

I.D.	Question	Answer
1	Will there be a test system for Q4 2023 QRT submission?	Yes - details will be communicated shortly. External test phase from Monday 4th to Friday 8th December. Testing queries to SIITestReturns@centralbank.ie
2	S.37.02 EIOPA guidance indicates that "Other" can be used for country, sector or currency. But the XBRL taxonomy does not allow those options.	Fixed in Hotfix 2.8.0
3	<ul style="list-style-type: none"> Where there is a conflict between the EIOPA guidance and the taxonomy (DPM dictionary), i.e. if the guidance suggests an input that seems like it would not be a valid entry in the XBRL file, which should take precedence? For example, on S.37.02, the guidance suggests that "Other" is a valid option for Country, Sector or Currency, but the XBRL taxonomy does not seem to allow for this option. 	<p>Fixed in Hotfix 2.8.0</p> <p>There should not be conflict, if you believe there is please let us know as it could be an error that needs to be fixed.</p>
4	<ul style="list-style-type: none"> For S.37.02 & S37.03, should all exposures be included or should there be a materiality threshold? The guidance suggests the former, but this does not seem practical. 	S.37 is relevant for entities in the scope of group supervision and third parties. There is no materiality threshold and per the ITS "The tables shall be based on all the exposures (full balance sheet) after credit or insurance risk mitigation technique and exemptions (net amount)".
5	<ul style="list-style-type: none"> On the new S.37.01 guidance, there seem to be a few typos. The latest guidance for C0280 refers to "Description of the other instruments that are reported in C0200" - should this be C0220? Also, the guidance for C0090 refers to "Identify the credit assessment institution (ECAI) giving the external rating in C0050"; should this refer to C0080? 	We agree these are errors and should refer to C0220 and C0080. An EIOPA Q&A has been submitted to clarify this error and allow it to be fixed in the next ITS update.
6	S.26.13.01.02/C0060: When calculating the proportion of an internal model LoB allocated to each SII LoB, is there a recommended exposure measure? E.g, GWP	The allocation between internal model LoB and SII will be model specific so there is no universal exposure measure or approach.
7	S.26.13.01.07/C0110: If the loss distribution is unavailable on a SII LoB basis, may a proxy distribution be used to calculate percentiles?	Yes. The proxy distribution should be consistent with the allocation established in S.26.13.01.02/C0060
8	Article 19 of the Implementing Regulation 2023-894 specifies required QRTs on SCR information for individual undertakings and captive insurance undertakings, including forms 26 and 27. Article 20 specifies the required QRTs on SCR information for captive reinsurance undertakings and does not include forms 26 and 27. However, Article 24, which applies to individual undertakings, captive insurance undertakings and captive reinsurance undertakings, specifies that forms 26 and 27 are to be prepared for each material ring-fenced fund and for the remaining part. This appears to be inconsistent with Article 20 which does not require captive reinsurance undertakings to prepare these forms. Can you confirm whether, in the case where a captive reinsurance undertaking has ring-fenced funds, forms 26 and 27 would be applicable?	The Central Bank of Ireland has submitted a Q&A to EIOPA on this and will update this answer when a response is published.
9	How about if dividends are payments, not receipts?	In this case they would not be considered foreseeable dividends and so the ITS change regarding foreseeable dividends is not applicable to them
10	Can I confirm EPIFP on S.23 should be reported Gross for solos and Groups as the Group log file has not been updated	Confirmed.

