Number	Date	Reference
1	06/11/2015	It is the the above document, as the above drop down menu does not have reference to Final Report 14/055 EIOPA - Bos - 15/118 30 June 2015
2	19/01/2016	Annex II, S.06.02 List of assets. C0290 CIC code. Alfa 2 code or XL for not listed
3	27/01/2016	Group SCR S.23.01.04 (R0680/C0010)

4	10/02/2016	QRT S.12.01 Life and Health SLT Technical Provisions Rows R0240 and R0250
5	10/02/2016	QRT S23.01 Own funds R0420
6	10/02/2016	Annexes to Final Report on CP-14-052; ITS Reporting Annex II_S_14_01_LOG_clean, Template S.14.01.01 solo.
7	24/02/2016	Template S.06.02, Field C0380

8	04/03/2016	S.25.01.04
9	04/03/2016	S.25.04 SCR
10	18/03/2016	Annex II, S.06.02 List of assets. C0150 "Valuation method".

11	01/04/2016	S.23.01.4
12	01/04/2016	EIOPA_SolvencyII_Validations_2.0.1
13	08/04/2016	S37.01- Risk Concentration

14	14/04/2016	EIOPA-BoS-15-115_Final_report_ITS_Regular_Supervisory_Reporting_rev_08092015 Article 6 Quarterly reporting templates for individual undertakings paragraph f
15	26/04/2016	s.26.01

16	26/04/2016	clarification on the scope of the Special Purpose Vehicle QRT (S.31.02).
17	26/04/2016	Delegated Regulation on reporting to NSAs, S.25.01.04

18	20/04/2016	QRT 25.02.04
19	27/05/2016	Annex II, S.06.02 List of assets. C0290 CIC code. Alfa 2 code or XT for not listed 24 for Money market instruments. Negative value in C0170 Total Solvency II value.

20	27/05/2016	Quantative Reporting Template, S.06.02 (D1) List of Assets template
21	27/05/2016	CIC classification

22	27/05/2016	S.26.01.01 Interest rate risk Business Validation for 2.0.1 BV564_1
23	02/06/2016	S.36.01 S.36.02 S.36.04
24	25/07/2016	S.19.01
25	04/08/2016	S.21.01

26	05/08/2016	Treatment in various QRTs when another Insurer is acquired by the Insurance group

27	05/08/2016	S.21.01
28	05/08/2016	Section II – Regular Supervisory Reporting Section D. Valuation for Solvency Purposes Guideline 22 – Technical provisions Paragraph 1.36

29	05/08/2016	RFF/MAP/Remaining Part reporting requirements (SR.25.0x, SR.26.0x, SR.27.01 QRT Logs)
30	05/08/2016	EIOPA_SolvencyII_DPM_Annotated_Templates_2.0.1,ITS Reporting Annex II_S_27_01_LOG_clean,EIOPA_SolvencyII_DPM_Dictionary_2.0.1

31	05/08/2016	QRT S.23.03, ordinary share capital.
32	05/08/2016	QRT S.04.01 R0040 Commissions

Question
In the Final report on public consultation No. 14/055 on the implementing technical standards with regards to procedures, formats and templates fo the solvency and financial condition report, reference is made to template S.19.01.21, S.22.01.21, S.25.01.21, S.25.02.21, S.25.03.21. I believe these should be all ".01" rather than ".21". Likewise with the group templates references as well. S.32.01.22, S.22.01.22, S.23.0122, S.25.01.22, S.25.02.22 and S.25.03.22. I believer these should be .02
We have a question on classification of Investment funds in S.06.02 “List of Assets”. In column C0290 “CIC” it says “Identify the ISO 3166-1-alpha-2 country code where the asset is listed in. An asset is considered as being listed if it is negotiated on a regulated market or on a multilateral trading facility, as defined by Directive 2004/39/EC”. However if the asset (e.g. Investment fund) is not listed on a stock exchange, the first two letters should be “XL”, despite that prices may be quoted on a daily basis by the fund management company. We would like to know if “Investment funds” can qualify as listed according to the Directive 2004/39/EC? If all Investment funds will have “XL” as first two letter, we will miss out on a lot of information on where the assets are listed or have its risk base?
Is there an incorrect reference in the definition of R0680/C0010 "Group SCR" in the logs? Group SCR is defined as ..the sum of the consolidated group SCR.." and "...the SCR for entities included with D&A (R0660/C0010)". Should this instead refer to R0670/C0010 "SCR for entities included with D&A method"? R0660/C0010 is the "Total eligible own funds to meet the Group SCR" and it is odd to reference part of the SCR to a number which represents the eligible own funds.

