

Sustainability Accounting Standards Board (SASB) Taxonomy

Feedback on SASB Taxonomy Published on April 05, 2021

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1. Basic Information to SASB Taxonomy

SASB taxonomy is designed for companies to report their environmental, social, and corporate governance (ESG) metrics information that follows SASB Standards in a structured, machine-readable data format (i.e., XBRL).

- a) SASB taxonomy consists of the following entry points:
 - <https://www.sasb.org/xbrl/taxonomy/cor/sasb-entryPoint-all.xsd> - entry point including the SASB Taxonomy, the General Information taxonomy, and concepts to report recommended Task Force on Climate-related Financial Disclosures (TCFD) information.
 - <https://www.sasb.org/xbrl/taxonomy/cor/sasb.xsd> - entry point to the SASB Taxonomy, which represents the SASB accounting and activity metrics for 77 industries
 - <https://www.sasb.org/xbrl/taxonomy/cor/sasb-dei.xsd> - entry point to the General Information related concepts for companies to report general information about their report (e.g. company name, country, etc.)
 - <https://www.sasb.org/xbrl/taxonomy/cor/tcf.d.xsd> - entry to the concepts to report recommended Task Force on Climate-related Financial Disclosures (TCFD) information.
- b) Entry point defined in the taxonomy package:
 - <http://www.sasb.org/xbrl/taxonomy/cor/sasb.xsd>
- c) The taxonomy contains of presentation linkbase, definition linkbase and label linkbase.
- d) Formula linkbase contains 5 *Value Assertion rules imported from LEI taxonomy*.

2. Technical feedback on SASB Taxonomy

- a) Taxonomy package must define all the entry points from the taxonomy which will be used for creating instance documents.

Observation: Entrypoint - <https://www.sasb.org/xbrl/taxonomy/cor/tcf.d.xsd> is neither included in taxonomy package nor it is imported in sasb.xsd.
- b) Sort Code not used in the definition of the ELRs which is useful when displaying the statements during creation and rendering for instance document
Observation: <link:definition>Services - Advertising & Marketing (SV-AD)</link:definition>
- c) Separate Role file could be created. Currently all the ELR's are defined in the core file itself i.e. sasb.xsd. A separate xml schema file for role (ELRs) greatly helps in on-going maintenance of ELR for changes and version management
- d) Generic label linkbase file could also be created. It will enable taxonomy to define ELR's in multiple languages to be used in other geographical regions.
- e) Some element's periodType in Taxonomy could be made "instant" instead of "duration". The fact values in nature of percentage, volume, energy, mass is always calculated based on as on data values, hence the period type of such elements could be made "Instant. Few examples given below:

Element ID	dataType	periodType
sasb_AccountHoldersWhoseInformationIsUsedForSecondaryPurposesPercentageOptedIn	dtr-types:percentItemType	duration
sasb_GraduationRate	dtr-types:percentItemType	duration
sasb_PortfolioPercentageThatHasAnEnergyRating	dtr-types:percentItemType	duration
sasb_RefiningThroughput	dtr-types:volumeltemType	duration
sasb_OilReservesProbable	dtr-types:volumeltemType	duration
sasb_OilReservesProved	dtr-types:volumeltemType	duration
sasb_LandfillGasQuantity	dtr-types:energyItemtype	duration
sasb_CruiseShipCapacityAvailableLowerBerthDistance	dtr-types:lengthItemtype	duration
sasb_CoalReservesProbable	dtr-types:massItemtype	duration
sasb_GreenhouseGasFootprintAcrossTransportModes	dtr-types:massItemtype	duration
sasb_GreenhouseGasFootprintOfProductShipments	dtr-types:massItemtype	duration

3. Technical feedback on sample SASB iXBRL documents

Sample instance provided within “Sample-iXBRL-Instance-Document.zip” contain validation errors as shown by IRIS Bushchat (XII Certified) and Arelle are given below:

- a) “sasb-reference.xml” File could not be located for loading
- b) Element missing from core schema
 - Invalid content was found on element “sasb:LossesAsAResultOfLegalProceedings”
 - Element “sasb:LossesAsAResultOfLegalProceedings” used in the instance is not found in the core “sasb.xsd” file
- c) Primary Item Dimensionally Invalid Error for context
“i5c09790c71b94a78b7ac203a86e8037a_D20200101-20201231”
- d) Within the iXBRL document, some elements tagged from “sasb-dei.xsd” have different element ids compared to the ones used for reporting. Example, Elements id used is "sasb-dei:NameOfReportingEntityOrOtherMeansOfIdentification" but the actual element ID created in “sasb-dei.xsd” is "sasb-dei-cor_NameOfReportingEntityOrOtherMeansOfIdentification"
- e) SASB Taxonomy files resolved via @href attribute in iXBRL documents has XBRL 2.1 specification error – ‘4.3.4 [RoleAttributeOnLinkbaseRef]’: Value of role attribute '<http://www.xbrl.org/2003/role/labelLinkbaseRef>' provided for linkbaseRef element points to definitionLink' which is not in accordance with the linkbase that the href attributes for 'sasb-dei-label.xml'.

```

1 <?xml version="1.0" encoding="UTF-8"?>
2 <!-- Generated by Fujitsu Interstage XWand B0228 -->
3 <xsd:schema targetNamespace="http://www.sasb.org/xbrl/taxonomy/dei" elementFormDefault="qualified" xmlns:xsd="http://www.w3.org/2001/XMLSchema" xmlns:sasb-dei="http://www.sasb.org/xbrl/taxonomy/dei" xmlns:srt-com="http://fasb.org/stm/srt-com/2020-01-31" xmlns:country-std="http://xbrl.sec.gov/country-std/2020-01-31" xmlns:generic="http://xbrl.org/2008/generic" xmlns:lei-fn="http://www.xbrl.org/taxonomy/int/lei/2020-07-02/functions" xmlns:ref="http://www.xbrl.org/2006/ref" xmlns:srt-type="http://fasb.org/srt-types/2020-01-31" xmlns:xbrldt="http://xbrl.org/2005/xbrldt" xmlns:nonnum="http://www.xbrl.org/dtr/type/non-numeric" xmlns:variable="http://xbrl.org/2008/variable" xmlns:xfi="http://www.xbrl.org/2008/function/instance" xmlns:xl="http://www.xbrl.org/2003/Link" xmlns:srt-std="http://fasb.org/srt-std/2020-01-31" xmlns:lei="http://www.xbrl.org/taxonomy/int/lei/2020-07-02" xmlns:cf="http://xbrl.org/2008/filter/concept" xmlns:srt-roles="http://fasb.org/srt-roles/2020-01-31" xmlns:val="http://xbrl.org/2010/message/validation" xmlns:link="http://www.xbrl.org/2003/linkbase" xmlns:srt="http://fasb.org/srt/2020-01-31" xmlns:enum2="http://xbrl.org/2020/extensible-enumerations-2.0" xmlns:currency="http://xbrl.sec.gov/currency/2020-01-31" xmlns:num="http://www.xbrl.org/dtr/type/numeric" xmlns:xlink="http://www.w3.org/1999/xlink" xmlns:msg="http://xbrl.org/2010/message" xmlns:va="http://xbrl.org/2008/assertion/value" xmlns:country="http://xbrl.sec.gov/country/2020-01-31" xmlns:ofi="http://xbrl.org/2010/custom-function" xmlns:label="http://xbrl.org/2008/label" xmlns:sasb-type="http://www.sasb.org/xbrl/taxonomy/types" xmlns:xsi="http://www.w3.org/2001/XMLSchema-instance" xmlns:xbrli="http://www.xbrl.org/2003/instance" xmlns:ref="http://xbrl.org/2008/filter/entity">
4 <xsd:annotation>
5 <xsd:appinfo>
6 <link:linkbaseRef xlink:type="simple" xlink:href="sasb-dei-presentation.xml" xlink:role="http://www.xbrl.org/2003/role/presentationlinkbaseRef" xlink:arcrole="http://www.w3.org/1999/xlink/properties/linkbase"/>
7 <link:linkbaseRef xlink:type="simple" xlink:href="sasb-dei-definition.xml" xlink:role="http://www.xbrl.org/2003/role/definitionlinkbaseRef" xlink:arcrole="http://www.w3.org/1999/xlink/properties/linkbase"/>