11	<p>Is there a captive exemption for S.19 where information does not have to be reported by currency and for S.27 where only the summary section has to be populated</p>	<p>S.19; For captive insurance and reinsurance undertakings complying with the conditions specified in Article 5(4) and (5), this template shall be reported without the currency split i.e. Z0030 is reported always as Total.</p> <p>S.27; Captive insurance and reinsurance undertakings complying with the conditions specified in Article 4(4) and (5) shall only report tables corresponding to R0001 and R002/C0001 and R0010/C0010 to R0340/C0030.</p>
12	<p>S.14.02: Is there additional guidance you can point to in the completion of data point: C0030 {The proportion of GWP covering climate related perils? (0-100)}?</p>	<p>Please refer to EIOPA Q&A 2637</p>
13	<p>Can you please advise on the granularity of the report S.14.04? Is this based on product type ID or portfolio level? Can you please clarify this?</p>	<p>S.14.04 - Liquidity risk for life business for Quarterly Financial Stability reporting data should be provided on portfolio level, please see EIOPA Q&A 2476 for more details.</p>
14	<p>How do you expect entities to report for S.14.01 regarding the fiscal treatment of the unit or index-linked product?</p>	<p>This field is to provide information on the fiscal treatment of the products, in particular when fiscal treatment could influence decision on exercising surrender/ cancellation. The following closed list should be used: 1 – In case of lapse/surrender there is no tax or subsidy related loss 2 – In case of lapse/surrender past or future tax benefits or other subsidies are lost 3 – Other tax related losses not covered above 4 – Not applicable Option 1 includes cases where policyholders would suffer a tax or subsidy loss unless a similar insurer is willing to accept the contract. Tax benefits that relate to future premiums i.e. where premiums reduce future income tax payments are not relevant for the purpose of above classification. Whether for a particular contract within a product a fiscal loss actually would occur at the valuation date may depend on individual contractual parameters like duration or the age of the policyholder. For the purpose of reporting no differentiation according to such parameters is however required. The criteria should be chosen where such a fiscal loss may occur for the contracts of that product. Not applicable for annuities stemming from non-life contracts.</p>
15	<p>Regarding the workshop in the 17th October, will there be worked examples for each new QRT?</p> <p>On S.14.02 can you please clarify the 10% rules below. Are entities to report separately for countries where the contract was entered into represents more than 10% of technical provisions or written premium for a given product and for countries where the amounts are less than 10% are these to be reported as a cumulative number with a separate listing of the countries making up this total?</p>	<p>1. Yes we intend to include some examples.</p> <p>2. For S.14.02 we expect that for a given LoB, there will be one row provided on the template (where no additional product category - C0020 - is selected). Where an additional product category is selected, there will be a maximum of two rows included per Lob (except in the case of LoB 12 where there will be a max of three rows). As such, the row will be defined by the LoB (C0010) & Additional Product Cat (C0020). For each row, the Country column (C0120) must be completed. C0120 can contain multiple countries for a given line of business and should be listed with a comma separating them.</p> <p>Where the countries reported meet the criteria defined in the ITS i.e. 1) <u>the country that the contract was entered into</u> is reported when the country represents more than 10 % of technical provisions or written premiums for the reported product or 2) the country reported represents less than 10 % of Technical Provisions or written premiums for the reported product.</p> <p>The entity is not required to report each country separately nor is it required to categorise countries on the basis of exceeding the 10%</p>

16	<p>S.14.02</p> <p>1. Is QRT S.14.02 expected to act as a control for the EU taxonomy disclosures that will be reported in 2023?</p> <p>2. C0030 Climate-related perils includes events such as flooding, heat waves, landslides, droughts, or wildfires for example).</p> <p>Considering that under one line of business there could be multiple products some covering and other not covering climate related perils, please report here the percentage of products in this category (measured by gross written premiums) that covers at least one aspect of climate-related perils, between 0 and 100.</p> <p>Question. If a product such as property, by design offers full perils cover as standard yet may include risks in the product that are restricted to fire only cover due to the individual risks condition or location, do we include these in the percentage as</p>	<p>1. Not directly. In general, we would expect there to be consistency between reporting and disclosure templates. Inconsistencies may give cause to raise a supervisory query.</p> <p>2.EIOPA Q&A 2637 clarifies that “The information collected in C0030 of Templates S.14.02 aims at identifying the total liabilities exposed to climate risks. This should indicate the percentage of total premium which would cover climate related perils and/or not specifically exclude pay-outs for climate related perils”. As the risks (even though they are restricted) contribute to the total liabilities exposed to climate risk, they should be included.</p>
17	<p>Re s.06.04, is this QRT to exclude unit linked assets? A recent Q&A specified for transition risk that unit linked was N/A but nothing regarding physical risk?</p>	<p>Unit linked and Index linked products are out of scope for transition risk. (EIOPA Q&A 2553). No express exclusion was provided for physical risk.</p>
18	<p>S.06.04 presume the entries for justification is free text box?</p>	<p>Yes.</p>
