Revised ESRS Draft XBRL Taxonomy September 2026 Public Consultation Survey

2. Respondent Information

1. First name:

Maryia

2. Last name:

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3. Name of the organisation:

European Association of Co-operative Banks (EACB)

4. Country of headquarters:

Belgium

5. Please enter your email address:

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6. Which of the following stakeholder types do you represent?

Association of financial institutions

Please define to which other stakeholder category you belong:

3. Questions on the Revised XBRL Taxonomy

7. Do you agree that the draft XBRL Taxonomy reflects the Revised ESRS text in accordance with the methodology applied (and used for the list of datapoints) and that it will support the digitalisation of sustainability statements prepared in accordance with the Revised ESRS as adopted on 3 July 2026?

Yes, I agree in general, but I have suggestions for improvements and/or corrections

8. Please write below your suggestions.

The draft Revised ESRS taxonomy transcribes the datapoints selected in the revised ESRS. In line with the simplification of the standards, it is less complex than the previously proposed version due to the reduction in the volume of regulatory datapoints. However, technical complexity persists, as it retains all the technical data types envisaged in the 2024 draft ESRS taxonomy. The technical complexity of the data model creates a heavy tagging burden for issuers: it requires specialized expertise and gives rise to numerous discussions regarding its preparation, implementation, verification/audit by statutory auditors, and filing.

It seems to us that, beyond reducing the number of datapoints between the 2024 draft ESRS taxonomy and the 2026 draft Revised ESRS taxonomy, it is necessary to simplify the technical structure.

This could be achieved by avoiding technically intricate types, such as Boolean or semi-narrative datapoints that include a YES/NO indicator present in the markup but not explicitly displayed in the human-readable report. Using the plain text (textblock) type to provide application information or an explanation in cases of non-application would be simpler, more effective and more accurate to use for preparers who are not necessarily technology specialists, and consistent with current practices for ESEF IFRS.

The planned use of markup (via a technically complex XBRL primary tag/dimension structure for both the metric and the associated impacts, risks and opportunities or policies, actions and targets (IRO/PAT)) also seems to us to complicate the digitization process, increase the risk of errors, and drive up costs. It requires preparers to apply two layers of tagging: first, tagging amounts or narrative elements with concepts and attributes tied to the datapoints, and then adding the dimension connecting them to the relevant IRO/PAT items. While the taxonomy allows this possibility, it is not obvious that it should be implemented in practice. Simpler alternatives would be technically lighter and easier for users to understand, for example a dual tag approach (a concept tag plus an IRO/PAT tag), or the markup of a centralized cross-reference table, which is also directly visible in print and therefore easier to manage.

Over the past three years, with the introduction of the ESRS, efforts have been made to improve the readability of sustainability reports in print, which were initially based on the normative structure. These efforts have led to a departure from that structure in order to clarify the message. These efforts must not be lost.

The draft Revised ESRS taxonomy follows the datapoints, and thus the normative structure of the ESRS, which many reports no longer strictly adhere to. Detailed mapping is now necessary. Since the taxonomy is provided with minimal documentation and lacks examples or implementation guidelines, the information provided does not allow preparers to determine whether its application will be straightforward or disruptive, depending on how it is interpreted, and may ultimately call into question the efforts made to improve the reports' readability.

More generally, the taxonomy is a technical representation of the ESRS content. In the consultation package, we unfortunately only have access to this technical codification: no dedicated, updated documentation has been provided (the presentation document largely reuses material from the previous consultation), and no implementation examples have been supplied.

A technical transcription alone is open to a wide range of interpretations. Clear documentation and practical examples are essential to complete the model, give each concept a single shared meaning, and articulate its link with the underlying regulation.

The taxonomy constitutes a dictionary of possible concepts for tagging the digital sustainability report. Depending on the tagging objectives and the intended use of the data, certain tags may appear useful, redundant or unnecessary. It is important to recall that digital reporting does not require tagging every possible ESRS datapoint simply because it appears in the taxonomy. Tagging should focus on datapoints that genuinely support communication between the issuer and the data user, in particular quantitative metrics that are identifiable and comparable across issuers. The fact that the taxonomy contains all datapoints should not lead to systematic, detailed tagging of every datapoint and dimension, especially as AI can already infer or reconstruct certain breakdowns or dimensions automatically. The final tagging guidance will ultimately depend on regulatory implementation requirements. Nevertheless, it is essential that the designers of the technical model, i.e. the taxonomy, clarify the intended use cases considered during its development, and explain how the different levels of tagging are meant to interact (see our answer to Question 12).

