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Targeted consultation on the establishment of a European single access point (ESAP) for financial and non-financial information publicly disclosed by companies

First action of the capital markets union action plan

Fields	marked	with	* are	mandatory.	
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Introduction

Background of this targeted consultation

The purpose of this targeted questionnaire is to seek general and technical views on the way to establish a European single access point (ESAP) for companies' financial and sustainable investment-related information made public pursuant to EU legislation. The establishment of the ESAP is the first action in the Commission's new action plan on the capital markets union (CMU). The EU legislation in the financial services area (in relation to inter alia capital markets, credit rating, investment, lending, insurance, asset management, funds (including UCITs), sustainable finance) requires companies to disclose a wide range of documents, particulars and datasets in order to increase the transparency and reduce asymmetry of information between company insiders and external investors.

The collection and dissemination of data is however fragmented. The EU law rarely prescribes specific dissemination channels. A few datasets such as an issuer's annual financial report must be published via a register. Registers are most of the time scattered along the national and / or sectoral dimensions. At the EU level, the <u>European Securities and Markets Authority (ESMA)</u> maintains a number of public registers.

Stakeholders encounter significant difficulties in accessing, comparing and using the companies' financial and sustainability-related information published pursuant to the relevant EU legislation. Based on responses received from stakeholders on previous consultation activities, it appears that:

- 1. Stakeholders find it difficult to access specific companies' information because the information itself is scattered geographically (generally by Member State), functionally and thematically. Information is also often searchable or available in local languages only, and not always freely accessible or bulk downloadable
- 2. Investors and users find publicly disclosed financial and non-financial information difficult to compare and analyse. This is mainly due to the lack of common standards for such disclosure, use of different identifiers for a

same entity, lack of interoperable formats and lack of harmonised implementation of reporting obligations at national level. The introduction of the ESEF format for financial reports by listed companies in 2021 or 2022 will to some extent remedy the situation but applies to only a small fraction of the regulated information disclosed by companies

 Stakeholders find the electronic usability of the data suboptimal. Data is hardly ever disclosed in a machine readable structured format. Notwithstanding some progress in the field of natural language processing, this undermines algorithmic processing of such data

The lack of an integrated data management at the EU level is detrimental in many ways. Firstly, it is particularly detrimental to SMEs and to companies incorporated in Member States with less-developed capital markets. These companies lack cross-border visibility and struggle to find investors, thus reducing the liquidity of their securities. Secondly, it stifles market integration and innovation in the EU (such as pan-EU added value services and Fintech), and constitutes a competitive disadvantage for the EU capital markets in terms of attractiveness, compared to capital markets in other jurisdictions, such as the US. Lastly, the lack of integrated data management and access act as an important impediment to a fully-fledged capital markets union (CMU).

An EU-wide mechanism offering easily accessible, comparable and digitally usable information such as the ESAP can remedy the situation. The EU can add value by establishing an EU platform offering an EU single access point as well as an EU harmonised approach for the IT format for companies' information published pursuant to EU law.

Context and link with other initiatives

The Commission aims to foster policies that are fit for the digital age. Industrial and commercial data are key drivers of the digital economy. In its European Data Strategy of February 2020, the Commission declared its intention to make more data available for use in the economy and society. The strategy suggests the roll out of common European data spaces in crucial sectors such as the green deal and the financial sector. The Commission is preparing a legislative proposal to establish such spaces.

The <u>High Level Forum on the Capital Markets Union (HLF)</u>, set up by the European Commission in November 2019, recommended in its final report adopted on 10 June 2020 to set up the ESAP as an EU-wide platform in order to facilitate investors' access to company data, including that of SMEs. The HLF considered that standardised data reporting standards and formats should make data more easily accessible and comparable for investors. The need to improve accessibility, comparability and usability of information is also mentioned in the <u>digital finance strategy</u> (in order to facilitate real-time digital access to all regulated financial information, the strategy suggests that by 2024, information to be publically released under EU financial services legislation should be disclosed in standardised and machine-readable formats). Similarly, the forthcoming renewed sustainable finance strategy (planned for Q1 2021) is likely to deliver similar messages as regards public data in its remit.

The development of the ESAP will seek to encompass a wide scope of public information. The scope of the information covered by the platform will focus on the needs of users, in particular investors, while also taking into account the needs of a broader range of users such as civil society in particular as regards sustainability-related disclosures. It will also examine whether and how to embed information beyond the financial services area, such as entities with no access to capital markets and SMEs in order to expand their funding opportunities.

It will entail streamlining disclosure mechanisms set-out in EU legislation. The platform should build to the greatest extent possible on existing EU and national IT infrastructure (databases, registers, in order to avoid adding to companies reporting burden). The Commission invites input from stakeholders to define the precise information coverage, governance and features of the ESAP.

The development of ESAP will build on existing EU initiatives, such as the findings of the <u>European financial transparency gateway (EFTG) pilot project</u>, and will complement existing initiatives such as the <u>business registers interconnection system (BRIS)</u>.

The Commission has recently undertaken a range of public and other consultations – <u>Capital Markets Union High Level Forum final report</u>, a new digital finance strategy for Europe/FinTech action plan, non-financial reporting by large companies, <u>fitness check on the EU framework for public reporting by companies</u>, <u>European strategy for data</u>, <u>renewed sustainable finance strategy</u> –, relevant for the development of the ESAP. The responses to these consultations indicate a strong and widespread support for an ESAP as regards public financial as well as non-financial information from both listed and non-listed companies, e.g. entities with no access to capital markets such as SMEs.

The development and deployment of the ESAP will have to take account of the many ongoing initiatives addressing supervisory or high value datasets at Commission level or in collaboration with the <u>European supervisory authorities</u>.

Targeted consultation

This targeted consultation on the ESAP initiative takes account of already undertaken consultations and aims at gathering further evidence and views on the best way to establish an ESAP, including the scope of data (and whether it could be broadened to non-mandatory information), cost-benefits, how to address SMEs, etc.

Note that you are not required to answer every questions and you may respond to only those questions that you deem the most relevant.

Please note: In order to ensure a fair and transparent consultation process only responses received through our online questionnaire will be taken into account and included in the report summarising the responses. Should you have a problem completing this questionnaire or if you require particular assistance, please contact <u>fisma-esap-project@ec.europa.eu</u>.

