

SOLVENCY 2.4.0 TAXONOMY

TECHNICAL SPECIFICATIONS FOR EIOPA RECOMMENDATIONS ON SUPERVISORY FLEXIBILITY REGARDING THE DEADLINE OF SUPERVISORY REPORTING AND PUBLIC DISCLOSURE - CORONAVIRUS/COVID-19

03 April 2020



eioipa

European Insurance and
Occupational Pensions Authority

I Introduction

1. On 20 March 2020, EIOPA published "Recommendations on supervisory flexibility regarding the deadline of supervisory reporting and public disclosure – Coronavirus/COVID-19"¹ (referred hereafter as Recommendations) as a response for the increasingly difficult conditions in the immediate future regarding running the business and its continuity caused by the epidemic of Coronavirus/COVID-19.
2. In order to ensure the technical implementation of the Recommendations described in the above-mentioned document with the 2.4.0 Solvency II taxonomy, EIOPA issues this document providing detailed technical instructions to be followed by the insurance and reinsurance undertakings, as well as by the Competent Authorities. Additionally, Frequently Asked Questions (FAQ) are provided.
3. EIOPA highlights the importance for Supervisors to receive timely and accurate Solvency II reporting as soon as available and in particular under the current circumstances. On this basis, and in order to facilitate the reporting for the undertakings facing unavailability of human or technical resources due to coronavirus COVID-19, EIOPA has provided recommendations on the reporting timelines for some templates.
4. In particular, as stated in the Recommendations' points 10 and 11 for Annual and points 17 and 19 for Quarterly, EIOPA recommends under these circumstances to allow, when appropriate, Partial Submissions without some of the normally mandatory templates for undertakings; And, at a later stage/deadline, the reporting of the Full Submission.

Recommendation 10: Competent authorities should accept an 8-week delay in the submission of the annual Quantitative Reporting Templates with the following exceptions: Content of the Submission (S.01.01), Basic Information (S.01.02), Balance-sheet (S.02.01), Cash-Flow projections for life business (S.13.01), LTG (S.22.01), Own funds (S.23.01) and SCR calculation (S.25.01 to S.25.03) at solo level.

Recommendation 11: Competent authorities should accept an 8-week delay in the submission of the annual Quantitative Reporting Templates with the following exceptions: Content of the Submission (S.01.01), Basic Information (S.01.02), Balance-sheet (S.02.01), LTG (S.22.01), Own funds (S.23.01), SCR calculation (S.25.01 to S.25.03) and Undertakings in the scope of the group (S.32.01) at group level.

Recommendation 17: Competent authorities should accept one week delay in the submission of the Q1-2020 Quantitative Reporting Templates and the Quarterly Financial Stability reporting both at solo and group level with the following exceptions: Derivatives Transactions (S.08.02) in the Quantitative Reporting Templates.

¹ Link to the document:

<https://www.eiopa.europa.eu/sites/default/files/publications/eiopa-recomendation-on-reporting-and-disclosure.pdf>

Recommendation 19: *Competent authorities should accept a 4-week delay for the template Derivatives Transactions (S.08.02).*

II Technical specifications

5. EIOPA has considered different options and concluded that the current 2.4.0 Solvency II taxonomy is suitable to accommodate the recommendations. Therefore, there is no need of taxonomy updates/hotfixes to implement these Recommendations, and it is only necessary to temporarily deactivate a small set of validations that could block the acceptance of Partial submissions.
6. Validations to be temporarily deactivated² for the annual entry points .01 (ars), .04 (arg) and .16 (aes) because of the Recommendations, and to be reactivated right after the extraordinary extended deadlines, are:

10. BV333	17. BV361
11. BV337	18. BV362 (currently non-blocking)
12. BV340	19. BV687 (currently non-blocking)
13. BV341	20. BV706
14. BV353	21. TV68
15. BV356	
16. BV357	

7. Note that a change of severity from blocking to non-blocking validations according to the current XBRL specifications would require a light taxonomy hotfix. For this reason, it has been decided that the validations are to be temporarily deactivated at list of validations and taxonomy level, and will be reactivated right after the end of the extraordinary extended deadlines for submission from undertakings to Competent Authorities.
8. However, it is recommended (not mandatory) that National Competent Authorities and reporting solutions apply a severity change only to the non-blocking category on the specific deactivated validations to allow partial reporting, instead of full deactivations. This helps Competent Authorities and reporting entities keep better track of missing templates during the partial reporting period. Moreover, it will allow to better identify full reports (i.e. the ones not having any of these warnings). Please note that for this reason, reporting entities may receive non-blocking warnings while submitting partial reports even on the rules which are shown as deactivated in the public list of validations.
9. All the templates allowed to be reported later according to the Recommendations have to be reported in the Content of Submission template as option "0" of the list

² Please note that the List of Solvency II Validations has to be followed, as other deactivations may be necessary given the extraordinary circumstances, or for other regular reasons.

