

16 December 2022

Developments in the Collection, Transmission and Validation of Supervisory Reporting Submissions

Pursuant to the [decision](#) of the European Banking Authority EBA/DC/446 of 23 May 2022 concerning investment firms' supervisory reporting by competent authorities to the EBA, the Authority is hereby issuing a communication to all investment firms licensed by the MFSA regarding the developments in the collection, transmission and validation of the EBA XBRL supervisory reporting submissions.

Please note that as **from 20 December 2022** the EBA XBRL submissions through the LH Portal will be sent directly to the EBA with the new file naming convention in line with [EBA XBRL Filing Rules version 5.2](#) as reported in the "Guidelines on File Naming Convention" available in the File Upload right side section in the LH Portal.

File Upload

Investment Firms ("IF") are kindly reminded that XBRL returns are to be uploaded to MFSA through the LH Portal ("LHP") using project "IFR EBA Return". Starting from Tuesday 20th December 2022 several changes will be introduced within LHP as explained hereunder.

File Validation

Investment Firms are required to upload the Supervisory Reporting module in a ZIP file including one XBRL file covering the whole module.

XBRL File Naming Convention

In line with the EBA guidelines, the following file naming conventions should be adopted for the XBRL file submissions of Supervisory Reporting module:

LEI_CountryCode_ReportingFramework_ModuleCode_ReferenceDate_CreationTimestamp

Where:

LEI : 20-character Legal Entity Identifier

CountryCode: MT

ReportingFramework: Framework name defined by the DPM/XBRL taxonomy in uppercase followed by the taxonomy version in six digits IF010100.

ModuleCode: The name of the module being submitted as defined by the taxonomy without underscore and in upper-case.

Available Modules:

- **IFCLASS2CON** - Investment Firms CLASS 2, Consolidated
- **IFCLASS2IND** - Investment Firms CLASS 2, Individual
- **IFCLASS3CON** - Investment Firms CLASS 3, Consolidated
- **IFCLASS3IND** - Investment Firms CLASS 3, Individual
- **IFGROUPTTEST** - Investment Firms GROUPTTEST, Individual (at this stage the adoption and submission of the Group Capital Test is not granted by the Authority)

ReferenceDate: The reference date of the module being submitted, in the format YYYY-MM-DD

CreationTimestamp: 17-digit timestamp of the XBRL file creation, in the format YYYYMMDDhhmmsszzz, where z denotes milliseconds (for example 20221207132744111).

In cases in which the XBRL filename does not match the naming convention as specified above, the upload will not be successful, and the submission will not be considered in terms of the applicable regulatory obligations.

Furthermore, in case of the need of a resubmission of an amended version of a return already submitted, the Timestamp must be unique and different from the previous used.

For the sake of clarity an XBRL file, for example, should be named as following:

LEICODE1234567890123_MT_IF010100_IFCLASS2IND_2022-12-31_20221207132744111

ZIP File Naming Convention

The following file naming convention should be used for the ZIP file containing the XBRL file:

LEI_CountryCode_ReportingFramework_ModuleCode_ReferenceDate

Where:

LEI: 20-character Legal Entity Identifier

CountryCode: MT

ReportingFramework: Framework name defined by the DPM/XBRL taxonomy in uppercase followed by the taxonomy version in six digits IF010100.

ModuleCode: The name of the module being submitted as defined by the taxonomy without underscore and in upper-case. Available Modules to be used are the same as the above mentioned

ReferenceDate: The reference date of the module being submitted, in the format YYYY-MM-DD

In cases where the ZIP filename does not match the naming convention as specified above, the upload will not be successful, and the submission will not be considered in terms of the applicable regulatory obligations.

IF are reminded that the EBA may change the validation rules from time to time, and IF must also ensure that they use the latest version in order to avoid errors when uploading the XBRL files.

File Upload Checks

LH Portal Checks

Any XBRL file uploaded through the LHP will go through first-level checks. If the submission fails these checks, an automated email is received outlining that the submission failed. Such email will provide details on the error.

Then, a series of second-level automated technical checks pertaining to the structure of the XBRL file will be performed on a submission that passes the first-level checks.

If a submission fails to pass the technical checks, an automated email is received outlining that the submission failed to upload.

IF are requested to address the outlined issue and resubmit the module. Any failures to submit these returns would be considered as a failure to comply with Rule R1-4.2.1. of Part BI of the Investment Services Rules.

Submissions to EBA

Submissions that pass the first level checks as well as the technical validations, are automatically uploaded to EBA. An automated email with EBA's data quality feedback is received.

The automated email will include:

1. The full EBA feedback in JSON format as an attachment.
2. A summary of EBA's feedback, including the following attributes:

Attribute in email	Definition
File status	The validation status and overall assessment of acceptability of the module by EBA.
Date Time Received	Date and time of file receipt by the EBA (dd/mm/yyyy hh:mm:ss)
File Name	The file name of the uploaded ZIP file
Feedback Text	A simple summary of rejected status in case file has been rejected.
Errors Found	Each error is a simple error object containing validation code, validation rule, and a list of violation messages pointing to where and how the referred rule has been violated.

This new process will apply to new submissions as well as re-submissions submitted by IF through LHP. Submissions uploaded to MFSA with reference dates March 2022, June 2022 and September 2022 will be uploaded by the Authority to EBA through a one-time batch file upload.

Submissions Status

A status is assigned to each submission successfully uploaded through LHP. The status of a submission can be viewed in the LHP User Logs. The following new status will be introduced:

Status	Definition
File pending upload to ESA*	Submission successfully passed MFSA validations and is pending to upload to EBA.
File uploaded to ESA	Submission successfully uploaded to EBA.
File Accepted by ESA	Submission successfully passed EBA validation process.
File Rejected by ESA	Submission rejected by EBA due to issues within the XBRL File.

Only the status of "File Accepted by ESA" are considered as valid submissions.

Should you have any queries in relation to the above, please do not hesitate to contact investmentfirms@mfsa.mt.

*ESA: European Supervisory Authorities which in the case of Investment Firms is the EBA