Reply Form

**to the Consultation on draft ITS specifying certain tasks of collection bodies and certain functionalities of the European Single Access Point**

**Responding to this Consultation Paper**

ESMA invites comments on all matters in this Consultation Paper and in particular on the specific questions summarised in Annexes. Comments are most helpful if they:

* respond to the question asked;
* indicate the specific question to which the comment relates;
* contain a clear rationale; and
* describe any alternatives ESMA should consider or comment to specific questions irrespective of the preferred option.

ESMA will consider all comments received by **8 March 2024.**

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

**Instructions**

In order to facilitate analysis of responses to the Consultation Paper, respondents are requested to follow the below steps when preparing and submitting their response:

* Insert your responses to the questions in the Consultation Paper in this reply form.
* Please do not remove tags of the type < ESMA\_QUESTION\_ESAP\_0>. Your response to each question has to be framed by the two tags corresponding to the question.
* If you do not wish to respond to a given question, please do not delete it but simply leave the text “TYPE YOUR TEXT HERE” between the tags.
* When you have drafted your responses, save the reply form according to the following convention: ESMA\_CP1\_ESAP \_nameofrespondent.
* For example, for a respondent named ABCD, the reply form would be saved with the following name: ESMA\_CP1\_ESAP \_ABCD.
* Upload the Word reply form containing your responses to ESMA’s website (**pdf documents will not be considered except for annexes**). All contributions should be submitted online at www.esma.europa.eu under the heading *‘Your input - Consultations’*.

**Publication of responses**

All contributions received will be published following the close of the consultation, unless you request otherwise. Please clearly and prominently indicate in your submission any part you do not wish to be publicly disclosed. A standard confidentiality statement in an email message will not be treated as a request for non-disclosure. 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 not to disclose the response 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 heading ‘[Data protection](https://www.esma.europa.eu/about-esma/data-protection)’.

**Who should read this paper?**

This Consultation Paper may be of particular interest to securitisation investors/potential investors, securitisation issuers/originators, market infrastructures, securitisation repositories, credit rating agencies as well as public bodies involved in securitisations (market regulators, resolution authorities, supervisory authorities, central banks and standard setters).

# General information about respondent

|  |  |
| --- | --- |
| Name of the company / organisation | XBRL Europe |
| Activity | Associations, professional bodies, industry representatives |
| Are you representing an association? |[x]
| Country / Region | Europe |

# Questions

1. Do you agree with the preferred approach outlined above, under which the validations will be defined on a cross-cutting basis without specifying explicitly the types of information to which a given validation should be applied (and understanding that they should be performed always when relevant for a given type of information as set out in the ITS on tasks of collection bodies or sectoral ITS)?

<ESMA\_QUESTION\_ESAP\_1>

We agree with the need for validation by the collection bodies. We consider that **validation results should be made available at the ESAP level**. While unsuitable or corrupted content would be rejected by the relevant collection body and not be sent to ESAP, the validation process may include warnings and those should be transmitted by the collection body with the main data and made available for consultation on ESAP.

**When possible, automatic checks could also be operated at the ESAP level**, to ensure a common level of validation has been provided. For files on which a direct validation mechanism can be processed, such as XBRL and iXBRL files where taxonomies include validation rules, those semantic assertions should be checked in addition to the standard format validation. Those rules are easily processed by the issuer, the collection body and at ESAP level. For XBRL validation rules, please refer to XBRL International guidance [See https://www.xbrl.org/guidance/filing-rules-checklist]. The XBRL Community is currently drafting additional guidance on features for a receiving platform.

Detailed validation rules are not proposed in the consultation. Therefore, we cannot comment on them. We encourage ESMA, with EBA and EIOPA,to **draft** **a set of validation rules** that should be considered. However, we strongly advice that validation rules **should never be directly described in the RTS** because they need to be easily completed or adjusted, out of a long regulatory process. To manage a common efficient set of validation rules, a central governance at the ESAP level is needed, and ESMA should be able to check that the rules can be and are effectively implemented by collection bodies. Hence, there is a need for a **delegated power by ESMA**, otherwise the global ESAP framework will be difficult to maintain, with disparate validation levels and risk of poor data quality.

