EMJ.LIFE | PRE-DISCLOSURE EVIDENCE INFRASTRUCTURE

RESPONSE TO EFRAG

REVISED ESRS DRAFT XBRL TAXONOMY

September 2026 consultation
Targeted technical implementation observations



SUPPORT WITH TARGETED TECHNICAL RECOMMENDATIONS

Prepared by EMJ LIFE HOLDINGS PTE. LTD.

Singapore | 20 October 2026

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EMJ.RESP.EFRAG-XBRL.2026

Response Overview

Field	Information
Consultation	Revised ESRS Draft XBRL Taxonomy, September 2026
Recipient	European Financial Reporting Advisory Group (EFRAG)
Reference	Draft package published 17 September 2026; technical explanatory note of the same date
Respondent	EMJ LIFE HOLDINGS PTE. LTD., Singapore
Overall position	Support with targeted technical recommendations
Record dates	Prepared 19 October 2026; submitted 20 October 2026; publication copy 20 October 2026
Comment deadline	11 November 2026
Document control	EMJ.RESP.EFRAG-XBRL.2026 | v1.1 | Controlled Public Response
Participation	Submitted; online completion screen supplied by respondent. Acceptance or adoption is not inferred.

Executive Summary

CORE CONCLUSION **Digital disclosure states should express only the meaning supported by their source requirements and remain distinguishable through validation and reuse.**

We support retaining Level 1 narrative elements in the taxonomy, with clear treatment of overlap and without prejudging mandatory tagging rules. We request clarification of the materiality member label, implemented conditionality metadata and the interpretation of absence. The observations identify specific files and paragraph references, with proposed acceptance tests.

We also recommend distinguishing technical checks from completeness and compliance assessments, and identifying package corrections independently of a stable taxonomy namespace. These changes can improve consistent interpretation without adding substantive ESRS disclosure obligations.

Summary of Positions

Survey items	Topic	Position and requested action
Q7 and Q8	Materiality and absence	Agree in general; clarify the label and permissible interpretations of reported states and absence.
Q7 and Q8	Conditionality	Reconcile documentation and metadata; normalise lexical values and explain alternatives.
Q9 and Q10	Level 1 narratives	Retain alongside entity-specific elements with comments on overlap, source order and navigation.
Q11 and Q12	Additional validation rules	Introduce after the first wave, with explicit scope, applicability and limitations.
Q12	Package corrections	Retain revision identity, digests and changes independently of namespace dates.

1 Institutional Profile and Scope of Response

EMJ LIFE HOLDINGS PTE. LTD., operating as EMJ.LIFE, is a Singapore-based Institutional Evidence Systems Integrator developing Pre-Disclosure Evidence Infrastructure. Our contribution concerns the preservation of disclosure meaning from source records into tagged reporting and later machine analysis.

Methodology and Scope of Review

We inspected the September package, the Technical Explanatory Note and ESRS 2 paragraph 37(g) in EFRAG's Knowledge Hub. Two downloads on 19 October 2026 produced matching digests. This was static XML and documentation inspection, not full discoverable taxonomy set validation, processor interoperability testing or a preparer field test. Source review cut-off: 19 October 2026.

The expanded questionnaire and a completion screen supplied by the respondent were reviewed on 20 October 2026. In the expanded form, Q7 is the overall assessment, Q8 is its suggestions field, Q9 concerns Level-1 narrative elements, Q10 is its comments field, Q11 concerns the timing of additional validation rules, and Q12 invites other comments. Appendix D records this numbering and the field text supplied for the completed survey session. The technical source review cut-off remains 19 October 2026.

2 Detailed Technical Responses

2.1 Questions 7 and 8 Overall assessment and suggestions

Response: Agree in general, with improvements and corrections. This corresponds to the second displayed option in Question 7. Our support concerns the design direction within the stated review scope; it is not an attestation that every concept or relationship correctly implements ESRS.

The observations below explain our qualifications to the overall assessment in Question 7 and support the suggestions field in Question 8. Appendix D records the field text supplied for the completed survey session. Sources: online questionnaire and respondent-provided expanded-form screenshots [5, 6].

2.1.1 Materiality and applicability

POSITION **Clarification and label change requested**

Package: esrs.xsd, esrs-definition.xml role 101150, label-en.xml and esrs-reference.xml. Standard: ESRS 2 paragraph 37(g). Explanatory Note: paragraphs 21 and 38.