More information on

- this consultation
- the consultation document
- the consultation strategy
- capital markets union
- the protection of personal data regime for this consultation

About you

*	Language	of	my	contribution
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- Bulgarian
- Croatian
- Czech
- Danish
- Dutch
- English

0	Estonian
0	Finnish
0	French
0	German
0	Greek
0	Hungarian
0	Irish
0	Italian
0	Latvian
0	Lithuanian
0	Maltese
0	Polish
0	Portuguese
0	Romanian
0	Slovak
0	Slovenian
0	Spanish
0	Swedish
*I am	giving my contribution as
0	Academic/research institution
0	Business association
0	Company/business organisation
0	Consumer organisation
0	EU citizen
0	Environmental organisation
0	Non-EU citizen
0	Non-governmental organisation (NGO)
0	Public authority
0	Trade union
0	Other
* First	name
	Maurits

*Surname			
Heldring			
*Email (this won't be p	oublished)		
mhe@dufas.nl			
*Organisation name			
255 character(s) maximum			
Dutch Fund and Asset N	Management Association		
*Organisation size			
Micro (1 to 9 em	nployees)		
Small (10 to 49)	employees)		
Medium (50 to 2	,		
Large (250 or m	,		
Transparency registe 255 character(s) maximum Check if your organisation is influence EU decision-makin	on the transparency regist	<u>er</u> . It's a voluntary database fo	r organisations seeking to
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*Country of origin Please add your country of o	origin, or that of your organi	sation.	
Afghanistan	Djibouti	Libya	Saint Martin
Aland Islands	Dominica	Liechtenstein	Saint Pierre and Miquelon
Albania	DominicanRepublic	Lithuania	Saint Vincent and the
			Grenadines
Algeria	Ecuador	Luxembourg	Samoa
American Samoa	Egypt	Macau	San Marino
Andorra	El Salvador	Madagascar	São Tomé and Príncipe

Angola	Equatorial Guinea	Malawi	Saudi Arabia
Anguilla	Eritrea	Malaysia	Senegal
Antarctica	Estonia	Maldives	Serbia
Antigua and Barbuda	Eswatini	Mali	Seychelles
Argentina	Ethiopia	Malta	Sierra Leone
Armenia	Falkland Islands	Marshall Islands	Singapore
Aruba	Faroe Islands	Martinique	Sint Maarten
Australia	Fiji	Mauritania	Slovakia
Austria	Finland	Mauritius	Slovenia
Azerbaijan	France	Mayotte	SolomonIslands
Bahamas	French Guiana	Mexico	Somalia
Bahrain	French Polynesia	Micronesia	South Africa
Bangladesh	FrenchSouthern andAntarctic Lands	Moldova	South Georgia and the South Sandwich Islands
Barbados	Gabon	Monaco	South Korea
Belarus	Georgia	Mongolia	South Sudan
Belgium	Germany	Montenegro	Spain
Belize	Ghana	Montserrat	Sri Lanka
Benin	Gibraltar	Morocco	Sudan
Bermuda	Greece	Mozambique	Suriname
Bhutan	Greenland	Myanmar	Svalbard and
		/Burma	Jan Mayen
Bolivia	Grenada	Namibia	Sweden
Bonaire SaintEustatius andSaba	Guadeloupe	Nauru	Switzerland
Bosnia and Herzegovina	Guam	Nepal	Syria

BotswanaBouvet IslandBrazilBritish IndianOcean Territory	GuatemalaGuernseyGuineaGuinea-Bissau	NetherlandsNew CaledoniaNew ZealandNicaragua	TaiwanTajikistanTanzaniaThailand
British Virgin Islands	Guyana	Niger	The Gambia
Brunei	Haiti	Nigeria	Timor-Leste
Bulgaria	Heard Island and McDonald Islands	Niue	Togo
Burkina Faso	Honduras	Norfolk Island	Tokelau
Burundi	Hong Kong	NorthernMariana Islands	Tonga
Cambodia	Hungary	North Korea	Trinidad and Tobago
Cameroon	celand	North Macedonia	Tunisia
Canada	India	Norway	Turkey
Cape Verde	Indonesia	Oman	Turkmenistan
Cayman Islands	Iran	Pakistan	Turks andCaicos Islands
Central AfricanRepublic	Iraq	Palau	Tuvalu
Chad	Ireland	Palestine	Uganda
Chile	Isle of Man	Panama	Ukraine
China	Israel	Papua New Guinea	United Arab Emirates
Christmas Island	Italy	Paraguay	UnitedKingdom
Clipperton	Jamaica	Peru	United States
Cocos (Keeling) Islands	Japan	Philippines	United StatesMinor OutlyingIslands
Colombia	Jersey	Pitcairn Islands	Uruguay

0	Comoros	Jordan	0	Poland		US Virgin
0	Congo	Kazakhstan	0	Dortugal	0	Islands Uzbekistan
0	Congo Cook Islands		0	Portugal Puerto Rico	0	Vanuatu
0	Cook Islands Costa Rica	Kenya Kiribati	0	Qatar	0	
0	Côte d'Ivoire	© Kosovo	0	Réunion	0	Vatican City Venezuela
0	Croatia	KosovoKuwait	0	Romania	0	Vietnam
0			0			
	Cuba	Kyrgyzstan		Russia		Wallis and Futuna
0	Curaçao	Laos	0	Rwanda	0	Western
	Ouração	Laos		riwanda		Sahara
0	Cyprus	Latvia	0	Saint	0	Yemen
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0	Czechia	Lebanon		Saint Helena	0	Zambia
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				Tristan da		
				Cunha		
	Democratic	Lesotho	0	Saint Kitts and		Zimbabwe
	Republic of the			Nevis		
	Congo					
	Denmark	Liberia	0	Saint Lucia		
* Field	of activity or secto	or (if applicable):				
	Accounting					
	Auditing					
	Banking					
	Credit rating ager	ncies				
	Insurance					
	Pension provision	1				
√	Investment manage	gement (e.g. hedge	fun	ds, private equity	fun	ds, venture
	capital funds, mor	ney market funds, s	ecur	rities)		
	Market infrastruct	ure operation (e.g. (CCF	s, CSDs, Stock e	xch	nanges)
	Social entreprene	urship				
	Other					
	Not applicable					

- *Are you a financial market participant?

 O Yes
 - No
 - Don't know / no opinion / not relevant
- * In terms of information published by market participants, are you a user or a preparer?
 - User
 - Preparer
 - User and preparer
 - None of these

The Commission will publish all contributions to this public consultation. You can choose whether you would prefer to have your details published or to remain anonymous when your contribution is published. Fo r the purpose of transparency, the type of respondent (for example, 'business association, 'consumer association', 'EU citizen') country of origin, organisation name and size, and its transparency register number, are always published. Your e-mail address will never be published. Opt in to select the privacy option that best suits you. Privacy options default based on the type of respondent selected

*Contribution publication privacy settings

The Commission will publish the responses to this public consultation. You can choose whether you would like your details to be made public or to remain anonymous.

