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# Observations from reporting of RoI to the ESAs. Key common issues identified

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# Introduction

- These slides provide an overview of the most common issues identified to date in the reporting of the registers of information (RoI) and provide explanations of the most common errors
- Technical checks and validation rules that are applied by the ESAs are described here: [Overview of technical checks, validation rules and business checks to be applied by the EBA for RoI reporting](#) (updated 28 April 2025)

All information provided is for illustration and reference purposes, reflecting the design and set-up of the ESAs reporting infrastructure. It should be noted that the validation checks, and feedback messages implemented by the competent authorities in their reporting solutions used for the collection of the registers of information from the financial entities may differ from those explained on these slides.

# Most Common Errors – per error code

Rule Codes	Description	Leads to Reject
807	Foreign key constraint violated	YES
v8886_m, v8850_m, v8885_m, v8884_m, v8888_m, v88889_m	Mandatory values missing	NO
805	Primary key missing	YES
808	Missing filing indicators or case is wrong	YES
VR_71, VR_23, VR_12, VR_77	Wrong LEI reported	NO
720	Non-DORA files reported, or case is wrong	YES
806	For open tables you cannot report identical key values	NO
714	entityID parameter – does not match filename	YES
VR_72	EUID code was not found in BRIS	NO
103	Report file structure - content	YES
801	All table header codes must be in the taxonomy	YES
v8826_m	LEI mask validity	NO

# 807 – Foreign key violation – self reference

Leads to reject

This is an example of an FK failing for self-reference being violated. The self reference can be seen in the model shared in the EBA website. Input is on the right. Violation at the bottom. C 0030 value not in any row for C 0010

B.02.01 — Contractual Arrangements – General Information	
0010 - Contractual arrangement reference number	varchar(255)
0020 - Type of contractual arrangement	varchar(255)
0030 - Overarching contractual arrangement reference number	varchar(255)
0050 - Annual expense or estimated cost of the contractual arrangement for the past year	money
0040 - Currency of the amount reported	char(3)

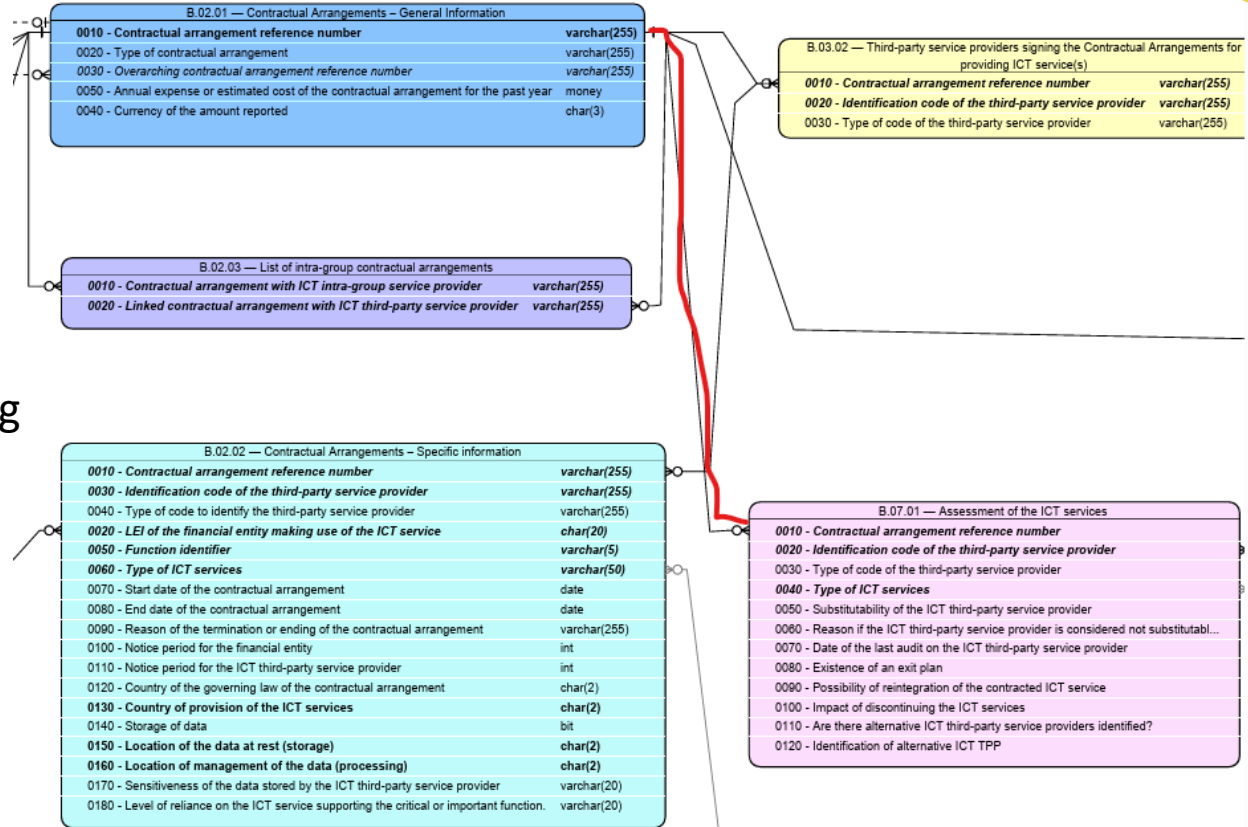
```
b_02.01.csv
1 c0010,c0020,c0030,c0040,c0050
2 RIVER-00008783,eba_CO:x1,,eba_CU:EUR,27000
3 RIVER-00008801,eba_CO:x1,,eba_CU:EUR,27000
4 RIVER-00008802,eba_CO:x1,,eba_CU:EUR,4239
5 RIVER-00008804,eba_CO:x1,,eba_CU:EUR,39390
6 RIVER-00008805,eba_CO:x1,,eba_CU:EUR,4200
7 RIVER-00008807,eba_CO:x1,,eba_CU:EUR,0
8 RIVER-00008808,eba_CO:x1,,eba_CU:EUR,74400
9 RIVER-00008809,eba_CO:x2,,eba_CU:EUR,220000
10 RIVER-00008810,eba_CO:x2,,eba_CU:EUR,44250
11 RIVER-00008812,eba_CO:x2,,eba_CU:EUR,170625
12 RIVER-00008813,eba_CO:x2,,eba_CU:EUR,1500000
13 RIVER-00008814,eba_CO:x2,,eba_CU:EUR,0
14 RIVER-00008815,eba_CO:x2,,eba_CU:EUR,3568215
15 RIVER-00008818,eba_CO:x1,,eba_CU:EUR,5972
16 RIVER-00008819,eba_CO:x1,,eba_CU:EUR,200000
17 RIVER-00008820,eba_CO:x1,,eba_CU:EUR,10000
18 RIVER-00008821,eba_CO:x1,,eba_CU:EUR,3000
19 RIVER-00008822,eba_CO:x1,,eba_CU:EUR,1000000
20 RIVER-00008824,eba_CO:x1,,eba_CU:EUR,15000
21 RIVER-00009701,eba_CO:x1,,eba_CU:EUR,0
22 RIVER-00009702,eba_CO:x1,,eba_CU:EUR,0
23 RIVER-00009704,eba_CO:x1,,eba_CU:EUR,0
24 RIVER-00009705,eba_CO:x1,,eba_CU:EUR,24000
25 RIVER-00009707,eba_CO:x1,,eba_CU:EUR,0
26 RIVER-00009708,eba_CO:x1,,eba_CU:EUR,0
27 RIVER-00009709,eba_CO:x1,,eba_CU:EUR,0
28 RIVER-00009710,eba_CO:x1,,eba_CU:EUR,0
29 RIVER-00009713,eba_CO:x1,,eba_CU:EUR,0
30 RIVER-00009714,eba_CO:x1,,eba_CU:EUR,18000
31 RIVER-00009715,eba_CO:x1,,eba_CU:EUR,3600
32 RIVER-00009716,eba_CO:x1,,eba_CU:EUR,19200
33 RIVER-00009718,eba_CO:x1,,eba_CU:EUR,0
34 RIVER-00009719,eba_CO:x1,,eba_CU:EUR,0
35 RIVER-00009722,eba_CO:x1,,eba_CU:EUR,0
36 RIVER-00009723,eba_CO:x1,,eba_CU:EUR,4035
37 RIVER-00009724,eba_CO:x3,RIVER-00030977,eba_CU:EUR,7800
38 RIVER-00009726,eba_CO:x3,RIVER-00030977,eba_CU:EUR,0
39 RIVER-00009728,eba_CO:x2,,eba_CU:EUR,370424
40 RIVER-00009730,eba_CO:x2,,eba_CU:EUR,4781
41 RIVER-00009731,eba_CO:x1,,eba_CU:EUR,78688
42 RIVER-00009732,eba_CO:x1,,eba_CU:EUR,0
43 RIVER-00009734,eba_CO:x2,,eba_CU:EUR,296
44 RIVER-00009735,eba_CO:x1,,eba_CU:EUR,37500
45 RIVER-00009736,eba_CO:x1,,eba_CU:EUR,25000
46 RIVER-00009739,eba_CO:x1,,eba_CU:EUR,97500
47 RIVER-00009740,eba_CO:x1,,eba_CU:EUR,25000
48 RIVER-00031026,eba_CO:x1,,eba_CU:EUR,20000
```

```
"detailedFeedback": [
  "templateCode,rowCode,columnCode,ruleCode,message,offendingValue",
  "b0201,36,c0030,807,The reported data must follow the key-foreign key constraints defined in the DPM,RIVER-00030977",
  "b0201,37,c0030,807,The reported data must follow the key-foreign key constraints defined in the DPM,RIVER-00030977",
]
```

