

**Summary of Comments on Consultation Paper: Response to the Call for Advice  
on the review of the IORP Directive 2003/41/EC: second consultation - EIOPA-  
CP-11/006  
Q91– Q96**

**EIOPA-BoS-  
12/016  
15 February 2012**

EIOPA would like to thank OPSG; AbA; ABI\_IT; ABI\_UK; Abvakabo\_FNV\_NL; ACA\_UK; ACT; ADEPO\_ES; AEIP; AFG; AFPEN; AFTI; Alecta; ALFI and ALFP; AMICE; AMONIS; ANIA; Aon\_Hewitt; APL\_UK; Association of Pensioner Trustees in Ireland; Assoprevidenzia IT; Assuralia; ATOS\_FR; Atradius; Balfour Beatty plc; BASF; BAVC; Bayer; BDA; BIPAR; BlackRock; BNP Paribas Cardif; BNP Paribas SS; Bosch Group; Bosch Pensionfonds AG; BP; BT Group plc; BT Pension Scheme Management Ltd; BusinessEurope; BVCA; BVI; BVPI-ABIP; BW; CBI; CEA; Charles Cronin from OPSG; Chris Barnard; CMHF; CNV NL; CWC; DATA; De Unie; Derek Scott of D&L Scott; Deutsche Post AG; Deutsche Post Pensionfonds AG; DG Treasury FR; DHL NL; DHL Services Limited UK; DHL Trustees; DIIR Germany; Dutch Labour Foundation; Dutch Ministry of Social Affairs; EAPSPI; ECB; ecie vie; ECIIA; EEF; EFAMA; EFI; EFRP; ESY FI; European Metalworkers Foundation; EVCA; FAIDER; FairPensions; FBIA; German Federal Ministry of Finance; Federation Dutch Pension Funds; FFSA FR; Finland; Finnish Centre for Pensions; FNMf; FNV; FNV Bondgenoten; FRC; Gazelle; GCAE; Generali Vie; Gesamtmetall; HM Treasury; Hundred Group; Hungarian Financial Supervisory Authority; HVB; IBM Germany Pensionskasse and Pensionsfonds; ICAEW; IMA; ING; Institute and Faculty of Actuaries; IVS DE; Keills; KPMG; Le cercle des epargnants; LTO Netherlands; LTPP; LV 1871 Pensionfonds AG; Macfarlanes; MAN Pensionsfonds AG; MAN SE; MCP; Mercer; MHP; NAPF; NEST; Nordmetall; OECD; PEIF; Pensioen Stichting Transport NL; Pensionskasse der Mitarbeiter der Hoechst Gruppe VVaG; PFZW NL; PMT\_PME\_MnServices NL; Predica; Prof.Pelsser Maastrich University; PSV aG; PTK; Punter Southall; PwC LLP UK; Reed Elsevier Group; Rio Tinto; RNLI; RPTCL; RWE AG; Sacker and Partners LLP; SAI; Siemens AG; Social Partners Bosch Group Germany; SPAG; SPC UK; Standard Life plc; State Street; TCO; TESCO; Transport for London; TUC; TW; UNI Europa; USS UK; vbw DE; VFPK; VHP2; VvV NL; Whitbread; ZIA; ZVK Bau.