Anonymous

Only organisation details are published: The type of respondent that you responded to this consultation as, the name of the organisation on whose behalf you reply as well as its transparency number, its size, its country of origin and your contribution will be published as received. Your name will not be published. Please do not include any personal data in the contribution itself if you want to remain anonymous.

Public

Organisation details and respondent details are published: The type of respondent that you responded to this consultation as, the name of the organisation on whose behalf you reply as well as its transparency number, its size, its country of origin and your contribution will be published. Your name will also be published.

☑ I agree with the personal data protection provisions

General questions

In this first section of the consultation, the Commission seeks to get stakeholders' views on some general questions regarding the features of the European single access point (ESAP). The Commission seeks views on which information stakeholders generally search for, where they search for it, in which format(s) and the barriers stakeholders might encounter. This will also help the Commission to prioritise which aspects should be considered immediately when developing ESAP, and which could be implemented at a later stage.

Question 1. Please rate the following characteristics of ESAP based on how relevant they are according to you:

	1 (fully disagree)	2 (somewhat disagree)	3 (neutral)	4 (somewhat agree)	5 (fully agree)	Don't know - No opinion - Not applicable
The information quality (accuracy and completeness) is most important	0	0	0	0	•	0
The widest possible scope of the information is most important	0	0	•	0	0	0
The timeliness of the information is most important	0	0	0	•	0	0
The source of the information is a key element to know	0	0	0	0	•	0
The immutability of the information is a key element	0	0	0	0	•	0
ESAP should include information made public on a voluntary basis by non-listed companies of any size, including SMEs	•	0	0	•	•	•
ESAP should include information made public on a voluntary basis by financial market actors	©	0	0	•	•	•
Other aspects	0	0	0	0	0	0

Question 1.1 Please explain your position providing your arguments, and where appropriate, concrete examples and data to support your answers:

5000 character(s) maximum

including spaces and line breaks, i.e. stricter than the MS Word characters counting method.

DUFAS believes that initially the focus of the ESAP should be on ESG/NFRD-data. For asset managers and pension funds, complying with sustainable finance related regulation like SFRD and Taxonomy is a key priority in the near term. Wide availability of high quality and comparable NFRD-data is therefore crucial. In due course, the scope of the ESAP can be extended to other (regulatory) areas.

Question 2. Which channels do you use when searching for, retrieving or using companies' public information?

Please select as many answers as you like

- Company's website
- Data aggregation service providers
- Stock Exchanges
- Public repositories or databases (OAMs, NCAs, ESAs)
- Other

Please specify what are the other channel(s) you use when searching for, retrieving or using companies' public information:

5000 character(s) maximum

including spaces and line breaks, i.e. stricter than the MS Word characters counting method.

Various asset managers and pension funds also use information from NGOs that is based on public information from companies. For example, they use benchmarking data like the Responsible Mining Index and the Access to Medicine Index.

Question 3. Would you say that the cost for retrieving and using companies' public information is:

- Immaterial
- Average
- High
- Don't know / no opinion / not relevant

Question 3.1 Please provide more information on your answer to question 3:

5000 character(s) maximum

including spaces and line breaks, i.e. stricter than the MS Word characters counting method.

Gathering information costs time as it often involves manual labor. Subscription costs of data providers can be high, especially when multiple data providers are used.	n
Question 4. In which electronic format is companies' public information provided by these channels?	on
Please select as many answers as you like	
□ von	
XBRL RDF	
☑ PDF ☑ YA#	
XML	
✓ HTML ✓ OOV TYT	
✓ CSV, TXT	
Excel	
Formats enabling natural language processing	
Other	
Don't know / no opinion / not relevant	
Question 5. Do you encounter barriers or difficulties when accessing t	he
information?	
Yes	
No	
Don't know / no opinion / not relevant	
Question 6. Do you encounter barriers or difficulties when using the	he
information?	
Yes	
O No	
Don't know / no opinion / not relevant	

Question 6.1 Please describe the barriers or difficulties you encountered when using the information:

5000 character(s) maximum

including spaces and line breaks, i.e. stricter than the MS Word characters counting method.

- Lack of (double) materiality of data
- Lack of completeness / accuracy of data
- Lack of clarity on definitions used
- Lack of clarity on scope of the data
- Lack of comparability of data"

The scope of ESAP

Question 7. Should ESAP include information from the hereunder provided list of EU legislations in the financial area?

And if so, please specify whether the ESAP should embed this information immediately (as soon as the ESAP starts) or at a later stage (phasing in).

- 1) The Transparency Directive (2004/109/EC) (e.g. annual/half yearly financial reports, acquisition or disposal of major holdings)
 - Fully disagree
 - Somewhat disagree
 - Neutral
 - Somewhat agree
 - Fully agree
 - Don't know / no opinion / not relevant

Please specify whether the information should be included immediately or at a later stage:

- Immediately
- At a later stage
- Don't know / no opinion / not relevant

Please explain your position providing your arguments, and where appropriate, concrete examples and data to support your answers to question 7. 1):

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2) The Accounting Directive (2013/34/EU	l) (e.g.	tinancial	statements,
management report, audit report)			
Fully disagree			
Somewhat disagree			
Neutral			
Somewhat agree			
Fully agree			
Don't know / no opinion / not relevant			
Please specify whether the information should	ld be inc	luded imn	nediately or at
a later stage:			
Immediately			
At a later stage			
Don't know / no opinion / not relevant			
Please explain your position providing appropriate, concrete examples and data	-		
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Please specify whether the information should be included immediately or at a later stage:

- Immediately
- At a later stage
- Don't know / no opinion / not relevant

Please explain your position providing your arguments, and where appropriate, concrete examples and data to support your answers to question 7. 3):

50	000 chara	acter(s) maximi	um					
inc	cluding sp	aces and line b	breaks, i.e. strict	er than the MS	Word character	s counting metho	od.	

- 4) The Non-Financial Reporting Directive (NFRD) (2014/95/EU) (e.g. non-financial statement)
 - Fully disagree
 - Somewhat disagree
 - Neutral
 - Somewhat agree
 - Fully agree
 - Don't know / no opinion / not relevant

Please specify whether the information should be included immediately or at a later stage:

- Immediately
- At a later stage
- Don't know / no opinion / not relevant

Please explain your position providing your arguments, and where appropriate, concrete examples and data to support your answers to question 7. 4):

5000 character(s) maximum

including spaces and line breaks, i.e. stricter than the MS Word characters counting method.

