

質問	損保協会意見（和文）	損保協会意見（英文）
<p>Question 1–Appropriate reflection of disclosure requirements in IFRS S1 General Requirements for Disclosure of Sustainability-related Financial Information and IFRS S2 Climate-related Disclosures</p>		
<p>Do you agree that the Proposed IFRS Sustainability Disclosure Taxonomy appropriately reflect the disclosure requirements in:</p> <p>(a) IFRS S1 General Requirements for Disclosure of Sustainability-related Financial Information; and</p> <p>(b) IFRS S2 Climate-related Disclosures?</p> <p>Why or why not? If not, please specify what changes you suggest and why.</p>	<p>[Broadly Agree]</p> <p>今回提案されたIFRSサステナビリティ開示タクソノミー案は、公表された文書を見る限り、IFRS S1およびS2の開示要件を反映していると考えます。ただし、S1・S2の開示事項は多く、タクソノミー要素によってすべての開示事項が網羅されているかどうかや、タグ付けによってナラティブ開示情報が漏れなく正確に表現されるかは、実務を通じて検証される必要があると考えます。</p>	<p>[Broadly agree]</p> <p>Based on what the consultation documents describe, we understand that the Proposed IFRS Sustainability Disclosure Taxonomy reflects the disclosure requirements in IFRS S1 and IFRS S2. However, as IFRS S1 and IFRS S2 contain a large number of disclosure items, it is necessary to verify, through actual practice, whether all the relevant items are covered by the taxonomy elements, and whether narrative information is accurately and fully represented by tagging.</p>
<p>Question 2–Usability of the IFRS Sustainability Disclosure Taxonomy</p>		
<p>Do you agree that the Proposed IFRS Sustainability Disclosure Taxonomy will facilitate:</p> <p>(a) users of general purpose financial reports to consume sustainability-related financial information digitally;</p> <p>(b) regulators to require the digital</p>	<p>[Broadly Agree]</p> <p>全般的に合意するが、下記の懸念がある。</p> <p>公表されたIFRSサステナビリティ開示タクソノミー案では、機械で識別可能なタグ付けを行うことが提案され、グローバル・ベース、また、時系列での比較・</p>	<p>[Broadly agree]</p> <p>While we generally agree with the views, we have some concerns as follows:</p> <p>The Proposed IFRS Sustainability Disclosure Taxonomy aims at machine-readable tagging for efficient comparison and analysis on a global basis and in a chronological order. If the</p>

<p>reporting of sustainability-related financial information; and (c) preparers to implement digital reporting of sustainability-related financial information, enabling tagging without undue cost?</p> <p>Why or why not? If not, please specify what changes you suggest and why.</p>	<p>分析を効率的に行うことを目指している。これが実現すれば、利用者の利便性が向上し、(a)一般目的財務報告書の利用者、(b)規制当局の、デジタルでの利用が促進される可能性が高いと考える。一方で、機械的にデータ抽出を行うことが可能になることで、本来の文脈から切り離された、断片的な情報が利用・比較・分析され、不十分な理解や本来の意図と異なる印象を与える懸念がある。</p> <p>また、(c)開示者の観点からは、タグ付け作業に一定ロードがかかることになる。今回の提案では、タグ付けの要素の数を一定レベルに抑えることで負担の軽減を目指しているが、実際に開示作業を行ってみるまでは、過大なコストをかけずに、デジタル報告の実現が可能か明言できず、過度な負担にならないかについて懸念がある。</p>	<p>digital reporting and tagging, described above, are realized, it will improve users' convenience and is highly likely to promote the consumption of sustainability-related financial information in a digital format by (a) users of general purpose financial reports and (b) regulators. On the other hand, there is concern that the ability to extract data digitally/automatically will lead to the use, comparison, and analysis of fragmented information that is disconnected from the original context, resulting in inadequate understanding or an impression that differs from the original intent.</p> <p>From the perspective of (c) preparers, tagging will pose a certain burden. While the proposal aims to reduce such burden by limiting the number of elements for tagging sustainability-related financial information to a certain level, until the taxonomy is put into practice, it is impossible to affirm whether digital reporting can be realized without incurring excessive costs, and there is concern that the burden could become excessive.</p>
<p>Question 3–Other comments on the general features of the Proposed IFRS Sustainability Disclosure Taxonomy</p>		
<p>Do you have any other comments on: (a) the general features of the Proposed IFRS Sustainability Disclosure Taxonomy (paragraphs 1-</p>	<p>(a) 提案された IFRS サステナビリティ開示タクソノミーは、一般目的財務報告書や他のサステナビリティ開示との相互参照を可能にすること、デジタル報告を促進</p>	<p>(a) The Proposed IFRS Sustainability Disclosure Taxonomy will make the comparison on a global basis and chronological analysis easier, and improve users' convenience by enabling</p>