# 807 – Foreign key violation – across tables

Leads to reject

Example Relationship  
 B 07.10 C 0010  
 Must match something  
 In  
 B 02.01 C 0010



# Foreign key violation – across tables

Leads to reject

## Error reported is

```
"detailedFeedback": [  
  "templateCode,rowCode,columnCode,ruleCode,message,offendingValue",  
  "b0701,12,c0010,807,The reported data must follow the key-foreign key constraints defined in the DPM,CNTR0010917",  
  "b0701,13,c0010,807,The reported data must follow the key-foreign key constraints defined in the DPM,CNTR0010917",  
  "b0701,14,c0010,807,The reported data must follow the key-foreign key constraints defined in the DPM,CNTR0010917",  
]
```

## Value found in B 07.01 is CNTR0010917

```
b_07.01.csv  
1 c0010,c0020,c0030,c0040,c0050,c0060,c0070,c0080,c0090,c0100,c0110  
2 DE_CTR_00001,5299002CRNX7K6KOL397,eba_qCO:qx2000,eba_TA:S05,eba_ZZ:x960,eba_ZZ:x964,9999-12-31,eba_BT:x28,eba_ZZ:x966,eba_ZZ:x793,eba_BT:x21  
3 DE_CTR_00001,5299002CRNX7K6KOL397,eba_qCO:qx2000,eba_TA:S06,eba_ZZ:x960,eba_ZZ:x964,9999-12-31,eba_BT:x28,eba_ZZ:x0,eba_ZZ:x793,eba_BT:x21  
4 DE_CTR_00001,5299002CRNX7K6KOL397,eba_qCO:qx2000,eba_TA:S07,eba_ZZ:x960,eba_ZZ:x964,9999-12-31,eba_BT:x28,eba_ZZ:x0,eba_ZZ:x793,eba_BT:x21  
5 DE_CTR_00001,5299002CRNX7K6KOL397,eba_qCO:qx2000,eba_TA:S09,eba_ZZ:x960,eba_ZZ:x964,9999-12-31,eba_BT:x28,eba_ZZ:x0,eba_ZZ:x793,eba_BT:x21  
6 DE_CTR_00001,5299002CRNX7K6KOL397,eba_qCO:qx2000,eba_TA:S14,eba_ZZ:x960,eba_ZZ:x964,9999-12-31,eba_BT:x28,eba_ZZ:x0,eba_ZZ:x793,eba_BT:x21  
7 DE_CTR_00001,5299002CRNX7K6KOL397,eba_qCO:qx2000,eba_TA:S16,eba_ZZ:x960,eba_ZZ:x964,9999-12-31,eba_BT:x28,eba_ZZ:x0,eba_ZZ:x793,eba_BT:x21  
8 DE_CTR_00001,5299002CRNX7K6KOL397,eba_qCO:qx2000,eba_TA:S17,eba_ZZ:x960,eba_ZZ:x964,9999-12-31,eba_BT:x28,eba_ZZ:x0,eba_ZZ:x793,eba_BT:x21  
9 DE_CTR_00001,5299002CRNX7K6KOL397,eba_qCO:qx2000,eba_TA:S19,eba_ZZ:x960,eba_ZZ:x964,9999-12-31,eba_BT:x28,eba_ZZ:x0,eba_ZZ:x793,eba_BT:x21  
10 DE_CTR_00002,3912008B4R4WAZOOKE08,eba_qCO:qx2002,eba_TA:S08,eba_ZZ:x959,eba_ZZ:x965,9999-12-31,eba_BT:x28,eba_ZZ:x967,eba_ZZ:x791,eba_BT:x28  
11 DE_CTR_00004,52990043XSDGKALUKW74,eba_qCO:qx2002,eba_TA:S05,eba_ZZ:x959,eba_ZZ:x965,9999-12-31,eba_BT:x28,eba_ZZ:x967,eba_ZZ:x792,eba_BT:x28  
12 DE_CTR_00015,391200DBW37TKGUOL556,eba_qCO:qx2002,eba_TA:S05,eba_ZZ:x961,,9999-12-31,eba_BT:x28,eba_ZZ:x966,eba_ZZ:x792,eba_BT:x28  
13 CNTR0010917,DE228678751,eba_qCO:qx2002,eba_TA:S05,eba_ZZ:x960,eba_ZZ:x964,9999-12-31,eba_BT:x29,eba_ZZ:x966,eba_ZZ:x793,eba_BT:x21  
14 CNTR0010917,DE228678751,eba_qCO:qx2002,eba_TA:S06,eba_ZZ:x960,eba_ZZ:x964,9999-12-31,eba_BT:x29,eba_ZZ:x966,eba_ZZ:x793,eba_BT:x21  
15 CNTR0010917,DE228678751,eba_qCO:qx2002,eba_TA:S07,eba_ZZ:x960,eba_ZZ:x964,9999-12-31,eba_BT:x29,eba_ZZ:x966,eba_ZZ:x793,eba_BT:x21  
16  
17
```