8 <link:linkbaseRef xlink:type="simple" xlink:href="sasb-dei-label.xml" xlink:role="http://www.xbrl.org/2003/role/labellinkbaseRef" xlink:arcrole="http://www.w3.org/1999/xlink/properties/linkbase"/>
9 <link:roleType roleURI="http://www.sasb.org/xbrl/taxonomy/dei" id="eir_GeneralInformation">
10 <link:definition>100000 - General Information</link:definition>
11 <link:usedOn>link:presentationLink</link:usedOn>
12 <link:usedOn>link:definitionLink</link:usedOn>
13 </link:roleType>
14 </xsd:appinfo>
15 </xsd:annotation>

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1 <?xml version="1.0" encoding="UTF-8"?>
2 <!-- Generated by Fujitsu Interstage XWand B0228 -->
3 <link:linkbase xmlns:xsi="http://www.w3.org/2001/XMLSchema-instance" xsi:schemaLocation="http://www.xbrl.org/2003/linkbase http://www.xbrl.org/2003/xbrl-linkbase-2003-12-31.xsd" xmlns:sasb-dei="http://www.sasb.org/xbrl/taxonomy/dei" xmlns:link="http://www.xbrl.org/2003/linkbase" xmlns:xlink="http://www.w3.org/1999/xlink" xmlns:xbrli="http://www.xbrl.org/2003/instance" xmlns:xbrldt="http://xbrl.org/2005/xbrldt">
4 <link:roleRef roleURI="http://www.sasb.org/xbrl/taxonomy/dei" xlink:type="simple" xlink:href="sasb-dei.xsd#eir_GeneralInformation"/>
5 <link:arcroleRef arcroleURI="http://xbrl.org/int/dim/arcrole/all" xlink:type="simple" xlink:href="http://www.xbrl.org/2005/xbrldt-2005.xsd#all"/>
6 <link:arcroleRef arcroleURI="http://xbrl.org/int/dim/arcrole/dimension-domain" xlink:type="simple" xlink:href="http://www.xbrl.org/2005/xbrldt-2005.xsd#dimension-domain"/>
7 <link:arcroleRef arcroleURI="http://xbrl.org/int/dim/arcrole/domain-member" xlink:type="simple" xlink:href="http://www.xbrl.org/2005/xbrldt-2005.xsd#domain-member"/>
8 <link:arcroleRef arcroleURI="http://xbrl.org/int/dim/arcrole/hypercube-dimension" xlink:type="simple" xlink:href="http://www.xbrl.org/2005/xbrldt-2005.xsd#hypercube-dimension"/>
9 <link:definitionLink xlink:type="extended" xlink:role="http://www.sasb.org/xbrl/taxonomy/dei">
10 <link:loc xlink:type="locator" xlink:href="sasb-dei.xsd#sasb-dei_GeneralInformationLineItems" xlink:label="DocumentAndEntityInformationLineItems" xlink:title="DocumentAndEntityInformationLineItems"/>
11 <link:loc xlink:type="locator" xlink:href="sasb-dei.xsd#sasb-dei_cor_NameOfReportingEntityOrOtherMeansOfIdentification" xlink:label="NameOfReportingEntityOrOtherMeansOfIdentification" xlink:title="NameOfReportingEntityOrOtherMeansOfIdentification"/>
12 <link:definitionArc xlink:type="arc" xlink:arcrole="http://xbrl.org/int/dim/arcrole/domain-member" xlink:from="DocumentAndEntityInformationLineItems" xlink:to="NameOfReportingEntityOrOtherMeansOfIdentification" xlink:title="definition: DocumentAndEntityInformationLineItems to NameOfReportingEntityOrOtherMeansOfIdentification" order="2.0"/>

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4. Feedback on Data modeling of SASB Taxonomy

- a) All sectors are merged into 1 entry point i.e., sasb.xsd; separate entry point could be created for each ELRs or group of ELRs. This will enable organizations to import only the applicable entry points into the base taxonomy instead of importing the whole SASB taxonomy. Example: 1) Financials - Insurance (FN-IN), 2) Extractives & Minerals Processing - Coal Operations (EM-CO) can be created as 2 separate entry points and they can be used by Insurance sector and Mining sector respectively.