There is a conflict between the template and the log file for disclosure of discounted benefits for accepted reinsurance: · The template requires total accepted reinsurance benefits to be split between FGB and FDB. The cells that split by LOB for accepted reinsurance are crossed out to indicate not required. The equivalent cells for direct written business are for with-profits participation only. · The log file instructions specifically describe that the split between FGB and FDB relates to with-profits participation LOB and hence does not relate to total accepted reinsurance. Hence, it is assumed that there is an error in the template, and that the reinsurance accepted column should be completed on the basis that it relates to with-profits business only (i.e. C0110 instead of C0100). It should be noted however that this interpretation makes no allowance for inclusion of accepted reinsurance for 'Index-linked and unit-linked insurance' and 'Other life insurance' as the cells for these lines of business are crossed out in the template - hence these rows will not capture all lines of business.
There is a conflict with in the Own funds template where there is a requirement to split the disclosure of Own funds of other financial sectors into the different tiers ie Tier 1 unrestricted, Tier 1 restricted and Tier 2 only. The log files note that information populated in these cells should be linked to the numbers added back in R0410 – R0440. In accordance to above, the template blocks out R410/R420 and R440 but missed the blocking of R430 related to Non regulated entities carrying out financial activities. This unblocking of R430 is in conflict to the log files and to the sub total provided in R440. Hence it is assumed that there is an error in the template, and the intention was also to block R430 data
Regarding the Annualised Guaranteed Rate (AGR) disclosures in S.14.01.01 cell C0210: 1. Should S.14.01 C0210 be disclosed at HRG or AGR level? If at HRG level (as implied in the EIOPA Log file), the AGR entry could be confusing and/or complicated (compared to HRG level). 2. The EIOPA Log states that S.14.01 should include all business (even unit-linked). However, C0210 guidance states that unit-linked contracts should be excluded from C0210. So, should the disclosures in C0170-C0210 capture all business (including unit-linked) or only that business which is in scope for C0210 (i.e. unit-linked contracts are excluded)? 3. What detail do you want disclosed for AGRs in C0210? Would a range of guaranteed rates be sufficient, or do you need information to allow you to judge materiality (e.g. a weighted average guaranteed rate)? The AGR information would be more information at AGR and not HRG level (linked to question 1 above). Thank you for your help and time. I look forward to your response.
What ist the exact format of the field C0380 (Unit percentage of par amount Solvency II price) in Template S.06.02? Should it be filled as decimal number, e.g. 1,0234, percentage number, e.g. 102,34, or percentage with % sign, e.g. 102,34%?

Do you expect R0220 Solvency capital requirements for undertakings under consolidation method to equal the total of these three rows? R0410 Total amount of notional SCR for remaining part; R0420 Total amount of notional SCR for RFF; R0430 Total amount of notional SCR for Matching adjustments
Do you expect R0500 Capital requirement for other financial sectors to equal the total of rows R0510 Capital requirement for other financial sectors (non-ins CR) - Credit institutions, investments firms....; R0520 Capital requirement for other financial sectors (non-ins CR) - Institutions for occupational retirement provisions; R0530 Capital requirement for other financial sectors (non-ins CR) - Capital requirement for non- regulated
We have a question on C0150 - Valuation method on assets in S.06.02 "List of assets". In the preparatory reporting we have seen different reporting from different companies on "Investment funds". NAV prices are normally quoted on a daily basis on Investment funds from fund management companies. However these Investment funds cannot be said to be trading on a regulated market defined as a MTF according to directive 2014/65/EU. Is there a more exact definiton on alternative 1. "quoted market price in active markets for the

In the final QRT' for S.23.01.04 released in the ITS R0220 for own funds not recognised by the reconciliation reserve, we note that you have removed the ability to add this to Tier 1, which was allowed previosly. This means that it can only be added to c010 the total. We are unclear to the logic and the rationale why it can not be disclosed as a tier as it means that the sum of the tiers no longer add to the total
My question regards reporting of template S.23.01.04. Do the business validations in the referenced sheet provide me with the correct way of calculating the item in each cell, or do they just provide me with validations in the same way as the EIOPA cross checks do?
Background: The EIOPA Level 2 text says that insurance companies shall consider listing concentrations of risk to natural disasters or catastrophes. The Risk Concentration template requires users to list risk concentrations at a counterparty level. Question: What approach do you suggest to the insurance groups where a significant risk concentration exists to a natural disaster (eg floods, earthquakes, longevity events etc), but this exposure is made up of a very large volume of individual policyholder level exposures?

