

**Comments Template on EIOPA-CP-11-002
Technical Consultation on the Solvency II XBRL Taxonomy**

Company name:	RSA Insurance Group
Disclosure of comments:	<p>EIOPA will make all comments available on its website, except where respondents specifically request that their comments remain confidential.</p> <p>Please indicate if your comments on this consultation should be treated as confidential, by deleting the word Public in the column to the right and by inserting the word Confidential.</p>
Please follow the instructions for filling in the template:	<ul style="list-style-type: none"> ⇒ Do not change the numbering in column "Reference". ⇒ Please fill in your comment in the relevant row. If you have <u>no comment</u> on a paragraph, keep the row <u>empty</u>. ⇒ Our IT tool does not allow processing of comments which do not refer to the specific paragraph numbers below. <ul style="list-style-type: none"> ○ If your comment refers to multiple paragraphs, please insert your comment at the first relevant paragraph and mention in your comment to which other paragraphs this also applies. ○ If your comment refers to sub-bullets/sub-paragraphs, please indicate this in the comment itself. <p>Please send the completed template to consultation.taxonomy-201107@eiopa.europa.eu, in MSWord Format, (our IT tool does not allow processing of any other formats).</p> <p>The paragraph numbers below correspond to the document: <i>EIOPA-CP-11-002_Introduction_Taxonomy_Consultation.doc</i></p>
Reference	Comment
General Comment	RSA will look to use an external supplier to provide our XBRL generation capability and to ensure that their solution meets and maintains the regulatory requirements. RSA will however not outsource the checking, validation and tagging of the disclosure returns.
10.	RSA will submit 2010 UK Statutory filings and Tax returns to the UK Tax authority in an XBRL format. RSA already have an XBRL converter application that allows tagging using these submissions.
11.	RSA can identify and understand the logic applied to the proposed taxonomies. It should be noted that the current intention is to purchase software from a third party supplier in order to provide the required XBRL output from the completed disclosure returns. RSA will therefore be reviewing the responses from the software houses on these technical points.
11.1.	Please see 11.
11.1.1.	

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11.1.2.	
11.1.3.	The TP_NL_E3 taxonomy follows recognised logic however RSA are unclear regarding a number of the references. For example RSA would understand the reference to 'E3:AF4' would refer specifically to cell AF4 of template E3 only, and therefore to development year 10, run off year 'prior'. However there are multiple lines with this 'AF4' reference which refer to multiple development years and run off years.
11.2.	
12.	
12.1.	RSA expect to incur initial costs in the purchase of additional reporting systems for the production of SII disclosures. As such the addition of XBRL reporting functionality should be a small additional cost associated with this, but it is not expected to be significant.
12.2.	RSA would envisage additional resource required to review the taxonomy, taxonomy mapping and outputs from any third party XBRL generator to ensure it meets requirements. Some initial costs of training / understanding of the taxonomy may be required in this respect, although not expected to be significant.
12.3.	RSA believe there will be challenges placed on Group and solo reporting entities to understand and produce the mappings to the regulatory taxonomy. It is uncertain at this time how much resource will be required until RSA fully understand the process and if this will be a repeatable or unique exercise for each reporting entity.
13.1.	RSA expect an on-going resource cost in ensuring that the most up to date taxonomies are loaded and that the output remains accurate and consistent across all submissions. RSA do not expect this cost to be significant.
13.2.	
13.3.	
14.	
15.	RSA consider the key risk to be the timing of the release of the final taxonomies. Sufficient time must be given to develop, test and review the XBRL generator software.
16.	
18.	As RSA intend to use a third party provider to supply an XBRL generator RSA will require them to conform to the technical standards set. RSA have no opinion on the technical topics, and will be reviewing the responses from the software houses on these matters.
19.	
20.	

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21.