- b) Following Hypercubes in definition linkbase can be merged into one hypercube since the axis and members are same, their fact value can be differentiated with separate line item already created. Examples;
 - sasb_PMLOfInsuredProductsFromWeatherRelatedNaturalCatastrophesGrossTable & sasb_PMLOfInsuredProductsFromWeatherRelatedNaturalCatastrophesNetTable
 - sasb_LossesAttributableToInsurancePayoutsGrossTable & sasb_LossesAttributableToInsurancePayoutsNetTable
 - sasb_EmployeeTurnoverRateInvoluntaryTable & sasb_EmployeeTurnoverRateVoluntaryTable

5. Feedback on SASB Questions

- a) Do you foresee any issues with the taxonomy being used globally across jurisdictions?
Comment: SASB Taxonomy can be used across jurisdictions as well. SASB may create separate entry points for separate sectors/regions to make the adoption easier. Also, multiple lingual capabilities can be added in SASB Taxonomy by using Generic linkbase and Label linkbase.
- b) Do you have any recommendations to enable wider adoption of XBRL based SASB reporting?
Comment: There are various events/conferences/webinars being held world-over where it is recommended by business reporting community to include ESG reporting as part of accounting standards (e.g., IFRS, US-GAAP, etc.). This basically means in recent future ESG will be part of such Financial Reporting XBRL Taxonomies published by respective accounting agencies. It would greatly help if SASB Taxonomy elements are structured and their relationships are created similar to their accounting terminologies/heads as per market practice.
- c) Do you agree with the recommendation of anchoring that we have proposed for taxonomy extension?
Comment: Yes. Extension provides users flexibility to provide additional data and anchoring requires such extension to be anchored to a narrower or broader element in the taxonomy. This will make representation of extended concepts easy.
- d) Should SASB taxonomy use elements from GAAP/IFRS taxonomies where applicable?
Comment: Yes. If the taxonomy is plugged into base taxonomy for financial accounting standards like IFRS and US GAAP then it can create duplicity of concepts. To avoid such circumstances, we suggest using elements from GAAP/IFRS taxonomies.
- e) Should SASB taxonomy use typed dimensions?
Comment: No. As the members defined will differ from instance to instance, they can't be used for comparison without an analysis first to see if they are the same. Hence, we suggest avoiding typed dimensions.
- f) Has the taxonomy adequately addressed tagging of TCFD disclosures?
Comment: Certainly, there is scope for improvement in SASB Taxonomy with regards to TCFD disclosures, wherein a more granular level elements (booleanType, monetaryType, dateType, etc.) can be created for faster extraction of information on ESG data from an instance document.
For example; 1) On Governance, detailed level tags can be added for – Number of board meeting where ESG related topics were discussed, - Resolutions passed in Board meeting related to ESG, 2) On Risk Management, detailed level tags can be added for – Type of climate-related risks identified impacting the business, - Financial impact of climate-related risks on operational activities, - Steps taken to mitigate climate-related risks, etc.