

Dear,

The National Bank of Belgium (NBB) would like to inform you about an upcoming change to the XBRL reporting process and protocol.

To maximally harmonise the approach for the different prudential reports and in line with the unified approach recommended by the European institutions (EIOPA, ECB, EBA,...), the NBB will apply the same filing rules in the domains INS of OneGate as in the other XBRL domains (Banking (MBS), Resolution (NRA),...).

The major change of this measure is the principle that all necessary information must be included in every XBRL-file and manual interventions via OneGate are not possible anymore (except for the closing of the report which remains possible, and absolutely necessary, via OneGate control panel).

This new approach offers several advantages for the declarers. As every instance is complete, the templates must no longer be declared manually as “notReported” or “Nihil” in OneGate control panel; the statuses are automatically determined based on the filing indicators mentioned in the XBRL file. As consequence, the validation report is directly 100% complete and no new validation request is necessary.

The main idea is that reporting institutions should have effective internal data quality procedures before sending any report to the NCA. Ideally, only one fully valid report is sent. A relatively high number of submissions, benchmarked against other declarers, might be an indication of poor reporting systems and/or insufficient quality checking.

These changes have been presented to Assuralia before the summer. They are all quite logical and stem from sound business reasons. Nevertheless, the impact will be different for every reporting institution. Some will not notice any difference at all while others might have to adapt their acquired or in-house developed software that generates the XBRL files. It is important to note that every file that does not respect the principles below will be rejected.

From a more detailed practical view, this change implies that only the 100% correct instances (validation rules errors excepted) are accepted by the system, which means that:

- Partial submissions are no longer allowed. According to EBA and EIOPA filing rule 1.12, an instance must contain the full report, as well for initial submissions as for resubmissions. In practice, this implies that action=“update” and reporting template-by-template is no longer possible.
- Declaring a template “notReported” is only allowed via the filing indicators that are present in the XBRL-file itself (no longer via OneGate control panel).
- For each template in OneGate control panel, either a negative or a positive filing must be present in the XBRL declaration. Filing indicators serve the purpose of giving a clear and transparent indication of the content of a report and triggering the correct execution of validation rules. Therefore, it must be explicitly indicated by the reporting institution which templates are intended to be reported and which are not through these filing indicators.
- Reporting a positive filing indicator for a template that is not present in OneGate control panel is contradictory and will result in the rejection of the file (in principle, for Solvency II, all templates are present in OneGate control panel).
- Reporting a negative filing indicator for a template while including facts that are belonging only to this template is contradictory and will result in the rejection of the file.
- Reporting facts that cannot be loaded into any of the templates in OneGate control panel (“invalid items”) result into the rejection of the file.
- Duplicate facts result into the rejection of the file. According to EBA and EIOPA filing rule 2.16, instances must not contain duplicate business facts.
- In case a positive filing indicator is sent for a given template, but no facts are present in the XBRL declaration, a “nihil” declaration is automatically assumed. So a manual “nihil” declaration via OneGate control panel is no longer possible.

- Only closing of the report remains possible (and absolutely necessary) via OneGate control panel.

Concerning the timing:

Following discussions with Assuralia, NBB will apply this new approach from 1 June 2022 in the **production** environment of OneGate. Until that date, the production environment of OneGate will continue to apply the current approach so the end-of-year reporting of 31/12/2021 does not require any change in the procedures.

However, in order to prepare and thoroughly test the new approach, the **testing** environment of OneGate has implemented this new approach already since 1 November 2021. During this time gap, the “behaviour” of OneGate will be different between the test and the production environment.

Institutions who have the authorisation to manually introduce their data into OneGate (“data entry”) can continue to do so, also under the new approach. However, in case they would upload an XBRL file, the same principles as laid out above will apply.

We strongly express our hope that this new approach will be intensively tested, for our mutual benefit, as the new approach must work smoothly and flawlessly by 1 June 2022 in production.

As always, any issues, feedback or questions can be sent to Assurep@nbb.be.