Article 6 paragraph f defines the conditions for an exemption for quarterly reporting of template S.06.03 Look through. The template must be reported when the ratio of collective investments held by the undertaking to total investments is higher than 30%. However the reference to the balance sheet only points to part of investments, not total investments. Included are: Investments (other than assets held for index-linked and unit-linked contracts) R0070 Assets held for index-linked and unit-linked contracts R0220 Excluded are: Property, plant & equipment held for own use R0060 Loans and mortgages R0230 Deposits to cedants R0350 Cash and cash equivalents R0410 All these investments are included in template S.06.02, but not in the definition of total investments in article 6(f).
In the template you are required to show separately the spread risk stresses for bonds, type 1 securitisations etc. The template also has cells to shown the effect on liabilities. This seems inconsistment with the instructions for working out the effect of spread risk on matching adjustment (article 181) where it implies you should look at the effect of the sum of the different kinds of spread risk. For the preparatory reporting we calculated a single liability effect based on the change to the matching adjustment caused by all types

clarification on the scope of the Special Purpose Vehicle QRT (S.31.02). Specifically, we need a view on whether the SPVs which are used by our Life business relating to their Equity Release book of business are in scope for the template. Cell C0060 requires disclosure of the “Lines of Business SPV securitisation relates”. The list of options that you can select from seems to indicate that the QRT only requires Groups to include disclosure where insurance risks have been securitised to SPVs. However the log file states that the definition of an SPV is as per Article 13 (26) of Directive 2009/138/EC (copied below for reference) which appears to have a wider scope, referring to any risk (ie not just insurance risk) ceded to a SPV. Article 13 (26) ‘special purpose vehicle’ means any undertaking, whether incorporated or not, other than an existing insurance or reinsurance undertaking, which assumes risks from insurance or reinsurance undertakings and which fully funds its exposure to such risks through the proceeds of a debt issuance or any other financing mechanism where the repayment rights of the providers of such debt or financing mechanism are subordinated to the reinsurance obligations of such an undertaking
I have a question related to group aggregation reported in S.25.01.04. Do you have any information if the values for Capital requirements for other financial sectors (row R0510 to R0550 of S.25.01.04) are reported proportionally to the diversification effect at group level that is attributed to those undertakings or in full size (as for SCR for undertakings included via D and A on row R0560). Is the Total SCR for group (row R0570) calculated as a simple sum of the other applicable items reported in S.25.01.04?

Please confirm that the balance shown in QRT 25.02.04 ‘Solvency capital requirement for undertakings under consolidated method’ (R0220/C0100) is expected to include balances relating to Capital requirement for other financial sectors (Non-insurance capital requirements) (OFS). However the Capital requirement for OFS will not be presented in the cells above (e. g. Total Undiversified Components R0110/C0100). The EIOPA Validation Control BV344 requires that balances in the Own Funds QRT 23.01 (R0590/C0010) and SCR QRT 25.02 (R0220/C0100) are expected to be the same. Also the log file definition for QRT s23.02 (R0590/C0010) ‘Consolidated Group SCR’ states that the balance includes ‘Consolidated Group SCR calculated for the consolidated data in accordance with Article 336 (letter a-b-c-d) of Delegated Regulation (EU) 2015/35’.
We have a question on template S.06.02 on repurchase agreements (repos). In the preparatory report one company has reported repos as negative assets with a negative SII value (C0170) with the CIC C0290 = XT 24 “Money market instruments”. The repos are here a loan and the asset is still kept by the company and listed as an asset. We believe the reporting is wrong and that repos should only be reported with a positive number with CIC = XT 24 when you are a purchaser/buyer of securities for short term financing. If you use repos as short term financing our interpretation is that the negative number should not be reported at all in S.06.02 list of assets. We would like this to be confirmed and clarified.

In our role supporting clients with their Solvency II data needs, we seem to have hit an obstacle with a certain data point. Within the S.06.02 (D1) List of Assets template, the Duration is required for Fixed Income instruments, including Fixed Income Funds. This has proved to be a difficult data point for ourselves and our clients to access as reported for bond funds. We have taken as many steps as possible to acquire this information - searching through documentation, prospectuses, KIDs - but the information is unavailable. We now intend to reach out to fund manager to see if we can access the data.
CIC FOR COVERED BONDS Typically, we would only expect to see banks issuing covered bonds and therefore with CIC code 26 (corporate covered bonds). However, we see that you also have CIC code 16 (government covered bonds). What would you expect to fall into this category? There are a handful of covered bonds which are issued by essentially special purpose banks set up by governments, predominantly in France, e.g. Issuers Caisse Francaise de Financement Local, Caisse de Refinancement de l'Habitat SA. How would you expect these to be categorised? CIC FOR US TREASURY BONDS What would you expect to see for the first to letters of the CIC for US treasury bonds? We are currently representing this as US, but should this still be the case if they are trading on other exchanges (eg US912828L328 on the Berlin exch - would this show US or DE) or no exchanges (eg US912828M649 would this show US or XL). HYBRID & SUBORDINATED BONDS