19	<p>An OEIC has 10% of its investments subject to transition risk. The insurer only invests in the OEIC will its transition risk be 100% or 10%?thanks</p>	<p>For this stylised example and without any further information, the transition risk would be 10%. The methodology for the determination of the transition risk is for the entity to determine.</p>
20	<p>Non reporting of climate data in S.06.04 can be justified by ORSA assessment, is that for 2023 only or every year?</p>	<p>The justification should be completed every year.</p>
21	<p>Re s.06.04 are unit linked assets applicable for the physical risk kpi?</p>	<p>Unit linked and Index linked products are out of scope for transition risk. (EIOPA Q&A 2553). No express exclusion was provided for physical risk.</p>
22	<p>S.06.04 should be reported for Unit-index linked product?</p>	<p>Unit linked and Index linked products are out of scope for transition risk. (EIOPA Q&A 2553). No express exclusion was provided for physical risk.</p>
23	<p>Re s.06.04. For the physical risk kpi, do you need to also do a lookthrough and factor in funds? Or is it only physical properties i.e.cic9s</p>	<p>On the basis that EIOPA have clarified that CIUs that are held for investment are in scope for the assessment of transition risk, it is required to look through to the underlying investments. The methodology for assessing the materiality of exposure to transition risk has not been prescribed, it is for the entity to define.</p>

24	<p>QRT: S.06.04.01 – Climate change related transition risk - KPI</p> <p>R0020/C0010 refers to the proportion of the Solvency II value exposed to physical risk in relation to property. Can you please confirm:</p> <p>(i) whether Right of Use (RoU) properties (e.g., leased office buildings for own use (not held for investment purposes)) should be included in the definition of Property?</p> <p>(ii) whether plant and equipment fall under the definition of Property for the purposes of R0020/C0010?</p>	<p>i) As the ITS says “The identification of properties exposed to physical risk should be consistent with the identification made, in C0190 Item Title in S.06.02.” then t all Property investments, including Right Of Use properties, that are included in S.06.02 should be included in the physical risk KPI calculation. Therefore Right of use properties should be included in the definition of property for the physical risk KPI.</p> <p>ii) Q&A 2553 answers part ii of this question: For the calculation of the KPI on physical risk (Solvency II value of property exposed to physical risk, in relation to total of property in the ITS amendments on reporting and disclosure 2022 to be applicable as of 31.12.2023) property, plant and equipment (PPE) should be included.</p>
25	<p>S.06.04</p> <p>Can the Central Bank set out its expectation regarding the completion of template S.06.04? In Q&A 2553 EIOPA stated that “the KPI on transition risk for investments includes assets held within funds, such as collective investment undertakings, which are part of investments”. A holding in a collective investments scheme gives insurers an exposure to a large number of underlying investments. Is the Central Bank able to confirm whether insurers are required to look through to the underlying investments and asses the transition risk on an individual basis? Such a requirement would be a complex task and not one which the manager of the fund (which often has a large number of unit holders that are not insurers) would necessarily be willing to help with.</p>	<p>S.06.04</p> <p>On the basis that EIOPA have clarified that CIUs that are held for investment are in scope for the assessment of transition risk, it is required to look through to the underlying investments. The methodology for assessing the materiality of exposure to transition risk has not been prescribed, it is for the entity to define.</p>
26	<p>Can you please confirm your view on what claims incurred are to be used within the 05.01. IFRS4 or 17?</p>	<p>Please refer to EIOPA Q&A 2634</p>
27	<p>Can you please clarify if interests from investments should be reported in quarterly S. 05. Does fronting income consider as technical income?</p>	<p>The new ITS states that S.05.01 {C0200/R1210 & C0300/R2510} is for net technical expenses/income not covered by other rows in S.05.01 and reduced by the amount ceded to reinsurance undertakings. Other technical expenses/income shall not be split by lines of business. Shall not include change in other technical provisions and non-technical expenses/income such as tax, interest expenses, losses on disposals, etc. The amount of net technical expenses/income shall be reported negative if the amount of technical income is larger than the amount of technical expenses.</p> <p>From this reading: fronting commission should be included in technical income but interest on investments should not.</p>
28	<p>For SFCR, 05.02 only reports 5 plus home country. But 04 reports all. So how many needs to be appended to it?</p>	<p>It is unclear if this question refers to the countries to be included in the SFCR or in S.04.</p> <p>Refer to ANNEX II Instructions for the templates for the solvency and financial condition report of individual undertakings.</p>
29	<p>How can cross border reinsurance business be allocated to country of risk if the cedant is a global underwriter?</p>	<p>According to the ITS "For the purposes of this template and in the case of proportional or non-proportional reinsurance, the ‘country in which the risk is situated’ means the country of localisation of the ceding undertaking".</p>

30	If 05.02 is removed by 04, do we need to include 04 in the SFCR or no longer need?	Under the revisions to the reporting and disclosure requirement the solo disclosure of 05.02 has been replaced with a requirement to disclose S.04.05.21, which is a reduced version of the regulatory version of this template (and can be constructed directly from the S.04.05). Please review the ITS and annotated templates from EIOPA. The annotated templates contain an entry point for Annual Solvency II public disclosure Solo (aps) the full list of templates required to be disclosed in the SFCR are listed. Please note that S.05.02 is still required to be disclosed for the group SFCR (entry point apg in the annotated templates).
