Comments Template on EIOPA-CP-11-002 **Technical Consultation on the Solvency II XBRL Taxonomy**	
Company name:	Financial Supervisory Authority (FIN-FSA)
Disclosure of comments:	EIOPA will make all comments available on its website, except where respondents specifically request that their comments remain confidential. Please indicate if your comments on this consultation should be treated as confidential, by deleting the word Public in the column to the right and by inserting the word Confidential.

Please follow the instructions for filling in the template:	⇨ Do **not** change the numbering in column "Reference".
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	The paragraph numbers below correspond to the document:
	EIOPA-CP-11-002_Introduction_Taxonomy_Consultation.doc

Reference	Comment
General Comment	The horizontal harmonization should be in mind when creating EU wide taxomies. Shared elements or concepts in different taxonomies must be defined in the same way. Now there are at least two differencies with S II sample taxonomy and COREP taxomony. 1. CurrencyDimension, S II = typed, COREP = explicit. 2. S II = LinesOfBusinessDimension, COREP = BusinessLinesDimension.
10.	We are collecting data based on COREP Taxonomy.
11.	
11.1.	
11.1.1.	This is fine.
11.1.2.	This is fine.
11.1.3.	This is fine.

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11.2.	
12.	
12.1.	
12.2.	
12.3.	
13.1.	Depending on how much templates are changed after first implementation.
13.2.	Depending on how much templates are changed after first implementation. There will be changes after the S II framework has been on usage some time.
13.3.	To implement these S II reports to our existing reporting framework.
14.	
15.	We are worried about the know-how of XBRL in Finland and more widely in Europe. There seems to to be less than enough capable people or organizations who are familiar with the technology. And this means long learning times and bottlenecks during S II taxonomy implementation.
16.	The harmonization of the data collection means heavy investments in some Member States. There needs to be clear revision policy since future changes means more work and costs.
18.	We do not prefer typed dimensions. There should always be a list of possible attributes for a dimension when ever it is possible. If you have an open lists you are in trouble when analysing data. The statistical analysis becomes hard with data cleaning and in the worst cases typed attributes are just nice to know background info.
19.	
20.	We agree if this referes to "IV. Rules to define standard labels for primary items". The systematic labelling helps all users.
21.	We agree with this. The creation date should also available as a metadata and now it is in comments.