

**Comments Template on
Discussion Paper on Sponsor Support Technical Specifications**

**Deadline
31 October 2013
18:00 CET**

Name of Company:	E.ON SE	
Disclosure of comments:	Please indicate if your comments should be treated as confidential:	Public
<p>Please follow the following instructions for filling in the template:</p> <ul style="list-style-type: none"> ⇒ Do not change the numbering in the column "reference"; if you change numbering, your comment cannot be processed by our IT tool ⇒ Leave the last column <u>empty</u>. ⇒ Please fill in your comment in the relevant row. If you have <u>no comment</u> on a question, keep the row <u>empty</u>. ⇒ Our IT tool does not allow processing of comments which do not refer to the specific numbers below. <p>Please send the completed template, in Word Format, to DP-13-001@eiopa.europa.eu</p> <p>Our IT tool does not allow processing of any other formats.</p> <p>The numbering of the questions refers to Discussion Paper on Sponsor Support.</p>		
Reference	Comment	
General Comment	<p><u>Relevance of the discussion paper / consultation</u></p> <p>1) There is no need to develop additional, supranational, quantitative solvency requirements for IORPs as local solvency rules are sufficient and adequate. 2) The proposed concept of the Holistic Balance Sheet – of which the sponsor support is a component - and the inspiration taken from the Solvency 2 insurance directive are not appropriate for IORPs.</p> <p>It is crucial that EIOPA bears in mind that their recent work could have a dramatic impact on the appetite of corporates to sponsor occupational pensions.</p>	Public

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	<p><u>EIOPA workstreams</u> The European Commission has, to a large extent, acknowledged these concerns through the decision not to introduce additional supranational quantitative requirements, which are no longer in the scope of the potential future Directive.</p> <p>Therefore it is hard to understand why technical work is continued by EIOPA on these quantitative aspects.</p> <p>Furthermore the representation of sponsoring companies, which should be viewed as key stakeholders in this process, is not properly ensured in the current rules of the OPSG of EIOPA.</p> <p>Regarding the following questions 1-36 we support the response of aba, the German industry association representing all matters concerning occupational pensions.</p>	
Q01.	We support the response of aba, the German industry association representing all matters concerning occupational pensions.	
Q02.	We support the response of aba, the German industry association representing all matters concerning occupational pensions.	
Q03.	We support the response of aba, the German industry association representing all matters concerning occupational pensions.	
Q04.	We support the response of aba, the German industry association representing all matters concerning occupational pensions.	
Q05.	We support the response of aba, the German industry association representing all matters concerning occupational pensions.	
Q06.	We support the response of aba, the German industry association representing all matters concerning occupational pensions.	
Q07.	We support the response of aba, the German industry association representing all matters concerning occupational pensions.	

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Q08.	We support the response of aba, the German industry association representing all matters concerning occupational pensions.	
Q09.	We support the response of aba, the German industry association representing all matters concerning occupational pensions.	
Q10.	We support the response of aba, the German industry association representing all matters concerning occupational pensions.	
Q11.	We support the response of aba, the German industry association representing all matters concerning occupational pensions.	
Q12.	We support the response of aba, the German industry association representing all matters concerning occupational pensions.	
Q13.	We support the response of aba, the German industry association representing all matters concerning occupational pensions.	
Q14.	We support the response of aba, the German industry association representing all matters concerning occupational pensions.	
Q15.	We support the response of aba, the German industry association representing all matters concerning occupational pensions.	
Q16.	We support the response of aba, the German industry association representing all matters concerning occupational pensions.	
Q17.	We support the response of aba, the German industry association representing all matters concerning occupational pensions.	
Q18.	We support the response of aba, the German industry association representing all matters concerning occupational pensions.	
Q19.	We support the response of aba, the German industry association representing all matters concerning occupational pensions.	
Q20.	We support the response of aba, the German industry association representing all matters concerning occupational pensions.	
Q21.	We support the response of aba, the German industry association representing all matters concerning occupational pensions.	
Q22.	We support the response of aba, the German industry association representing all matters concerning occupational pensions.	

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Q23.	We support the response of aba, the German industry association representing all matters concerning occupational pensions.	
Q24.	We support the response of aba, the German industry association representing all matters concerning occupational pensions.	
Q25.	We support the response of aba, the German industry association representing all matters concerning occupational pensions.	
Q26.	We support the response of aba, the German industry association representing all matters concerning occupational pensions.	
Q27.	We support the response of aba, the German industry association representing all matters concerning occupational pensions.	
Q28.	We support the response of aba, the German industry association representing all matters concerning occupational pensions.	
Q29.	We support the response of aba, the German industry association representing all matters concerning occupational pensions.	
Q30.	We support the response of aba, the German industry association representing all matters concerning occupational pensions.	
Q31.	We support the response of aba, the German industry association representing all matters concerning occupational pensions.	
Q32.	We support the response of aba, the German industry association representing all matters concerning occupational pensions.	
Q33.	We support the response of aba, the German industry association representing all matters concerning occupational pensions.	
Q34.	We support the response of aba, the German industry association representing all matters concerning occupational pensions.	
Q35.	We support the response of aba, the German industry association representing all matters concerning occupational pensions.	
Q36.	We support the response of aba, the German industry association representing all matters concerning occupational pensions.	