We understand that the first step would be to centralise and publish all documents. But there is **need for a vision that will embrace an agreed set of validation processes** that are applied across all Member States, with the results available to all users via ESAP.

When there are common European regulatory requirements and machine-readable European schemes, it is vital to have a single, common, centrally managed set of validation rules. A clear governance system is therefore needed and should be defined by the RTS. There should be full consistency in level 3 (guidance) controls applied by the various collection bodies. In our experience, the validation rules should better be defined and implemented by the organisation in charge of managing the structured data scheme and/or the taxonomy attached to the report (e.g. ESMA for ESEF, EBA for the CRD/CRR banking regulatory reporting, local business registries or standard settlers for GAAP based reporting). However, this should be monitored within a global common governance scheme.

<ESMA\_QUESTION\_ESAP\_1>

1. Do you agree with the above proposal how the collection bodies shall verify that the information is data-extractable? In case of any challenges foreseen, please propose alternatives.

<ESMA\_QUESTION\_ESAP\_2>

We agree that extractable data should be validated by collection bodies as well as, when possible and as highlighted in Q1, **at the ESAP level**. Files which do not respect the format should be rejected but additional validations should be done on the consistency of the data included in the report, where the data-extractable format allows such checks, such as the taxonomy validation with the XBRL format.

There is no clear definition of “extractable” data and we urge to consider a wide scope of data. Not only tagged or structured data should be validated. **Any machine-readable data should be considered.** For example, in files such as inline XBRL reports, the rendering data is also part of the scope.

It is important to have a **single, common, centrally managed set of validation rules** for extractable data. A clear governance system is therefore needed and should be defined by the RTS. For reasons associated with overall data quality and utility, it is important the extractable-data validation rules not to be in the RTS, but in level 3 guidance, with a delegated power to make sure this guidance is correctly applied by all collection bodies.

<ESMA\_QUESTION\_ESAP\_2>

1. Do you agree with the above proposal how the collection bodies shall verify that the information is machine-readable? In case of any challenges foreseen, please propose alternatives.

<ESMA\_QUESTION\_ESAP\_3>

We agree on the principle that all machine-readable information should be validated. It is however difficult to comment on the question because the scope of data-extractable and machine-readable data are not defined. **Clear definitions should be provided in the RTS**. Otherwise, the risk is that each collecting body could apply its own definition, and therefore its own set of rules. The risk is high also because ESAP will deal with multiple file formats, generating different sets of rules.

It is important to have a single, common, centrally managed set of validation rules for extractable data. A clear governance system is therefore needed and should be defined by the RTS.

For reasons associated with overall data quality and utility, it is important the extractable-data validation rules not in the RTS, but in level 3 guidance, with a delegated power to make sure this guidance is correctly applied by all collection bodies.

The checks should validate that data is machine-readable, but also measure how good the machine-readable data is. This requires that standardised **machine executable rules** are made available for each format of file collected and published on ESAP. It requires collecting bodies to use those rules consistently. To ensure that the rules are correctly processed, it also requires their **software to be certified** by a qualified body, even if collection bodies are fully responsible in the choice of their tools and equipment.

<ESMA\_QUESTION\_ESAP\_3>

1. Do you agree with the above proposal for the validation of the metadata? In case of any challenges foreseen, please propose alternatives.

<ESMA\_QUESTION\_ESAP\_4>

We agree the validation of metadata is needed to make ESAP works. A **clear definition of metadata** must be shared by all counterparts. We understand that it consists in extra information about the filed data (details about the issuer, the period, the type of information) but access to this information may vary depending on the format of the document shared on ESAP. We consider that **some additional metadata to those listed in the consultation should be considered**. See Q16 for more details.

