

To: Prudential Team, Supervisory Reporting PG  
From: Prudential Team  
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Subject: Key takeaways from the meeting with EIOPA on several reporting topics

## Summary

Members are informed that the secretariat held a bilateral call on 30 September with representatives from EIOPA and the ECB.

Below, members will find a summary of the key takeaways from the meeting, along with follow-up actions.

Should members have any questions or require further clarification, please feel free to contact the secretariat at [prudential@insuranceeurope.eu](mailto:prudential@insuranceeurope.eu).

In terms of next steps, the secretariat will present the main issues and recommendations during the Joint ECB/EIOPA reporting workshop on 24 October.

### Insights from the survey on future implementation dates

- **EIOPA decided to keep the current Q4 implementation start date unchanged.**
- EIOPA received 19 responses to the survey on future taxonomy implementation dates.
- The feedback was considered insightful.

### Update on SHS ECB statistics

- The SHS (Securities Holdings Statistics) process is currently in the "matching merits and cost" stage, prepared by the ECB. The ECB is considering implementing monthly reporting for these statistics.
- The ECB plans to consult the wider market with a proposal most probably next year.
- The secretariat will continue to monitor these developments.

### Update on Taxonomy 2.10.0 and EC objective of 25% reduction of the burden

- EIOPA plans to consult on amendments to the ITSs on reporting and disclosure related to Taxonomy 2.10.0 during the summer of next year.
- In line with Lars Dieckhoff's message during the Solvency II Working Group, EIOPA invited Insurance Europe and its members to submit proposals for QRT simplifications, in the context of the EC's request aiming for a 25% burden reduction.
- Proposals are ideally expected by the end of the year.
- **The secretariat will initiate a request for suggestions on QRT simplifications from members.**

### Exchange of views on the paper with lessons learned from Taxonomy 2.8.0 and recommendations for implementation

The specific issues that were discussed included the following:

- **Improved quality control of instructions and related information before publication and enhanced documentation structure**
  - EIOPA acknowledged responsibility for inconsistencies in ITS and taxonomy implementation. However, the latest ITS included a full review with complex amendments, which follow a strict review and approval process.
  - Regarding the question as to whether the SII amendments could include a potential solution to give EIOPA the opportunity to update/correct the logs for the QRTs more frequently, EIOPA noted that a high-level pilot is ongoing at EBA, and further steps must be awaited.
  - EIOPA will make the annotated templates available again in its 'legacy format' (one tab per QRT), as it did previously, thereby noting that the ATOME version prevails.
  - Regarding the single central area/document recommendation. While EIOPA noted that they would look at it, it would require a lot of (financial) resources which are not available.
  
- **Legal binding nature of the regulation**
  - EIOPA emphasised that the ITS has legal binding authority.
  - In case of errors, stakeholders should first refer to the instructions, and then to the Q&As.
  - As indicated in the previous point, at this stage EIOPA is not able to make changes to the ITS swiftly.
  - For errors in the taxonomy, if such errors are identified after the taxonomy is published, EIOPA can only address them using the "List of Known Issues" file until the next release.
  
- **Proactive information dissemination**

EIOPA acknowledged that there were technical issues with the DPM/XBRL notifications due to webpage migration, but this has been resolved. The RSS feed now triggers with every page update and the Q&A RSS feed sends notifications whenever a new Q&A is published. EIOPA recommends that users subscribe to both feeds. EIOPA noted that for this they are relying on DG DIGIT and further improvements are outstanding. EIOPA also acknowledged the need to find solutions if RSS feeds are no longer supported by various web browsers in the future.

  - Additionally, EIOPA highlighted its regular participation in Eurofiling calls, where updates on the taxonomy roadmap are shared and stakeholders' questions are answered. EIOPA noted:
    - Eurofiling meetings, open to all stakeholders, are held quarterly.
    - Meeting minutes are published at <https://minutes.eurofiling.info/>.
    - The most recent meeting was held last week, following a shift in frequency from monthly to quarterly.
    - The next meeting is scheduled for November 27.
  - The secretariat asked whether there was any reason why taxonomy related consultations and/or surveys are only announced on the dedicated XBRL/Taxonomy page and not on the news page like all other EIOPA consultations and surveys. EIOPA would investigate it and also announce these consultations on the EIOPA news page.
  
- **Regarding the Q&As:**
  - EIOPA emphasised that there is a lengthy governance process involved in answering a Q&A, which requires significant resources. As a result, EIOPA encourages undertakings to carefully review existing Q&As, as their questions may already have been addressed. Prioritising Q&As that cover new ground will help streamline the process.
  - EIOPA noted that there have been some technical issues in relation to the Q&As and the search function. EIOPA acknowledged that the RSS feed does not notify users when a Q&A is updated. However, users can filter by "Status" on EIOPA's website and select "revised" to view updated Q&As.
  - EIOPA also shared a best practice used by some undertakings: As part of the company governance, reviewing/downloading the excel with the Q&As every Friday (or regularly) for new Q&As and assessing and implementing any necessary changes.