Dear EIOPA, I have a question regarding the business validation BV564_1. It states: {r0100}=MAX({r0110},{r0120},0) in other words it states: netSCR for IR = max(0;netSCR for IR up;netSCR for IR down) grossSCR for IR = max(0;grossSCR for IR up;grossSCR for IR down) Taking into account how the individual net/gros SCR for IR up/down are calculated (i.e. following BV565_1; BV566_1; BV567_1; BV568_1), I think that the Level 2 Delegated regulation Article 165(2) is thus ignored and validations are not correct. Would you be so kind and explain how the Article 165(2) is reflected in the validations or, if I am in fact right
In the Log it is stated: Where similar transactions with a related entity may be excluded from IGT reporting when considered individually against the thresholds for significant and very significant, these transactions must nevertheless be reported individually where collectively, they are at or above the corresponding threshold values for significant or very significant IGTs. Coud EIOPA confirm: 1. Is the threshold applied on market or nominal value? 2. What exactly we can understand under the term "similar transaction"? We apply the threshold on individual transactions. Do we need to make a sum of transactions with the same counterparty and apply the second threshold?
Annex II states in column “Item” the following for one of the items “Gross Reported but not Settled Claims (RBNS) – Year end (discounted data)”. Is this item to be reported on the discounted basis? Word “discounted” does not appear in accompanying instructions in the Annex II log file of template S.19.01. Similarly, item definition of “Reinsurance RBNS Claims – Triangle” and “Net RBNS Claims – Year end” and Annex I template definition (Excel) do not use word “discounted”.
Should claims with 0 incurred losses (for example cases declined or withdrawn) to be included in the count as well?

In the event an insurer is acquired by a group, the solo submissions for the acquired insurer are not expected to be affected.

It is not clear how the group submission may be affected. The issue also applies to the internal transfer of an insurer within the Group (a Part VII transfer).

1. Specific fields in QRTs related historic value or date

Is the group submission to report the information below based on the acquired insurer's perspective (as per the solo)? Or should the information be based on the date of acquisition of the insurer by the group (differing from the solo)?

S.06.02 – List of Assets

C0160(A25) Acquisition value

S.08.01 – Open Derivatives

C0220(A26) Initial date

C0150(A17) Premium paid to date

Annex II of log “ITS Reporting Annex II_S_21_01_LOG_clean.docx” states that template S.21.01 shows “the distribution, in (predefined) brackets, of the claims incurred during the reporting year” suggesting a relation to the claim cost made only during the reporting year. However answer to comment 74 in document “Final Report on the public consultation CP-14-052 ITS on regular supervisory reporting” reads “Generally, the template should reflect the amounts effectively paid to the reporting reference date and RBNS amounts at the reporting reference date which is why only positive values are allowed.” Shouldn’t then the template description read “the distribution, in (predefined) brackets, of the claims incurred up to the reference reporting date” as there is no relation of the reported amounts to the 12 month period in the report year, but only to a specific reporting date?

According to guideline 22 (1.30) point (i) the following should be described for Technical Provisions:

Description of the assessments referred to in points (a), (b) and (c) of the first subparagraph of article 44 of Solvency II Directive. Where the reduction of the matching adjustment or the volatility adjustment to zero would result in non-compliance with the SCR, an analysis of the measures it could apply in such a situation to re-establish the evel of eligible own funds covering the SCR or to reduce its risk profile to restore compliance with the SCR;

Does the reference to points (a), (b) and (c) above refer to 2a of article 44 of the SII Directive?