(i.e. "0 - Not reported (in this case special justification is needed)" or "0 - Not reported other reason (in this case special justification is needed)" or "0 - Not reported other reason" depending on the particular template).

10. Also, to keep better control on completeness by Competent Authorities regarding the intended content of the reports, the reporting entities are asked to voluntarily (not mandatory) report in the XBRL technical field of row R0990 (Ad hoc XBRL technical field 1) of the Basic information template (S.01.02), the string 'PARTIAL' for the Partial submissions and for the Full submission the string 'FULL'. To allow the use of this field, TV68 will be deactivated. Please note that this technical validation (TV) is the only change affecting quarterly reporting, meaning that quarterly reporting does not require any change in business validations (BV) or in the taxonomy.
11. In any case, Competent Authorities must verify that the validations that are temporarily deactivated due to the Recommendations are satisfied by the final/latest valid submissions of each undertaking.
12. Full submissions must include also the templates provided in the Partial submissions (if applied by a given Filer).
13. Partial submissions (and re-submissions) will be allowed only until the end of the delay period described in the Recommendations.
14. After the delay period, only Full submissions (and re-submissions) will be accepted and not further updates on Partial submission are accepted/expected.
15. Reporting entities can directly send full submissions within the partial submission deadlines in case they are able to provide the full package. In such circumstances, no further submissions are required on the basis of these Recommendations concerning partial submissions. This also applies to reports sent from National Competent Authorities to the EIOPA Central Repository.

III FAQ

Q1: Shall the Partial submission be treated as regular or ad-hoc submission in R0100 of the Basic Information templates?

A1: The Partial submission shall be reported as a regular submission. Ad-hoc submission must not be used.

Q2: If the Partial submission does not satisfy all active validations, does it need to be re-submitted?

A2: Yes, if a Partial submission does not satisfy the active validations, it has to be re-submitted. However, if a re-submission is reported after the delay period, it has to be a Full submission already (not a Partial submission).

Q3: Will Level 2 deactivations (from Competent Authorities to EIOPA) be the same as for L1 reporting (from Filers to Competent Authorities)?

A4: Yes, they will be the same.

Q4: Are the Recommendations aligned with the ECB?

A4: ECB is on the process of discussing similar approaches. Not pre-empting any decision from the ECB we have applied the same deactivations in order to be able to fulfil the temporary Solvency II partial reporting with the ECB entry points.

Q5: Is quarterly reporting affected?

A5: Only Quarter 1 (Q1) is affected by allowing partial reporting (extraordinary delay allowed for S.08.02) with the indications given in the Recommendations and in this document. However, from a taxonomy point of view, the impact is minor as there are no mandatory changes applicable (the only change is the optional string described in the point 10 related with TV68), nor is there a need to deactivate business validations. As usual, reporting entities and Competent Authorities need to ensure that the final package includes the derivative template (S.08.02) when appropriate for the entity.

Q6: My software solution does not support/cover the use of XBRL field 1 of basic information explained in point 10.

A6: Please note that this is not mandatory. If this request is too complex or not possible to be implemented, do not do it. In general, please note that partial reporting is optional, and if your tool does not support it you can still follow the regular reporting approach at any time before the shortest delay indicated in the Recommendations.

Q7: I am reporting to my National Competent Authority using means other than the EIOPA XBRL taxonomy.

A7: Please check with your Competent Authority how to implement these Recommendations.

Q8: What are the expected Delays/reactivation dates?

A8: Please note that for the validations listed in the point 6 and the current expectations for the reactivation is as listed below (i.e. the day after the submission deadline of the small packages). Note that further updates on this are to be provided in the taxonomy roadmap and in the list of solvency 2 validations in the EIOPA taxonomy webpage.

- Entry points .01 (ars) and .16 (aes) by 22/04/2020
- Entry point .02 (qrs) by 13/05/2020
- Entry point .04 (arg) by 03/06/2020
- Entry point .05 (qrg) by 24/06/2020