

DescriptionOfAccountingPolicyForHedgingExplanatory

9

DescriptionOfAccountingPolicyForFinancialLiabilitiesExplanatory

10

DescriptionOfAccountingPolicyForBorrowingsExplanatory

3 Continuation

DescriptionOfAccountingPolicyForFairValueMeasurementExplanatory

DescriptionOfAccountingPolicyForDerecognitionOfFinancialInstrumentsExplanatory

11

DisclosureOfOtherNoncurrentAssetsExplanatory

DisclosureOfFinancialInstrumentsExplanatory

12

DisclosureOfFairValueMeasurementExplanatory

12

DisclosureOfFairValueMeasurementExplanatory

Continuation

13

DisclosureOfFinancialInstrumentsAtFairValueThroughProfitOrLossExplanatory

12

DisclosureOfFairValueMeasurementExplanatory

Continuation

14

DisclosureOfDerivativeFinancialInstrumentsExplanatory

15

DisclosureOfMarketRiskExplanatory

Questionnable elements

Some elements do not seem to be applicable

- DisclosureOfConsolidatedAndSeparateFinancialStatementsExplanatory
- DisclosureOfInterimFinancialReportingExplanatory
- DisclosureOfExpensesExplanatory

These elements could be ignored (except in case they are described as such in the report)

- DisclosureOfConsolidatedAndSeparateFinancialStatementsExplanatory
 - ESEF reports are for consolidated financial statements only
- DisclosureOfInterimFinancialReportingExplanatory
 - ESEF reports are for Annual reports only
- DescriptionOfAccountingPolicyForExceptionalItemsExplanatory
 - IFRS does not define Exceptional items
- DisclosureOfExpensesExplanatory / DescriptionOfAccountingPolicyForExpensesExplanatory
 - This could relate to all disclosures relating to the expenses in the Income statement
- DisclosureOfExpensesByNatureExplanatory
 - Expenses by nature do not have a clear definition in the IFRS
- DisclosureOfBasisOfConsolidation - DisclosureOfInformationAboutEmployeesExplanatory - DisclosureOfInformationAboutKeyManagementPersonnelExplanatory
 - There is no clear explanation of what is the expected content?

Issues for future consideration



XBRL

Relationship between primary statements and disclosures

This type of relationship is not present in the XBRL specification. This linkage would be needed to validate that at least all expected disclosures are correctly tagged.



IFRS

References to IFRS and cross-references in the taxonomy should be updated

Common practice elements are not referenced to a specific IFRS even when they represent a required disclosure. The IFRS taxonomy should be completed with these references. .



ESMA

Review and give more precisions about what is expected from blocktagging of the notes.

Options are :

- to reduce the number of mandatory text blocks,
- define the expected granularity and
- organize the elements in hierarchies that help preparers and data users in their understanding of the disclosures.



USABILITY

Consider detail tagging of selected values in tables and/or in text

There is no consensus on the business expectations for the use of text block tags. The scope of the detail tagging should be defined based on the results of a survey and a call for feedback from all parties.

Q & A

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