Remaining Part: I was working on the basis that Remaining Part captures any business within the entity which does not fall under any Ring-fenced fund or Matching Adjustment portfolio. So, for a simple case where an entity has 1 RFF and 1 MAP (with no overlap), the sum of RFF + MAP + Remaining Part will reconcile to the Total Entity (ignoring any measurement differences). So, for the Balance Sheet SR.02.01 QRT, which is disclosed for each material RFF and the Remaining Part, I had assumed that Remaining Part here would capture any business not in the material RFF. However, recent feedback from the EIOPA DPM and XBRL team implies that this is not the case – instead this feedback implies that the Remaining Part does not contain any Matching Adjustment Portfolio business. Please can you confirm the definition of Remaining Part for the SR QRTs?   Sub-fund reporting: I was working on the assumption that sub-fund reporting is only required for the SR.25, SR.26 and SR.27 QRTs. This is on the basis that only the EIOPA Log instructions for these QRTs explicitly mention any sub-fund reporting requirements. However, recent feedback from the EIOPA DPM and XBRL team implies that this is not the case – instead this feedback implies that sub-fund reporting is required for all SR QRTs where RFF/MAP reporting is required (e.g. sub-fund reporting is required for each of the SR.01, SR.02, SR.12. SR.17, SR.25, SR.26 and SR.27 QRTs). Please can you confirm for which SR QRTs additional sub-fund reporting is required?
I have a question regarding template S.27.01.01, "Largest liability limit provided" (cells number: C0090_R2700, C0090_R2710, C0090_R2720, C0090_R2730 and C0090_R2740).   If the undertaking provides unlimited cover, how should the above cells be filled out, and such that the cells

In QRT S.23.03, R0010 (paid in share capital) equals the R0100 (Ordinary share capital gross of own shares). This is because in the financial statements the ordinary share capital is shown gross of treasury shares and equals the paid in share capital. As a result of this, we presume that the line R0030 (Own shares) is included in the QRT only for presentational purposes, with R0100 (ordinary share capital gross of own shares) being only equal to R0010 (paid in share capital). An example on how we are presenting: R0010 Paid in share capital: 10 R0020 called up but not paid: 0 R0030 Own shares: 5 R0100 Ordinary share capital (gross of own shares): 10
When the latest log files were released at the end of last year, the definition of the row R0040 "Commissions" in the QRT S.04.01 was changed to match the definition of the row R2210 "Acquisition expenses - Gross" in the QRT S.05.01. However the row R0040 in the QRT S.04.01 is still called "Commissions". Will this description be updated to "Acquisition expenses" on the QRT S.04.01 to avoid any confusion? In relation with the definition change of the row R0040 in the QRT S.04.01, the equivalent "Acquisition expenses" row R2210 for Life insurance entities in the QRT S.05.01 does not include the three words "including renewal expenses". Our interpretation from a life point of view is that we should follow the equivalent definition provided in the QRT S.05.01 for the Life insurance entities (row R2210).

Answer
The codification is explained the document bellow. The templates indicated cannot end with .01 and .02 respectively as code .01 is reserved for the templates developed for reporting solo/annual and 02. for solo/quarterly. The templates referred to are specific for disclosure (different from the ones developed for reporting) and therefore have specific codes. https://dev.eiopa.europa.eu/Taxonomy/Full/2.0.0/EIOPA%20DPM%20Documentation.pdf
Directive 2014/65/EU (that partly recast Directive 2004/39/EC) defines: "'multilateral trading facility' or 'MTF' means a multilateral system, operated by an investment firm or a market operator, which brings together multiple third-party buying and selling interests in financial instruments – in the system and in accordance with non-discretionary rules – in a way that results in a contract in accordance with Title II of this Directive'" Insurance and reinsurance undertakings are responsible for assessing their investments and attribute the CIC. If the asset in question (collective investment undertaking or other) is exchanged in a market complying with the definition above then they should not be classified as "XL". NAV prices published by entities that do not comply with the definition of MTF should not lead to consider that the asset, in this case the collective investment undertaking, is considered as listed.
We confirm there is a mistake in the instruction. This will be corrected on the first possible opportunity. The value in cell R0680/C0010 is the sum of the values of "Consolidated Group SCR" (R0590/C0010) and "SCR for entities included with D&A method" (R0670/C0010). It should be used to calculate "Ratio of Eligible own funds to group SCR including other financial sectors and the undertakings included via D&A" (R0690/C0010), which is calculated as the total of eligible own funds to meet the group SCR (R0660/C0100) divided by the group SCR, including other financial sectors and D&A undertakings (R0680/C0010).