	To comply with the level 2 regulation of SFDR and the Taxonomy Regulation it is crucial that non-financial data become available on a wide scale as soon as possible.
-	The Prospectus Regulation (2017/1129/EU) (e.g. Prospectus, Universal egistration Document, SME Growth Markets-information) Fully disagree
	Somewhat disagree
	Neutral
	Somewhat agree
	Fully agree
	Don't know / no opinion / not relevant
	ease specify whether the information should be included immediately or at later stage:
	Immediately
	At a later stage
	Don't know / no opinion / not relevant
ap qu	ease explain your position providing your arguments, and where propriate, concrete examples and data to support your answers to lestion 7. 5): 5000 character(s) maximum cluding spaces and line breaks, i.e. stricter than the MS Word characters counting method.
-	The Shareholders Rights Directive (2007/36/EC) and (2017/828/EU) (e.g. emuneration Report)
	Fully disagree
	Somewhat disagree
	Neutral
	Somewhat agree

Don't know / no opinion / not relevant
Please specify whether the information should be included immediately or at
a later stage:
Immediately
At a later stage
Don't know / no opinion / not relevant
Please explain your position providing your arguments, and where appropriate, concrete examples and data to support your answers to question 7. 6): 5000 character(s) maximum including spaces and line breaks, i.e. stricter than the MS Word characters counting method.
7) The Market Abuse Regulation (596/2014/EU) and Market Abuse Directive (2014/57/EU) (e.g. inside information)
Fully disagree
Somewhat disagree
Neutral
Somewhat agree
Fully agree
Don't know / no opinion / not relevant
Please explain your position providing your arguments, and where
appropriate, concrete examples and data to support your answers to
question 7. 7):
5000 character(s) maximum including spaces and line breaks, i.e. stricter than the MS Word characters counting method.
including spaces and line breaks, i.e. stricter than the word characters counting method.

Fully agree

8) The Resolution and Recovery of Credit institutions and Investment firms					
Directive (BRRD) (2014/59/EU) (e.g. information on the group financial					
support agreement)					
Fully disagree					
Somewhat disagree					
Neutral					
Somewhat agree					
Fully agree					

Please explain your position providing your arguments, and where appropriate, concrete examples and data to support your answers to question 7. 8):

including spaces and line breaks, i.e. stricter than the MS Word characters counting method.

- 9) The Covered Bonds Directive (2019/2162) (e.g. information on the cover pool)
 - Fully disagree
 - Somewhat disagree
 - Neutral
 - Somewhat agree
 - Fully agree
 - Don't know / no opinion / not relevant

Don't know / no opinion / not relevant

Please explain your position providing your arguments, and where appropriate, concrete examples and data to support your answers to question 7. 9):

5000 character(s) maximum

including spaces and line breaks, i.e. stricter than the MS Word characters counting method.

10) The Capital Re	equirements Directive (CRD) (2013/36/EU) and Capital
•	lation (CRR) (575/2013/EU) (e.g. prudential information
stress test results)	
Fully disagree	
Somewhat disag	yree
Neutral	
Somewhat agree	€
Fully agree	
Don't know / no	opinion / not relevant
question 7. 10): 5000 character(s) maximum including spaces and line brea	aks, i.e. stricter than the MS Word characters counting method.
	gs Regulation (1060/2009/EU) (e.g. transparency report)
11) The Credit Rating Fully disagree	gs Regulation (1060/2009/EU) (e.g. transparency report)
Fully disagree	
Fully disagree Somewhat disag	gree
Fully disagree Somewhat disag Neutral	gree
Fully disagree Somewhat disag Neutral Somewhat agree Fully agree	gree

appropriate, concrete examples and data to support your answers to question 7. 11):

	character(s) maximum ing spaces and line breaks, i.e. stricter than the MS Word characters counting method.
12)	The Central Securities Depositories Regulation (909/2014/EU) (e.g.
-	rnance arrangements)
	Fully disagree
0	Somewhat disagree
•	Neutral
_	Somewhat agree
_	Fully agree
0	Don't know / no opinion / not relevant
ques	opriate, concrete examples and data to support your answers to stion 7. 12): character(s) maximum ing spaces and line breaks, i.e. stricter than the MS Word characters counting method.
base	The Key Information Documents for Packaged Retail and Insurance- d Investment Products (PRIIPs) Regulation (1286/2014/EU) (e.g. key mation document)
(i)	Fully disagree
0	Somewhat disagree
•	Neutral
0	Somewhat agree
0	Fully agree
	Don't know / no opinion / not relevant

Please explain your position providing your arguments, and where					
appropriate, concrete examples and data to support your answers to					
question 7. 13):					
5000 character(s) maximum					
including spaces and line breaks, i.e. stricter than the MS Word characters counting method.					
14) The Regulation on European Long-term Investment Funds (ELTIF) (2015)					
/760/EU) (e.g. fund-related information)					
Fully disagree					
Somewhat disagree					
Neutral					
Somewhat agree					
Fully agree					
Don't know / no opinion / not relevant					
Please explain your position providing your arguments, and where					
appropriate, concrete examples and data to support your answers to					
appropriate, concrete examples and data to support your answers to question 7. 14):					
appropriate, concrete examples and data to support your answers to					
appropriate, concrete examples and data to support your answers to question 7. 14): 5000 character(s) maximum					
appropriate, concrete examples and data to support your answers to question 7. 14): 5000 character(s) maximum					
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appropriate, concrete examples and data to support your answers to question 7. 14): 5000 character(s) maximum including spaces and line breaks, i.e. stricter than the MS Word characters counting method.					
appropriate, concrete examples and data to support your answers to question 7. 14): 5000 character(s) maximum including spaces and line breaks, i.e. stricter than the MS Word characters counting method. 15) The European Market Infrastructure Regulation (EMIR) (648/2012/EU) (e.g.					
appropriate, concrete examples and data to support your answers to question 7. 14): 5000 character(s) maximum including spaces and line breaks, i.e. stricter than the MS Word characters counting method. 15) The European Market Infrastructure Regulation (EMIR) (648/2012/EU) (e.g. prices and fees of services provided, risk management model)					
appropriate, concrete examples and data to support your answers to question 7. 14): 5000 character(s) maximum including spaces and line breaks, i.e. stricter than the MS Word characters counting method. 15) The European Market Infrastructure Regulation (EMIR) (648/2012/EU) (e.g. prices and fees of services provided, risk management model) Fully disagree					
appropriate, concrete examples and data to support your answers to question 7. 14): 5000 character(s) maximum including spaces and line breaks, i.e. stricter than the MS Word characters counting method. 15) The European Market Infrastructure Regulation (EMIR) (648/2012/EU) (e.g. prices and fees of services provided, risk management model) Fully disagree Somewhat disagree					
appropriate, concrete examples and data to support your answers to question 7. 14): 5000 character(s) maximum including spaces and line breaks, i.e. stricter than the MS Word characters counting method. 15) The European Market Infrastructure Regulation (EMIR) (648/2012/EU) (e.g. prices and fees of services provided, risk management model) Fully disagree Somewhat disagree Neutral					
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appropriate, concrete examples and data to support your answers to question 7. 14): 5000 character(s) maximum including spaces and line breaks, i.e. stricter than the MS Word characters counting method. 15) The European Market Infrastructure Regulation (EMIR) (648/2012/EU) (e.g. prices and fees of services provided, risk management model) Fully disagree Somewhat disagree Neutral					