# 807 – Foreign key violation – across tables

Leads to reject

But CNTR0010917 is not found in b 02.01 hence the error

The image shows a CSV file named 'b\_02.01.csv' with 34 rows of data. Each row contains a numeric ID, a date-like string (e.g., 'c0010,c0020,c0030,c0040,c0050'), and a status string (e.g., 'DE\_CTR\_00001,eba\_CO:x2,nicht anwendbar,eba\_CU:EUR,55000000'). A search dialog box is overlaid on the right side of the CSV, with 'Find what:' set to 'CNTR0010917'. The dialog has several options: 'Find Next', 'Count', 'Find All in Current Document', 'Find All in All Opened Documents', 'Close', 'Backward direction', 'Match whole word only', 'Match case', 'Wrap around', 'Search Mode' (Normal, Extended, Regular expression), 'Transparency' (On losing focus, Always), and 'Matches newline'. A red message at the bottom of the dialog reads: 'Find: Can't find the text "CNTR0010917" in entire file'.

Line	ID	Date	Status
1	c0010,c0020,c0030,c0040,c0050		
2	DE_CTR_00001	eba_CO:x2,nicht	anwendbar,eba_CU:EUR,55000000
3	DE_CTR_00002	eba_CO:x1,nicht	anwendbar,eba_CU:EUR,32000
4	DE_CTR_00003	eba_CO:x1,nicht	anwendbar,eba_CU:EUR,140
5	DE_CTR_00004	eba_CO:x1,nicht	anwendbar,eba_CU:EUR,144000
6	DE_CTR_00005	eba_CO:x1,nicht	anwendbar,eba_CU:EUR,15000
7	DE_CTR_00006	eba_CO:x1,nicht	anwendbar,eba_CU:EUR,1700
8	DE_CTR_00007	eba_CO:x1,nicht	anwendbar,eba_CU:EUR,45000
9	DE_CTR_00008	eba_CO:x1,nicht	anwendbar,eba_CU:EUR,2612.5
10	DE_CTR_00009	eba_CO:x1,nicht	anwendbar,eba_CU:EUR,10000
11	DE_CTR_00010	eba_CO:x1,nicht	anwendbar,eba_CU:EUR,7000
12	DE_CTR_00011	eba_CO:x1,nicht	anwendbar,eba_CU:EUR,5100
13	DE_CTR_00012	eba_CO:x1,nicht	anwendbar,eba_CU:EUR,23000
14	DE_CTR_00013	eba_CO:x1,nicht	anwendbar,eba_CU:EUR,29000
15	DE_CTR_00014	eba_CO:x1,nicht	anwendbar,eba_CU:EUR,0
16	DE_CTR_00015	eba_CO:x1,nicht	anwendbar,eba_CU:EUR,240000
17	DE_CTR_00016	eba_CO:x1,nicht	anwendbar,eba_CU:EUR,70000
18	DE_CTR_00017	eba_CO:x1,nicht	anwendbar,eba_CU:EUR,550
19	DE_CTR_00018	eba_CO:x1,nicht	anwendbar,eba_CU:EUR,75000
20	1295	eba_CO:x2,nicht	anwendbar,eba_CU:EUR,1000000
21	13354	eba_CO:x1,nicht	anwendbar,eba_CU:EUR,45500
22	99675	eba_CO:x1,nicht	anwendbar,eba_CU:EUR,69100
23	112211	eba_CO:x1,nicht	anwendbar,eba_CU:EUR,290
24	2175619	eba_CO:x1,nicht	anwendbar,eba_CU:EUR,2600
25	2676807	eba_CO:x1,nicht	anwendbar,eba_CU:EUR,1000
26	2717630	eba_CO:x1,nicht	anwendbar,eba_CU:EUR,124100
27	6581294	eba_CO:x1,nicht	anwendbar,eba_CU:EUR,4270
28	6605348	eba_CO:x2,nicht	anwendbar,eba_CU:EUR,277000
29	8187255	eba_CO:x1,nicht	anwendbar,eba_CU:EUR,13400
30	8392579	eba_CO:x1,nicht	anwendbar,eba_CU:EUR,24200
31	8825277	eba_CO:x1,nicht	anwendbar,eba_CU:EUR,41000
32	9395190	eba_CO:x1,nicht	anwendbar,eba_CU:EUR,5000
33	12718453	eba_CO:x1,nicht	anwendbar,eba_CU:EUR,81000
34	8580923	eba_CO:x1,nicht	anwendbar,eba_CU:EUR,0

# 807 – Foreign key violation – across tables

Leads to reject

If some reason, one of the templates is not possible to integrate for example:

- 801 error - All the header column codes must be defined in the taxonomy json files (in DPM)
- 805 error - For open tables, the key columns values cannot be empty

Then many FK can potentially fail, and other tables will be referring to the failed to load table.

This is expected behaviour a database system would fail for this reason.



# v8886\_m, etc – Mandatory values missing

Pattern example:

with {tB\_07.01, default: null, interval: false}: if (...) then ( ( not ( isnull ({c0080}) ) ) ) endif

Essentially means

For B 07.01 c0080 is mandatory

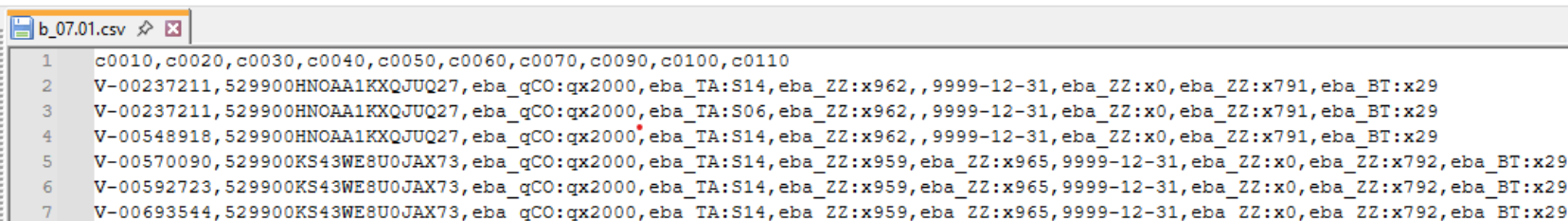
Also, can be found on the model shared on the EBA website here as in the table shared next