According to recital (17) of the Commission Delegated Regulation 2015/35 “The definition of future discretionary benefits should capture the benefits of insurance and reinsurance contracts that are paid in addition to guaranteed benefits and that result from profit participation by the policy holder. It should not capture index-linked or unit-linked benefits.”. For this reason template S.12.01 only allows the reporting of future discretionary benefits for the LoB “Insurance with profit participation” (C0020). In relation to the “Accepted reinsurance” it is required that only C0100 is reported (total accepted reinsurance). However it is considered that the values can only relate to “Insurance with profit participation” which is the reason why in the Instructions this LoB is referred to.
We believe that the question is addressing R0420 (Institutions for occupational retirement provision), for which in fact Tier 3 own funds might be reported (and not R0430). However, in fact there is a mistake in R0440 where C0050 should in fact be open (not crossed out) to allow the reporting of the amount reported in R0420. A similar mistake was found in R0230 where the column of Tier 3 (C0050) should also be open (not crossed out) We will try to incorporate this amendment in an ERRATA and amend XBRL taxonomy accordingly.
1. The information on C0210 (Annualised guaranteed rate (over average duration of guarantee)) should be reported at the level of HRG, as indicated in the Instructions. In this template, columns C0010 to C0080 shall be reported by product, columns C0090 to C0160 characterise the product and columns C0170 to C0210 shall be reported by Homogeneous Risk Group. 2. Reporting in C0170-C0210 should capture all business (including unit-linked). For the lines referring to HRG that refer to Unit-Linked business only C0170 to C0200 should be filled in. C0210 should be left blank for this HRG. 3. What is finally reported will depend on the different types of products aggregated at the level of the HRG. C0210 however always displays the average guaranteed rate for each HRG reported in lines C0170-C0210 (apart from UL as explained in 2. above).
It should be filled in as a decimal with 4 decimals. In the example below it should be 1,0234. Please note that this value multiplied by the “Par amount” (plus accrued interests) should provide the Total Solvency II amount value.

The group SCR calculation is performed on the basis of information included in rows from R0100 to R0200 of S.25.01.04. Please see validations BV134 and BV136 (https://eiopa.europa.eu/regulation-supervision/insurance/reporting-format). The rows from R0410 to R0430 provide additional information on the group SCR, which are not used to validate the group SCR calculation.
We would like to clarify that the answer refers to template S.25.01.04 (not S.25.04). We confirm that R500 is expected to be equal to the sum of R510, R520 and R530.
In the case of CIU it depends. The case described in the question is an example of where the option 3 (alternative valuation methods) should be used as the quotation on investment funds by fund management companies does not comply with article 10 (4) of the Delegated Regulation.

Technically the item “Own funds from the financial statements that shall not be represented by the reconciliation reserve and do not meet the criteria to be classified as Solvency II own funds” is not classifiable by tiers. Therefore only the C0010 on the total is required to be reported. It is true that the sum of the tiers will not add to the total and this was duly considered in the validations.
In order to fill in properly the cells of the quantitative reporting templates, including S.23.01.04, one needs to consider the relevant provisions of the Solvency II Directive, Commission Delegated Regulation (EU) 2015/35, Commission Implementing Regulation (EU) 2015/2450 laying down implementing technical standards with regard to the templates for the submission of information to the supervisory authorities, and relevant guidelines. In particular, instructions regarding reporting templates for groups as laid down in Annex III of the Commission Implementing Regulation (EU) 2015/2450 need to be considered. Validations should not be perceived as instructions to fill in the cells. Their aim is to guarantee the quality of the information provided in the reporting templates.
Risk concentration is reported on the basis of the thresholds and the types of risks identified by a relevant supervisory authority. In case of natural disaster or catastrophes (that should be considered as concentration risk as indicated in Article 376(2) of the Commission Delegated regulation 2015/35), the following cells should be left empty: C0020, C0030, C0060, C0070, C0080, C0090, C0100, C0010, C0010, C0170. When the risk concentration caused by exposure to a natural disaster or catastrophe is created by a high volume of insurance contracts with low exposures per contract, the total value of the exposure should be reported in C150. In addition, please note that in the specific case of cells C0010 and C0140 the following should be considered in relation to concentration on natural disaster or catastrophes: o C0010 : When it is not possible to identify one external counterparty, the risk should be identified by the label Individual Policyholders for instance, o C0140 : In case of individual policyholders with different validity dates, this cell can be left empty. Relevant information, which cannot be provided in S.37.01, should be provided as part of the narrative reporting. In case of any doubts, we advise to approach a relevant group supervisor.

EIOPA confirms the calculation. In fact the items referred to are included in the list of assets but are not considered as investments for the purpose of calculation of the threshold.
The assets subject to 181 (a) should be filled in R0410 to R0480, and C0020, C0040 and C0060 to C0080. The liabilities subject to spread risk and that are linked to the MAP should also be filled in the same rows. However, as the amount reported in C0050 should reflect the provision under 181 (b) (i.e. single liability effect) this effect should be reported in the row of the major asset, usually bonds and loans.