The numbering of the paragraphs refers to Consultation Paper No. EIOPA-CP-11/006

No.	Name	Reference	Comment	Resolution
1.	OPSG (EIOPA Occupational Pensions Stakeholder Group)	91.	The OPSG believes that for DB schemes the IORP Dir. can continue to rely on what is required under art. 9, 11, 12 and 20.	Noted
2.	AbA Arbeitsgemeinschaft für betriebliche Altersver	91.	<p>No. We believe that the information requirements in the current IORP directive are sufficient. In particular, we agree with EIOPA that "information should be provided to members/beneficiaries in all phases of their participation in the pension scheme, proportionally to the choices to be made."</p> <p>The proposed information requirements are aligned with the EIOPA aim of the consumer protection (see our answer to question 52: For IORPs, which are sponsored by an employer, whose stakeholders' interests are aligned and whose beneficiaries are protected by a web of interacting security mechanisms in social and labour law, the objective for supervision should be: "This Directive supports the establishment and operation of IORPs, facilitates their efficient management and administration and supports the protection of members and beneficiaries.") But the IORP membership is always connected with employment and there is no choice for the employee to choose between several IORPs. Therefore the value of the information is, except for personal planning purposes, low. The information costs should therefore also be low.</p>	Noted
3.	ABVAKABO FNV	91.	The PF thinks that against the background of the good information provision existing in the Netherlands, it is certainly necessary to provide more information to DC members than to DB members considering the risks that a member of an individual DC system is bearing compared to the member of a collective DB system.	Noted
4.	AEIP	91.	147. The EIOPA ideas have a lot to do with consumer protection.	Noted

			<p>AEIP believes that this starts from a wrong assumption. It assumes that pension funds are commercial operators providing a product, and scheme members are consumers of this product. We would like to stress the fact that pension funds are very often not for profit organisations that do not compete on a market. The benefits managed by IORPs are not simple products. They are in most cases mandatory because they are part of collective labour agreements in industry sectors, or because they are part of the employment relation between an employer and his employees. They are as such not consumer products that are consumed. In these cases they do not need as many “pre-contractual information” as customers of insurance companies. Even during their membership their information needs are different from insurance, because the contributions paid for them by their employers are an unchangeable part of their salary.</p> <p>AEIP rejects the approach that collective pension scheme members are to be considered as consumers. The information requirements as are laid down in Solvency II may fit customers and stakeholders of insurance companies. They are far too heavy for IORP’s.</p>	
5.	AMONIS OFP	91.	<p>Do stakeholders believe that additional information requirements - besides the current ones - are not only necessary for DC schemes, but also for DB schemes?</p> <p>The EIOPA ideas have a lot to do with consumer protection. AMONIS OFP believes that this starts from a wrong assumption. It assumes that pension funds are commercial operators providing a product, and scheme members are consumers of this product. We would like to stress the fact that pension funds are very often not for profit organisations that do not compete on a market. The benefits managed by IORPs are not simple products. They are in most cases mandatory because they are part of collective labour agreements in industry sectors, or because they are part of the employment relation between an employer and his employees. They are as such not consumer products that are consumed. In these cases they do not need as many</p>	See AEIP

			<p>“pre-contractual information” as customers of insurance companies. Even during their membership their information needs are different from insurance, because the contributions paid for them by their employers are an unchangeable part of their salary.</p> <p>AMONIS OFP rejects the approach that (DC or DB) pension scheme members are to be considered as consumers. The information requirements as are laid down in Solvency II may fit customers and stakeholders of insurance companies. They are far too heavy for IORP’s.</p> <p>AMONIS OFP does not believe that additional information requirements are necessary for DB schemes.</p>	
6.	ANIA – Association of Italian Insurers	91.	<p>The ANIA is of the opinion that even though there are some articles on information requirements already in the IORP Directive, they are not sufficient for certain schemes. As regards the additional contractual information to be provided, this is something specific to the type of product, and as such it should be tailored to capture the relevant features of different pension products to enable members and beneficiaries to understand their product or the possible choices that they can make for example regarding investment options offered in DC schemes. As such we support the EIOPA views that additional information requirements are not necessary where the employers/IORPs carry the investment risks and members are not asked to make choices regarding the investing decisions of their pension schemes.</p> <p>In any case, about the structure of the information document, the ANIA is fully supportive to have the same layout for DB and DC schemes, with the same sections as much as possible, in order to harmonise the</p>	Noted

