



## CRD IV Taxonomy v2.1.0.PC

CoreFiling feedback on specific issues identified in the Public Consultation CRD IV Taxonomy (v2.1.0).

### Comments on Validation Rules

1. There is a logical conflict between several rule 'triplets' relating to cross-validation between C\_01.00 and C\_05.01. Fact equivalence rules v0189\_m, v0191\_m to v0197\_m inclusive, v0198\_m, v0199\_m, v0200\_m, v0202\_m and v0203\_m conflict with sign rules v\_3685\_s and v3693\_s where the former expects all referenced data points in C\_01.00 to be zero or negative, and the latter expects the equivalent data points in C\_05.01 to be zero or positive. Since the former correspond to data points whose row labels are prefixed with “(-)” we believe that it is as intended. We therefore conclude that v3693\_s is erroneous. [This issue arose in v2.0.1 and is still extant in v2.1.0.PC.]
2. Rule v0216\_m refers to a non-existent cell at r700,c010 (despite the Formula in Annex XV being correct). [This issue arose in v2.0.1 and is still extant in v2.1.0.PC.]
3. Rule v0312\_m contains a 'hard-coded' value of 270 as a result of a typo in the Annex XV Formula. The same issue affected v0313\_m in v2.0.1 but has been fixed in v2.1.0.PC. However, it remains an outstanding issue for v0312\_m.
4. Rule v2090\_h contains an apparent business-level inconsistency – c140 values are a component of c130 values (which must be reported as negative according to the row label). The rule implies that c140 values must be “more negative” than c130 values. [This issue arose in v2.0.1 and is still extant in v2.1.0.PC.]
5. Identity rules v3319\_j to v3543\_j inclusive have not been implemented in the taxonomy (as indicated in the Consultation paper) because they represent pairs of values associated with the same underlying fact and would normally be policed by EBA filing rule 2.16 relating to duplicate facts. However, some NCAs have yet to implement rules designed to detect duplicates. The presence of these rules in Annex XV is leading some filers to assume that the taxonomy is applying them.
6. Rule v4027\_a (a COREP rule) appears in the FINREP rules in the v2.1.0.PC taxonomy although it is not referenced in Annex XV.
7. Rule v1160\_m appears to have been translated incorrectly from Annex XV into the taxonomy. The rule compares a single value in one table with a sum derived from another table that iterates over all sheets (i.e. a Z-axis). The Annex XV Formula uses the

notation "(sNNN)" and there are also row and column restrictions, though it is not clear whether these apply to one or both tables. It would appear, from test cases, that the taxonomy formula is applied repeatedly to the single value and each of the referenced sheet values in turn, instead of once with the sum across all sheets. [This issue arose in v2.0.1 and is still extant in v2.1.0.PC.]

## Comments on Domains/Dimensions/Members

1. The DPM describes one currency Domain containing all currencies including "OTHER (foreign exchange, internal models)" and "Other (interest rate)" members.

The DPM describes two Member Hierarchies:

- \* CU1 - 34 Members plus "OTHER (foreign exchange, internal models)"
- \* CU2 - 23 Members plus "Other (interest rate)"

The taxonomy defines one currency Domain containing 171 members (all 162 currencies plus 'OTHER' and 'Other' and seven other miscellaneous aggregate members that are not drawn from the DPM).

The Taxonomy defines three Member Hierarchies:

- \* CU1 - 34 Members plus "OTHER (foreign exchange, internal models)" with label "Hierarchy to describe a set of currencies"
- \* CU2 - 23 Members plus "Other (interest rate)" with label "Hierarchy for currencies in the MKR SA TDI template"
- \* CU3 - 162 Members with label "Currencies applicable for open axis tables"

CU1 and CU2 are not referenced by any tables in the taxonomy and are therefore not used. CU3 is used wherever a currency is required. It is therefore impossible to use "OTHER" or "Other (this may be intentional, but it is confusing would-be filers who are basing their XBRL generation on the DPM).

2. The DPM describes one Geographic area Domain containing all countries including "Other countries" and a couple of other aggregate Members.

The DPM describes four Member Hierarchies:

- \* GA1 - 42 Members inc "Countries not relevant for MKR purposes"
- \* GA2 - 37 Members
- \* GA3 - 38 Members inc "Other countries"
- \* GA4 - 250 Members inc "Other countries"

The Taxonomy defines one Geographic areas Domain containing all 249 countries (but no "Other countries")

The Taxonomy defines five Member Hierarchies:

- \* GA1 - 42 Members inc "Countries not relevant for MKR purposes" with label "Hierarchy for the markets in the MKR SA EQU template"
- \* GA2 - 37 Members with label "Core country list"
- \* GA3 - 38 Members inc "Other countries" with label "Core countries and other"
- \* GA4 - 346 Members inc "Other countries" and a lot more aggregates with label "All countries and other"
- \* GA5 - 250 Members with label "All countries applicable for open axis tables"

GA1, GA2 and GA3 are not referenced by any tables in the Taxonomy and are therefore not used. However, GA4 is referenced in crr/dict/met/met.xsd. GA5 is used wherever a country is required. It is therefore impossible to use "Other countries" or even "Countries not relevant for MKR purposes" (this may be intentional, but it is confusing would-be filers who are basing their XBRL generation on the DPM).

### Comments on Taxonomy Distribution

Now that the Taxonomy Package specification has been published as an XII standard it would be helpful if the taxonomy were published as a Taxonomy Package once again (i.e. with .taxonomyPackage.xml included), as was the case with early drafts of the CRD IV taxonomy.

### Comments on Taxonomy Versioning

The catalog supplied with Public Consultation 2.1.0 remaps the entire domain:

```
<rewriteURI uriStartString="http://www.eurofiling.info/"  
rewritePrefix="www.eurofiling.info/" />
```

(a similar issue exists for [www.eba.europa.eu](http://www.eba.europa.eu))

This means that you can't use this catalog in conjunction with a different catalog for a previous/subsequent version of the taxonomy, or a Solvency II taxonomy that is based on a different version of [www.eurofiling.info](http://www.eurofiling.info).

It would be better to put each release of the eurofiling.info files in a separate location, and to remap only that location, e.g.

```
<rewriteURI uriStartString="http://www.eurofiling.info/20140414/"  
rewritePrefix="www.eurofiling.info/20140414/" />
```

Besides making it difficult to use a mix of taxonomy versions in the same processor at the same time, the current approach makes interpretation of instance documents

dangerous, as it's not clear which version of the taxonomy they were written against. Use of the wrong version may invalidate the instance or subtly change its meaning.