	Comments Template on CP-12-003 – Draft Technical Specifications QIS IORP II	Deadline 31 July 2012 18:00 CET
Name of Company:	Bayer AG	
Disclosure of comments:	Please indicate if your comments should be treated as confidential:	Public

Please follow the following instructions for filling in the template:

⇨ Do **not** change the numbering in the column "reference"; <mark>if you change numbering, your comment cannot be processed by our IT tool</mark>

⇨ Leave the last column empty.

⇨ Please fill in your comment in the relevant row. If you have no comment on a paragraph or a cell, keep the row empty.

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Please send the completed template, in Word Format, to CP-12-003@eiopa.europa.eu. Our IT tool does not allow processing of any other formats.

The numbering of the paragraphs refers to Consultation Paper 12-003.

Reference	Comment	
General Comment	Bayer still strongly believes, that the proposed quantitative framework, which is more or less a "copy-and-paste"-approach from Solvency II, only taking additionally sponsor support (the concrete method and amount is still unclear) and pension protection schemes (still unclear if at all) into account, is by no means suitable for determining capital requirements of IORP's. Due to the short term orientation of the approach (pure mark-to-market valuations, model based on only one business period, high volatility of results etc.) it does not fit to the extremely long-term oriented business of (especially German) IORP's. Also the calculation methods are by far too complicated. The majority of German IORP's will not be able to perform theses without an undue amount of additional costs (stemming e.g. from external consultants needed to do the calculations). Given the – often quite simple – nature of the business structure of theses IORP's this methodology is by far over-engineered.	

	Due to the missing fit to IORP's and due to the lack of clarity, how sponsor support and pension protection schemes will be concretely taken into account, we are very much concerned, that the application of this inappropriate approach will make occupational pensions more expensive and less attractive for the employer, and hence will seriously endanger the whole landscape of occupational pensions. Hereby one has to take into account, that occupational pensions usually are voluntary benefits that employers grant to their employees and that IORP's in many cases are organized in a way, that they are financed in a solidary manner by employees and employers. In many cases also the profits, an IORP is gaining, are only for the benefit of the future and current beneficiaries. Any solvency ruling, that will make IORP's either more expensive for the employer or that will bind more of the employers capital, that could be used by the employer for his operative businesses otherwise, will significantly reduce the attractiveness of the respective IORP for the employer. So, in this case the employers will in future offer forms of occupational pensions (if at all), that leave their employees with much more uncertainty than today. So, it is to be expected, that the application of this methodology for determining capital requirements will definitively weaken occupational pensions in Europe, and hence will turn-out to be politically counter-productive to the targets, that have been defined in the Whitebook. A less in security from the beneficiaries point of view will be the consequence and not more security (and a higher spread of occupational pensions in Europe), as it was intended by the EU commission. So we urge you, to stop this whole approach and to rethink the whole issue seriously and thoroughly! Additionally it should be mentioned, that the time schedule of conducting the QIS at the end of the year is more than unfortunate, since the most responsible people involved are usually tied up with different issues at this particular time of the year. To carry out the QIS e.g. in March/April 2013 would be a very much better timing.	
Q1.	No, we think the whole approach is inappropriate, will endanger the whole landscape of occupational pensions and will result in less security of employees and beneficiaries compared to today (please see also: General Remarks above). Since this whole issue has to be rethought, improvements regarding single details cannot be suggested.	

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Q2.	No, because of the general inappropriateness of the approach! We think, that a high-quality pension protection scheme (e.g. like the German "Pensionssicherungsverein aG", which is financed by almost the whole community of companies of the total German economy), and/or the full support of a first-quality sponsor company should automatically close any gap in the Holistic Balance Sheet.	
Q3.	No, because they are in the one hand side by far too complicated (see also general comment above), so that a majority of IORP's will not be able to perform the calculations at reasonable efforts. On the other hand, this QIS will not offer enough information, since its scope is much too narrow: Only one methodology – namely that of Solvency II – together with some options regarding only details within the model is pursued. Other approaches are not tested.	
Q4.	No, see answers above.	
Q5.	No, see answers above.	
Q6.	No, see answers above. Additionally, it has clearly to be stated, that the concept of the Risk Margin does not fit to the world of occupational pensions. (Only one example: most of the IORPS do not have to gain their capital costs, since they have none, because they have no shareholders, are financed in a solidary manner between employer and employees and all gains of the IORP's are for the benefit of the current and future beneficiaries.) So, the Risk Margin would have to be taken out. The calculations of sponsor support and pension protection schemes are also complicated. A proposal for simplification follows from the answer to Q2.	
Q7.	Yes, IORPs will be able to take into account suitable mortality trend regarding the individual and specific group of their beneficiaries.	
Q8.	No, because the current draft of the technical provisions leaves it e.g. unclear, how conditional benefits shall be calculated concretely.	
Q9.		
Q10.	We think in general, that a high-quality pension protection scheme (e.g. like the German "Pensionssicherungsverein aG", which is financed by the whole community of companies of the total German economy) and/or the full support of a first-quality sponsor company should automatically close any gap in the Holistic Balance Sheet. In such an environment complicated	

	calculations are superfluous. Especially the current way of calculating the sponsor support will turn out to be quite burdensome and complicated in many cases. If one generally follows the approach of the draft specifications (what we don't), it would be a reasonable approach to take the FULL Maximum Value of Sponsor Support completely as own funds (and not only as ancillary own funds, as one option in the QIS suggests) into account. The motivation for this is, that a rationally and responsibly behaving sponsor company would in most cases also be willing to financially strengthen "its" IORP and to give money also to cover the SCR's (not only the liabilities), if otherwise a reduction of benefits would become inevitable, since this would have very negative consequences for the sponsor's image and in most cases, especially in Germany, the reduction of liabilities would have to be paid by the sponsor anyhow (because the sponsor stays liable for the whole promised benefit).	
Q11.	Since the whole general approach being based on the Solvency II framework is not suitable for determining capital requirements of IORPs, we naturally have no suggestions regarding single parameters.	
Q12.	No, please see answer to Q10.	
Q13.	No, see previous answers.	
Q14.	No, we think, it is in general problematic to use data derived from one special reference date, since this might not be representative for the future development. Perhaps it would be better to use longer term averages.	
Q15.	No, see previous answers.	
Q16.	The description of the SCR is clear and understandable for us, whereas we feel, that it will turn out, that the majority of IORPs, especially smaller ones, will not be able to perform the concrete calculations without undue burden and costs (see above).	
Q17.	As already said, we think, that the whole approach does not fit. Due to the reasons already explained the Risk Margin should be taken out of the model anyhow.	
Q18.	No, see previous answers.	

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Q19.	No, see previous answers.	
Q20.	No, see previous answers.	
Q21.	No, see previous answers.	
Q22.	No, see previous answers.	
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