The scope of the template is only insurance risks. The reference to article 13(26) is followed by “and authorised under article 211(1) of Directive 2009/138/EC” which limits it to SPVs assuming reinsurance contracts or assuming insurance risks insurance risks through similar arrangements (as in Article 318 of Regulation 2015/35).
As a general rule the values in R0510 to R0550 are reported without any diversification effect, as the sum of solo capital requirements. However, in accordance with Guideline 11 of the EIOPA Guidelines on group solvency, where the undertakings from other financial sectors form a sub-group subject to non-insurance sectoral capital requirements, and are all covered by the calculation carried out according to method 1 set out in Annex I to Directive 2002/87/EC, as provided in Article 228 of the Solvency II Directive, the participating insurance or reinsurance undertaking, the insurance holding company or the mixed financial holding company may use the solvency requirement of such a sub-group instead of the sum of the requirements of each individual undertaking (i.e. diversification effects between entities subject to another sector’s regulatory capital requirements may be recognised if provided in relevant sectoral rules). There will be no diversification effects recognised between the insurance undertakings in the group and the other financial sector entities in the group. In this specific case the amount reported in cell R0510 should consider those diversification effects.

We confirm that the cell R0220 in S.25.02.04 should include all components of the consolidated SCR, including capital requirements of undertakings from other financial sectors.

In this context, S.25.02.04 R0220/C0100 should be the sum of the following: R0210/C0100 + R0200/C0100 + R0500/C0100 + R0540/C0100 + R0550/C0100. At the same time we confirm S.25.02.04 R0220/C0100 should be equal to S.23.01 R0590/C0010.

We confirm that the capital requirements of undertakings from OFS should not be included in the cell R0110/C0110.

The seller of the repo (i.e. the party that gives the underlying asset) recognises a liability in the balance sheet which should not have CIC as it is a liability. The seller usually keeps the underlying asset in his balance sheet because there's no effective transfer of all risks and benefits related to the asset. Therefore, the seller should assign a CIC code to the underlying asset according to its nature as to any other asset, but identify in C0100 the option "4" (Asset pledged as collateral - 4 - Repos).

On the other side, the buyer of the repo (i.e. the party that receives the underlying asset) has an asset in the balance sheet (a credit for the money "lended" to the seller). The buyer does not recognize the underlying asset in his balance sheet because there's no effective transfer of all risks and benefits related to the asset, which as we said remains in seller's balance sheet. Therefore, the underlying asset could be seen as a collateral and the credit recognized by the buyer should be considered as CIC 82 (Loans made collateralised with securities) or CIC 85 (Other collateralised loans made) for the cash-collaterised one, depending on the type of repo.

All efforts should be implemented together with the fund manager in order to get the required information. If ultimately the information is not available, and in particular when this relates to material amounts, the undertaking will have to contact the NCA and explain why the information is not available and how is the undertaking proceeding regarding risk management to overcome the lack of this information.
Bonds issued by special purpose banks or vehicles set by the government should not be considered as government bonds. When creating the CIC table we did not have any specific security in mind and tried to create a comprehensive table. If the asset is listed in more than one country the first two letter of the CIC code should reflect the country of the regulated market or multilateral trading facility used as the reference for valuation purposes. For the use of XL please refer to the definition of “negotiated on a regulated market or on a multilateral trading facility, as defined by Directive 2004/39/EC.” Regarding the precedence between code 25 (Hybrid bonds) and code 28 (Subordinated bonds) the classification should follow a risk-based approach. Which risk is more relevant from risk management perspective? The fact that the payoff is more similar to equity than to bonds or the fact that it has a lower priority in case of liquidation?

Validation BV564_1 will be deactivated as in fact it does not take into account where the Article 206(2) scenario is relevant. This is only relevant when assessing the scenario to choose, i.e. in the calculation of R0100. Validations 565, 566, 567 and 568 should still apply.
1. It is expected that usually a nominal value should be considered, but this may differ depending on the type of the transaction. Therefore we advise to contact a relevant group supervisor in case of doubts. 2. The similarity of the transactions should be assessed on the basis of the type of the transaction. In case of doubts please contact with the group supervisor. If the transactions mentioned in the example are determined as similar and the sum of their value exceeds the threshold, both transactions should be individually reported.
We expect this to be on case-by-case reserves estimated by claim handlers and do not need to be on a best estimate Solvency II basis. In this case the concept of discounting/undiscounting would not apply. However we confirm that if the concept applies C0400-C0550 are undiscounted and C0560 should reflect the last diagonal but discounted. The same approach applies to “Reinsurance RBNS Claims – Triangle” and “Net RBNS Claims – Year end”.
The loss distribution profile non-life shows the distribution, in (predefined) brackets, of the claims incurred during the reporting year, therefore claims with 0 incurred losses should not be considered.