Also, checks should be done on metadata to avoid filing of the same document through multiple circuits, resulting in duplicates in the ESAP database (e.g. due to multi-jurisdictional virtual filing, as is common in NASDAQ OMX Member States or filing in various languages).

We also propose to add, to any document which doesn’t contain machine-readable structure data, **a cover page, which could be encoded in an ESEF (inline XBRL) document as in EDGAR, to include all metadata**. This would allow ESAP users to access metadata in a single way, using the “european single electronic format”. Depending on the type of document, this cover page could be provided by the filers but could equally, and trivially, be generated by the collection bodies where the raw metadata is provided either by way of an API or via a metadata entry portal.

As answered before, it is sensible not to include the validation rules in the RTS, and this is true as well for metadata. It is better to provide them in the **level 3 guidance**, with a delegated power to make sure this guidance is correctly applied by all collection bodies. ESAP could then provide a validation API for the metadata scheme to reduce the burden on the collection bodies to independently develop these validation mechanisms.

This raises the question about why to focus on metadata only and not consider all data. There are, of course, difference between reports in PDF for example, where data is not directly accessible, and reports in ESEF/inlineXBRL where automatic access to metadata and data is fully described by a standard. However, in a long-term vision, **ESAP could allow to check and query more data than the metadata only**.

<ESMA\_QUESTION\_ESAP\_4>

1. Do you agree with the proposed approach to the validation of the electronic seal? In case of any challenges foreseen, please propose alternatives.

<ESMA\_QUESTION\_ESAP\_5>

We agree, provided that there is **sufficient flexibility to permit the use of relevant standards for specific formats** (such as the planned XBRL signature approach – see Q9 for details), and that the signature required for the electronic seal is compatible with other signature requirements, such as the likely requirement for ESEF reports to have multiple signatures for different purposes.

We encourage ESAs to pay close attention to the QES aspects of ESAP. We are **concerned about the significant costs** that might be imposed on software vendors if they are faced with significantly different approaches to QESs by Member States. We assume that the requirements to use eIDAS compliant QESs will be enforced, meaning that either Member States elect to require an eIDAS qualified electronic seal or they don’t. Please see our answer to Q9 for details about the importance of digital signatures over XBRL materials and the standard being prepared in this field.

<ESMA\_QUESTION\_ESAP\_5>

1. Do you agree that the format of rejection feedback to the submitting entities should be standardised?

<ESMA\_QUESTION\_ESAP\_6>

In principle, consistency across different collection authorities is a good thing, but in practice, the format for the rejection messages is a relatively **small piece of the puzzle compared to standardising the mechanism for submitting reports**. Further, rejection messages are ones that a) should be rare and b) are likely to need human intervention to resolve and as such, the benefits of standardisation are lower than the “routine” parts of the submission system.

<ESMA\_QUESTION\_ESAP\_6>

1. Do you agree that the rejection feedback should be provided in a common format in accordance with ISO 20022 methodology?

<ESMA\_QUESTION\_ESAP\_7>

As per our answer to Q6, the rejection messages is a relatively small piece of the puzzle compared to standardising the mechanism for submitting reports. Further, rejection messages are ones that a) should be rare and b) are likely to need human intervention to resolve and as such, the benefits of standardisation are lower than the “routine” parts of the submission system. The ISO20022 externalised rejection messages are well proven in the transactional messaging field and they are optimised for bank routing workflows. **There are likely to be some differences thrown up by some types of filings that ESAP will cover**, and this is perhaps worth bearing in mind.

<ESMA\_QUESTION\_ESAP\_7>

1. Do you agree that the rejection feedback should be provided within sixty minutes?

<ESMA\_QUESTION\_ESAP\_8>

We think this is an important policy question for the ESAs, goes to the purpose and overall utility of ESAP and we recognise that there a wide range of materials that will be covered by ESAP where time is not of the essence. There are different perspectives on this question within our diverse community of members and **we are therefore not responding to this question**.