Please explain your position providing your arguments, and where
appropriate, concrete examples and data to support your answers to
question 7. 15):
5000 character(s) maximum including spaces and line breaks, i.e. stricter than the MS Word characters counting method.
16) The Financial Conglomerates Directive (FICOD) (2011/89/EU) (e.g.
corporate structure of the conglomerate)
Fully disagree
Somewhat disagree
Neutral
Somewhat agree
Fully agree
Don't know / no opinion / not relevant
Please explain your position providing your arguments, and where appropriate, concrete examples and data to support your answers to question 7. 16): 5000 character(s) maximum including spaces and line breaks, i.e. stricter than the MS Word characters counting method.
17) The Directive of Prudential Supervision of Investment Firms (IFD) (2019)
17) The Directive of Prudential Supervision of Investment Firms (IFD) (2019 /2034/EU) and the Regulation of Prudential Requirements of Investment Firms
17) The Directive of Prudential Supervision of Investment Firms (IFD) (2019 /2034/EU) and the Regulation of Prudential Requirements of Investment Firms (IFR) (2019/2033/EU) (e.g. aggregated information on high-earners,
/2034/EU) and the Regulation of Prudential Requirements of Investment Firms
/2034/EU) and the Regulation of Prudential Requirements of Investment Firms (IFR) (2019/2033/EU) (e.g. aggregated information on high-earners,
/2034/EU) and the Regulation of Prudential Requirements of Investment Firms (IFR) (2019/2033/EU) (e.g. aggregated information on high-earners, remuneration arrangements)
/2034/EU) and the Regulation of Prudential Requirements of Investment Firms (IFR) (2019/2033/EU) (e.g. aggregated information on high-earners, remuneration arrangements) Fully disagree

Don't know / no opinion / not relevant
Please explain your position providing your arguments, and where appropriate, concrete examples and data to support your answers to question 7. 17): 5000 character(s) maximum including spaces and line breaks, i.e. stricter than the MS Word characters counting method.
18) The Directive on the Activities and Supervision of Institutions for Occupational Retirement Provision (IORP) (2016/2341/EU) (e.g. remuneration policy)
Fully disagree
Somewhat disagree
Neutral
Somewhat agree
Fully agree
Don't know / no opinion / not relevant
Please explain your position providing your arguments, and where appropriate, concrete examples and data to support your answers to question 7. 18): 5000 character(s) maximum including spaces and line breaks, i.e. stricter than the MS Word characters counting method.
19) The Pan-European Personal Pension Products Regulation (PEPP) (2019 /1238/EU) (e.g. key information document) Fully disagree Somewhat disagree

Neutral
Somewhat agree
Fully agree
Don't know / no opinion / not relevant
Please explain your position providing your arguments, and where appropriate, concrete examples and data to support your answers to question 7. 19): 5000 character(s) maximum including spaces and line breaks, i.e. stricter than the MS Word characters counting method.
20) The Regulation on Wholesale Energy Market Integrity and Transparency (REMIT) (1348/2014/EU) (e.g. inside information) Fully disagree Somewhat disagree
Neutral
Somewhat agree
Fully agree
Don't know / no opinion / not relevant
Please explain your position providing your arguments, and where appropriate, concrete examples and data to support your answers to question 7. 20): 5000 character(s) maximum including spaces and line breaks, i.e. stricter than the MS Word characters counting method.
21) The Securities Financing Transactions Regulation (SFTR) (2015/2365/EU (e.g. aggregate positions) © Fully disagree
any analysis

Somewhat disagree
Neutral
Somewhat agree
Fully agree
Don't know / no opinion / not relevant
Please explain your position providing your arguments, and where appropriate, concrete examples and data to support your answers to question 7. 21): 5000 character(s) maximum including spaces and line breaks is a strictor than the MS Word observators counting method.
including spaces and line breaks, i.e. stricter than the MS Word characters counting method.
22) The Solvency II Directive (2009/138/EC) (e.g. solvency and financial condition report)
Fully disagree
Somewhat disagree
Neutral
Somewhat agree
Fully agree
Don't know / no opinion / not relevant
Please explain your position providing your arguments, and where appropriate, concrete examples and data to support your answers to question 7. 22): 5000 character(s) maximum including spaces and line breaks, i.e. stricter than the MS Word characters counting method.
23) The Short Selling Regulation (236/2012/EU) (e.g. net short position) Fully disagree

Somewhat disagree
Neutral
Somewhat agree
Fully agree
Don't know / no opinion / not relevant
·
Please explain your position providing your arguments, and where
appropriate, concrete examples and data to support your answers to
question 7. 23):
5000 character(s) maximum including spaces and line breaks, i.e. stricter than the MS Word characters counting method.
24) The Take-Over Bid Directive (2004/25/EC) (e.g. Information in the
management report on companies' capital and shareholders, voting rights,
governance)
Fully disagree
Somewhat disagree
Neutral Neutral
Somewhat agree
Fully agree
Don't know / no opinion / not relevant
Please specify whether the information should be included immediately or at
a later stage:
Immediately
At a later stage
Don't know / no opinion / not relevant
Please explain your position providing your arguments, and where
appropriate, concrete examples and data to support your answers to

including spaces and line breaks, i.e. stricter than the MS Word characters counting method.