31	Re S.04.03, do branches need individual LEI codes?	Branches do not need their own LEI code. The ITS states "For EEA branches and any non-EEA branches which do not have a distinct LEI, a specific code shall be attributed by the undertaking. Such a code shall be unique for the specific underwriting entity and shall not overlap with any other code attributed by the undertaking or LEI code". You can find more details about different codes used in the model in section IV.3 Codes and Type of Codes of EIOPA Filing Rules.
32	Is LEI required for C0010 in QRT S.04.04 or are other entity codes allowable? Often a Branch will not have its own LEI code.	Branches do not need their own LEI code. The ITS states "For EEA branches and any non-EEA branches which do not have a distinct LEI, a specific code shall be attributed by the undertaking. Such a code shall be unique for the specific underwriting entity and shall not overlap with any other code attributed by the undertaking or LEI code". You can find more details about different codes used in the model in section IV.3 Codes and Type of Codes of EIOPA Filing Rules.
33	On S.04 U/W entities if the branch is on runoff do you still need reporting	Yes. All entities with business activity are required to be reported.
34	Is the determination of the country of risk for S.04. based on the country of risk at the time of GPW or on the policyholder's residence at each reporting date	The principle outlined in the ITS is the "habitual residence " of the policyholder or "country of registration" for moveable property. The determination should consider the location of risk at the time of writing/renewing the contract.
35	Will any guidances be provided on the new public QRT S.04.05.21?	Refer to ANNEX II Instructions for the templates for the solvency and financial condition report of individual undertakings
36	Does the new public QRT S.04.05.21 expect to be audited?	There is no requirement for S.04.05.21 to be audited. The scope of templates subject to external audit are unchanged by the new taxonomy. Please refer to The Central Bank's Requirement for External Audit of Solvency II Regulatory Returns / Public Discl
37	<p><u>S.04.04 / S.04.05</u></p> <p>1. Example - Underwriting branch is Ireland writing FPS business with a client based in France, but the risks are located in various EEA locations (Germany, Spain, Italy etc.) . Using this example, could you advise how the premium on this policy should be reported by "Location of Underwriting" and "Location of Risk"?</p>	<p><u>S.04.04 – Location of underwriting</u></p> <p>C0020 - Business underwritten through FPS in country different from the country of establishment (i.e. All FPS business is aggregated into this column).</p> <p>Assuming the only FPS business is located in France, then C0020 and C0030 should equate across rows. R0010 should reflect the code of the EEA member country where the business is underwritten through FPS (i.e. 'FR').</p> <p>This is then repeated for each Line of business (Z0010) written by the underwriting entity concerned (Z0020).</p> <p>Stylised Example</p> <p>Business underwritten in the country of establishment Business underwritten through FPS in country different from the country of establishment Business underwritten in the considered country through FPS</p> <p>C0010 C0020 C0030</p> <p>R0010 FR</p> <p>Premiums written (gross) R0020 1,000,000 500,000 500,000</p> <p><u>S.04.05 – Location of Risk</u></p> <p>C0020 – Will reflect the sum total of business written by the undertaking for the specific line of business (Z0010) being reported. R0010 should reflect the code of the 'country in which the risk is</p>

38	Is there a definition of Run off business for S.01.02	<p>S.01.02 has multiple options to cover partial run-off undertaking, full run-off undertaking & specialised run-off undertakings so this is more than a run-off/not run off list.</p> <p>Please also review the Supervisory statement on the supervision of run-off undertakings from EIOPA https://www.eiopa.europa.eu/publications/supervisory-statement-supervision-run-undertakings_en</p> <p>If still unsure please discuss with your supervisor.</p>
39	When will the updated Data Quality Checks be available on CBI website?	The draft list of CBI data quality checks will be published before the 7th of November with an updated list following a review of the first set of annual return in 2024 and a review of the EIOPA Taxonomy 2.8.2 minor release due in October 2024 (see EIOPA website for further details).