Observed issue. In esrs.xsd the member esrs_NotMaterialNotApplicableMember is used in definition role 101150 through the MaterialityOrNaMember hierarchy. Its standard English label in label-en.xml is “Not material (not applicable) [member]”. The reference linkbase points to ESRS 2, Appendix A, paragraph 37(g). The referenced requirement asks the undertaking to identify the location of EU-legislation datapoints or indicate that they have been assessed as not material [1, 2].

The member name and parenthetical label could cause a consuming application to treat a materiality judgement and a conclusion that a disclosure does not apply as interchangeable. That consequence is a semantic risk, not an observed processor failure. The difference matters to evidence reuse: a user reviewing management's materiality assessment needs a different explanation from one checking whether a conditional disclosure applies.

Requested change. Align the English label with the state expressed by paragraph 37(g), preferably by removing the parenthetical reference to applicability, and document the permitted meaning of the member. If EFRAG intends to use it for a combined state, explain the standard-based rationale, identify the conditions under which it may be used and demonstrate how the two reasons remain distinguishable where required. A change to the established QName is not necessary merely to improve the label; any QName change would require migration guidance.

This request does not propose an additional materiality test or require a new fact for every omission. It asks that the digital representation communicate no broader conclusion than the underlying requirement supports.

Distinguish values and absence

Paragraph 38 of the explanatory note already distinguishes a nil fact from an explicit materiality indication. Paragraph 21 separately describes a nil typed-dimension value as a workaround for an optional breakdown [3]. The guidance should connect these points in one worked example. A nil dimension value concerns a dimension in the context; a nil fact concerns the reported value. An omitted fact supplies neither conclusion by itself.

We recommend an example showing an actual reported zero, a nil fact value, an omitted fact, an explicit materiality member and the optional typed-dimension workaround. State the permissible interpretation of each, and show that a non-nil metric can coexist with the nil dimension workaround where the model permits it. Do not turn every missing fact into a materiality decision or a completeness error.

Acceptance test. A consuming tool should recover the explicit reported state and its applicable context without inferring a reason for absence that the company has not reported. These examples should use the final supported hypercubes, particularly if the planned additional hypercubes remove the current workaround.

2.1.2 Conditionality metadata

POSITION **Implementation clarification requested**

Package: esrs-reference.xml. Explanatory Note: paragraphs 34 and 37.

Observed issue. Paragraphs 34 and 37 of the explanatory note describe conditionality and alternative-presentation references as not yet implemented, or not yet implemented for every associated concept. The retrieved esrs-reference.xml already contains 225 occurrences of ConditionalityOrAlternativePresentation. They resolve through reference arcs to 163 distinct schema concept fragments and contain 130 distinct DatapointId values. These are different counting units; none is a completeness measure for ESRS [1, 3].

Exact lexical value	Count	Interpretation of this count
Conditional	159	Reference-part occurrences, including repeated legislative references.
Alternative presentation	44	Reference-part occurrences, not 44 independent alternative choices.
Conditional followed by one space	22	Lexical variant of the first category requiring an explicit normalisation rule.

For example, datapoint ESRS26_GDR-A_06 points to esrs_AbilityToImplementAKeyActionDependsOnSpecificPreconditions and carries Conditional. Datapoint ESRS26_E1-6_01 appears for both esrs_AbsoluteValueOfAScope1GhgEmissionReductionTarget and esrs_ShareOfTargetRelatedToScope1GhgEmissionsInCaseOfCombinedGhgEmissionReductionTargets and carries Alternative presentation. Multiple legislative references contribute

additional occurrences for some concepts. Datapoint ESRS26_S1-2_02 supplies one example of the trailing-space variant.

Requested change. State which annotations are implemented, whether coverage is complete, what a missing annotation means and whether consumers should trim or otherwise normalise the values. Release a machine-readable vocabulary or documented lexical set, and normalise the 22 trailing-space occurrences. We have not shown that these values cause an XBRL validation error; the identified risk is divergent downstream filtering if tools compare the raw strings differently.

For alternative presentations, document the permitted relationship and identifying mechanism for the relevant concepts. A common datapoint identifier may help locate candidates but does not by itself explain whether alternatives are exclusive, conditional, complementary or capable of coexisting in different contexts. The absence of one concept must not automatically trigger an error when another permitted presentation satisfies the requirement.

Suggested policy wording

> *Conditionality annotations describe conditions attached to a referenced disclosure; they do not assert that the condition applies to a reporting undertaking. Absence of an annotation does not establish unconditional applicability. Alternative-presentation metadata should be interpreted with its reference and context, rather than as a requirement to report every associated concept.*

Acceptance test. Publish a positive and negative example for the GDR-A condition and for an E1-6 alternative. Identify the expected result and the underlying standard reference. The same package should produce the same annotation categories in consumers that implement the documented lexical rules. This can be achieved through reference metadata and examples without adding reporting obligations.