•						nents (MIFII ts (MIFIR) (•	•
g. volume	and pri	ce of	certain tra	nsactions)				
Fully	disagree	Э						
_	ewhat di	sagree)					
Neut								
	ewhat aç	gree						
Fully	agree							
Don'	t know /	no opii	nion / not r	elevant				
question 5000 charac including spa	eter(s) maxir		i.e. stricter tha	n the MS Word o	characters	counting method	d.	
/EU) (e.g. Fully Som Neut Som Fully	fund-rel disagree ewhat dis ral ewhat ag agree	ated in e sagree gree	nformatio	n)	Capital	Funds (Eu\	VECA) (345/2013
Please e	xplain	your	position	providing	your	arguments	s, and	where

Please explain your position providing your arguments, and where appropriate, concrete examples and data to support your answers to question 7. 26):

5000 character(s) maximum

includin	ng spaces and line breaks, i.e. stricter than the MS Word characters counting method.
27) TI	he Regulation on European social entrepreneurship funds (EuSEF) (346
/2013	/EU) (e.g. fund-related information)
	-ully disagree
	Somewhat disagree
•	Neutral
0	Somewhat agree
_	Fully agree
	Don't know / no opinion / not relevant
	•
Pleas	e explain your position providing your arguments, and where
appro	ppriate, concrete examples and data to support your answers to
quest	ion 7. 27):
	character(s) maximum
includin	ng spaces and line breaks, i.e. stricter than the MS Word characters counting method.
00\ T !	
	ne Regulation on Money Market Funds (2017/1131/EU) (e.g. prospectus)
	Fully disagree
0 (Somewhat disagree
•	Neutral
© (Somewhat agree
0	Fully agree
	Don't know / no opinion / not relevant
	·

Please explain your position providing your arguments, and where appropriate, concrete examples and data to support your answers to question 7. 28)

5000 character(s) maximum

includin	spaces and line breaks, i.e. stricter than the MS Word characters counting method.
29) Th	e Directive on the coordination of laws, regulations and administrative
-	ons relating to undertakings for collective investment in transferable ies (UCITS) (2009/65/EC) (e.g. key investor information)
_	ully disagree
	omewhat disagree
_	eutral
0 9	omewhat agree
© F	ully agree
0	on't know / no opinion / not relevant
	explain your position providing your arguments, and where
appro quest	explain your position providing your arguments, and where priate, concrete examples and data to support your answers to on 7. 29) **aracter(s) maximum** **spaces and line breaks, i.e. stricter than the MS Word characters counting method.**
approquest 5000 c includin	priate, concrete examples and data to support your answers to on 7. 29) aracter(s) maximum spaces and line breaks, i.e. stricter than the MS Word characters counting method. The Directive on Alternative Investment Fund Managers (AIFM) (2011/61 a.g. investment strategy and objectives of the fund) ally disagree omewhat disagree entertal omewhat agree
approquest 5000 c includin	priate, concrete examples and data to support your answers to on 7. 29) aracter(s) maximum spaces and line breaks, i.e. stricter than the MS Word characters counting method. Directive on Alternative Investment Fund Managers (AIFM) (2011/61 a.g. investment strategy and objectives of the fund) ally disagree omewhat disagree entral

appropriate, concrete examples and data to support your answers to
question 7. 30)
5000 character(s) maximum
including spaces and line breaks, i.e. stricter than the MS Word characters counting method.
31) The Regulation on EU Climate Transition Benchmarks, EU Paris-aligned Benchmarks and sustainability-related disclosures for benchmarks (EU 2019/2089) (e.g. information on measurable carbon emission reduction)
Fully disagree
Somewhat disagree
Neutral
Somewhat agree
Fully agree
Don't know / no opinion / not relevant
Please specify whether the information should be included immediately or at a later stage:
Immediately
At a later stage
Don't know / no opinion / not relevant
Please explain your position providing your arguments, and where appropriate, concrete examples and data to support your answers to question 7. 31) 5000 character(s) maximum including spaces and line breaks, i.e. stricter than the MS Word characters counting method.
 Immediately At a later stage Don't know / no opinion / not relevant Please explain your position providing your arguments, and where appropriate, concrete examples and data to support your answers to question 7. 31)

Please explain your position providing your arguments, and where

Regulation (EU) 2019/2088 on sustainability-related disclosure and The
Taxonomy Regulation (2020/852/EU) (e.g. sustainability risks integration
policies)
Fully disagree
Somewhat disagree
Neutral
Somewhat agree
Fully agree
Don't know / no opinion / not relevant
Please specify whether the information should be included immediately or at
a later stage:
Immediately
At a later stage
Don't know / no opinion / not relevant
Please explain your position providing your arguments, and where appropriate, concrete examples and data to support your answers to question 7. 32) 5000 character(s) maximum including spaces and line breaks, i.e. stricter than the MS Word characters counting method.
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appropriate, concrete examples and data to support your answers to question 7. 32) 5000 character(s) maximum
appropriate, concrete examples and data to support your answers to question 7. 32) 5000 character(s) maximum including spaces and line breaks, i.e. stricter than the MS Word characters counting method.
appropriate, concrete examples and data to support your answers to question 7. 32) 5000 character(s) maximum including spaces and line breaks, i.e. stricter than the MS Word characters counting method. 33) The EU Emissions Trading System (EU ETS)
appropriate, concrete examples and data to support your answers to question 7. 32) 5000 character(s) maximum including spaces and line breaks, i.e. stricter than the MS Word characters counting method. 33) The EU Emissions Trading System (EU ETS) Fully disagree
appropriate, concrete examples and data to support your answers to question 7. 32) 5000 character(s) maximum including spaces and line breaks, i.e. stricter than the MS Word characters counting method. 33) The EU Emissions Trading System (EU ETS) Fully disagree Somewhat disagree
appropriate, concrete examples and data to support your answers to question 7. 32) 5000 character(s) maximum including spaces and line breaks, i.e. stricter than the MS Word characters counting method. 33) The EU Emissions Trading System (EU ETS) Fully disagree Somewhat disagree Neutral

Please specify whether the information should be included immediately or at a later stage:

- Immediately
- At a later stage
- Don't know / no opinion / not relevant

Please explain your position providing your arguments, and where appropriate, concrete examples and data to support your answers to question 7. 33)

50	1000 character(s) maximum	
inc	cluding spaces and line breaks, i.e. stricter than the MS Word characters counting method.	

34) Other

- Yes
- No

The usability and accessibility

Investors and users find publicly disclosed financial and sustainability-related information difficult to compare and analyse. This is mainly due to the lack of structured data, of common frameworks and/or interoperable formats for such disclosures, the use of different identifiers for the same entity and the lack of harmonised implementation of reporting obligations at national level. This section of the questionnaire seeks stakeholders' views on format(s) in which the information in ESAP should be made available, in order to make it more usable digitally, and how stakeholders would prefer to have access to and retrieve this information from ESAP.

Question 8. In order to improve the digital use and searchability of the information, for which of the hereunder information would you support the use of structured data formats, such as ESEF (XHTML and iXBRL), XML, etc., allowing for machine readability?