<ESMA\_QUESTION\_ESAP\_8>

1. Do you agree that QES under ESAP should be in XAdES, CAdES or PAdES format?

<ESMA\_QUESTION\_ESAP\_9>

We agree that **QES under ESAP should be in XAdES, CAdES or PAdES**, but it is important that the manner in which they are applied is not unnecessarily constrained.

Point 41 states: “For instance, iXBRL files would be sealed using XAdES or CAdES format” but Inline XBRL reports actually consists of multiple files, typically contained within an XBRL Report Package, and may have dependencies on external files, such as the ESEF, IFRS or other taxonomy.

The XBRL International Digital Signatures in XBRL Working Group is currently developing a **standard approach for applying digital signatures to XBRL and Inline XBRL reports**. This specification is now a Public Working Draft [see https://specifications.xbrl.org/work-product-index-d6-d6-1.0.html]. This will address issues such as ensuring that all dependencies (e.g. taxonomies, images, fonts and style) are included in the signature, permitting multiple signatures with different purposes and scopes, and the inclusion of the signatures within a report package so that consumers do not need to deal with a detached signature.

The proposed solution explicitly permits the use of XAdES as the signature mechanism, but the approach to embedding signatures within XBRL Report Packages, and selecting the XBRL facts that are covered by a given signature is necessarily XBRL-specific. It is important that ESAP requirements do not preclude the adoption of the standard mechanism for signing XBRL reports once it is finalised. The specification permits:

- Signing all of a report, selected section(s) of a report, and/or selected facts.

- Signing the entire report, including relevant company-specific taxonomy extenstions and supporting materials such as fonts, images and CSS files.

- Multiple signatures, for example officers of the corporation to file the entire report, financial auditors to sign the audit report contained within the annual report, and sustainability assurance provider signing their report covering the CSRD disclosures.

ESAs may wish to examine the PWD to consider whether an approach of this sort might be helpful in contexts beyond XBRL content.

ESAP should provide functions to render the information contained in the electronic seal.

<ESMA\_QUESTION\_ESAP\_9>

1. Do you agree that there is no need to use ASiC format under ESAP?

<ESMA\_QUESTION\_ESAP\_10>

The ASiC format provides a way to associate one or more signatures with **one or more signed files**. Even where there is only a single file being signed, ASiC can provide value by combining the detached signature file with the file being signed. Further, some documents may require multiple signatures for different purposes (e.g. separate signatures from auditors and reporting entities), and ASiC provides a way to combine all of these into a single container file.

<ESMA\_QUESTION\_ESAP\_10>

1. Do you agree that QES under ESAP should be at least at conformance level LT?

<ESMA\_QUESTION\_ESAP\_11>

This answer is prepared by the member of the XBRL Community whose mandate is to explain and promote the use of XBRL for business reporting. The question doesn’t seem related to the mandate of our Community, and we have therefore not prepared an answer to it. Members are invited to answer individually to this question.

<ESMA\_QUESTION\_ESAP\_11>

1. Do you agree with the requirement to include ISO 17442 LEI code as an attribute in the digital certificates whenever the information submitted to ESAP is accompanied by a QES?

<ESMA\_QUESTION\_ESAP\_12>

This answer is prepared by the member of the XBRL Community whose mandate is to explain and promote the use of XBRL for business reporting. The question doesn’t seem related to the mandate of our Community, and we have therefore not prepared an answer to it. Members are invited to answer individually to this question.

Some consideration about the use and availability of LEIs are provided in our answer to Q16.

<ESMA\_QUESTION\_ESAP\_12>

1. Are there any other characteristics of the QES that should be defined under ESAP?

<ESMA\_QUESTION\_ESAP\_13>

Please see our answers to Q5 and Q9.

<ESMA\_QUESTION\_ESAP\_13>

1. Do you agree with the proposed approach to the open standard licences which shall be applied by collection bodies to the datasets to be made available to ESAP? If not, why not and what alternative approach would you suggest?