2.2 Questions 9 and 10 Level 1 narrative elements

POSITION **Support with comments, corresponding to the second option in Question 9. The supporting comments belong to Question 10 [5, 6].**

Explanatory Note: paragraphs 55 to 64, particularly Level 1 narrative modelling and incorporation by reference.

Position. Retain Level 1 narrative concepts in the taxonomy. They can preserve explanations and entity-specific information that would otherwise be missed by a consumer selecting only granular concepts. Taxonomy availability should remain separate from ESMA and Commission decisions about mandatory tagging and any phased approach.

Paragraphs 59 to 64 of the explanatory note recognise both contextual usefulness and overlapping tagging [3]. Our recommendation concerns how a user recovers an intelligible disclosure. A complete section and one of its paragraphs may legitimately be represented by

distinct facts. Treating both retrieved texts as independent supporting statements would exaggerate evidentiary coverage, even when the Inline XBRL is valid.

Requested guidance. Supply a paired human-readable and tagged example containing a Level 1 block, granular facts, an entity-specific addition and a continuation in another location. Explain how an application can recover source order and recognise shared source content, while retaining the separate fact identities. Such an example should not prescribe identical deduplication for every analytical task: a content index and a count of independent source passages answer different questions.

Include the single-textblock case already described in paragraph 63, so the example demonstrates where an additional overarching concept is unnecessary. Also include an incorporated disclosure in a multi-document report package. A link to a separate untagged PDF should not be depicted as equivalent to a tagged disclosure in that package.

Acceptance test. A reader should navigate to the complete disclosure, see its qualifications in order and recover the relevant granular facts. An analytical application counting source passages should identify overlap instead of presenting the same passage as corroboration from two independent sources. Report the additional tagging and review effort so that retention of the concepts does not become an untested argument for universal additional mandatory tagging.

2.3 Question 11 Timing of additional validation rules

POSITION **Support implementation after the first wave of digital reports, corresponding to the first option in Question 11. Supporting observations are recorded in Question 12 [5, 6].**

Explanatory Note: paragraphs 36 to 38. Consultation scope: paragraph 6.

We agree that additional XBRL validation rules should be developed after the first wave of digital ESRS reports, using observed quality issues to prioritise them. This concerns additional rules and does not propose removing the existing EU-datapoint existence assertion described in the explanatory note. Before introducing each additional rule, publish its identifier, authoritative reference, applicability, severity and example outcomes. Where a rule depends on an undertaking judgement unavailable to the processor, identify that limitation rather than assert a definitive failure.

A technically successful validation should not be labelled a conclusion that all applicable disclosures have been reported. A numeric consistency check, an explicit existence check and an assessment of legal or materiality compliance involve different evidence. Validation guidance should make that difference visible in the output. This can be explained in tool guidance and example reports without inventing a new ESRS disclosure status.

2.4 Question 12 Other comments and package identity

POSITION **Release control recommended**

EFRAG consultation project page and the September 2026 package, including the reference-file replacement noted on 18 September.

The project page identifies publication on 17 September 2026 and replacement of esrs-reference.xml on 18 September to address product compatibility. The schema entry point uses the date 2026-08-30. These dates serve different purposes [4]. A consumer recording only the namespace could therefore fail to identify which downloaded reference file was used.

We recommend a package revision identifier, a retained change log and file or package digests for corrected releases. Keep prior downloadable releases where practicable, and state whether a correction affects references, labels, relationships or fact interpretation. A patch need not force a new namespace when concept semantics have not changed, but the released artefact should remain distinguishable. Re-running an analysis should identify the package actually used.

Prioritise the materiality label and documentation of implemented conditionality before finalisation. Pair those changes with small, reusable worked examples for absence, alternatives and narrative overlap. More ambitious completeness rules can follow evidence from real reports. The effort should concentrate on preventing unsupported interpretations at extraction and reuse, rather than expanding the taxonomy to replicate information already supplied by contexts, units or existing records.

3 Consolidated Recommendations

1. Align the label with the referenced state and define any intended use for non-applicability.

2. Publish coverage and lexical rules; normalise trailing spaces and explain alternatives.

3. Demonstrate overlap, continuations and entity-specific information without double counting evidence.

4. State rule scope, applicability, severity and limits; avoid an overall compliance conclusion.

5. Identify corrected packages independently of an unchanged namespace and retain change history.

4 Closing Remarks

Our main concern is the interpretation of states and relationships when reported information is reused. A label, a nil value, an overlapping narrative and a successful technical check each support a particular conclusion. Clarifying those conclusions at source would help preparers and users preserve context without expanding the underlying reporting requirements.

