

2017 November 25th

SOLVENCY II QRT SOLO Q3 SUBMISSION



Discussion between Christelle BERNHARD, consultant & reporting expert at ADDACTIS® Software, and Julie LAROCHE, consultant & modelling expert at ADDACTIS® Worldwide.



Julie: EIOPA has just released a new taxonomy so which taxonomy should companies use for this new submission, the previous one or the new one?



Christelle: For the QRT Solo Q3 submission, companies will definitely have to use the previous one but next year, for both QRT Solo Q4 and QRT Annual 2017 submissions they should use the new one.

Julie: QRT Solo Q4 2016 and QRT Annual 2017 will be related to data end of 2016. Why are there 2 submissions required for similar information?

Christelle: QRT Solo Q4 submission is scheduled for March 25th, 2017 and the Annual one for May 2017. Deadlines are different and companies will have more time for the QRT Annual submission as there is a lot more information required. Indeed, in the past, several companies complained about the burden created by this additional reporting and were wondering why there were two submissions for the same reporting date. So EIOPA simplified reporting to avoid double reporting issues. The reason why EIOPA doesn't only request annual information is that collecting end-of-the-year information only after more than 14 weeks is not acceptable from a prudential perspective.

Julie: Did you observe any improvements in companies' submissions, less questions for example than for the first step on Day One in May of this year?

Christelle: Companies got used to it as time passed by. Assets templates were clearly difficult to fill in but now we see fewer questions on this topic. In France, we had many questions related to the new electronic signature requirement since this new requirement entered into force in October 2016.

Julie: Did you receive any questions already on annual reporting? Any anticipation from companies?

Christelle: As a matter of fact, several companies are outsourcing the work to consulting firms. They may think that everything will be mapped and that they don't need to anticipate right now. But even if the mapping is done, companies are still the ones that will have to input the correct data. This is a major point that we are very attentive for our clients. Though, we observe more anticipation by the bigger companies. As an example: deadlines are reduced each year, in 2017 one is allowed to submit 20 weeks after the closing date but it will become 14 after 2020! Companies will need to act and be faster but at the same time they will get used to reporting.

Julie: Have you noticed any specific recurrent questions by companies?

Christelle: In general the questions are on the axis of the templates. A lot of annual templates will be currency dependent or LoB dependent which makes it more complex for companies.

Julie: Would you say that when it comes to reports, companies will become faster and faster and are there still foreseen challenges along the way?

Christelle: For sure! They will act faster but it is obvious that regulators may make some changes in requirements in the future. But we are ready and very close to regulatory information.