EIOPA confirms that solo submissions for the acquired are not expected to be affected.

Regarding the group submission, by default the date of acquisition of the insurer should be considered as the general principle of consolidation states that only the profit/loss after the acquisition date should be considered in the consolidation. If a group buys an entity, all assets and liabilities are revalued. This means:

- S.06.02.C0160 - Acquisition value: should reflect the Solvency II value at the date of insurer acquisition. Please note that, if the same asset is held by different entities within the group are subject to consolidation, the acquisition value should be reported as a weighted average. Different acquisition values do not originate additional lines in S.06.02;

- S.08.01.C0220 - Initial date; C0150 - Premium paid to date; C0160 - Premium received to date: should reflect the information since the date of insurer acquisition;

- S.08.02.C0140 - Premium paid to date; C0150 - Premium received to date; C0160 - Profit and loss to date: should reflect the information since the date of insurer acquisition;

- S.09.01: should reflect the information since the date of insurer acquisition.

Regarding the scope of trading activity, the contracts closed prior to the insurer acquisition of the company should not be reported.

Unfortunately the example provided in Q.74 is misleading. Template S.21.01 does not require historical data to be reported. Please see also Q.30.

The examples should have read:

Please note that only the RBNS part of the best estimate is included in template S.21.01 (the incurred but not reported (IBNR) part of the best estimate is not included in S.21.01). Downward (or upward) revisions to previous claims are not explicitly reported in template S.21.01. Consider a single claim that occurred in 2006, say, for which during 2016 paid = 20 and RBNS = 100. It might be that for this claim during 2017 paid =10 and RBNS =80. Thus the total claims incurred for the claim in question was 120 in the at end 2016 and 90 at the end 2017, the claim in question has been revised down by 10 during 2017 but thus revision is not explicitly shown.

In the example given, 2006 is the accident year (AY) and 2016, 2017 are considered development years (DY). Then claims_incurred_AY2006_DY2016=100+20=120 and claims_incurred_AY2006_DY2017=10+80=90 . Note that both amounts should be captured in the column for total claims incurred in accident year 2006.

I hope this clarifies your question.

Yes, that is correct. The reference is to para. 2a of article 44 of the Solvency II Directive.

The feedback provided by DPM and XBRL team is correct. The definition of the remaining part needs to be consistent across templates, regardless if the information on the MAP is requested or not. In the specific case of the balance-sheet, a decision was taken not to request the balance-sheet by MAP, however this does not impact the definition of remaining part. In other cases such as the S.26 templates, where information is requested by RFF and by MAP, the remaining part would need to exclude the MAP business. In sum "remaining part of the business" is the business which is not material RFF or MAP. The definition of remaining part is the same across templates. In reality your assumption that the sum of material RFF + MAP + Remaining Part will reconcile to the Total Entity is correct. Sub-fund reporting is required where a RFF/MAP includes a MAP/RFF embedded. Therefore the reporting requirements applicable to RFF and MAP apply to each sub-fund, according to its nature (RFF or MAP). This means that we confirm that all templates required to be reported under article 18 or 34 should be reported for all sub-funds. In cases of sub-funds, all "son" funds have to be reported, including the "remaining part of the fund". The "mother" fund does not need to be reported in addition. Please note that answers by EIOPA DPM and XBRL team are supported by EIOPA business team whenever the question relates to business clarifications.
According to para. (3)(b) of article 133 of DR the "Largest liability limit provided" is used to calculate the number of claims. However, para. (c) says that where the insurance or reinsurance undertaking provides unlimited cover in liability risk group i, the number of claims ni is equal to one. This means that in this case the "Number of claims" (C0910) is 1 and the "Largest liability limit provided" (C0900) is not reported.

The interpretation is correct. In both S.23.02 and S.23.03 the amount of paid in share capital should be reported gross of own shares. The information on own shares is not considered in the Total as it is already included in the amount of paid in share capital.
Please see Q&A 28 from file Answers to questions on the Final report on the ITS on the templates for the submission of information to the supervisory authorities (CP-14-052). The intention is actually to have the same item reported even if in S.04.01 is called “Commissions” and in S.05.01 is called “Acquisition expenses”. However, the templates and instructions were published in the Technical Standard and EIOPA will not amend the labels for the moment. Regarding the difference between life and non-life it was not intentional, acquisition expenses should include renewal expenses in both cases.