<p>41)?</p> <p>(i) In particular, do you agree with the specific proposed categorical elements and their properties? (See Appendix F—General features of the Proposed IFRS Sustainability Disclosure Taxonomy—List of categorical elements).</p> <p>(ii) Why or why not? If not, please suggest changes to the elements or their properties.</p> <p>(b) specific IFRS Sustainability Disclosure Taxonomy elements or the groups of elements to which they relate (see the Proposed IFRS Sustainability Disclosure Taxonomy files or its visual representation in IFRS Taxonomy Illustrated)?</p>	<p>することなどにより、グローバルでの比較や、時系列の分析などが容易となり、利用者の利便性向上につながると思う。他方、開示情報の準備者の負担となる懸念もある。</p> <p>例えば、インダストリーベースの開示について、SASBタクソノミーと同等の要素をIFRSサステナビリティ開示タクソノミーに反映させているが、従来SASB分類構造に準拠していない法域においてはインダストリーベースの項目に適応した開示を行うことには相応な困難も想定される。SASB分類構造に準拠していない法域におけるインダストリーベースのデジタル開示項目については、ガイダンス等が提供されると開示情報の準備者の負担軽減につながると思われる。</p> <p>(i)(ii) [Broadly Agree] ナラティブ情報のタグ付けに関し、IFRS S1・S2基準の第1サブパラグラフのレベルを基本にしつつ、それ以下のレベルにおいては、真に必要な項目に限定し、カテゴリー要素を設定することは、利用者の利便性の向上を図ると考える。また、開示情報の準備者の負担にも配慮されていると考える。ただし、タグ付けによってナラティブ開示情報が漏れなく正確に表現されるかは、実務を通じて検証される必要があると考える。</p>	<p>cross-referencing between general-purpose financial statements and other sustainability-related financial disclosures. However, from the standpoint of preparers, there is concern over the additional burden.</p> <p>For example, while the Proposed IFRS Sustainability Disclosure Taxonomy reflects the equivalent elements of the SASB Taxonomy for industry-based disclosures, to make disclosures in line with the industry-based topics, certain difficulties are expected in the jurisdictions that have not implemented the SASB classification structure. Regarding items for digital reporting of industry-based disclosures in such jurisdictions, provision of guidance material, etc. will reduce the burden on preparers.</p> <p>(i)(ii) [Broadly agree] While basically tagging narrative information on the first-level subparagraphs of IFRS S1 and IFRS S2, it would be more convenient for users to set up categorical elements at lower levels, strictly limiting them to items that are truly necessary. This also takes into account the burden on preparers. However, it is necessary to verify, through actual practice, whether narrative information is accurately and fully represented by tagging.</p>
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	<p>(b)</p> <p>サステナビリティ開示報告書作成にあたり、一つのタクソノミー要素の対象となる内容が、報告書では複数個所に分散して記載される可能性がある。その結果、同一の要素が複数個所にタグ付けされることになるが、この場合でも、利用者が適切にデジタル開示情報を理解・利用できるよう、デザインされていることを希望する。前記のタグ付けが適切になされない場合、サステナビリティ開示報告書の内容がデジタル開示に正確に反映されないことを懸念する。</p>	<p>(b)</p> <p>In a sustainability disclosure report, the content covered by a single taxonomy element may appear in multiple places. As a result, the same element may be tagged in multiple places. We hope that the taxonomy will be well designed to ensure that users can adequately understand and consume the information disclosed digitally, even in such cases. If the aforementioned tagging is not carried out appropriately, there is concern that the contents of sustainability disclosure reports will not be accurately reflected in digital reporting.</p>
<p>Question 4–Reflecting the relationship between IFRS S1 and IFRS S2</p>		
<p>Do you agree with the ISSB's proposal to create a single set of elements to reflect the corresponding disclosure requirements relating to the core content in IFRS S1 and IFRS S2 (paragraphs 42-55)?</p> <p>Why or why not? If not, please specify what changes you suggest and why.</p>	<p>[Broadly Agree]</p> <p>S1 と S2 で要求されるコアコンテンツに関する情報を共通の要素でタグ付けすることは、開示者の負担を軽減することにつながると考えられ、この点に関するISSBのアプローチに合意する。</p>	<p>[Broadly agree]</p> <p>We broadly agree with the ISSB's proposal, as tagging information related to the core content in IFRS S1 and IFRS S2 using common elements will be likely to reduce the burden on preparers.</p>
<p>Question 5–Granularity of narrative disclosures</p>		
<p>a) Do you agree with the ISSB's proposal that, as a principle, distinct taxonomy elements should be created for narrative information that is expected to be both separately</p>	<p>(a) [Broadly Agree]</p> <p>ナラティブ情報へのタグ付けのため、原則として、特別なタクソノミーを作成するというISSBの方針は、一般目的財務報告書の利用者の利便性の向上や、規制当局の活用の促進が図られるなどのメリットが見込ま</p>	<p>(a) [Broadly agree]</p> <p>We broadly agree with the ISSB's proposal.</p> <p>In principle, distinct taxonomy for tagging narrative information is supported by the expected benefits, such as improved convenience for users of general purpose financial</p>

