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| 25 September 2015 |

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| Reply form for the  Consultation Paper on the  European Single Electronic Format (ESEF) |
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| Date: 25 September 2015 |

Responding to this paper

The European Securities and Markets Authority (ESMA) invites responses to the specific questions listed in Consultation Paper on the European Single Electronic Format (ESEF), published on the ESMA website.

*Instructions*

Please note that, in order to facilitate the analysis of the large number of responses expected, you are requested to use this file to send your response to ESMA so as to allow us to process it properly. Therefore, ESMA will only be able to consider responses which follow the instructions described below:

* use this form and send your responses in Word format (pdf documents will not be considered except for annexes);
* do not remove the tags of type < ESMA\_QUESTION\_ESEF \_1> - i.e. the response to one question has to be framed by the 2 tags corresponding to the question; and
* if you do not have a response to a question, do not delete it and leave the text “TYPE YOUR TEXT HERE” between the tags.

Responses are most helpful:

* if they respond to the question stated;
* contain a clear rationale, including on any related costs and benefits; and
* describe any alternatives that ESMA should consider

**Naming protocol**

In order to facilitate the handling of stakeholders responses please save your document using the following format:

ESMA\_ ESEF \_NAMEOFCOMPANY\_REPLYFORM.

E.g. if the respondent were XXXX, the name of the reply form would be:

ESMA\_ESEF\_XXXX\_REPLYFORM

To help you navigate this document more easily, bookmarks are available in “Navigation Pane” for Word 2010 and in “Document Map” for Word 2007.

***Deadline***

Responses must reach us by **24 December 2015.**

All contributions should be submitted online at [www.esma.europa.eu](http://www.esma.europa.eu) under the heading ‘Your input/Consultations’.

***Publication of responses***

All contributions received will be published following the end of the consultation period, unless otherwise requested. **Please clearly indicate by ticking the appropriate checkbox in the website submission form if you do not wish your contribution to be publicly disclosed. A standard confidentiality statement in an email message will not be treated as a request for non-disclosure.** Note also that a confidential response may be requested from us in accordance with ESMA’s rules on access to documents. We may consult you if we receive such a request. Any decision we make is reviewable by ESMA’s Board of Appeal and the European Ombudsman.

***Data protection***

Information on data protection can be found at [www.esma.europa.eu](http://www.esma.europa.eu) under the headings ‘Legal notice’ and ‘Data protection’.

# Introduction

Please make your introductory comments below, if any:

<ESMA\_COMMENT\_ESEF\_1>

According to the European Statistics Code of Practice Statistics Sweden uses administrative sources when possible to avoid duplicating requests for information. The Structural Business Statistics survey for example is based on annual accounts for all enterprises within the business economy, regardless of company form or size. Profit and loss accounts and balance sheets for all enterprises are taken from the standardised accounting information which the enterprises report to the Swedish Tax Authority. Additional detailed information is collected through sample surveys mainly targeted at large enterprises. Annual financial reports of enterprises are used as a complementary source, to ascertain the quality of the statistics, and in order to minimise the need to contact enterprises for additional information. In a situation where all parts of the AFR are available in structured form (ie, notes, cash flow statement and management reports), companies can avoid having to report the same information multiple times. Since the information is not structured, different parts of the AFR are also reported to the tax office and the national statistical institute. When authorities agree on a common format for the electronic submission of reports (XBRL as a SEF), the company has the opportunity to create a concept once and then reuse it in different reports together with specific concepts for each stakeholder. The process within the company will be more efficient and the result will be consistent as concepts will be reused.

<ESMA\_COMMENT\_ESEF\_1>

**Question 1: The provisions included in the amended Transparency Directive requiring a single electronic format were not subject to a formal impact assessment by the European Commission. While from a legal point of view ESMA could not address in this CP whether there is a need for the provisions included in the amended Transparency Directive, do you believe that a wider assessment should be performed on the requirements of introducing a single electronic reporting format in Europe? Please indicate your opinion and provide arguments.**

<ESMA\_QUESTION\_ESEF\_1>

No, a wider assessment is not needed. A Single Electronic Format is an obvious goal and there are many good experiences from different implementations within Europe and also throughout the world. The development of Swedish submission of data according to a SEF is slow and further delay is not desirable. If there is a recommended format it will facilitate national efforts to coordinate company reporting of financial information.

