

Consultation Paper

On the XBRL Taxonomy related to the EBA final draft Implementing Technical Standards on Supervisory Reporting Requirements under the draft Capital Requirements Regulation



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1. Responding to this Consultation

The EBA invites comments on the attached XBRL taxonomy (intended to form the basis for supervisory data transmission between competent authorities and the EBA) and supporting documentation, and in particular on the technical expression of the ITS data point model in XBRL.

Comments regarding the timing of implementation of the supervisory reporting requirements, their scope of application, the extent of information covered therein and other matters put forward in prior consultations (such as EBA/CP/2012/06, EBA/CP/2012/05, EBA/CP/2013/03, EBA/CP/2013/04, DPM, CP50 and CP51) will not be processed here, as these have already been subject to those public consultations (see below). Further, detailed comments on the implementation of data collection in any particular nation will not be processed, either, as this falls within the choice and competency of the national competent authorities. In particular, there is no requirement that data be collected from firms in XBRL, or if in XBRL using this, or a related taxonomy.

Comments are most helpful if they:

- indicate the specific issue that might present a problem;
- contain a clear rationale;
- provide evidence to support the views expressed/ rationale proposed; and
- describe any alternatives the EBA should consider.

Submission of responses

To submit your comments, click on the 'send your comments' button on the consultation page by 09/10/2013. Please note that comments submitted after this deadline, or submitted via other means may not be processed.

Publication of responses

Please clearly indicate in the consultation form if you wish your comments to be disclosed or to be treated as confidential. A confidential response may be requested from us in accordance with the EBA's rules on public access to documents. We may consult you if we receive such a request. Any decision we make not to disclose the response can be reviewed by the EBA's Board of Appeal and the European Ombudsman.

Data protection

The protection of individuals with regard to the processing of personal data by the EBA is based on Regulation (EC) No 45/2001 of the European Parliament and of the Council of 18 December 2000 as implemented by the EBA in its implementing rules adopted by its Management Board. Further information on data protection can be found under the [Legal notice section](#) of the EBA website.

2. Executive Summary

On 26 July 2013 the EBA published final draft Implementing Technical Standards (ITS) on supervisory reporting, in accordance with Regulation (EU) No 575/2013 of the European Parliament and of the Council of 26 June 2013 on prudential requirements for credit institutions and investment firms and amending Regulation (EU) No 648/2012 (colloquially known as Capital Requirements Regulation or CRR). These were revised with corrections on 17 September 2013.

As the final draft ITS on supervisory reporting will become, eventually, part of the single rulebook with the particular aim of specifying uniform prudential reporting requirements, the implementation of the reporting requirements imposed on credit institutions and investment firms shall be based on uniform technical specifications of a granular level of detail. Hence the Data Point Model (DPM) published as part of the ITS, which is a structured representation of the data requirements included in the ITS, identifying all the business concepts and their relations, as well as validation rules.

Once supervisory data has been collected by the competent supervisory authorities, by whatever mechanism determined by each competent authority, (some of) that data will need to be submitted to the EBA. To facilitate this, a concrete technical representation of the DPM, in the form of an XBRL taxonomy, has been produced, the intention being that data will be exchanged between competent authorities and the EBA in the form of XBRL instances conforming to this taxonomy.

It is also anticipated that several competent authorities may wish to make this XBRL format the basis of their collection of supervisory reporting from firms.

Besides the feedback provided to this consultation, the Taxonomy will be finalised based on the final text of the ITS, including final versions of the related data templates, instructions, validation rules and data point model for supervisory reporting requirements.

The Taxonomy only consists of one particular IT representation of the DPM, representing the requirements of the templates, instructions and wider text of the ITS as captured in the DPM. The definition of those requirements remains purely in the ITS, with the detailed identification and classification of them expressed in the DPM.

Timing and next steps

Based on the final versions of the related data templates and instructions of the ITS on supervisory reporting requirements, and taking into account, where appropriate, the feedback received to this consultation and further consultation with competent authorities, a final Taxonomy will be produced..

3. Content and Methodology of the Taxonomy

Content of the Taxonomy

The DPM covers all data items included in the corrected final draft ITS published 17 September. It is a representation, utilising the XBRL standard, of the data point model of the final draft ITS. It includes a dictionary layer identifying all the business concepts and their relations, a table linkbase layer indicating the reporting requirements and their canonical visual layout, as well as validation rules represented as XBRL formula assertions.

Specifications

The following standards and specifications are used in the Taxonomy:

- XBRL 2.1 - December 31, 2003 with Errata Corrections to February 20, 2013
- Dimensions 1.0 - September 18, 2006 with errata corrections to January 25, 2012
- Formula Specification 1.0 - 2009 - 2011
- Table Linkbase 1.0 PWD - May 17, 2013¹

Validation rules

To facilitate uniform implementation and avoid implementation problems, validation rules (quantitative relations between rows and columns of each template, and among templates) were included in the final draft ITS. These have been translated into XBRL formula assertions.

It is intended that reported instance files must pass all validation assertions before being accepted by the EBA. In general, all rules from the ITS are included, however:

- Cross-period rules are not expressed in XBRL, nor are rules requiring information from more than one instance file (i.e. cross validations between XBRL modules). This is because the XBRL formula specification, and technical implementations of it, is considered less well developed in this area, and it less clear cut what the effect of a failed validation rule should be in such circumstances. These checks will however likely be implemented as second level (non-XBRL) checks applied by the EBA on the reception of data.
- Rules from the ITS that document that two table cells are in fact the same item of data are unnecessary in XBRL as these will be the same XBRL data fact, and so only reported once within a single instance file. Where these identities exist between instance files, the previous point applies.
- An additional few rules that were more complex to map to XBRL, such that the cost/benefit assessment of including them was unfavourable, are not included.

4. Accompanying documents

XBRL Taxonomy.zip

The files forming the XBRL taxonomy which is the subject of this consultation. Note that for convenience, this zip file includes all XBRL files required to utilise the taxonomy offline if needed, including some that are properly currently available from canonical URI's (e.g. www.xbrl.org).

Sample Instances.zip

Included are both mechanically produced volumetric examples (not expected to be valid according to the taxonomy's XBRL formula assertions) demonstrating all of the data points from each reportable instance (i.e. "module") and for each individual template, and a selection of individual example instances that are expected to be valid according to the XBRL assertion formulae included in the taxonomy.

Also included to aid comprehension of the taxonomy is the source material of which the taxonomy is a technical implementation, namely:

Data Point Model.zip

The data point model specifying the reporting requirements expressed in the ITS in a structured form, including a database containing the data point model, and documentation including annotated tables, dictionaries and hierarchies, several other representations of aspects of the model, and explanatory documentation.

In addition the taxonomy should be considered in the context of its ultimate source, the final draft ITS, published at <http://www.eba.europa.eu/-/eba-publishes-final-draft-technical-standards-on-supervisory-reporting-requiremen-4>.