

General Circular No: 33/2012

No. HQ/MCA/Digitized/ARBS/2009-Pt2
Government of India
Ministry of Corporate Affairs

5th Floor, "A" Wing, Shastri Bhawan,
Dr. R.P. Road, New Delhi – 110001
Dated: 16.10.2012

To

The President
Institute of Chartered Accountants of India, Institute of Company
Secretaries of India and Institute of Cost Accountants of India

Subject: Quality of XBRL filing certified by Professional members.

Sir,

You are aware that XBRL filing of financial statements by a select class of companies for FY 2010-11 was mandated vide Ministry of Corporate Affairs Notification GSR No: 748(E) dated 05.10.2011. The e-forms were duly certified by CA/CS/CWA professionals for their completeness and correctness in representation with respect to audited financial statement of the company.

2. A random scrutiny of XBRL filing of financial statements by few companies to MCA for FY 2010-11 reveals significant variations in disclosures in published results and the XBRL filings due to 'incorrect' mapping of disclosures. It has been observed that few disclosures were 'mapped/tagged' with incorrect accounting concept despite availability of appropriate element in taxonomy. It has also been observed that provisions of "Block Text tagging" and/or "Footnote" have been inappropriately used to report disclosures, like subsidiary details, related party transactions, Director's Report, etc., even when appropriate elements were available in the taxonomy for such disclosures. Few instances of "incorrect" tagging of XBRL documents are provided at Annexure-I.

3. Such filing are inaccurate and do not adequately represent true and fair view of the state of affairs of the company as per Section 211 of the Companies Act, 1956. Such XBRL filings, apart from being misleading, also dilute the effectiveness of XBRL for stakeholders' usage relating to the companies. It is unfortunate that professionals have certified the authenticity of such incorrect

data, for which they are liable to be penalized. Such lapses defeat the very purpose of introducing XBRL filings which are meant to elicit more detailed and refined information as to the affairs of companies. Please note that XBRL filings are being minutely scrutinized to see if similar mistakes also appear in a larger sample.

4. It is bounden duty of Institutes to direct its members to take necessary steps to improve the quality of XBRL filing for FY 2011-12 to be undertaken by its members. The Institute may conduct further trainings, issue guidelines, etc so that such quality related issues are appropriately resolved.

5. This may be accorded high priority.

Yours faithfully,


(Pankaj Srivastava)
Director

Encl: As above

GENERAL XBRL FILING ERRORS

Errors	Observation
Cash Flow Statement not tagged	The Cash Flow Statement for FY 2010-11 is available in the Audited Financial Statements (PDF file). However, the same has not been tagged in XBRL financial statements filed at MCA portal.
Information of all subsidiaries not provided in XBRL financial statements	Information about one Subsidiary has been tagged in XBRL financial statements whereas the Company had nine Subsidiaries.
Information of all related party transactions not provided in XBRL financial statements	Related Party Disclosures have not been tagged in XBRL financial statement.
Parenthetical (additional disclosures) information not tagged in XBRL financial statements	Aggregate Market Value of Investments not provided by way of footnote. Additional information on Issued, Subscribed & Paid up Share Capital not explained by way of footnote.
Footnotes not tagged in XBRL financial statements.	Footnotes on Share Capital, Secured Loan, Reserve and Surplus, unsecured loan-Fixed deposits, Investments, Fixed Assets, Security deposit, etc have not been tagged. Footnote on "Investments" has not been given.
Different presentation in pdf and XBRL filings	The Annual Report presented before the shareholders the figures were presented in Rs Thousands whereas in the XBRL documents the figures were provided in Rs. Lakhs.
Incorrect usage of Footnote	Director's Report provided by way of footnote whereas separate tags are available for tagging of Directors' Report. Similarly, for Auditors' Report, Significant Accounting policies, Unsecured Loan, Current Liabilities, etc Footnote has been incorrectly used.

INCORRECT USAGE OF TAGS

A. When appropriate taxonomy element is available

Line Item	Tag Used (label)	Correct Tag (label)
Secured Cash Credit from Banks	Term Loan	Working Capital Loans Banks Secured
Investment in Quoted Equity Shares	Unutilized Money	Equity Securities Long Term Quoted
Bad debts written off	Other Provisions Created	Bad debts Advances written off
Investment (joint Venture)	Equity securities long-term unquoted non-trade	Investment joint ventures
Power and fuel expenses	Electricity expenses	Cost power fuel
Advertising and Brand marketing	Travelling conveyance	Advertising and promotional expenses
Travelling and conveyance	Legal professional charges	Travelling conveyance
Purchase/sale of Fixed Assets	Purchase other Assets, Proceed disposal other assets	Purchase tangible fixed Assets, Proceeds sale disposal tangible fixed assets

B. Incorrect tagging/ inaccurate disclosures

Line Item	Tag Used	Correct Tag	Remarks
Stock Differential-(Decrease)/Increase	Not tagged separately	Increase decrease inventories	Clubbed with 'Other expenditure'.
Salaries, Wages & Bonus	Tagged as zero	Amount is 92,539,039	It is a mandatory tag. Clubbed with 'Other expenditure'.
Power, Fuel, Water & Gas	Tagged as zero	Amount is 248,737,864	Clubbed with 'Other expenditure'.

Manufacturing Cost	Tagged as zero		Clubbed with 'Other expenditure'. It is a manufacturing company.
RAW MATERIALS CONSUMED Opening Stock	Not tagged	Stock of Raw Materials, Opening Balance	Given as part of footnote to 'Raw Materials Consumed'
RAW MATERIALS CONSUMED Add: Purchases	Not tagged	Purchase raw materials during year	
RAW MATERIALS CONSUMED Less: Closing Stock	Not tagged	Stock of Raw Materials, Closing Balance	
Deferred Tax Liability (Net)	Net Deferred Tax Assets	Deferred Tax Liability	Tagged with negative sign.
Deferred tax liabilities(Net)	Deferred tax liability depreciation	Deferred tax asset other, Deferred tax asset VRS payment, Deferred tax asset provision for doubtful debts, etc	Disaggregated disclosures all consolidated into 'Deferred tax liability depreciation'