			format of the information document for all members . Of course, different characteristics among DB and DC schemes will emerge in the contents of the sections of the information documents.	
7.	Association Française de la Gestion financière (AF)	91.	<p>AFG strongly supports the introduction of a KIID-like document for pension schemes to ensure that members receive relevant pre-enrolment information at or before joining to provide future members with comparable information on pension schemes and enable them to make the choices they are asked to make and compare, including between IORP schemes and a life insurance products. The adoption of the KID for pension scheme would also represent a valuable and practical step to strengthen financial literary and investor education.</p> <p>We consider that the requirements are not only necessary for DC schemes. A KIID-like document could also be helpful where employers/IORPs carry the investment risks and members are not asked to make choices, to allow members compare the relative quality of their pension schemes with other schemes and long-term savings products. This is essential to create a level playing field in the long-term savings market.</p>	Noted, text adjusted, with reference to initiatives of EC on the usefulness of a KIID-like document for other all long-term savings instruments
8.	Association of British Insurers	91.	No. The ABI shares EIOPA's view that additional information requirements in respect of DB schemes are not necessary where employers/IORPs carry the investment risks and members are not asked to make choices specifically regarding their pension schemes.	Noted
9.	Association of Consulting Actuaries (UK)	91.	No – current DB disclosure minimum standards are appropriate and do not need to be extended	Noted
10.	Association of French Insurers (FFSA)	91.	97. The FFSA is supportive of greater information to members / beneficiaries to capture the relevant features of IORPs to enable members / beneficiaries to understand their pension product and the	Noted

			<p>level of protection they have.</p> <p>The FFSA is of the opinion that even though there are some articles on information requirements already in the IORP Directive, they are far from complete.</p>	
11.	Assoprevidenza – Italian Association for supplementen	91.	NO	Noted
12.	Assuralia	91.	<p>Do stakeholders believe that additional information requirements – besides the current ones – are not only necessary for DC schemes, but also for DB schemes?</p> <p>A pension promise is, firstly, a promise of an employer to his employees. Employers are responsible for keeping that pension promise and for the way it is organised, even if they rely on the services of a pension institution. Information for the employee/beneficiary differs from the information that is relevant for the employer.</p> <p>It is essential for employees/beneficiaries to be adequately informed about those aspects of the pension promise that directly affect their pension claims. This can be done via a document that describes the various aspects of an employer’s pension promise to its employees.</p> <p>On the contrary, information about the underlying aspects linked to the management of the pension promise by the pension institution (such as costs, the pension institution’s investment strategy, etc.) must be aimed primarily at employers and not at members.</p> <p>Only in the case of a DC plan, where members bear the investment risk and where members can choose from between various investment options, is it necessary for members to be informed via a kind of pre-contractual information document that enables them to correctly estimate the consequences of the choices they are about to make. Assuralia therefore agrees with the suggestion set out in the consultation paper to only provide for a Key Information Document for</p>	Noted

			such DC schemes, as well as the view that the pre-contractual KID will, in that case, differ from what is provided for under the UCITS directive.	
13.	BARNETT WADDINGHAM LLP	91.	No. We do not believe that additional information, to be disclosed to DB scheme members, is required.	Noted
14.	Belgian Association of Pension Institutions (BVPI-	91.	<p>Do stakeholders believe that additional information requirements - besides the current ones - are not only necessary for DC schemes, but also for DB schemes?</p> <p>The EIOPA ideas have a lot to do with consumer protection. BVPI-ABIP believes that this starts from a wrong assumption. It assumes that IORPs are commercial operators providing a product, and scheme members are consumers of this product. We would like to stress the fact that IORPs are very often not for profit organisations that do not compete on a market. The benefits managed by IORPs are not simple products. They are in most cases mandatory because they are part of collective labour agreements in industry sectors, or because they are part of the employment relation between an employer and his employees. They are as such not consumer products that are consumed. In these cases they do not need as many “pre-contractual information” as customers of insurance companies. Even during their membership their information needs are different from insurance, because the contributions paid for them by their employers are an unchangeable part of their salary.</p> <p>BVPI-ABIP rejects the approach that collective pension scheme members are to be considered as consumers. The information requirements as are laid down in Solvency II may fit customers and stakeholders of insurance companies. They are far too heavy for IORP’s.</p>	Noted