Table	Column	Type	Length	PrimaryKey	ForeignKey	Nullable
	<i>0010 - Contractual arrangement reference number</i>	varchar	255	Yes	Yes	No
	<i>0020 - Identification code of the third-party service provider</i>	varchar	255	Yes	Yes	No
	0030 - Type of code of the third-party service provider	varchar	255	No	No	Yes
	<b>0040 - Type of ICT services</b>	varchar	255	Yes	No	No
	0050 - Substitutability of the ICT third-party service provider	varchar	255	No	No	No
	0060 - Reason if the ICT third-party service provider is considered not substitutable or difficult to be substitutable	varchar	255	No	No	Yes
B.07.01 — Assessment of the ICT services	0070 - Date of the last audit on the ICT third-party service provider	date	0	No	No	No
	<b>0080 - Existence of an exit plan</b>	bit	0	No	No	No
	0090 - Possibility of reintegration of the contracted ICT service	varchar	255	No	No	No
	0100 - Impact of discontinuing the ICT services	varchar	255	No	No	No
	0110 - Are there alternative ICT third-party service providers identified?	bit	0	No	No	No
	0120 - Identification of alternative ICT TPP	varchar	255	No	No	Yes

# v8886\_m, etc – Mandatory values – column is gone

```
"detailedFeedback": [  
  "templateCode,rowCode,columnCode,ruleCode,message,offendingValue",  
  "b0701,1,c0080,v8886_m,Value should not be missing,None",  
  "b0701,2,c0080,v8886_m,Value should not be missing,None",  
  "b0701,3,c0080,v8886_m,Value should not be missing,None",  
  "b0701,4,c0080,v8886_m,Value should not be missing,None",  
  "b0701,5,c0080,v8886_m,Value should not be missing,None",  
  "b0701,6,c0080,v8886_m,Value should not be missing,None"  
]
```

C 0080 is missing completely from the input

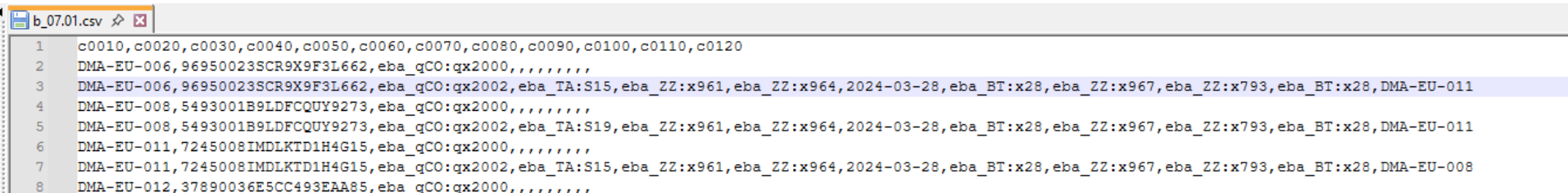


Line	Content
1	c0010,c0020,c0030,c0040,c0050,c0060,c0070,c0090,c0100,c0110
2	V-00237211,529900HNOAA1KXQJUQ27,eba_qCO:qx2000,eba_TA:S14,eba_ZZ:x962,,9999-12-31,eba_ZZ:x0,eba_ZZ:x791,eba_BT:x29
3	V-00237211,529900HNOAA1KXQJUQ27,eba_qCO:qx2000,eba_TA:S06,eba_ZZ:x962,,9999-12-31,eba_ZZ:x0,eba_ZZ:x791,eba_BT:x29
4	V-00548918,529900HNOAA1KXQJUQ27,eba_qCO:qx2000,eba_TA:S14,eba_ZZ:x962,,9999-12-31,eba_ZZ:x0,eba_ZZ:x791,eba_BT:x29
5	V-00570090,529900KS43WE8U0JAX73,eba_qCO:qx2000,eba_TA:S14,eba_ZZ:x959,eba_ZZ:x965,9999-12-31,eba_ZZ:x0,eba_ZZ:x792,eba_BT:x29
6	V-00592723,529900KS43WE8U0JAX73,eba_qCO:qx2000,eba_TA:S14,eba_ZZ:x959,eba_ZZ:x965,9999-12-31,eba_ZZ:x0,eba_ZZ:x792,eba_BT:x29
7	V-00693544,529900KS43WE8U0JAX73,eba_qCO:qx2000,eba_TA:S14,eba_ZZ:x959,eba_ZZ:x965,9999-12-31,eba_ZZ:x0,eba_ZZ:x792,eba_BT:x29

# v8886\_m, etc – Mandatory values – value is gone

```
"detailedFeedback": [  
  "templateCode,rowCode,columnCode,ruleCode,message,offendingValue",  
  "b0701,1,c0080,v8886_m,Value should not be missing,None",  
  "b0701,3,c0080,v8886_m,Value should not be missing,None",  
  "b0701,5,c0080,v8886_m,Value should not be missing,None",  
  "b0701,7,c0080,v8886_m,Value should not be missing,None",  
  "b0701,12,c0080,v8886_m,Value should not be missing,None",  
  "b0701,14,c0080,v8886_m,Value should not be missing,None"  
]
```

C 0080 is not filled



Line	Content
1	c0010,c0020,c0030,c0040,c0050,c0060,c0070,c0080,c0090,c0100,c0110,c0120
2	DMA-EU-006,96950023SCR9X9F3L662,eba_qCO:qx2000,,,,,,,,
3	DMA-EU-006,96950023SCR9X9F3L662,eba_qCO:qx2002,eba_TA:S15,eba_ZZ:x961,eba_ZZ:x964,2024-03-28,eba_BT:x28,eba_ZZ:x967,eba_ZZ:x793,eba_BT:x28,DMA-EU-011
4	DMA-EU-008,5493001B9LDFCQUY9273,eba_qCO:qx2000,,,,,,,,
5	DMA-EU-008,5493001B9LDFCQUY9273,eba_qCO:qx2002,eba_TA:S19,eba_ZZ:x961,eba_ZZ:x964,2024-03-28,eba_BT:x28,eba_ZZ:x967,eba_ZZ:x793,eba_BT:x28,DMA-EU-011
6	DMA-EU-011,7245008IMDLKTD1H4G15,eba_qCO:qx2000,,,,,,,,
7	DMA-EU-011,7245008IMDLKTD1H4G15,eba_qCO:qx2002,eba_TA:S15,eba_ZZ:x961,eba_ZZ:x964,2024-03-28,eba_BT:x28,eba_ZZ:x967,eba_ZZ:x793,eba_BT:x28,DMA-EU-008
8	DMA-EU-012,37890036E5CC493EAA85,eba_qCO:qx2000,,,,,,,,

