Revised ESRS Draft XBRL Taxonomy September 2026 Public Consultation Survey

2. Respondent Information

1. First name:

Taina

2. Last name:

Wilhelms

3. Name of the organisation:

Finnish Energy

4. Country of headquarters:

Finland

5. Please enter your email address:

taina.wilhelms@energia.fi

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

Business association (financial or non-financial institution)

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.

We generally agree that the draft taxonomy reflects the Revised ESRS. However, digital reporting requirements should be kept as simple and proportionate as possible and should not reintroduce complexity or administrative burden that has been reduced through the revision of the ESRS.

We also encourage EFRAG and the European Commission to explore the potential of AI-driven solutions for collecting, extracting and analysing sustainability information. Technological developments should be taken into account when assessing the need and appropriate level of granularity of digital tagging requirements.

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?

No, with comments. I disagree to include the Level-1 narrative elements and have a comment or suggestion.

Please write below your comments.

10. Please write below your comments or suggestions.

We do not support the inclusion of Level-1 narrative elements where they result in overlapping or duplicative tagging. Their added value should be clearly demonstrated before introducing an additional layer of tagging and related implementation costs for preparers.

The need for Level-1 narrative tagging should also be considered in light of technological developments. AI-driven solutions may increasingly facilitate the identification and analysis of narrative sustainability information without requiring the same information to be tagged at multiple levels.

The taxonomy should therefore remain as simple as possible and avoid tagging requirements whose information value does not clearly outweigh the additional burden for preparers.

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?

Yes, it is much easier to address potential common data quality issues or inconsistencies with a sample set of reports and to address those with specific validation rules at a later stage.

Please write below your comments or suggestions.

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

Finnish Energy stresses that digital sustainability reporting requirements should remain proportionate and as simple as possible. The development of the XBRL taxonomy should avoid unnecessarily granular or overlapping tagging requirements and should not undermine the simplification achieved through the Revised ESRS.

Additional validation rules should only be introduced if practical experience demonstrates that they are necessary to address relevant and recurring data quality issues. Any future validation rules should avoid unnecessary complexity and administrative burden.

We also encourage EFRAG and the European Commission to explore the potential of AI-driven solutions for collecting, extracting and analysing sustainability information. Rapid technological developments should be taken into account when assessing the need for detailed tagging requirements.

Digital reporting requirements should be limited to what is necessary under the applicable EU legislation, remain sufficiently flexible to benefit from technological development and avoid unnecessary administrative burden for companies.