

DATEV Contribution

on a European Single Access Point for Financial and Non-financial Information disclosed by companies (ESAP)

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The EU Commission plans to establish a European single access point for financial and non-financial information disclosed by companies (ESAP). DATEV welcomes the opportunity to provide feedback on the EU Commission's consultation.

DATEV eG is the software company and IT services provider for tax consultants, auditors, lawyers, and their clients. With over 8,000 employees, the company is one of the largest IT service providers in Germany and Europe. Via DATEV's 40,000 members, the cooperative continuously improves the business processes of 2.5 million companies (most of them SMEs), municipalities, and institutions.

The cooperative's range of products and services encompasses the fields of accounting, personnel management, taxation, enterprise resource planning (ERP), IT services, IT security, training, and consulting. DATEV has consistently developed into an internationally operating service provider, with branches in Italy, Austria, the Czech Republic, Poland, Slovakia, Hungary, and Spain.

A European single access point for financial and non-financial information disclosed by companies is a valuable **contribution to more transparency** of information disclosed by companies and will foster the availability of **data** for the European economy. The establishment of the ESAP would contribute to make companies more visible to cross-border investors, better integrate national capital markets and facilitate their access to market funding. To make sound investment decisions, investors need easy access to comparable and reliable company information. Therefore, DATEV fully supports the establishment of the ESAP.¹

Companies are subject to many periodical reporting and disclosure obligations. Disclosure does not always take place via registers. Information is also published on the company's own website. National rules set out diverging obligations. In many cases, there is no standard for reporting and disclosure. Due to the variety of publication locations and formats, access for users is complicated and thus rather costly. **To this end, the Commission's proposal to make the disclosed information available in machine-readable formats via a single access point is very welcome.**

¹ Cf. [Datev position paper on the Consultation on non-financial reporting](#)

The **ambition for ESAP should be to make accessible all financial and non-financial information** which must be disclosed due to EU or national law or is disclosed voluntarily.

However, the ESAP should not be used to introduce new disclosure requirements or timeframes, as reporting requirements are very cost intensive for companies, especially for SMEs.

Given the fragmentation of disclosure regulation and practices, it seems reasonable to build ESAP in a **first step** on existing registers where **information is already available in machine-readable form (ESEF)**. The ESAP should offer the ability to integrate SME data on a voluntary basis by using a simplified standard. We therefore welcome EFRAG's work on the development of possible EU non-financial reporting standards.

In a **further step**, additional information already disclosed due to national obligations should be included, without imposing new reporting obligations. A precondition is transparency about which requirements exist for companies in each Member State, as today the information is available in different formats and via multiple access points (e.g. registers or companies' websites).

Machine readable formats are a key factor for efficient disclosure as well as for efficient usability. XBRL as a machine-readable format is the open international standard for digital business reporting. It allows the creation of taxonomies. Taxonomies are the reporting-area specific hierarchical dictionaries. They define the specific tags used for individual data items, their attributes, and their interrelation (cf. ESEF). Taxonomy can help bridge national-EU meaning gaps. Next to machine readability there is another fundamental requirement: structured data formats should be based on **standardised taxonomies** as often as possible. Taxonomy extensions to cover specific needs should be an exemption. Machine readability favors improved data analyses, a higher quality of information and leads to cost savings for users, especially SMEs. Due to the missing **semantic standardisation** XML files, EXCEL or CSV-files would not be sufficient.

The information available in ESAP should be available to everyone at the **same time as it is available at the local** or commercial source. Data must have probative value and be considered valid and correct.

The **integrity** of the information and the **credibility of the source** of data which is directly submitted to ESAP can be ensured by **submission via regulated professions** bound to compliance (i.e. tax advisor or accountant).

While today information is often only available in local languages, ESAP should include a **translation** in a language that is customary in the sphere of international finance. This should also apply to meta data and taxonomy/labels.

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