Anderson Yu
Founder and Chief Executive Officer
For EMJ LIFE HOLDINGS PTE. LTD.
anderson@emj.life

Appendix A Response Matrix

Survey and section	Position	Rationale	Requested action
Q7 Q8 / 2.1.1	Support with clarification	Materiality and non-applicability can convey different conclusions.	Clarify the label and worked examples without adding a reporting requirement.
Q7 Q8 / 2.1.2	Support with corrections	Reference metadata and its documentation need a consistent interpretation.	Document coverage, missing annotations, lexical rules and alternatives.
Q9 Q10 / 2.2	Support with comments	Whole-section and granular facts can refer to the same source passage.	Retain Level-1 and entity-specific elements with extraction examples.
Q11 Q12 / 2.3	Agree to later introduction	Real reports provide evidence for prioritising additional rules.	Use first-wave findings and define scope, applicability, severity and limits.
Q12 / 2.4	Additional comments	A stable namespace can accompany a corrected downloadable package.	Use package revisions, change logs and digests; field text is in Appendix D.

Appendix B Publication and Submission Boundary

This independent response is prepared by EMJ LIFE HOLDINGS PTE. LTD. It is not issued or endorsed by EFRAG, ESMA or the European Commission. We do not determine ESRS compliance, materiality or assurance conclusions. Taxonomy advice and regulatory tagging obligations remain distinct.

Participation status: Submitted. The respondent supplied a completion screen showing the EFRAG survey title and its Thank You message for the session completed on 20 October 2026. This supports recording completion of the online submission. No unique response identifier, exact completion time or platform-generated response export was supplied. Acceptance, adoption, endorsement and external validation are not inferred [6].

The online form was the submission channel. This PDF is the EMJ.LIFE publication copy prepared for public archiving after that session. Sections 2 and 3 provide the expanded technical analysis; Appendix D records the field text supplied for the session. The completion screen does not independently verify the wording of every submitted field or establish that this PDF was uploaded to EFRAG.

Version record: v1.0 was prepared on 19 October 2026 for submission. This v1.1 publication copy, dated 20 October 2026, corrects the expanded questionnaire numbering, separates the three text fields, records the completion evidence and removes filling instructions. The underlying technical recommendations are retained.

Appendix C Technical Review Record

Reviewed package: Revised-ESRS-Draft-XBRL-Taxonomy-September-2026.zip, retrieved 19 October 2026. SHA-256:

c449106902e36ff9b72471c93ce1580b7be5430ffb3f31258de430e73d725d2b

Reference-part values were counted by exact text and resolved through concept-reference arcs and locators. The 225 occurrences, 163 distinct concept fragments and 130 distinct DatapointId values are different counting units. None establishes ESRS completeness. Examples and acceptance tests are proposed; no instance or processor pass result is asserted.

Appendix D Online Questionnaire Record

The expanded form displays the following questions after the comment options are selected. Question numbers are specific to that displayed path; the topic and field label should also be used to identify each response. The selections below match the supplied screenshots. The three text fields reproduce the wording supplied for the completed session [6].

Item	Question or field	Recorded position or text
Q7	Overall assessment	Second option: agreement in general with improvements or corrections.
Q8	Suggestions following Q7	Field text reproduced below; see Section 2.1.
Q9	Level-1 narrative elements	Second option: support with comments alongside the entity-specific element.
Q10	Comments following Q9	Field text reproduced below; see Section 2.2.
Q11	Timing of validation rules	First option: introduce additional rules after first-wave digital reports.
Q12	Other comments	Field text reproduced below; see Sections 2.3 and 2.4.

D1 Question 8 Suggestions

EMJ LIFE HOLDINGS PTE. LTD. supports the draft in general, within the scope of a targeted static XML and documentation review. We have not performed full DTS validation, processor testing or a preparer field test. We request the following improvements.

1. Clarify materiality and applicability. The member esrs_NotMaterialNotApplicableMember has the English label "Not material (not applicable) [member]" and a reference to ESRS 2 paragraph 37(g). Please align the label with the referenced requirement, preferably by removing the parenthetical reference to applicability, or explain the standard-based rationale for a combined state and how the reasons remain distinguishable where required. A label clarification need not require a QName change. This is a semantic interpretation risk, not an observed processor failure.