Please write below your comments or suggestions.

9. The role of Level-1 narrative elements

The ESRS Set 1 XBRL Taxonomy for the 2023 ESRS released in August 2024 included Level-1 elements textblock to capture the content of entire Disclosure Requirements (DRs) as well as entity-specific additions to DRs and to facilitate navigation within the sections of a tagged report.

Potential benefits

Capturing additional information: Level-1 narrative elements can capture information that supplements datapoints, the objectives of Disclosure Requirements, or entity-specific disclosures. Such information is likely to be useful to analysts and required as per ESRS 1 paragraph 11.

Improved navigation: Level-1 elements can provide a "content index" that helps users navigate the human-readable report and identify where disclosures related to a specific Disclosure Requirement are located. This could provide a more sophisticated navigation mechanism than page numbers and may also support AI-based analysis of tagged reports.

Entry-level tagging: Level-1 elements could provide a relatively simple entry point for digital tagging, for example, by allowing ESMA to introduce a phased approach in which Level-1 tagging is implemented first.

Potential drawbacks

Risk of double tagging: Level-1 elements could result in "double tagging" when used with more granular narrative elements. A detailed tagging hierarchy could be perceived as overly complex, creating an additional burden for preparers. The extent of this issue would also depend on the tagging rules to be defined by ESMA and the European Commission.

Reduced relevance of phasing-in: Narrative tagging, which was considered burdensome by certain stakeholders in previous consultations, has been significantly reduced as part of the ESRS simplification. As a result, the need for a phased approach may be less relevant.

Level-1 narrative element and interaction with "entity-specific" disclosures

Level-1 narrative elements may contain entity-specific information or additions to ESRS datapoints. However, the ESRS Taxonomy already contains a dedicated "Entity-specific" element that can be used to tag entity-specific information and additions (in the 2023 Taxonomy this tag was identified as "Other disclosures").

This element makes entity-specific disclosures readily identifiable to analysts. If the entire content of a Disclosure Requirement is tagged either with distinct ESRS elements or with an "Other/additional disclosure" element, the additional Level-1 element could in some situations result in double tagging without adding significant information value.

The Level-1 narrative XBRL elements covering an entire Disclosure Requirement have been included. Does the inclusion of Level-1 elements in the 2026 XBRL Taxonomy for the revised ESRS improve the usability of the taxonomy and its corresponding digital reports?

Yes, with comments. In general, I agree to include the Level-1 narrative elements in addition to the "Entity-specific" element, but I have a suggestion or additional comment.

10. Please write below your comments.

Comprehensive and detailed tagging of data in financial reports and sustainability statements does not ensure comparability among issuers. However, the discussions and decisions regarding this tagging are time-consuming; they represent a heavy workload added at the end of the production process and constitute a bottleneck for publications, since they rely on a small number of experts. Thus, the cost-benefit ratio of comprehensive tagging for qualitative items appears unconvincing.
Level 1 tags are therefore welcome if they help avoid the need for systematic, detailed tagging of all data in the report. Using Level 1 tags alone for certain sections of the report could eliminate the need for more specific tags in those sections, thereby reducing the burden on the preparer.
Otherwise, the markup becomes too complex, cumbersome to update, and difficult for auditors to review, requiring the involvement of experts just to mark-up elements that are often not comparable across institutions, which likely explains the limited use of such mark-up by investors or rating agencies.
We consider Level 1 valuable for structuring a tagged document and for organising the taxonomy's concepts in a way that may give them a shared and consistent meaning. By default, a single Level 1 layer would be sufficient to structure the digital report and could also ultimately support automated AI access to more detailed levels, significantly reducing the burden on preparers. They would only need to apply granular tagging when they specifically wish to highlight key figures or text, thereby avoiding any ambiguity regarding this information, or to indicate the precise position of a detailed concept within the narrative of their report.
Level 1 is therefore useful and justified within the taxonomic dictionary, but its presence should not lead to systematic use. Our understanding, which we would support, is that Level 1 and more detailed levels are not meant to be redundant: Level 1 can be used instead of more detailed levels for a given section, and using more detailed levels can, conversely, make Level 1 unnecessary for that section. We would welcome EFRAG's confirmation of this understanding. While it is primarily up to the regulator to establish whether tagging is mandatory or not, it remains essential that the designers of the taxonomy clarify the intended use cases considered during its development and the principles that led to the design of the different levels of tagging. Clear guidance on how these levels are intended to operate is therefore indispensable.