Please select as many answers as you like

- Listed companies' half yearly financial reports
- Financial statements
- Management report
- Payments to governments
- Audit report
- 1

- Total number of voting rights and capital
- Acquisition or disposal of issuer's own shares
- Home Member State
- Acquisition or disposal of major holdings
- Inside information
- Prospectuses
- Net short position details
- Fund-related information
- Key Information Document
- Public disclosure resulting from prudential requirements
- Remuneration policies
- Corporate structure of the conglomerate
- Governance arrangements
- Covered bonds related information
- Solvency and financial condition report
- Sustainability related information
- Other

Please specify for what other information you would support the use of structured data formats allowing for machine readability:

5000 character(s) maximum

including spaces and line breaks, i.e. stricter than the MS Word characters counting method.

It would be good to have most information in one place, but one data point should be only sourced from one place. So if there is overlap in the content of the yearly financial report and the acquisition and disposal of issuers' own shares, only source the overlapping content from one place. This should be rule based and consistent over time, to make sure corporate reporting effectively gets more streamlined. We would also recommend a phased-in approach.

Question 9. Which of the following machine-readable formats would you find suitable?

	1 (not at all suitable)	2 (rather not suitable)	3 (neutral)	4 (somewhat suitable)	5 (highly suitable)	Don't know - No opinion - Not applicable
ESEF (XHTML files + inline XBRL tagging requirements)	0	0	0	0	•	0
XML files	0	0	0	0	•	0
CSV files	0	0	0	0	•	0
Excel	0	0	•	0	0	0
Formats enabling natural language processing	0	0	•	0	0	0
Other	0	0	0	0	0	•

Question 9.1 Please explain your position providing your arguments, and where appropriate, concrete examples and evidence to support your answers:

5000 character(s) maximum

including spaces and line breaks, i.e. stricter than the MS Word characters counting method.

The ESEF format and XBRL tagging is not widely known among asset managers yet. We point to the iniative of SASB to develop a XBRL taxonomy for non-financial information.

Question 10. How should the information be accessible in ESAP?

Please select as many answers as you like

- Through Application Programming Interfaces (APIs)
- Bulk download
- Web portals
- Other
- Don't know / no opinion / not relevant

Please specify how else should the information be accessible in ESAP:

5000 character(s) maximum

including spaces and line breaks, i.e. stricter than the MS Word characters counting method.

Given the fact that there will be multiple user groups of the ESAP, making the data accessible in multiple ways is desirable.

Question 11. To what extent should the language barrier be tackled?

For the following features of the ESAP (web portal, metadata, taxonomy/labels, and content/data), which of the following language arrangements would you favour?

a) Portals / search tools:

- in a language that is customary in the sphere of international finance
- in multiple or all EU languages
- Don't know / no opinion / not relevant

b) Metadata (where variable text):

- in original language
- 0

- in a language that is customary in the sphere of international finance
- in multiple or all EU languages
- Don't know / no opinion / not relevant

c) Taxonomy / labels (if any):

- n original language
- in a language that is customary in the sphere of international finance
- in multiple or all EU languages
- Don't know / no opinion / not relevant

d) Content / data:

- in original language
- in a language that is customary in the sphere of international finance
- in multiple or all EU languages
- Don't know / no opinion / not relevant

Infrastructure and data governance (collection of data + validation of data)

The Commission seeks stakeholders' views on the preferred technical solution(s) to establish the architecture of ESAP, and how to ensure the quality and integrity of the information within ESAP. A body in charge of ESAP, which should be non-for-profit, would be responsible for coordinating IT systems, maintenance and budgetary aspects.

Question 12. Should specific categories of stakeholders be involved in the governance of ESAP?

Please select as many answers as you like

- EU authority (ESMA, European Commission etc.) or a consortium of EU authorities?
- National competent authorities
- Investors
- Reporting companies
- Other

Please specify which EU authority should be involved in the governance of ESAP:

5000 character(s) maximum

including spaces and line breaks, i.e. stricter than the MS Word characters counting method.

	ESMA and National Authorities; EC and ECB.
	ease specify which national competent authorities should be involved in
	e governance of ESAP: 000 character(s) maximum
	sluding spaces and line breaks, i.e. stricter than the MS Word characters counting method.
	All NCA's should be involved
Ple	ease specify what other category(ies) of stakeholders should be involved in
	e governance of ESAP:
	000 character(s) maximum
inc	cluding spaces and line breaks, i.e. stricter than the MS Word characters counting method.
	NGOs with specific knowledge relating to certain sustainability topics. Data aggregators to combine datasets for data processing, such as SASB, IASB, GRI. Given the scope of the ESAP, and the comparability and ability to aggregate with other data vendors to combine European information with non-European information in a justified way on a portfolio level.
	Data vendors/aggregators could be involved as well as they could play an advisory role, for example on setting quality standards.
	nestion 13. Considering the point in time at which a company makes public me information that is legally required, what would be the ideal timing for
the	e information to be available on the ESAP?
	1000 character(s) maximum sluding spaces and line breaks, i.e. stricter than the MS Word characters counting method.
1110	It should be the responsibility of the company to first share the information on the ESAP prior make the information public via other channels. Companies should obtain a confirmation via the ESAP that the information is uploaded successfully.
	At the same time; company information is upload but only visible to the public after release of the report (annual report, quarterly report etc.).

Question 14. Should the integrity of the information and the credibility of the source of data used be ensured, when it is made accessible in ESAP?

- By electronic seals or electronic signature embedded at data emitter level
- By the ESAP platform
- By other means / trust services
- Don't know / no opinion / not relevant

Question 15. Should the information in ESAP be subject to quality checks?

- Yes
- O No
- Other
- Don't know / no opinion / not relevant

Question 16. Should a quality check be needed, what would need to be checked?

Please select as many answers as you like

- Compliance with IT formats
- Certain key tests (matching figures, units, ...)
- Use of a correct taxonomy
- Completeness
- Availability of metadata
- Other
- Don't know / no opinion / not relevant

Please explain what you mean by 'other' in your answer to question 16:

5000 character(s) maximum

including spaces and line breaks, i.e. stricter than the MS Word characters counting method.

In order to have a ESAP with data that is comparable, all these ex post quality checks are desirable. Assessment of data can for example lead to developing guidelines with the purpose to harmonize the quality of data. Automated checks on completeness are desirable when uploading the data.

A recommendation would be that newly added data to ESAP are automatically checked by comparing the data of previous reporting periods. For example, a company that reports a CO2-emission figures that is 10 times larger than in the previous year could give an indication that an additional check is required.

Besides reliability of the data there should be a focus on aggregability and comparability of the data both over time in the cross-section.