# 805 – Primary key missing

Leads to reject

Primary keys can be found documented in the model share in the EBA web site

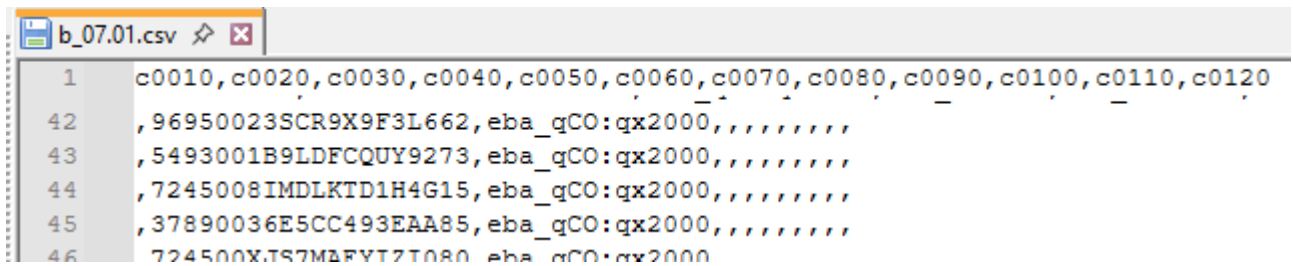
Table	Column	Type	Length	Primary Key	Foreign Key	Nullable
	0010 - Contractual arrangement reference number	varchar	255	Yes	Yes	No
	0020 - Identification code of the third-party service provider	varchar	255	Yes	Yes	No
	0030 - Type of code of the third-party service provider	varchar	255	No	No	Yes
	0040 - Type of ICT services	varchar	255	Yes	No	No
	0050 - Substitutability of the ICT third-party service provider	varchar	255	No	No	No
B.07.01 – Assessment of the ICT services	0060 - Reason if the ICT third-party service provider is considered not substitutable or difficult to be substitutable	varchar	255	No	No	Yes
	0070 - Date of the last audit on the ICT third-party service provider	date	0	No	No	No
	0080 - Existence of an exit plan	bit	0	No	No	No
	0090 - Possibility of reintegration of the contracted ICT service	varchar	255	No	No	No
	0100 - Impact of discontinuing the ICT services	varchar	255	No	No	No
	0110 - Are there alternative ICT third-party service providers identified?	bit	0	No	No	No
	0120 - Identification of alternative ICT TPP	varchar	255	No	No	Yes

# Top 3 - 805 – Primary key missing

Leads to reject

```
"detailedFeedback": [  
  "templateCode,rowCode,columnCode,ruleCode,message,offendingValue",  
  "b0701,41,c0010,805,"For open tables, the key columns values cannot be empty",None",  
  "b0701,42,c0010,805,"For open tables, the key columns values cannot be empty",None",  
  "b0701,43,c0010,805,"For open tables, the key columns values cannot be empty",None",  
  "b0701,44,c0010,805,"For open tables, the key columns values cannot be empty",None",  
]
```

C 0010 values are missing



```
b_07.01.csv  
1 c0010,c0020,c0030,c0040,c0050,c0060,c0070,c0080,c0090,c0100,c0110,c0120  
42 ,96950023SCR9X9F3L662,eba_qCO:qx2000,,,,,,,,,  
43 ,5493001B9LDFCQUY9273,eba_qCO:qx2000,,,,,,,,,  
44 ,7245008IMDLKTD1H4G15,eba_qCO:qx2000,,,,,,,,,  
45 ,37890036E5CC493EAA85,eba_qCO:qx2000,,,,,,,,,  
46 724500X.TS7MDFYI7T080,eba_qCO:qx2000,,,,,,,,,
```

# 808 – Missing filing indicators or case is wrong

Leads to reject

```
"detailedFeedback": [  
  "templateCode,rowCode,columnCode,ruleCode,message,offendingValue",  
  "FilingIndicators.csv,,,808,All filing indicators have to be sent as true,"  
]
```

## All DORA templates must be reported

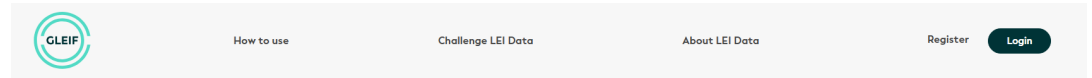
- TemplateIDs are expected in **capitals** in the FilingIndicators.csv
- All reported template IDs must be declared as **true**, with **1**, allowed as **true** value
- Template can be reported empty, if no content to report.
- Rule 808 replaces 405 in the rest of EUCLID; it is an indication that the reporter has NOT declared to report all templates expected.
- Reported template IDs declared as **false** or with the value **0**, will be rejected with 808 filing indicator error

Line	templateID	reported
1	templateID	reported
2	B_01.01	true
3	B_01.02	true
4	B_01.03	false
5	B_02.01	true
6	B_02.02	true
7	B_02.03	false
8	B_03.01	false
9	B_03.02	true
10	B_03.03	false
11	B_04.01	false
12	B_05.01	true
13	B_05.02	true
14	B_06.01	true
15	B_07.01	true
16	B_99.01	false
17		

# VR\_71, VR\_23, VR\_12, VR\_77 etc - Wrong LEI reported

```
"detailedFeedback": [  
  "templateCode,rowCode,columnCode,ruleCode,message,offendingValue",  
  "b0501,23,c0010,VR_71,LEI code needs to be a valid one according to the GLEIF database,3912009K5596FEEZIQ",  
]
```

There is a set of Business validation rules checking against GLEIF. EBA keeps a cache of the GLEIF database



## LEI Search

The image shows the 'Search LEI Records' interface. It includes a search bar with a dropdown menu set to 'FIND LEIS' and the search term '3912009K5596FEEZIQ'. Below the search bar are filter buttons for 'Country', 'General Category', and 'Status'. There is also a 'Clear filters' button and an 'Expert Mode' toggle switch.

Showing 0 results as of 2025-04-15T00:00:00Z

# 720 - Non-DORA templates, or case is wrong

Leads to reject

Name	Date modified	Type	Size
b_01.01.csv	11/04/2025 20:06	Microsoft Excel C...	1 KB
b_01.02.csv	11/04/2025 20:06	Microsoft Excel C...	1 KB
b_01.03.csv	11/04/2025 20:06	Microsoft Excel C...	1 KB
b_02.01.csv	11/04/2025 20:06	Microsoft Excel C...	14 KB
b_02.02.csv	11/04/2025 20:06	Microsoft Excel C...	133 KB
b_02.03.csv	11/04/2025 20:06	Microsoft Excel C...	1 KB
b_03.01.csv	11/04/2025 20:06	Microsoft Excel C...	11 KB
b_03.02.csv	11/04/2025 20:06	Microsoft Excel C...	15 KB
b_03.03.csv	11/04/2025 20:06	Microsoft Excel C...	1 KB
b_04.01.csv	11/04/2025 20:06	Microsoft Excel C...	18 KB
b_05.01.csv	11/04/2025 20:06	Microsoft Excel C...	10 KB
b_05.02.csv	11/04/2025 20:06	Microsoft Excel C...	30 KB
b_06.01.csv	11/04/2025 20:06	Microsoft Excel C...	15 KB
b_07.01.csv	11/04/2025 20:06	Microsoft Excel C...	1 KB
b_99.01.csv	11/04/2025 20:06	Microsoft Excel C...	1 KB
FilingIndicators.csv	11/04/2025 20:06	Microsoft Excel C...	1 KB
parameters.csv	11/04/2025 20:06	Microsoft Excel C...	1 KB
report.json	11/04/2025 20:06	JSON File	1 KB

b_01.01.csv	11/04/2025 15:46	Microsoft Excel C...	1 KB
b_01.02.csv	11/04/2025 15:46	Microsoft Excel C...	1 KB
b_02.01.csv	11/04/2025 15:46	Microsoft Excel C...	2 KB
b_02.02.csv	11/04/2025 15:46	Microsoft Excel C...	5 KB
b_03.02.csv	11/04/2025 15:46	Microsoft Excel C...	3 KB
b_05.01.csv	11/04/2025 15:46	Microsoft Excel C...	6 KB
b_05.02.csv	11/04/2025 15:46	Microsoft Excel C...	3 KB
b_06.01.csv	11/04/2025 15:46	Microsoft Excel C...	2 KB
b_07.01.csv	11/04/2025 15:46	Microsoft Excel C...	7 KB
FilingIndicators.csv	13/04/2025 13:56	Microsoft Excel C...	1 KB
parameters.csv	11/04/2025 15:46	Microsoft Excel C...	1 KB
report.json	11/04/2025 15:46	JSON File	1 KB