<ESMA\_QUESTION\_ESAP\_14>

**We globally support the CC0 target.** However, this answer is prepared by the member of the XBRL Community whose mandate is to explain and promote the use of XBRL for business reporting. The question isn’t directly related to the mandate of our Community, and we have therefore not prepared a more detailed answer to it. Members are invited to answer individually to this question.

<ESMA\_QUESTION\_ESAP\_14>

1. Do you agree with the proposed characteristics of the API for data collection? If not, what alternative characteristics would you recommend?

<ESMA\_QUESTION\_ESAP\_15>

We support the use of APIs for data collection.

However the features of the API are based on the double storage of information, which we do not consider to be the unique and best way to work. If the documents are not only to be made available by the collection bodies but also submitted for double storage, there is a need to qualify which document is authentic and up-to-date, and to organize coordinated processes for storage and deletion.

If ESMA oversees the ESAP governance, it seems natural to opt for a **Push API** from collection bodies to ESAP. It makes more sense for OAMs to push the data when it becomes available.

However, an additional **Pull API** could be considered, allowing ESAP to go back to previous periods, amendments or extra documents from the connected collection bodies, that are not in the main ESAP scope, to allow ESAP users to access them from a single access point.

<ESMA\_QUESTION\_ESAP\_15>

1. Do you agree with the proposed approach to the format, list and characteristics of the metadata? If not, what alternative approach would you recommend?

<ESMA\_QUESTION\_ESAP\_16>

We consider that **additional metadata to the information listed in the consultation could be considered**. This should include:

* A flag if there has been an amendment to the data, and information about successive filings (correction, update – if permitted, translation...).
* Timestamps indicating when the data was received by the collecting body and by ESAP.
* The identification of the collecting body having initially received the document.
* The previous LEI, if relevant (for companies changing their identity between successive filings) and additional national indentifiers of the issuer.
* Product identifiers, including ISIN.
* Language(s) of the document.

We strongly encourage that the metadata should include the identity of the software vendor (a code or LEI), software application (a string) and a version number of the software package(s) used to prepare the filing where that information is provided in digital (non-PDF) format.

It is key that the filing company is correctly identified.

Therefore, it is needed to **better define how LEIs are controlled and how the entity identity is effectively proven**. ESAs may wish to consider the use of the vLEI in this respect.

Focusing on XBRL filings, XBRL **embedded metadata should not be repeated by the issuer** in the document and as an additional metadata requested in the filing process. If there is a need to add this data in a separate document, this could be generated automatically by the collecting body.

<ESMA\_QUESTION\_ESAP\_16>

1. Do you agree with the proposed approach with regards to time limits? If not, what alternative approach would you suggest?

<ESMA\_QUESTION\_ESAP\_17>

This answer is prepared by the member of the XBRL Community whose mandate is to explain and promote the use of XBRL for business reporting. The question doesn’t seem related to the mandate of our Community, and we have therefore not prepared an answer to it. Members are invited to answer individually to this question.

<ESMA\_QUESTION\_ESAP\_17>

1. [for users of information only] Do you currently access price and time-sensitive information via the Officially Appointed Mechanisms or other (private or public) databases? If so, which ones? If not, how do you access such information?

<ESMA\_QUESTION\_ESAP\_18>

No, we do not access such information as a community designed for promoting XBRL

<ESMA\_QUESTION\_ESAP\_18>

1. Do you expect that a maximum time delay of sixty minutes between when information is available at the level of the collection body and when it is available on ESAP will diminish the usefulness of ESAP? If so, what maximum time delay would you consider acceptable?

<ESMA\_QUESTION\_ESAP\_19>

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<ESMA\_QUESTION\_ESAP\_19>

1. Do you agree with the indicative list of formats and characteristics proposed? If not, what alternative formats or characteristics would you recommend?

<ESMA\_QUESTION\_ESAP\_20>

We fully support the use of **XBRL** and **inline XBRL** as an ESAP format.