<ESMA\_QUESTION\_ESEF\_1>

**Question 2: Do you agree with the description of the policy objectives as included in this section? Are there any further elements that you believe should be analysed? If yes, please indicate them.**

<ESMA\_QUESTION\_ESEF\_2>

Yes, we agree. However there could be a discussion on possible cost savings in objectives 1, 3 and 4.

There ought to be further synergy effects at the European level, but also at the national level, the more reports and concepts that are harmonized and reported by a SEF. Already existing SEF’s could be analysed in order to find benefits and take advantage of synergy effects.

<ESMA\_QUESTION\_ESEF\_2>

**Question 3: Do you believe that the introduction of electronic reporting should serve as a basis for further debate on auditing of electronic structured data? Please explain your reasoning.**

<ESMA\_QUESTION\_ESEF\_3>

Yes. All processes need to be debated and overseen in order to take advantage of new possibilities that electronic structured data imply.

<ESMA\_QUESTION\_ESEF\_3>

**Question 4: Are you aware of any further elements which are necessary to provide an accurate picture of the current reporting for the purpose of this CP?**

<ESMA\_QUESTION\_ESEF\_4>

Yes. All ongoing and planned uses of XBRL in Europe should be observed and analysed, both mandatory and non-mandatory reporting. Benefits from Standard Business Reporting (SBR) programs ought to be described in order to give a broader description and cost benefit analysis. The more structured data the more possibilities of saving costs for both issuers and users. We are aware of XBRL reporting of company accounts in for example the Netherlands, Denmark, the UK and Finland, which is in its starting position.

<ESMA\_QUESTION\_ESEF\_4>

**Question 5: Do you agree with the description of the technologies included in the CP?**

<ESMA\_QUESTION\_ESEF\_5>

Yes, but from what we understand iXBRL rather is a part of XBRL than a technology of its own.

<ESMA\_QUESTION\_ESEF\_5>

**Question 6: Do you agree with the choice of the technologies to be further analysed as part of the CBA? If not, please indicate which other technologies you would propose for further analysis.**

<ESMA\_QUESTION\_ESEF\_6>

Yes, we agree.

<ESMA\_QUESTION\_ESEF\_6>

**Question 7: Do you agree with ESMA’s proposal to use the IFRS taxonomy as issued by the IFRS Foundation for reporting under IFRS, subject to formal endorsement in the European Union?**

<ESMA\_QUESTION\_ESEF\_7>

Yes, we agree.

<ESMA\_QUESTION\_ESEF\_7>

**Question 8: Do you agree with ESMA’s preliminary conclusions not to use regulatory and entity specific extensions? Please provide arguments in your answer in relation to the impact on issuers and users.**

<ESMA\_QUESTION\_ESEF\_8>

No, our opinion is that regulatory and national extensions should be allowed as well as essential company specific extensions. By extensions we mean the possibility of adding extra data (not the possibility of amending the general content).

<ESMA\_QUESTION\_ESEF\_8>

**Question 9: Do you agree with the proposed approach in relation to the taxonomies of third countries GAAPs deemed equivalent to IFRS?**

<ESMA\_QUESTION\_ESEF\_9>

Yes, we agree.

<ESMA\_QUESTION\_ESEF\_9>

**Question 10: Do you believe that taxonomy shall be developed for other parts of the AFR (outside financial statements)? If yes, please indicate which ones and explain why.**

<ESMA\_QUESTION\_ESEF\_10>

Yes, we believe that the best choice is to apply digital structured data in a SEF for all aspects of reporting. We therefore believe that the taxonomy of the AFR ought to be developed for all parts of the AFR, both structured and unstructured data. We also believe in one single approach, ie. one implementation consisting all parts of AFR at the same time.