Missing files now accepted

Lower case accepted



# 720 - Non-DORA templates, or case is wrong

Leads to reject

Name	Date modified	Type	Size
B_01.01.csv	11/04/2025 10:10	Microsoft Excel C...	1 KB
B_01.02.csv	10/04/2025 11:27	Microsoft Excel C...	1 KB
B_01.03.csv	09/04/2025 15:05	Microsoft Excel C...	1 KB
B_02.01.csv	09/04/2025 15:24	Microsoft Excel C...	2 KB
B_02.02.csv	09/04/2025 15:05	Microsoft Excel C...	92 KB
B_02.03.csv	09/04/2025 15:05	Microsoft Excel C...	1 KB
B_03.01.csv	09/04/2025 15:05	Microsoft Excel C...	1 KB
B_03.02.csv	09/04/2025 15:04	Microsoft Excel C...	1 KB
B_03.03.csv	09/04/2025 15:02	Microsoft Excel C...	1 KB
B_04.01.csv	09/04/2025 15:04	Microsoft Excel C...	2 KB
B_05.01.csv	09/04/2025 15:25	Microsoft Excel C...	3 KB
B_05.02.csv	09/04/2025 15:01	Microsoft Excel C...	3 KB
B_06.01.csv	09/04/2025 15:01	Microsoft Excel C...	17 KB
B_07.01.csv	09/04/2025 15:06	Microsoft Excel C...	4 KB
B_99.01.csv	10/04/2025 10:08	Microsoft Excel C...	2 KB
FilingIndicators.csv	11/04/2025 11:55	Microsoft Excel C...	1 KB
parameters.csv	11/04/2025 11:05	Microsoft Excel C...	1 KB
report.json	09/04/2025 15:53	JSON File	1 KB

b_01.01.csv	11/04/2025 15:46	Microsoft Excel C...	1 KB
b_01.02.csv	11/04/2025 15:46	Microsoft Excel C...	1 KB
b_02.01.csv	11/04/2025 15:46	Microsoft Excel C...	2 KB
b_02.02.csv	11/04/2025 15:46	Microsoft Excel C...	5 KB
b_03.02.csv	11/04/2025 15:46	Microsoft Excel C...	3 KB
b_05.01.csv	11/04/2025 15:46	Microsoft Excel C...	6 KB
b_05.02.csv	11/04/2025 15:46	Microsoft Excel C...	3 KB
b_06.01.csv	11/04/2025 15:46	Microsoft Excel C...	2 KB
b_07.01.csv	11/04/2025 15:46	Microsoft Excel C...	7 KB
FilingIndicators.csv	13/04/2025 13:56	Microsoft Excel C...	1 KB
parameters.csv	11/04/2025 15:46	Microsoft Excel C...	1 KB
report.json	11/04/2025 15:46	JSON File	1 KB
s_99.01.csv	11/04/2025 15:46	Microsoft Excel C...	7 KB

Extra-wrong filename rejected

Upper case rejected

# 806 – Identical key values on open tables

Key columns can be identified from the model shared on the web site. If a user reports the same key twice then it will be rejected with 806. This is an example

Table	Column	Type	Length	Primary Key	Foreign Key	Nullable
	<b>0010 - Identification code of the third-party service provider</b>	varchar	255	Yes	No	No
	0020 - Type of code of the third-party service provider	varchar	255	No	No	No
	0030 - Additional identification code of the third-party service provider	int	0	No	No	Yes
	0040 - Type of additional identification code of the third-party service provider	varchar	255	No	No	Yes
	0050 - Legal name of the third-party service provider	varchar	255	No	No	No
	0060 - Name of the ICT third-party service provider in Latin alphabet	varchar	255	No	No	Yes
3.05.01 – ICT third-party service provider	0070 - Type of person of the third-party service provider	varchar	255	No	No	No
	0080 - Country of the third-party service provider's headquarters	char	2	No	No	No
	0090 - Currency of the amount reported	char	3	No	No	Yes
	0100 - Total annual expense or estimated cost of the third-party service provider	money	0	No	No	Yes
	0110 - Identification code of the third-party service provider's ultimate parent undertaking	varchar	255	No	Yes	No
	0120 - Type of code of the third-party service provider's ultimate parent undertaking	varchar	255	No	No	Yes

```

b_05.01.csv
1 c0010,c0020,c0030,c0040,c0050,c0060,c0070,c0080,c0090,c0100,c0110,c0120
2 INR2EJN1ERANOW5ZP974,eba_qCO:qx2000,,Microsoft Corporation,Microsoft Corporation,eba_CT:x212,eba_GA:USA,eba_CU:EUR,1093.38,INR2EJN1ERANOW5ZP974,eba_qCO:qx2000
3 INR2EJN1ERANOW5ZP974,eba_qCO:qx2000,,Microsoft Corporation,Microsoft Corporation,eba_CT:x212,eba_GA:USA,eba_CU:EUR,6811.98,INR2EJN1ERANOW5ZP974,eba_qCO:qx2000
4 ELGEMI.134501901000,eba_qCO:qx2002,,VOICELAND AE,VOICELAND AE,eba_CT:x212,eba_GA:GR,eba_CU:EUR,371.07,ELGEMI.134501901000,eba_qCO:qx2002
5 529900BLNVEWOMVKJB37,eba_qCO:qx2000,,Hubspot Inc.,Hubspot Inc.,eba_CT:x212,eba_GA:USA,eba_CU:EUR,0,529900BLNVEWOMVKJB37,eba_qCO:qx2000
6 6354003LMZZAKOPXLX69,eba_qCO:qx2000,,Github Inc.,Github Inc.,eba_CT:x212,eba_GA:USA,eba_CU:EUR,0,6354003LMZZAKOPXLX69,eba_qCO:qx2000
7 254900X7UAJNMLPLZ510,eba_qCO:qx2000,,Asana Inc.,Asana Inc.,eba_CT:x212,eba_GA:USA,eba_CU:EUR,0,254900X7UAJNMLPLZ510,eba_qCO:qx2000
    
```

# 714 - entityID parameter does not match filename

Leads to reject

Example filename

5299001ZDCILHOAR7Q32.CON\_DE\_DORA010100\_DORA\_2025-03-31\_20250411211200001.zip

```
parameters.csv
1 "name", "value"
2 "entityID", "lei:5299001ZDCILHOAR7Q32.CON"
3 "refPeriod", "2025-03-31"
4 "baseCurrency", "iso4217:EUR"
5 "decimalsInteger", "0"
6 "decimalsMonetary", "-3"
7
```