- EIOPA responded that the possibility of asking questions anonymously has been disregarded for the following reasons:
  - Some questions may be unclear or require additional information for a proper response, and in such cases, EIOPA needs to contact the stakeholder for clarification.
  - Certain questions may involve specific supervisory practices, and in these cases, EIOPA consults the relevant NCA based on the stakeholder's email and country to better understand the issue.

EIOPA emphasized that personal information is never shared with NCAs, only the content of the question. EIOPA also clarified that the identity of those asking questions is never disclosed publicly. Only EIOPA knows the name of the company or person who asked and all identifying information is deleted after five years.

#### ■ **Timeliness and clear communication**

- Regarding the suggestion of **enhancing the log instructions** to provide clearer guidance on newly requested data. EIOPA responded that stakeholders are encouraged to highlight areas needing further clarification during public consultations. Additionally, Q&As are used to address any clarifications and when necessary, these clarifications are incorporated into the next ITS amendments.
- For what concerns **taxonomy changes**, stakeholders are encouraged to provide their comments to the PWD, afterwards it is very difficult to make changes to the final taxonomy.
- On the **timeliness of the taxonomy publication**, EIOPA noted EIOPA published several PWDs for the latest taxonomy, and for taxonomy 2.8.2 the timing may seem short, but it is one month ahead of the usual hotfix.
- The **ECB** highlighted that they are working on a solution to make reporting information more accessible for insurance corporations and other stakeholders. The next changes will be introduced after the ECB Regulations are updated, with any new ECB add-ons following the usual adaptive taxonomy release timeline. The ECB also committed to improving communication about taxonomy changes, aiming to make it as clear and timely as possible.

#### ■ **Regarding (new) validations**

- The secretariat highlighted that new validations added to existing QRTs have been incorrect.
  - EIOPA acknowledged the inherent risk associated with new validations. To minimise the impact of potential issues, most new validations are introduced with non-blocking severity. EIOPA also releases PWDs to allow for feedback before changes become operational. Additionally, between releases, EIOPA regularly updates the validations through deactivations. While the severity of validations cannot be altered, incorrect validations can be disabled.  
For validation issues detected during the submission phase, only deactivations are possible. Permanent deactivations are removed from the "List of Validations" in the next adaptive release but remain listed for the release in which they were deactivated. All deactivations are traceable in the "List of Validations," with the deactivation date included for easy identification.
- The secretariat proposed excluding unimplemented validation checks from the list to prevent confusion.
  - EIOPA responded that it was unclear what was meant by "unimplemented validation checks." EIOPA explained that they recently introduced an expanded changelog at the validation level for new taxonomy releases. Between releases, validations cannot be removed, only deactivated, to avoid creating multiple subversions of the model.
  - **The secretariat to follow up with members to check if the "unimplemented validation" is about the activation of validations.**

- The secretariat suggested that, due to the dependency of internal model reporting on the model architecture, the number of validation checks should be minimized and focused solely on verifying consistency between QRTs, without applying validation checks to the formulas embedded in the templates.
  - EIOPA responded that in their experience, reducing the number of validations has an immediate negative impact on data quality. While EIOPA is open to optimisations and suggestions for improving the model, they emphasised that removing validations tends to lead to a significant drop in data quality. Validations play a crucial role in maintaining the accuracy and consistency of the data.

■ **Unclear versioning and missing version of previous Taxonomies:**

- The secretariat proposed that subversions (e.g., 2.8.0.1) should be clearly indicated with supporting documentation for improved version management and that links to all published versions should be retained on the EIOPA website, as currently only the latest version is available.
- EIOPA responded that the DPM/XBRL webpage displays all the latest production packages and templates for the previous three taxonomy versions are supported for data collection. This approach allows undertakings, NCAs and EIOPA to adapt their systems to new taxonomy versions with a reasonable lead time and facilitates the correction of submissions with errors. EIOPA also removes PWDs after public consultation.
- EIOPA further explained that it uses a three-part numbering system (e.g., 2.8.2) for taxonomy versions:
  - The first number (e.g., "2") represents a major release, indicating significant changes, particularly in the comparability of the DPM glossary/dictionary.
  - The second number is the main revision number (adaptive release), which typically changes annually in line with governance.
  - The third number is for minor (corrective) releases issued within the year.

**EIOPA was unsure which specific versions are missing from the website and asked the secretariat to follow up with its members to identify the missing versions.**

■ **Targeted/improved workshop efficiency and frequency**

- EIOPA noted that there have been dedicated public events focused on ITS amendments and joint events with ECB on reporting. Some events have indeed covered both taxonomy items and supervisory reporting topics. EIOPA will consider how to improve this process in the future. Workshops are typically organised around specific changes, such as new taxonomies or ITS updates. While EIOPA is trying to increase the number of workshops, they noted that these events are resource- and time-intensive.