

Comments Template on CP-12-003 – Draft Technical Specifications QIS IORP II		Deadline 31 July 2012 18:00 CET
Name of Company:	The European Centre of Employers and Enterprises providing Public services (CEEP) Rue des Deux Eglises, 26 / BE – 1000 Brussels Tel: + 32 (0) 2 219 27 98 / Fax: + 32 (0) 2 218 12 13 ceep@ceep.eu www.ceep.eu	
Disclosure of comments:	Please indicate if your comments should be treated as confidential:	Public
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Reference	Comment	
General Comment	The European Centre of Employers and Enterprises providing Public services (CEEP) would like to thank EIOPA for giving the opportunity to present our views in its thorough consultation exercise. It is important to listen to the views of stakeholders, most notably the social partners, with regard to the planned revision of the IORP Directive and as such we welcome this opportunity. However, it needs to be stated	

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	<p>that for such an important and technical exercise the time frame for submitting a response, i.e. six weeks, is extremely short under normal circumstances and even more so during summer months. Also, the level of detail in the consultation is well beyond the capabilities of many stakeholders and enterprises who sponsor pension funds. This will, in our view, raise questions on how good and trustworthy the outcomes of the Quantitative Impact Study (QIS) will be. We also question whether one QIS will be enough to provide all the relevant information needed ahead of the planned revision of the IORP Directive.</p> <p>Rather than going into the details of how the QIS should be operated, CEEP would like to make a number of general comments on the consultation and the planned revision of the IORP Directive itself:</p> <p>The 162-pages heavy consultation document is very technical and focuses strictly on quantitative aspects (i.e. pillar I of the solvency II framework) with respect to the concept of the Holistic Balance Sheet (HBS) and the capital requirements for IORPs. In particular the question of how to quantify and implement the security mechanisms of IORPs is tackled, as well as some risk categories are changed with respect to Solvency II. Apart from that, the structure of the technical specifications and the forthcoming QIS is identical to Solvency II (see 1.4.5. of the consultation document).</p> <p>This means that Solvency II has become the very blueprint for the IORP review, from the general Solvency II principles (market-consistency, risk-sensitivity) to the concrete calculation of the Solvency Capital Requirements despite though the European Commission has stated that the rules for IORP's would not be just cut and paste from Solvency II. This is in our view most regrettable, even more so given the existing differences between pension funds and insurance providers. Pension schemes are fundamentally different from insurance products due to their long-term liabilities, the absence of competition between pension schemes, their generally not-for-profit nature, and because mechanisms exist to adjust contributions, indexation or benefits over time, if needed. Moreover, in contrast to insurance products, pension funds often have a collective character, e.g. they are supported by a collective agreement negotiated by employer and employee representatives or have the specific</p>	

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	<p>characteristic of an employer covenant. Often, they are even managed by the social partners themselves. Finally, pension funds tend to have a long-term investment horizon.</p> <p>Also, EIOPA’s 23 Questions to stakeholders concentrate on the details of the QIS, but there seems to be no place to formulate more general criticisms concerning the overall direction of the IORP review. This mirrors the whole process of the IORP review till now.</p> <p>Additionally it seems EIOPA wants stakeholders to help finalizing the technical design of a large complex structure without saying how the structure will be used: it is still not clear what the intention of the HBS is and what will be done with the results of all this number-crunching. Is the HBS just for informational reason? Or will it trigger hard consequences in terms of capital requirements?</p> <p>On a more specific remark, CEEP wants to highlight our concerns regarding the sheer amount of information being requested from schemes. This will be extremely onerous and costly and we cannot see how this would apply to multi-employer schemes where there might be hundreds of sponsoring employers. CEEP’s preference is therefore to use data already supplied by schemes as part of their existing annual reporting process.</p> <p>Moreover, from a general point of view CEEP questions many of the arguments used in justifying the planned revision of the IORP Directive and adding capital requirements for pension funds. As stated above, pensions are fundamentally different from other financial products and it has to be stated that any ‘one size fits all’-approach is not a realistic one.</p> <p>The target of promoting more cross-border activity does not come in time. The final implementation of the IORP directive was only accomplished in 2007. Therefore, it seems to be necessary to wait until the IORP-Directive has produced its full impact in practice before undertaking any new legislative initiatives.</p>	

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	<p>With respect to the demographic evolution in Europe, CEEP is convinced that IORP will be able to help solving future problems of state-run first pillar pension schemes. But this will only be possible if there are no additional and unnecessary burdens put on their shoulders.</p> <p>Badly timed additional solvency rules threaten to result in a major increase in funding costs for pension schemes and for employers, i.e. increasing costs but without improving security for members in the schemes. The debate should not be about the requirement for more robust funding arrangements but the timing of action necessary to support such arrangements. Stricter funding requirements should be in place when funds are healthy and are tempted to run down surpluses. That should be the time when surpluses are protected to ensure the presence of a buffer when the cycle turns downwards.</p>	
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	Comments Template on CP-12-003 – Draft Technical Specifications QIS IORP II	Deadline 31 July 2012 18:00 CET
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