Please write below your comments or suggestions.

11. The EFRAG final advice on ESRS Set 1 XBRL Taxonomy released in August 2024 included a number of validation rules, for example to ensure the existence of mandatory disclosures (paragraph 29 of ESRS 1 of the 2023 ESRS Set 1, which has been deleted in the Revised ESRS 2026) or technical validations avoiding inconsistent values (e.g. negative numbers where positive ones are expected). Currently, the draft of the XBRL Taxonomy for the Revised ESRS does not include such additional validation rules. Instead, EFRAG proposes to include validation rules at a later stage.

Do you agree to implement XBRL validation rules after the first wave of digital ESRS disclosures has been published?

No, and I have a comment or suggestion.

12. Please write below your comments or suggestions.

We agree that it is reasonable to wait for use cases to emerge before formulating detailed validation rules. However, we do not support deferring the whole validation framework: EFRAG would benefit from articulating the principles of these validations as soon as possible, in order to enhance understanding of the datapoints and the relationships between them.
The XBRL technical codification of validation rules can be developed and refined later, once actual reporting practices emerge, and adjusted over time through subsequent taxonomy releases. However, the complete absence of any validation framework undermines shared understanding. Even if the detailed XBRL formulae can be specified at a later stage, it remains essential to complement the current taxonomy with documentation that sets out the underlying principles for data quality checks and validation. Such guidance would clarify how the taxonomy has been conceived and how its designers envisage its practical use.
For this reason, we would find it highly valuable for EFRAG to provide a description of the validation rule set it intends to deploy at a later stage. A clear articulation of these principles would support consistent interpretation, enhance confidence in the model, and help preparers understand the quality expectations embedded in the taxonomy's design.
These principles must take into account the use of tags in reports. For example, if the current value exceeds the set target, this does not necessarily mean it is incorrect; it could indicate outperformance. Validation checks should therefore not treat such legitimate reporting outcomes as errors.
In addition, XBRL tagging can provide consistency checks, currently for financial data and, eventually, for sustainability data. However, the coexistence of two distinct taxonomies (IFRS and ESRS) does not allow for consistency checks between the two domains. The description of the intended validation framework should therefore also explain how consistency between financial and sustainability information could be checked.

13. Do you have any other comment or suggestions?[max 3000 characters]

The tagging system must be designed to handle multiple sustainability reports combined into a single document.
In fact, for some issuers, in particular co-operative banking groups, the CSRD reporting requirement may apply to multiple scopes: different levels of group consolidation. However, current ESEF regulations do not allow for multiple different scopes to be tagged using the same taxonomy within a single report, such as a universal registration document.
Thus, if the technology and implementation rules do not evolve, certain issuers would be required to modify the structure of their report or to publish a single PDF report but multiple XBRL packages depending on the taxonomy and the scope for which it is tagged. This risks confusing rather than simplifying the reading of these documents. We would therefore invite EFRAG to raise this issue with ESMA, which is responsible for the ESEF rules.
More generally, following the postponement of the digital tagging requirement under the Omnibus I Directive, we invite the European Commission and ESMA to carefully weigh costs and benefits when establishing the marking-up rules. Some of our members report that they have not received any requests for tagged data from their investors or rating agencies, several of whom are not even aware of the ESEF digital format, even though they analyse members' financial and sustainability reports in detail and continue to rely on the human-readable version. The scope of mandatory tagging should therefore remain proportionate and focus on the information that users actually need.
Finally, given that the taxonomy has been simplified through the reduction of regulatory datapoints, it would be equally beneficial to simplify its practical use to support wider adoption and improve overall tagging quality.