Targeted questions regarding entities with no access to capital markets (non-listed entities), including SMEs

The lack of an integrated data management at the EU level is detrimental to entities with no access to capital markets notably to SMEs that struggle to find investors beyond national borders. Companies of all sizes – and in particular SMEs – need solid market-based funding sources. This was already the case before COVID-19, but will be even more important for the recovery if bank lending might not be sufficient. Therefore, this section of the consultation sets out questions on how ESAP specifically can help ensure that SMEs receive the funding they need.

SMEs, often do not have the technical expertise nor resources necessary to prepare reports in accordance with state-of-the-art, sophisticated standards. At the same time, many SMEs are under increasing pressure to provide financial information as well as certain sustainability related information in order to access market-based funding and for their usual conduct of business. In this respect, entities which cannot provide this information may experience a negative impact on their commercial and/or investment opportunities.

Question 17. Should it be possible for companies other than those with securities listed on EU regulated markets to disclose information on ESAP on a voluntary basis?

- Yes
- O No
- Don't know / no opinion / not relevant

Question 17.1 If you replied yes to question 17, please specifiy which type of entities should be allowed to disclose data on a voluntary basis in the ESAP:

Please select as many answers as you like

- Companies with securities listed on a SME growth-market
- Companies with securities listed on other non-regulated markets
- Pre-IPO companies not yet listed on an exchange
- Any unlisted companies
- Other entities

Please specify what other entities should be allowed to disclose data on a voluntary basis in the ESAP:

5000 character(s) maximum

including spaces and line breaks, i.e. stricter than the MS Word characters counting method.

Ideally the ESAP would ultimately be a central library for financial- and non-financial information on a wide variety of organizations. However, most added value would be realized when the ESAP would cover complete and reliable information from entities listed on (EU) regulated markets.

Question 18. What type of information should be disclosed on a voluntary basis in the ESAP?

Please select as many answers as you like

V	A set of predefined key financial information, allowing to compare data
	Any financial information that the issuer would be willing to render public via ESAP
V	A set of predefined key sustainable related information, allowing to compare the data
	Any sustainability related information that the issuer would be willing to render public via ESAP
	Other

Question 19. As regards frequency of the submission of the voluntary information to ESAP, when should it occur?

- Following predefined periodic submission dates
- On an ongoing basis as soon as available
- Don't know / no opinion / not relevant

Question 20. In which language should entities with no access to capital markets be able to encode the voluntary information?

- National language
- A language that is customary in the sphere of international finance
- Any language
- Other

Question 21. Should filings done on a voluntary basis by SMEs and non-listed companies follow all the rules of the ESAP as regards for instance identification, data structuring and formats, quality checks, etc.?

0	Yes
$\overline{}$	162

O No

Don't know / no opinion / not relevant

Please explain your answer to question 21:

5000 character(s) maximum

including spaces and line breaks, i.e. stricter than the MS Word characters counting method.

Yes, as this would facilitate the comparisons between companies.

Costs and benefits

The Commission anticipates that ESAP will lead to multiple benefits. It can, however, also, imply additional costs for

- i. preparers, in terms of compliance requirements on machine-readability, standards, as well as training of staff, etc.
- ii. users, in terms of search, collection and processing of the information they need
- iii. the development of the ESAP architecture. In some areas ESAP should also lead to cost savings, notably related to fil

Question 22. Do you expect that costs of introducing ESAP be proportionate to its overall benefits?

- Not at all
- To some extent
- To a reasonable extent
- To a very great extent
- Don't know / no opinion / not relevant

Question 23. As a user, can you give an estimation of your yearly cost for retrieving and using companies' public information?

5000 character(s) maximum

including spaces and line breaks, i.e. stricter than the MS Word characters counting method.

It is hard to put a number on this. This largely depends on the quality of the information and the scope. For financial market participants, if SFDR information will be included this could be potentially significant.

External data provider cost for big asset managers estimated at several hundred thousands; however, there might be a lock-in using the current data providers as their scope reaches beyond EU. So taking this into account the actual cost savings of a ESAP might be less.

Question 24. As a user, how large share of these costs do you expect to save through the use of ESAP?

0 10%

⁰ 20%

 30% 40% More than 50% Other Don't know / no opinion / not relevant
Don't know / no opinion / not relevant
Question 25. Should the user have access for free to all data in the ESAP
(based e.g. on an open data policy approach)?
Yes
No
Don't know / no opinion / not relevant
Question 26. Assuming that development and maintenance costs will arise, how do you think the ESAP should be funded? Please select as many answers as you like
■ By EU funds
By national funds
By users (i.e. usage fees)
By preparers (i.e. uploading fee)
☑ Other
Please explain what you mean by 'other' in your answer to question 26: 5000 character(s) maximum including spaces and line breaks, i.e. stricter than the MS Word characters counting method.
There is no clear consensus among members of DUFAS about how ESAP should be funded. Most members favor an approach where the majority of costs come from EU funds. Some members argue that part of costs could be borne by preparers as ESAP could reduce their cost of capital by making data widely available to potential investors. Finally, some argue that the data users could bear part of the costs if ESAP substantially reduces their costs of data and if the quality of the ESAP platform is sufficient.
Question 27. What would be the main benefits for entities with no access to capital markets to disclose this information publicly in ESAP?
Please select as many answers as you like
Get more visibility and attract a broader range of investors
Get more transparency on ESG data (easily retrievable)
Other

Don't know / no opinion / not relevant

Please specify what else would be the main benefits for entities with no access to capital markets to disclose this information publicly in ESAP:

5000 character(s) maximum

including spaces and line breaks, i.e. stricter than the MS Word characters counting method.

Interesting from a research perspective to understand the ESG-impacts of non-listed entities/SME's etc. Both from an academic perspective as an investors relying on research for competitive advantages this will be interesting.

Additional information

Should you wish to provide additional information (e.g. a position paper, report) or raise specific points not covered by the questionnaire, you can upload your additional document(s) below. Please make sure you do not include any personal data in the file you upload if you want to remain anonymous.

The maximum file size is 1 MB.

You can upload several files.

Only files of the type pdf,txt,doc,docx,odt,rtf are allowed

Useful links

More on this consultation (https://ec.europa.eu/info/publications/finance-consultations-2021-european-single-access-point_en)

Consultation document (https://ec.europa.eu/info/files/2021-european-single-access-point-consultation-document_en)

Consultation strategy (https://ec.europa.eu/info/files/2021-european-single-access-point-consultation-strategy_en

More on capital markets union (https://ec.europa.eu/info/business-economy-euro/growth-and-investment/capital-markets-union_en)

Specific privacy statement (https://ec.europa.eu/info/files/2021-european-single-access-point-specific-privacy-statement en)

More on the Transparency register (http://ec.europa.eu/transparencyregister/public/homePage.do?locale=en)

Contact

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