			BVPI-ABIP does not believe that additional information requirements are necessary for DB schemes.	
15.	BNP Paribas Cardif	91.	<p>BNP Paribas Cardif is supportive of greater information to members / beneficiaries to capture the relevant features of IORPs to enable members / beneficiaries to understand their pension product and the level of protection they have.</p> <p>BNP Paribas Cardif is of the opinion that even though there are some articles on information requirements already in the IORP Directive, they are far from complete.</p>	Noted
16.	Bosch Pensionsfonds AG	91.	We believe that information requirements in the current Directive are sufficient and no additional requirements are needed.	Noted
17.	Bosch-Group	91.	We believe that information requirements in the current Directive are sufficient and no additional requirements are needed.	Noted
18.	BT Pension Scheme Management Ltd	91.	We are fully supportive of clear communication to the beneficiaries of DB schemes, but it must be recognised that their information needs are significantly different from those of DC schemes. The pension entitlements of the beneficiaries of DB schemes closed to further accruals, or deferred beneficiaries of open schemes, will change year-on-year only to reflect whatever inflation-related uplift they are entitled to. The entitlements of active members of open schemes will alter only according to inflation and any changes in their salary. Otherwise, nothing in the year - particularly nothing in terms of their own contributions or the investment performance of the IORP - will alter their pension entitlement from year to year. Thus the information needs of DB beneficiaries are significantly different from those of DC members. We thus think that it is not appropriate simply to read across DC information requirements to the DB world - that risks confusing	Noted

			beneficiaries rather than assisting their understanding - and we believe that any disclosure requirements for DB members need to be designed specifically to suit the circumstances of the individual scheme.	
19.	BVI Bundesverband Investment und Asset Management	91.	BVI strongly supports the introduction of a KIID-like document for pension schemes to ensure that members receive relevant pre-enrolment information at or before joining to provide future members with comparable information on pension schemes and enable them to make the choices they are asked to make and compare, including between IORP schemes and life insurance products. The adoption of the KID for pension scheme would also represent a valuable and practical step to strengthen financial literary and investor education. We consider such requirements especially necessary in the area of DC schemes.	Noted
20.	CEA	91.	The CEA is of the opinion that even though there are some articles on information requirements already in the IORP Directive, they are not sufficient for certain products. As regards the additional contractual information to be provided, this is something specific to the type of product, and as such it should be tailored to capture the relevant features of different pension products to enable members and beneficiaries to understand their product or the possible choices that they can make for example regarding investment options offered in DC schemes. As such we support the EIOPA views that additional information requirements are not necessary where the employers/IORPs carry the investment risks and members are not asked to make choices regarding the investing decisions of their pension schemes.	Noted
21.	Charles CRONIN	91.	I agree with EIOPA's draft advice that there needs to be an improvement of information made available to members of DC and DB schemes. I support EIOPA's three basket approach to improving information provision: pre-enrolment, ongoing and payout phase. All	Noted

