



EFFAS THE EUROPEAN FEDERATION OF FINANCIAL ANALYSTS SOCIETIES

ESMA
European Securities and
Markets Authority

www.esma.europa.eu

Mainzer Landstrasse 47a
DE – 60329 Frankfurt am Main

Contact: Claudia Stinnes
Direct number: +49 69 26 4848 300
Fax number: +49 69 26 4848 335
Email: claudia.stinnes@effas.com
Internet: www.effas.com

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Call for Evidence

Request for technical advice on possible delegated acts concerning the Prospectus Directive (2003/71/EC) as amended by the Directive 2010/73/EU

Comments by the European Federation of Financial Analysts Societies (EFFAS) Market Structure Commission - MSC

Dear Madam, dear Sir,

The European Federation of Financial Analysts Societies is the European umbrella organization of national analysts' societies. It comprises 26 members, representing more than 14,000 investment professionals in the areas of equity and bond research, asset management as well as investment advice.

As representatives of EFFAS, we are pleased to give you our comments to the following point.

3 ESMA is invited to provide technical advice on the following issues:

3.2 Format of the summary of the prospectus and detailed content and specific form of the key information to be included in the summary (Article 5(5))

We suggest that ESMA develop the same content format in Europe for the base prospectus, for the summary prospectus, for detailed content and for the specific form of the key information to be included in the summary.

We suggest that ESMA recommend adoption of the use of the XBRL format for this purpose and recommend the development of an entire XBRL taxonomy for a whole prospectus and its related information.

The adoption of the common content of the prospectus as well as the development of a unique taxonomy will allow prospectuses to be read and understood everywhere and in

the same manner across Europe. Furthermore that will cope with the demands of the transparency directive in Europe.

We are of the opinion that the absence of a common reporting format (of having prospectuses in one of these), and the absence of the use of a language such as XBRL and thus the absence of common tools, is a barrier to transparency in Europe and generates huge additional costs all along the supply chain of business information as well leading to monopoly situations regarding the exploitation and use of financial data and information.

The XBRL language is perfectly adapted for the purpose of a common approach and already some relevant experiments have been made in Europe using the XBRL language: such as a taxonomy for a part of the prospectus in France, which has been developed by XBRL France to be experimented with by stakeholders. XBRL France will be delighted to put the results of these experiments at the disposal of ESMA.

3.3 Proportionate disclosure regime (Article 7)

We underline that the XBRL Format is also adapted to this regime as well and a prospectus XBRL taxonomy would be able to embed this regime.

About XBRL

Contact: www.xbrl.org

XBRL, eXtensible Business Reporting Language, is an open standard for the electronic communication of business and financial data which is revolutionising business reporting around the world. XBRL is being developed by an international non-profit consortium of approximately 600 major companies, organisations and government agencies. Based on XML and internet interoperability, it provides major benefits in the preparation, analysis and communication of business information. It offers cost savings, greater efficiency and improved accuracy and reliability to all those involved in supplying or using financial data. The idea behind XBRL is simple. Instead of treating financial information as a block of text - as in a standard internet page or a printed document - it provides an identifying tag for each individual item of data. This is computer readable. For example, company net profit has its own unique tag. It is already being put to practical use in a number of countries and implementations of XBRL are growing rapidly around the world.

The European Commission (DG Internal Market) is an observer and a regular attendee of XBRL Europe events and Working Groups.

Yours sincerely,



Giampaolo Trasi
EFFAS Chairman



Chris Golden
Chair Market Structure Commission