<p>understandable to users of general purpose financial reports and readily identifiable for tagging (paragraph 65)? Why or why not? If not, what principle would be more appropriate?</p> <p>(b) Do you agree that creating elements that represent the first-level subparagraphs of IFRS S1 and IFRS S2 (for example, paragraph 30(a) or 30(c) of IFRS S1 (see paragraph 67)) would generally be consistent with this principle?</p> <p>Why or why not? If not:</p> <p>(i) should taxonomy elements generally represent narrative data sets that are more detailed or less detailed than the first-level subparagraphs. Why?</p> <p>(ii) should the elements suggested in response to (i) be provided in addition to the proposed elements (creating a hierarchical structure) or as an alternative to the proposed elements? Why?</p> <p>(c) In which, if any, cases do you think elements representing another level of disclosure requirement instead of the</p>	<p>れるため賛成である。一方、開示者の立場からは、タグ付けが過大なコストをかけることなく容易に実施できることが、その前提条件となる。</p> <p>(b) [Broadly Agree]</p> <p>IFRS S1 および IFRS S2 の第 1 レベルのサブパラグラフを象徴する要素は、利用者の利便性と、作成者の負担の双方を適度にバランスさせたものと考えるが、開示者の立場からは、開示情報の作成にあたり、実際に、容易にかつ過度な負担なく実施できるか現時点では確信が持てず、実務を通じて検証され、定期的な見直しが為されることを希望する。</p>	<p>reports and increased use by regulators. On the other hand, from preparers' standpoint, the prerequisite is that tagging can be easily implemented without incurring excessive costs.</p> <p>(b) [Broadly agree]</p> <p>The elements that represent the first-level subparagraphs of IFRS S1 and IFRS S2 strike a reasonable balance between users' convenience and preparers' burden. However, from the standpoint of preparers, we are not certain at this point whether, when preparing disclosures, they can actually be easily used for tagging and without excessive burden. We hope that these elements will be tested through actual practice and reviewed periodically.</p>
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<p>first-level subparagraphs in IFRS S1 and IFRS S2 would be more appropriate? Why?</p>		
<p>Question 6–Facilitating digital reporting of sustainability-related financial disclosures globally</p>		
<p>(a) Are there any aspects of the proposals related to the Proposed IFRS Sustainability Disclosure Taxonomy that should be changed to enhance the IFRS Sustainability Disclosure Taxonomy's ability to facilitate digital reporting of sustainability-related financial disclosures globally? If so, please specify what changes you suggest and why.</p> <p>(b) What implementation guidance and supporting materials and other resources, if any, would be useful to those using the IFRS Sustainability Disclosure Taxonomy, what issues do you think they should focus on and why?</p>	<p>(b) 一般目的財務報告書や他のサステナビリティ開示報告書との相互参照が、より簡易に行えるようになれば、開示者にとって準備の負担が減り、利用が促進され、その結果、一般目的財務報告書の利用者や、規制当局の利便性も増すことになる。パラグラフ 83 に記載されているように、相互運用性の改善に向け、他の団体（例えば GRI）や法域と幅広く連携し、更なる開発が進むことを望む。また、インダストリーベースの開示は、SASB タクソノミーと同等の要素を IFRS サステナビリティ開示タクソノミーに反映させているが、従来 SASB 分類構造に準拠していない法域においてはインダストリーベースの項目に適応した開示を行うことには相応な困難も想定される。SASB 分類構造に準拠していない法域におけるインダストリーベースのデジタル開示項目については、ガイダンス等が提供されると開示情報の準備者の負担軽減につながると考えられる。</p>	<p>(b) If cross-referencing between general purpose financial reports and other sustainability-related financial disclosures is made easier, the burden on preparers will be reduced and digital reporting will be facilitated. Consequently, convenience for users of general purpose financial reports and regulators will be increased. As Paragraph 83 explains, in order to improve interoperability, we hope that the ISSB will enhance broad coordination with other organizations (such as the GRI) and jurisdictional initiatives toward the development of relevant materials. In addition, while the Proposed IFRS Sustainability Disclosure Taxonomy reflects the equivalent elements of the SASB Taxonomy for industry-based disclosures, to make disclosures in line with the industry-based topics, certain difficulties are expected in jurisdictions that have not implemented the SASB classification structure. Regarding the items for digital reporting of industry-based disclosures in such jurisdictions, provision of guidance material, etc. will reduce the burden on preparers.</p>

Question 7–Other comments		
Do you have any other comments or suggestions on the Proposed IFRS Sustainability Disclosure Taxonomy?	総論として、IFRSサステナビリティ開示タクソミーはサステナビリティ関連財務情報を適切に表現するために必要十分な要素を備えていることが必要と考える。一方、開示者の立場としては、要素が多いことによって複雑さが増し、誤った開示がなされることや、開示のための準備に過度な負担が生じることが懸念される。必要な要素の数と複雑さのバランスのとれた、利用者・規制当局・開示者にとって利便性の高いタクソミーになることを期待する。	As a general comment, it is necessary for the IFRS Sustainability Disclosure Taxonomy to have sufficient elements to adequately represent sustainability-related financial information. On the other hand, from the standpoint of preparers, there are concerns that a large number of elements may increase complexity, resulting in incorrect disclosures and/or an excessive burden when preparing disclosures. We hope that the taxonomy will be highly convenient for users, regulators, and preparers, while striking a balance between the number of necessary elements and complexity.