			three being applicable to DC schemes, the last two being applicable to DB schemes. I also support the use of digital medium as a supplement to conventional printed documents, but not as a substitute.	
22.	Chris Barnard	91.	<p>The current information requirements are a good starting point. Basic information on benefits, contributions, rights and obligations, risks, funding, investment policy and its link to benefits and funding etc, should be provided prior to joining (pre-enrolment) for all IORPs, and should be provided at the earliest opportunity for mandatory IORPs.</p> <p>I agree that more information, in line with the proposals for a KID should be provided for DC schemes.</p> <p>Ongoing information also needs to be provided, at least annually. I agree with the analysis regarding ongoing information disclosures for DC and DB schemes.</p>	Noted
23.	CMHF (Centrale van Middelbare en Hogere Functionar	91.	The CMHF thinks that against the background of the good information provision existing in the Netherlands, it is certainly necessary to provide more information to DC members than to DB members considering the risks that a member of an individual DC system is bearing compared to the member of a collective DB system.	Noted
24.	De Unie (Vakorganisatie voor werk, inkomen en loop	91.	De Unie thinks that against the background of the good information provision existing in the Netherlands, it is certainly necessary to provide more information to DC members than to DB members considering the risks that a member of an individual DC system is bearing compared to the member of a collective DB system.	Noted
25.	Direction Générale du Trésor, Ministère des financ	91.	Yes, we believe that additional information requirements are necessary for both DC and DB schemes. Besides, on the issue of information to beneficiaries, we think that EIOPA did not sufficiently focus on the pre-contractual information to beneficiaries regarding the contents of the products. This information should be as detailed and specific as possible, in particular concerning the contractual and/ or legal ability of the IORP to reduce benefits in stress situations. It should be public and	Noted

			accessible to all members and beneficiaries.	
26.	Ecie vie	91.	The same information requirements should apply for insurance contracts and IORPs.	Noted, text adjusted with reference to initiatives of EC on the usefulness of a KIID-like document for other all long-term savings instruments
27.	EFI (European Federation of Investors)	91.	We are very happy to see that the commission and EIOPA seems to attached so much importance to information. Yes it will also be necessary for DB and not only for DC.	Noted
28.	European Association of Public Sector Pension Inst	91.	<p>Do stakeholders believe that additional information requirements - besides the current ones - are not only necessary for DC schemes, but also for DB schemes?</p> <p>EAPSPI believes the current information requirements in the IORP Directive are adequate.</p> <p>However, it must be pointed out that members of DC schemes have a right to the same level of information as members of DB schemes.</p> <p>Moreover, in the case where DC members have a degree of choice concerning investment vehicles, the need for reliable information is crucial. The simple 3 part definition of what information should be (1) correct, 2) understandable and 3) not misleading) is perfect in terms of</p>	Noted

			<p>best practice. However, despite the simplicity of these criteria, transforming these concepts into legislative measures would be a major challenge. Each Member State already has a corpus of legislation in the field of consumer protection and financial services. It is not clear that a European definition in the specific field of pensions would add any value to these national measures in place.</p> <p>Furthermore, many of the information requirements presented in the Call for Advice are essentially examples of best practice, and it is questionable if they should be enshrined in European law. For example, the OECD has for some time been managing a research project on the ways of communicating uncertainty in the context of DC pension schemes. The results are extremely interesting and they are providing input for debate on information obligations and, perhaps more important, financial education. However, there seems to be limited justification for legislation on these minimum information requirements at EU level, particularly since the recipients of this information may well be unable to use it to make informed decisions. The Open Method of Coordination, with its focus on exchange of good practice, seems to provide a cost-efficient platform.</p>	
29.	European Federation for Retirement Provision (EFRP)	91.	The EFRP believes that, for DB schemes, requirements in the current IORP Directive are sufficient and that no additional information is needed.	Noted
30.	European Fund and Asset Management Association (EFAMA)	91.	EFAMA strongly supports the introduction of a KIID-like document for pension schemes to ensure that members receive relevant pre-enrolment information at or before joining to provide future members with comparable information on pension schemes and enable them to make the choices they are asked to make and compare, including between IORP schemes and a life insurance products. The adoption of the KID for pension scheme would also represent a valuable and	Noted, text adjusted, with reference to initiatives of EC on the usefulness of a KIID-like