40	Where are the slides for today on the CBI website?	Solvency-ii-taxonomy-17-october-2023.pdf
41	On portal, where are 'pending actions' or tasks due. Some actions due at month end are not appearing. Thank you.	These should be found under "pending activities", please contact your supervisor if you cannot find what you need.
42	Will all historical submissions made on ONR always remain available through the new portal or will access to these be lost over time?	Historical submissions made on ONR will remain available through the new portal.
43	Is there any guidance available for interpreting XBRL errors when uploading the return onto the ONR?	Error messages will be shown when a file that is not valid is submitted. If you believe there is an issue with a validation please contact InsuranceRegulatoryReportingQueries@centralbank.ie
44	Can you speak briefly on the NST validation changes?	<p>The NST taxonomy is being updated to include a number of technical changes that will apply to the underlying data dictionary. This NST taxonomy update is being undertaken in order to maintain alignment with the changes to EIOPA's QRT Taxonomy 2.8.0. The revised NST taxonomy will be published in early November 2023, with external user acceptance testing (UAT) taking place following its publication. The NST taxonomy will have an effective date of 31 December 2023.</p> <p>This update will not affect the information being collected in the NSTs or the current validations. We will review and consider the need to make changes to the NSTs throughout 2024 as firms submit under QRT Taxonomy 2.8.0.</p>
45	Is NST14 required to be reported for Q4 2023 quarterly reporting?	No. NST14 is no longer required to be reported.
46	As S.14.02 is replacing NST14 for Q4 and NST14 is currently a bi-annual reporting. Can you please advise if NST14 is still need to be reported for Q2?	No. NST14 is no longer required to be reported.
47	Is there a separate testing platform for NST02 changes?	There will be no separate testing platform for NST02. NST02 will be available to test along with other returns on the new test portal.
48	Internal model - will the new templates replace the current entity specific reports submitted?	No. The "Structured Templates" should continue to be reported, however the need for these will be reviewed once the new QRT templates have been received and analysed. The "Unstructured templates" are generally agreed at college level and feedback will come via that channel.
49	Is the IMST still needed following the new QRTs for PIM and FIM?	Assume IMST = internal model structured template; The "Structured Templates" should continue to be reported, however the need for these will be reviewed once the new QRT templates have been received and analysed.

50	What were the main changes published in the hotfix last Friday?	<p>The list of changes are too detailed to list here. Please refer to:</p> <ul style="list-style-type: none"> -Detailed change log between the 2.8.0 Hotfix_and 2.8.0 -validations change log between the 2.8.0 Hotfix_and 2.8.0 <p>Both of which are available on this webpage https://www.eiopa.europa.eu/tools-and-data/supervisory-reporting-dpm-and-xbrl_en</p>
51	<p>Group Supervision of UK Insurers Can the Central Bank advise those insurers, with a UK Parent, whether taxonomy 2.8.0 will effect its supervision of the UK Group? The adoption of taxonomy 2.8.0 means that group templates submitted to the PRA will no longer be identical to those set out by EIOPA. Can the Central Bank confirm whether, in its role as supervisor for UK Groups, it will continue to accept the templates set out before the adoption of taxonomy 2.8.0 - especially if these are submitted in excel rather than an XBRL format?</p>	<p>Assuming this refers to Group "Other Methods" supervision where we are the sole NCA for an entity that is a part of a UK Group. We will continue to accept the UK Returns as expecting full EU group submissions for an EU sub-group consisting of a single entity would be unduly onerous.</p>