Gets rejected

```
parameters.csv
1 "name", "value"
2 "entityID", "rs:5299001ZDCILHOAR7Q32.CON"
3 "refPeriod", "2025-03-31"
4 "baseCurrency", "iso4217:EUR"
5 "decimalsInteger", "0"
6 "decimalsMonetary", "-3"
7
```

Gets accepted

# VR\_72 - EUID code was not found in BRIS

Hard for the CAs and reporters to check the EUID in advance

Common issues that can be avoided

- LEI is flagged as EUID
- Reported EUID does not follow the EUID pattern.
- Easy validations for the CAs to implement
  - It should have a dot (.)
  - It should start with the 2 letter ISO-code of one of the EEA countries

BRIS Status	Count
INVALID_EUID_FORMAT	58170
FOUND	2717
NOT_FOUND	258

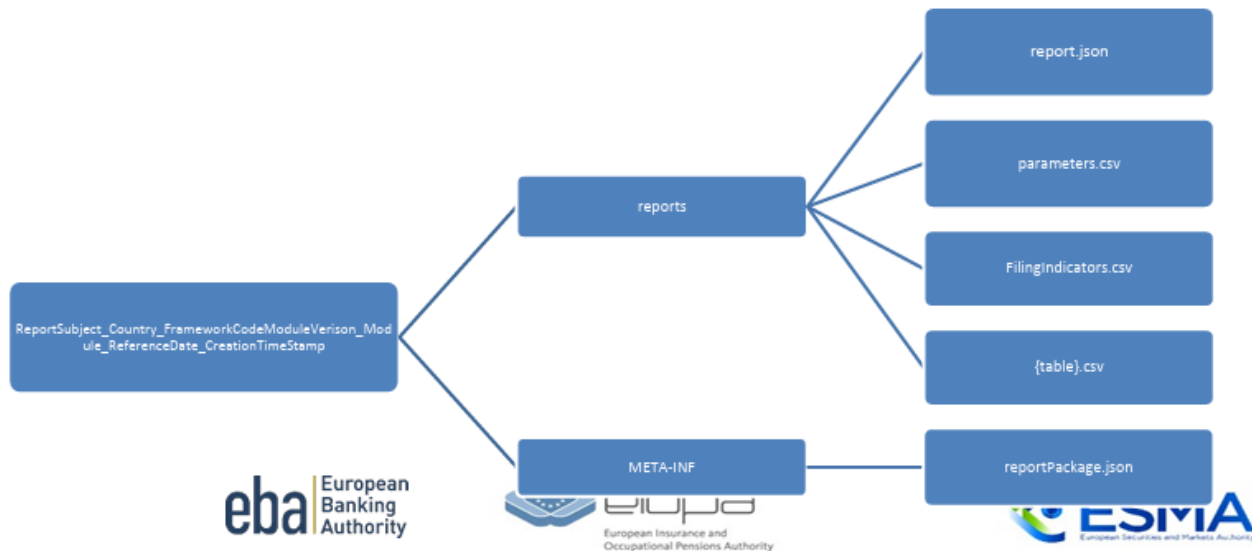
# 103 - Report file structure - content

Leads to reject

Please just follow the structure on the presentation about creating the reporting package

## Plain-csv reporting package structure

- ReportSubject.CON/IND\_Country\_FrameworkCodeModuleVersion\_Module\_ReferenceDate\_CreationTimestamp.zip
  - DUMMYLEI123456789012.CON\_IT\_DORA010100\_DORA\_2024-12-31\_20240821141632000.zip
  - DUMMYLEI123456789012.IND\_IT\_DORA010100\_DORA\_2024-12-31\_20240821141632000.zip  
(DUMMYLEI123456789012 should be replaced by the LEI of the reporter institution)



# 801 - All table header codes must be in the taxonomy

"detailedFeedback": [  
 "templateCode,rowCode,columnCode,ruleCode,message,offendingValue",  
 "b\_01.02.csv,,,801,All header column codes must be defined in the schema,"  
 ]

Leads to reject

```
b_01.02.csv
1 c0010,c0020,c0030,c0040,c0050,c0060,c0070,c0080,c0090,c0100,c0120
2 81560051AAE0E0F10021,Cherry Bank S.p.A.,eba GA:IT,eba CT:x12,eba RP:x21,81560051AAE0E0F10021,2025-04-15,2025-04-15,2958465,eba CU:EUR,4419257717
```

Table	Column	Type	Length	PrimaryKey	ForeignKey	Nullable
B.01.02 — List of financial entities within the scope of the register of information	0010 - LEI of the entity	char	20	Yes	No	No
	0020 - Name of the entity	varchar	255	No	No	No
	0030 - Country of the entity	char	2	No	No	No
	0040 - Type of entity	varchar	255	No	No	No
	0050 - Hierarchy of the entity within the group (where applicable)	varchar	255	No	No	No
	0060 - LEI of the direct parent undertaking of the financial entity	char	20	No	Yes	Yes
	0070 - Date of last update	date	0	No	No	No
	0080 - Date of integration in the Register of information	date	0	No	No	No
	0090 - Date of deletion in the Register of information	date	0	No	No	No
	0100 - Currency	char	3	No	No	Yes
	0110 - Value of total assets - of the financial entity	money	0	No	No	Yes

There is no c0120 in the definition it goes up to c0110

# v8826\_m – LEI Mask validity

Rule is

```
match({tB_01.02, c0060}, "^[A-Z0-9]{18}[0-9]{2}$")
```

Means:

- 18 characters A-Z or 0-9
- Followed by 2 characters 0-9

20 characters in total

Example

```
"detailedFeedback": [  
  "templateCode,rowCode,columnCode,ruleCode,message,offendingValue",  
  "b0102,2,c0010,v8826_m,Value should be in valid LEI format,9322330961"  
]
```

# Parameter.csv, FilingIndicators.csv

parameters.csv - order of the headers is important – name first, value later

```
name,value  
entityID,rs:DUMMYLEI123456789012.COM  
refPeriod,2024-12-31  
baseCurrency,iso4217:EUR  
decimalsInteger,0  
decimalsMonetary,-3
```

```
templateID,reported  
B_01.01,true  
B_01.02,true  
B_01.03,true  
B_02.01,true  
B_02.02,true  
B_02.03,true  
B_03.01,true  
B_03.02,true  
B_03.03,true  
B_04.01,true  
B_05.01,true  
B_05.02,true  
B_06.01,true  
B_07.01,true  
B_99.01,true
```

## FilingIndicators.csv

- order of the headers is not important
- reported, values allowed are 1, true
- templateIDs values are in capitals

## FootNotes.csv

- Supported by xbrl – we ignore it



# Table.csv files

- Filename must be in lower case – e.g. b\_01.01.csv
- Column names can come in any order
- Column names are case-sensitive in lower case
- The first row in a table is the header row. Each cell in the header row **MUST** not be empty – 801 rule.
- Empty table.csv file – devoid of any data is allowed – means nothing to report
- “” can be used even if not necessary to enclose the cells.
- CRLF is optional in the last row whichever than one might be.
- Decimals suffix – e.g. 78920030d-4 disallowed
- Data for table.csv (and report.json, parameter.csv, FilingIndicators.csv) must be in UTF-8, if not so 306 error is raised.

