

Insurance Europe comments on the 2.4.0 draft version of XBRL Taxonomy

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Insurance Europe welcomes the opportunity to provide comments on the 2.4.0 draft version of XBRL Taxonomy.

Detailed comments

S.06.02 (List of Assets)

- This concerns the new C0292 field (SCR calculation approach for CIU) in S.06.02. Insurance Europe would ask EIOPA to confirm whether this field is relevant for solo entities that use a Solvency II internal model, or whether they should simply report "9 – not applicable".
- There are multiple references to Article 84 and Article 168(3) in the Log instructions for this new field, both of which are contained within Chapter V "SCR Standard Formula" of the Delegated Acts. However, there is no Delegated Act reference against Option 1 – the industry would ask EIOPA to confirm whether this omission is intended.

S.25.01

- The interpretation of cell R0590/C0109 in S.25.01.01.03 should be clarified. The term "Approach based on average tax rate" cannot be found in Solvency II (Delegated) Regulation 2015/35, article 207.
- It should be clarified whether cell R0690/C0130 in S.25.01.01.05 equals the tax rate multiplied with (BSCR + SCR_{op} + LAC TP)

Validations

Rule	Template	Filter	Validation	Error message	Comment
BV806	S.08.01	{c0380} like '##F#' or {c0380} like '##D#'	{c0200}<>empty or {c0210}<>empty	The Items "Swap outflow amount" or "Swap inflow amount" in S.08.01 - Open Derivatives should be reported for Swaps (CIC = ##D# and ##F#).	Sometimes there is no value to report because there are no flows on the period. It should be authorized to include a null value.
BV1018	S.08.02		{c0150}>0	The item "Premium received to date" in S.08.02 - Derivatives Transactions should be positive.	<p>The rule should have a filter. All derivatives do not have premiums.</p> <p>Even the LoG limits C0150 to options and swaps. "The payment received (if sold), for options and also up-front and periodical premium amounts received for swaps, since the moment the undertaking entered in the derivative."</p> <p>BV1018 is contradictory to taxonomy 2.3.0 rule BV820 "The items "Premium paid to date" and "Premium received to date" in S.08.02 - Derivatives Transactions are not applicable for futures and forwards (CIC ##A#, ##E#)."</p> <p>Taxonomy 2.3.0 rule BV823 requires among other things paid premiums in S.08.02 to be positive and it does not either have a filter. This rule should be deactivated, too, and the several items in it should be divided to separate rules with proper filters.</p>

BV1020	S.08.02		{c0180} >0	The item "Contract size" in S.08.02 - Derivatives Transactions should be positive.	The rule should have a filter. According to LoG C0180 is "Only applicable for futures and options" BV1020 is contradictory taxonomy 2.3.0 rule BV819 "The Item "Contract size" in S.08.02 - Derivatives Transactions is applicable to futures and options (CIC ##A#, ##B#, ##C#)."
BV1021	S.08.02		{c0190} >=0	The item "Maximum loss under unwinding event" in S.08.02 - Derivatives Transactions should be positive or equal to zero.	The rule should have a filter. According to LoG C0190 is "Applicable to CIC category F (credit derivatives)". BV1021 is contradictory to taxonomy 2.3.0 rule BV818 "Maximum loss under unwinding event shall not be reported for instruments other than credit derivatives (CIC ##F#)", filter: {c0320} not like '##F#', validation: {c0190} = empty
BV1022	S.08.02		{c0200} >0	The item "Swap inflow amount" in S.08.02 - Derivatives Transactions should be positive.	For a 3-month period, it is possible there are no inflows on derivative transaction. Consequently, the null value should be authorized.
BV1024	S.08.01		{c0160} >0	The item "Premium received to date" in S.08.01 - Open Derivatives should be positive.	Similar comments than comments to BV1018. The rule should have a filter. All derivatives do not have premiums. Even the LoG limits C0160 to options and swaps. "The payment received (if sold), for options and also up-front and periodical premium amounts received for swaps, since the moment the undertaking entered in the derivative." BV1024 is contradictory to taxonomy 2.3.0 rule BV802 "The items "Premium paid to date" and "Premium received to date" in S.08.01 - Open Derivatives are not applicable for futures

					<p>and forwards (CIC ##A# and ##E#)."</p> <p>Taxonomy 2.3.0 rule BV1014 requires among other things paid premiums in S.08.01 to be positive and it does not either have a filter. This rule should be deactivated, too, and the several items in it should be divided to separate rules with proper filters.</p>
BV1026	S.08.01		{c0180} >0	<p>The item "Contract size" in S.08.01 - Open Derivatives should be positive.</p>	<p>Similar comments than comments to BV1020.</p> <p>The rule should have a filter. According to LoG C0180 is "Only applicable for futures and options"</p> <p>BV1026 is contradictory to working draft validation rule BV1071 "The item "Contract size" in S.08.01 - Open Derivatives should be reported for futures and options (CIC '##A#' or '##B#' or '##C#')." "</p>
BV1027	S.08.01		{c0190} >=0	<p>The item "Maximum loss under unwinding event" in S.08.01 - Open Derivatives should be positive or equal to zero.</p>	<p>Similar comments than comments to BV1021</p> <p>The rule should have a filter. According to LoG C0190 is "Applicable to CIC category F (credit derivatives)".</p> <p>BV1027 is contradictory to taxonomy 2.3.0 rule BV801 "The item "Maximum loss under unwinding event" in S.08.01 - Open Derivatives should not be reported for derivatives other than credit derivatives (CIC ##F#), validation: {c0190} = empty</p>