52	<p>For certain undertakings which are part of groups domiciled in other jurisdictions that are not Solvency II equivalent, the CBI requires the group to submit specific QRT forms. Will the changes to Solvency II reporting affect the required reporting for these groups?</p>	<p>There are no specific changes to this requirement under the changes to Solvency II reporting coming into force on 31 December 2023. Changes to the Solvency II framework for group supervision are being considered as part of the 2020 review, with the amendments to the Directive currently at trilogue stage between the European Commission, the European Parliament and the European Council. Changes to the requirements for group supervision may result in additional changes in reporting requirements in the future, but this will not be for year-end 2023.</p>
53	<p>Re changes to ECAI identifiers. There are multiple options for each ECAI and also what looks like a default. Is it permissible to use the default for a ECAI?</p>	<p>As per the ITS regarding ECAI:</p> <p>Identify the credit assessment institution (ECAI) giving the external rating in C0320, by using the name of the ECAI as published on ESMA's website. In case of ratings issued by subsidiaries of the ECAI please report the parent ECAI (the reference is made to ESMA list of credit rating agencies registered or certified in accordance with Regulation (EC) No 1060/2009 on credit rating agencies).</p>
54	<p>Should E.04.01 be reported for pure P&C entities. The log file notes the first two tables are for Life only figures & last table is for company figures.</p>	<p>Yes, template E.04.01.16.03 applies to all (life and non-life) investment revenues and expenses not attributed to policyholders. Templates E.04.01.16.01 and E.04.01.16.02 require the geographical breakdown of life technical provisions related to investment revenues and investment expenses attributed to policyholders.</p> <p>Under the assumption that non-life products with profit participation do not exist, the following holds:</p> <ul style="list-style-type: none"> - Investment revenues of S.29.02.01 C0010 R0040 equals the sum of all rows of E.04.01 EC0020, EC0030 and EC0060 - Investment expenses of S.29.02.01 C0010 R0050 equals the sum of all rows in E.04.01 EC0040, EC0050 and EC0070 <p>If no investment revenues or investment expenses are attributed to policyholders, then the relationship with S.29.02.01 will be applicable with E.04.01 EC0060 and EC0070 respectively.</p>

55	Is E.04 QRT applicable to Life Reinsurance undertakings?	<p>Yes, template E.04.01.16.03 applies to all (life and non-life) investment revenues and expenses not attributed to policyholders. Templates E.04.01.16.01 and E.04.01.16.02 require the geographical breakdown of life technical provisions related to investment revenues and investment expenses attributed to policyholders.</p> <p>Under the assumption that non-life products with profit participation do not exist, the following holds:</p> <ul style="list-style-type: none"> - Investment revenues of S.29.02.01 C0010 R0040 equals the sum of all rows of E.04.01 EC0020, EC0030 and EC0060 - Investment expenses of S.29.02.01 C0010 R0050 equals the sum of all rows in E.04.01 EC0040, EC0050 and EC0070 <p>If no investment revenues or investment expenses are attributed to policyholders, then the relationship with S.29.02.01 will be applicable with E.04.01 EC0060 and EC0070 respectively.</p>
56	<ul style="list-style-type: none"> • There seems to be a conflict between E.04.01 and S.29.02. Per the E.04.01 guidance: “The information on investment revenues and expenses not attributed to policyholders is equivalent to information reported in S.29.02 Excess of Assets over Liabilities - explained by investments and financial liabilities R0040 and R0050” (emphasis added). However, S.29.02 includes revenues and expenses for unit-linked and non Unit-linked assets (so policyholders are included). Is the E.04.01 guidance incorrect? 	<p>The guidance in the ECB add-on template instructions for E.04 has been clarified in the latest version:</p> <p>“Under the assumption that non-life products with profit participation do not exist, the following holds:</p> <ul style="list-style-type: none"> - Investment revenues of S.29.02.01 C0010 R0040 equals the sum of all rows of E.04.01 EC0020, EC0030 and EC0060 - Investment expenses of S.29.02.01 C0010 R0050 equals the sum of all rows in E.04.01 EC0040, EC0050 and EC0070”
57	CBS threshold: is the threshold calculated using total liabilities or total technical provisions?	The new threshold for templates S.18-S.21 is calculated using total technical provisions. If we have misinterpreted the question, please contact InsuranceRegulatoryReportingQueries@centralbank.ie