# More on table.csv files – valid files examples

**Valid file** - all columns in the table schema exist in the file

c0010,c0020,c0030,c0040,c0050,c0060

635400EWECOAKJOHRI84,Godzilla Heavy Industries,eba\_GA:IE,eba\_CT:x309,Central Bank of Ireland,2025-03-31

**Valid file** - all columns in the table schema exist in the file but different order (c0020 and c0030) are switched

c0010,c0030,c0020,c0040,c0050,c0060

635400EWECOAKJOHRI84,eba\_GA:IE,Godzilla Heavy Industries,eba\_CT:x309,Central Bank of Ireland,2025-03-31

**Valid file** - one column is missing (c0050) but the rest of header columns exist in the table schema:

c0010,c0020,c0030,c0040,c0060

635400EWECOAKJOHRI84,Godzilla Heavy Industries,eba\_GA:IE,eba\_CT:x309,2025-03-31

**Valid file** - only header no data:

c0010,c0020,c0030,c0040,c0050,c0060

**Valid file** – empty

# More on table.csv files – invalid file examples

**Invalid file** - file contains an extra column which doesn't exist in table schema (c0500)

c0010,c0020,c0030,c0040,c0050,c0060,c0500

635400EWECOAKJOHRI84,Godzilla Heavy Industries,eba\_GA:IE,eba\_CT:x309,Central Bank of Ireland,2025-03-31,TEST

**Invalid file** - file header doesn't have column name (,,)

c0010,,c0020,c0030,c0040,c0050,c0060

635400EWECOAKJOHRI84,TEST,Godzilla Heavy Industries,eba\_GA:IE,eba\_CT:x309,Central Bank of Ireland,2025-03-31

**Invalid file** - file data cells do not match header cells - is missing commas (,,) in data row

c0010,c0030,c0020,c0040,c0050,c0060

635400EWECOAKJOHRI84,eba\_GA:IE

Disclaimer: This and the previous slide are examples only. It is not an exhaustive list of what can be done wrong in CSV.



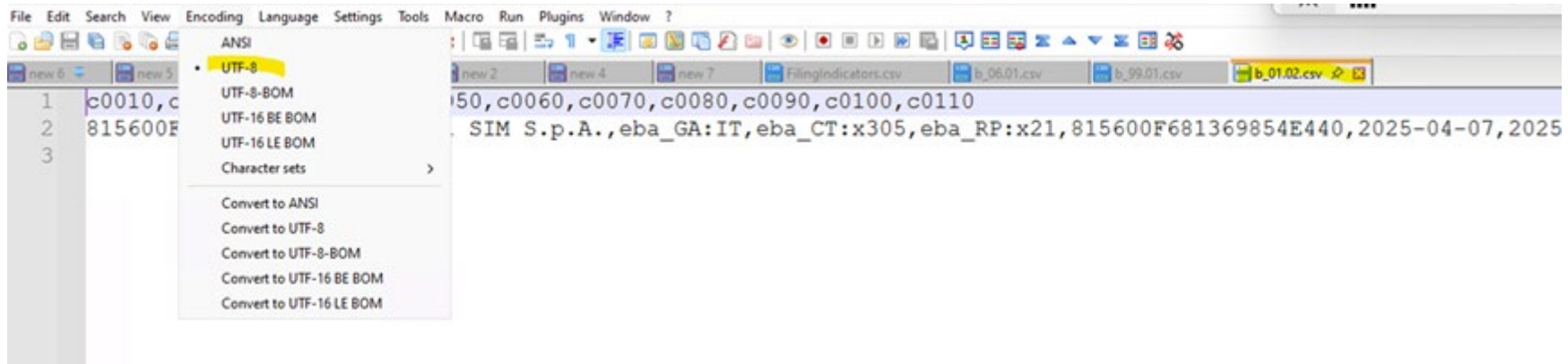
# Recent changes to the rules (implemented 1 May)

1. 306 - **change – implemented** - move to the from DPM Technical checks to Reception checks. Made it a failing rule no change to rule itself.
2. 723 - **new - implemented** - In the xbrl standard the name appears before the value in parameters.csv
3. 724 - **new – implemented** - After the change in 720 empty and missing files are allowed. However, it does not make sense to have **all** files missing or empty as this would lead to validation results – no findings found.
4. 809 - **new - implemented** - If we cannot parse the csv rows in some file, and we do not integrate a table because of this many FKs will fail with 807. It is very hard for the submitters to understand that the reason for the 807 if we could not integrate the target table file in the first place.

# Moved to failing 306 – documents must use UTF-8 encoding.

Leads to reject

If the file is not a proper UTF-8 file, we will integrate corrupted data for the text fields. This leads to problems in the analysis of the data. One way to check that the file is UTF-8 is to open it in Notepad++ and check the encoding



We will also accept UTF-8-BOM files as this is mandated by EBA filing rules

# New 723 – parameters.csv header row validation

The header row in parameters.csv must consist only of the values name and value, in the first and second columns, respectively.

Leads to reject

This is part of the XBRL rules.

```
name,value  
entityID,rs:DUMMLEI123456789012.CON  
refPeriod,2024-12-31  
baseCurrency,iso4217:EUR  
decimalsInteger,0  
decimalsMonetary,-3
```

Passes

```
value,name  
rs:DUMMLEI123456789012.CON,entityID  
2024-12-31,refPeriod  
iso4217:EUR,baseCurrency  
0,decimalsInteger  
-3,decimalsMonetary
```

Fails

# New 724 – essentially no instance data has been received

Leads to reject

It is impossible not to report any data for DORA. At least the B 01.xx tables need to be reported even for someone with no contracts to external providers – if something like this exists. After relaxing 720 it is necessary to validate that some data has been received

An empty report with only the 3 files below fails

FilingIndicators.csv  
parameters.csv  
report.json

Fails

If **all** table CSV files are valid **but empty**  
**Valid file** - only header no data:  
c0010,c0020,c0030,c0040,c0050,c0060

**Valid file** – empty

Fails



# New 809 – csv parsing issues

Leads to reject

If a csv file cannot be parsed because the number of columns in the content does not match the number of columns in the content

**Invalid file** - file data cells do not match header cells - is missing commas (,,) in data row  
c0010,c0030,c0020,c0040,c0050,c0060  
635400EWECOAKJOHRI84,eba\_GA:IE

**Invalid file** - file data cells do not match header cells - is extra commas (,,) in data row  
c0010,c0020,c0030,c0040,c0050,c0060  
635400EWECOAKJOHRI84,Godzilla Heavy Industries,eba\_GA:IE,eba\_CT:x309,,Central Bank of Ireland,2025-03-31,,

**Invalid file** - file data cells do not match header cells - is extra commas (,,) in data row with data  
c0010,c0020,c0030,c0040,c0050,c0060  
635400EWECOAKJOHRI84,Godzilla Heavy Industries,eba\_GA:IE,eba\_CT:x309,data,Central Bank of Ireland,2025-03-31,d,