**xBRL-CSV** is included in the list, we think that **xBRL-JSON** should also be included.

The list should not be included in the RTS, but as a lower regulatory level, to allow easy update as new format might appear with innovation. The RTS should focus on the required characteristics and on the governance of the list of accepted format.

ESAP should not allow documents with data embedded in images, unless this data is also provided in other parts of the document and fully extractable.

<ESMA\_QUESTION\_ESAP\_20>

1. Do you agree with the proposed characteristics of the API for data publication? If not, what alternative characteristics would you recommend?

<ESMA\_QUESTION\_ESAP\_21>

About data publication, **rendering services** are essential, ESAP should be more than just a central place for downloading documents. Added value services could be provided, to easily extract, compare and share the data made available on ESAP. Therefore, a single API should not be sufficient, and ESAP should also provide web-access to any citizen.

Hence, mechanisms to make the information more accessible should include **viewers for any accepted format** on ESAP. ESAP could play a considerable role in giving sense to the filing requirements by providing rendering solutions for each available format, in a way that any human user might directly view and understand. Clearly, the use of a viewer (that provides humans direct access to XBRL markup) should be part of the approach to visualisation of ESAP filings that arrive in ESEF format.

As you may be aware, we are strongly of the view that analysis and consumption of ESEF data can be simplified by the (programmatic) transformation of ESEF data in Inline XBRL into xBRL-JSON. We recognise that this could be considered a value add, and perhaps not within the publication scope of ESAP, but would encourage the provision of this kind of convenience function.

**Extraction and comparison functions** are also needed for end-users. Having a direct access to data and basic functions to review it is a way to ensure better quality: filers are more responsible in providing quality when they know anyone can directly read the data they are filing.

Web or API search should be made possible by filters and requests on the metadata, but also on any structured information available in the documents published on ESAP.

The publication API should also indicate if there is a seal/signature on the file and provide all information contained in the seal.

The API should also provide access and rendering functions for metadata and validation check results.

One additional feature that would be useful is **a convenient way to get only filings that have been added since a certain point**, in order to make it easier for users to incrementally obtain new filings. This can be implemented by allowing a request to include the ID of filing that was previously downloaded, and the response should only include filings (including those with amendment flags) that have been added to the index after that filing.

<ESMA\_QUESTION\_ESAP\_21>

1. Do you agree with the proposal to specify that the legal entity identifier should be the ISO 17442 LEI code? If not, what other identifier would you suggest and why?

<ESMA\_QUESTION\_ESAP\_22>

**We consider a unique entity identifier must be used.** We agree with the use of the LEI as an international standard. The choice of non-public registers generating associated cost must not stop entities to publish. As the LEI was originally created for identification of organizations acting on the international finance market, many entities don’t currently have a registered for a LEI, and there is no LEI for individuals.

**As for any metadata, LEI need to be validated.** Some misuses/errors could have been observed in previous filings. The information attached to the ISO 17442 LEI code is not necessarily validated by official parties or can be outdated as it is not automatically updated. LEI doesn’t guarantee unicity neither real identity and some issuers are using wrong LEIs, two distinct LEIs, or lapsed LEIs. So, additional identity controls by collecting bodies or by ESAP could be considered on the submitted LEI. Currently, LEIs are administered by a governmental administration in Finland, France, Italy, Spain, Switzerland and The Netherlands only. A risk assessment could be done on depending entirely or mainly on LEI.

<ESMA\_QUESTION\_ESAP\_22>

1. Do you agree with the proposed approach with regards to types of information? If not, what additional/ alternative type of information do you recommend?

<ESMA\_QUESTION\_ESAP\_23>

The use of the type, as tags or as unique category, could impact on the access to the data.

Instead of a long list with inconsistent granularity of type, there could be a **hierarchy of types** with type and sub-types(ex: Prospectus / SME Prospectus merged under Prospectus, with a SME/Full subtype). Some documents could also be multi-tagged (the type Prospectus is containting the type Financial Statement). Search on types need at least to be done on groups of types.