<ESMA\_QUESTION\_ESEF\_10>

**Question 11: Do you agree that non-structured electronic reporting should be required for the entire Annual Financial Report? Do you agree that the format used shall be PDF? If you disagree, please explain your opinion by providing arguments on the policy objectives and impact on the CBA.**

<ESMA\_QUESTION\_ESEF\_11>

No, in the long run we are in favour of XBRL being mandated as the primary format for the entire AFR, both structured and unstructured data. Only with one single filing full consistency is assured.

<ESMA\_QUESTION\_ESEF\_11>

**Question 12: Do you agree with the solution of a single electronic format composed of structured and non-structured data (option B)? If not, please explain your opinion as well as the impact on the CBA.**

<ESMA\_QUESTION\_ESEF\_12>

No, we rather believe in one single electronic filing. To provide a PDF filing in addition to the XBRL filing (for both structured and unstructured data) does not ensure consistency, neither is it cost efficient since it involves different processes.

<ESMA\_QUESTION\_ESEF\_12>

**Question 13: Do you agree that iXBRL and XBRL are the most relevant options available for the ESEF?**

<ESMA\_QUESTION\_ESEF\_13>

Yes, we agree.

<ESMA\_QUESTION\_ESEF\_13>

**Question 14: Could you please indicate what is your preferred solution between iXBRL and XBRL? Please explain the reasons.**

<ESMA\_QUESTION\_ESEF\_14>

Since different solutions already exist among certain EU member states we believe a technical study assessing the advantages of the different possible solutions ought to be conducted.

<ESMA\_QUESTION\_ESEF\_14>

**Question 15: Do you agree that structured reporting format should in a first stage be required for consolidated IFRS financial statements and eventually in a second stage for individual financial statements?**

<ESMA\_QUESTION\_ESEF\_15>

No, we do not agree. We believe that the requirement of digital structured reporting format should concern both consolidated IFRS statements and individual financial statements at the same time. It must be most cost effective to develop and implement the whole process simultaneously.

<ESMA\_QUESTION\_ESEF\_15>

**Question 16a: Do you agree with a different approach for the financial statements under national GAAPs compared to IFRS on the grounds of the existence of a taxonomy?**

<ESMA\_QUESTION\_ESEF\_16a>

Yes, we agree. As the development does not occur at the same time in all EU countries it must be possible with a different approach for financial statements under national GAAP. Still the goal should be to reach the advantages of an XBRL filing in a SEF according to the digital agenda.

<ESMA\_QUESTION\_ESEF\_16a>

**Question 16b: Do you agree with the proposed approach in terms of potential development of a EU core taxonomy to be used for national GAAPs in the future?**

<ESMA\_QUESTION\_ESEF\_16b>

Yes, we agree. In Sweden discussions of developing an XBRL taxonomy for companies’ annual reports, annual tax return and annual business statistics just have started. We are of the belief that a core taxonomy would be a good help for the development of a taxonomy according to Swedish GAAP.

<ESMA\_QUESTION\_ESEF\_16b>

**Question 17: Do you agree that a single electronic format should not be required for financial statements under third country GAAP?**

<ESMA\_QUESTION\_ESEF\_17>

Yes, we agree.

<ESMA\_QUESTION\_ESEF\_17>

**Question 18: Would you be in favour for a phased approach for SMEs, if it would be allowed under the legal mandate? Would it be relevant in the context of the development of the Capital Markets Union?**

<ESMA\_QUESTION\_ESEF\_18>

No, we are not in favour of a phased approach. A shorter transition period is more cost effective as well as a larger encouragement for the software vendors.

<ESMA\_QUESTION\_ESEF\_18>

**Question 19: Do you have any other comment to make?**

<ESMA\_QUESTION\_ESEF\_19>

Electronic structured filing by XBRL / iXBRL should be extended to other reports (than the AFR) as well.

Since June 2015 XBRL is the Swedish standard for digital reporting and exchange of business information (SS 40100:2015):  
<http://www.sis.se/en/information-technology-office-machines/applications-of-information-technology/it-applications-in-banking/ss-401002015>

<ESMA\_QUESTION\_ESEF\_19>