2. Reconcile conditionality documentation with the released metadata. Our 19 October 2026 inspection of esrs-reference.xml found 225 ConditionalityOrAlternativePresentation occurrences, resolving to 163 distinct concept fragments and 130 distinct DatapointId values. Exact values comprise 159 "Conditional", 44 "Alternative presentation" and 22 "Conditional" with a trailing space. These are different counting units and do not establish ESRS completeness or an XBRL validation failure.

Please document implemented coverage, the meaning of a missing annotation and the permitted lexical values, and normalise the trailing spaces. Explain how alternative presentations are related and when they may coexist. A shared datapoint identifier alone does not establish that concepts are exclusive alternatives. Conditionality metadata does not determine whether a condition applies to a particular undertaking, and absence of an annotation does not establish unconditional applicability.

3. Provide a worked example distinguishing a reported zero, a nil fact, an omitted fact, an explicit materiality indication and the optional nil typed-dimension workaround. A nil dimension concerns a context dimension; a nil fact concerns the value. Missing information alone does not establish a reason for absence. Explain the permissible interpretation of each using the final supported hypercubes.

These changes should clarify digital representation without introducing substantive ESRS disclosure obligations.

D2 Question 10 Level 1 comments

We support retaining Level-1 narrative elements alongside the entity-specific element. They can help users navigate complete disclosures and recover qualifications and contextual information that may be missed when only granular facts are retrieved.

Please provide paired human-readable and tagged examples containing a Level-1 block, granular narrative facts, entity-specific additions and a continuation in another location.

Demonstrate source order, navigation and shared source content while preserving distinct fact identities.

A Level-1 block and a granular fact may legitimately represent the same source passage. This does not necessarily make the XBRL invalid, but analytical tools counting independent supporting passages should recognise the overlap. Two tags referring to one passage do not provide two independent sources of support.

Also illustrate the single-textblock case described in paragraph 63 of the Technical Explanatory Note, including when an additional overarching concept is unnecessary. Include incorporation by reference within a multi-document report package, distinguishing a tagged disclosure in that package from a link to a separate untagged PDF.

Retention in the taxonomy should remain separate from ESMA and European Commission decisions about mandatory tagging and phasing. Evaluate the additional preparation and review effort before requiring overlapping tagging. Our support for retaining the concepts is not a request to mandate every available tag.

D3 Question 12 Other comments

We support introducing additional XBRL validation rules after the first wave of digital ESRS reports, using observed data quality issues to prioritise them. This concerns additional rules, not removal of the existing EU-datapoint existence assertion described in the Technical Explanatory Note.

For each additional rule, publish its identifier, authoritative reference, applicability conditions, severity and worked outcomes. Where a rule depends on an undertaking judgement unavailable to the processor, identify that limitation. A technical pass should not imply overall ESRS completeness or compliance.

We also recommend identifying corrected taxonomy packages through a package revision identifier, retained change log and file or package digests, even where the namespace remains unchanged. The project page records publication on 17 September 2026 and replacement of esrs-reference.xml on 18 September, while the schema entry point uses the date 2026-08-30. The namespace date alone does not identify which corrected package was used.

Retain prior releases where practicable and explain whether a correction affects labels, references, relationships or fact interpretation. A patch need not force a new namespace when concept semantics have not changed, but the released artefact should remain distinguishable.

Prioritise label clarity, documented conditionality and reusable examples before broader completeness rules. These recommendations concern consistent technical interpretation and evidence reuse; they add no substantive ESRS disclosure obligations.

Source Documents

[1] EFRAG, September 2026 draft taxonomy package. esrs.xsd, esrs-definition.xml, label-en.xml and esrs-reference.xml. Official source

[2] EFRAG Knowledge Hub, Revised ESRS 2 paragraph 37(g). Official source

[3] EFRAG, Technical Explanatory Note, 17 September 2026. Paragraphs 6, 21, 34 to 38 and 55 to 64. Official source

[4] EFRAG, ESRS XBRL Taxonomy consultation project page. Official source

[5] EFRAG, Revised ESRS Draft XBRL Taxonomy September 2026 Public Consultation Survey. Expanded Questions 7 to 12, reviewed using the respondent-provided screenshots on 20 October 2026. Official source

[6] Respondent-provided screenshots of the expanded questionnaire and the EFRAG survey completion page, 20 October 2026. Supporting records retained by EMJ.LIFE.

Citation convention: explanatory-note paragraph numbers refer to the 17 September 2026 document; standard references identify the version reviewed in EFRAG's Knowledge Hub. Technical source review cut-off: 19 October 2026. Expanded-form numbering and submission evidence review: 20 October 2026. Observations, interpretations, recommendations and submission evidence are distinguished in this publication copy.