Some of the data transmitted to ESAP is not company data but personal data. These are the data in the register of auditors under Article 15 of the Auditing Directive 2006/43/EC and the "sanctions and administrative measures" (Article 30c of the Auditing Directive) concerning auditors The **treatment of personal data** must be carefully addressed on certain types of data.

<ESMA\_QUESTION\_ESAP\_23>

1. Do you think that information required at national level pursuant to Article 3(1) of the Transparency Directive (so-called gold plating) should be captured by certain specific types of information? Or would you prefer such information be captured by one generic category, namely “Additional regulated information required to be disclosed under the laws of a Member State”?

<ESMA\_QUESTION\_ESAP\_24>

We would recommend creating a hierarchy of types, as described in Q24. In that case, the type “Other” could be **qualified by an open/extended subtype** for any document not in the core list of types.

The format of the file could also be a criterion for categorizing documents, as some type of documents may be accepted in multiple formats, or must have different format depending on the jurisdiction of the filer.

The list of types should not be directly part of the RTS but the RTS should describe the governance to make changes in the list, depending on the uses.

<ESMA\_QUESTION\_ESAP\_24>

1. Do you agree with the proposed approach with regards to the categories of the size of the entities? If not, what alternative approach would you suggest and why?

<ESMA\_QUESTION\_ESAP\_25>

This answer is prepared by the member of the XBRL Community whose mandate is to explain and promote the use of XBRL for business reporting. The question doesn’t seem related to the mandate of our Community, and we have therefore not prepared an answer to it. Members are invited to answer individually to this question.

<ESMA\_QUESTION\_ESAP\_25>

1. Do you agree that it would be disproportionate to the purpose of the ESAP search function to introduce new categories by size for reporting regimes where currently no size category is foreseen in level one legislation? If not, for what additional categories of entities would you add a size category and on the basis of what thresholds?

<ESMA\_QUESTION\_ESAP\_26>

This answer is prepared by the member of the XBRL Community whose mandate is to explain and promote the use of XBRL for business reporting. The question doesn’t seem related to the mandate of our Community, and we have therefore not prepared an answer to it. Members are invited to answer individually to this question.

<ESMA\_QUESTION\_ESAP\_26>

1. Do you think it would be useful to leverage on the thresholds introduced by DORA for the classification by size of at least some entities in scope of ESAP, such as IDD intermediaries and PRIIS manufacturers? If not, why not? If yes, are there other entities in scope of ESAP for which you think the thresholds defined in DORA would be applicable and/or useful?

<ESMA\_QUESTION\_ESAP\_27>

This answer is prepared by the member of the XBRL Community whose mandate is to explain and promote the use of XBRL for business reporting. The question doesn’t seem related to the mandate of our Community, and we have therefore not prepared an answer to it. Members are invited to answer individually to this question.

<ESMA\_QUESTION\_ESAP\_27>

1. Do you agree with proposed approach with regards to the categorisation of industry sectors? If not, what approach would you suggest and why?

<ESMA\_QUESTION\_ESAP\_28>

This answer is prepared by the member of the XBRL Community whose mandate is to explain and promote the use of XBRL for business reporting. The question doesn’t seem related to the mandate of our Community, and we have therefore not prepared an answer to it. Members are invited to answer individually to this question.

<ESMA\_QUESTION\_ESAP\_28>

1. Do you think additional or fewer sectors would be appropriate for the ESAP search function? If so, which ones would you propose to add and/or remove?

<ESMA\_QUESTION\_ESAP\_29>

This answer is prepared by the member of the XBRL Community whose mandate is to explain and promote the use of XBRL for business reporting. The question doesn’t seem related to the mandate of our Community, and we have therefore not prepared an answer to it. Members are invited to answer individually to this question.

<ESMA\_QUESTION\_ESAP\_29>