			<p>practical step to strengthen financial literary and investor education.</p> <p>We consider that the requirements are not only necessary for DC schemes. A KIID-like document could also be helpful where employers/IORPs carry the investment risks and members are not asked to make choices, to allow members compare the relative quality of their pension schemes with other schemes and long-term savings products. This is essential to create a level playing field in the lon-term savings market.</p>	document for other all long-term savings instruments
31.	European Metalworkers Federation	91.	9.	
32.	European Mine, Chemical and Energy workers' Fede	91.	9.	
33.	FAIDER (Fédération des Associations Indépendantes)	91.	We are very happy to see that the commission and EIOPA seems to attached so much importance to information. Yes it will also be necessary for DB and not only for DC.	Noted
34.	FairPensions	91.	<p>Yes, although information requirements are clearly particularly critical in DC schemes, where the member bears the investment risk.</p> <p>We believe that members should have access to a greater range of information on request than is currently the case. This is particularly important in DC schemes. For example, members should have the right to access:</p> <ul style="list-style-type: none"> <li>- information about how the IORP's SIPP has been implemented over the past year, rather than simply a right to access the SIPP itself (in the UK, members who raise a specific query about their investments are often directed to the SIPP which provides little relevant information);</li> </ul>	Noted

			<ul style="list-style-type: none"> <li>- information on the IORP's voting and engagement policy, and on how this policy has been implemented over a given period, including how voting rights were exercised in relation to specific issues or companies;</li> <li>- fuller information about costs and charges, including 'hidden' costs, for example those associated with high portfolio turnover;</li> <li>- information about what assets their money is invested in.</li> </ul> <p>We recognise EIOPA's concern that differing pension systems may make maximum harmonisation inappropriate, and that the principle of subsidiarity must be respected. However, we wonder whether a general provision might be possible, either within a future IORP Directive or through guidance, to the effect that IORPs must comply with any reasonable request from members for information necessary to a full understanding of their pension savings. This would guarantee members the right to access information about their money, without creating a raft of burdensome, prescriptive and potentially inappropriate disclosure requirements. This answer is also relevant to Q96.</p>	
35.	Federation of the Dutch Pension Funds	91.	The PF thinks that against the background of the good information provision existing in the Netherlands, it is certainly necessary to provide more information to DC members than to DB members considering the risks that a member of an individual DC system is bearing compared to the member of a collective DB system.	Noted
36.	Financial Reporting Council	91.	We consider that additional information requirements are not necessary.	Noted
37.	FNV Bondgenoten	91.	FNV BG thinks that against the background of the good information provision existing in the Netherlands, it is certainly necessary to provide more information to DC members than to DB members considering the risks that a member of an individual DC system is	Noted

			bearing compared to the member of a collective DB system.	
38.	Generali vie	91.	The same information requirements should apply for insurance contracts and IORPs.	Noted
39.	Groupe Consultatif Actuariel Européen.	91.	<p>Informing members is not a matter of providing lots of information, but is a matter of considering what the goal of information provision is and deciding what information members really need and can absorb.</p> <p>The purpose of information requirements in the IORP directive is clearly defined in 29.2.1. In order to decide what information to send to the member, IORPs should define what they want to accomplish with the information.</p> <p>Apart from what pension experts think is useful information for members, it is necessary (and more important) for IORPs to examine the members' need for information (content and format) and share these findings among other IORPs. This is the best way to decide what information is needed for the member and should be decided on a national level due to cultural differences and differences in pension systems.</p> <p>One of the most important developments concerning the revision of the IORP directive is the shift towards a risk based approach for pensions. Risk in pensions is divided among all stakeholders involved including IORP members. As stated in our detailed remarks to 29.2.5, in almost every IORP the members have to bear at least a minimum amount of risk. Policy rules on benefit accrual, indexation and contributions tend to be more complex in DB products compared with DC products. We think that all stakeholders should be informed about those risks and the impact they have as far as these stakeholders bear the risks. The information requirements should therefore not be limited to DC IORPs.</p> <p>Detailed remarks</p> <p>29.2.9 Apart from the difference between pre-enrolment and ongoing information there should be a distinction between personalized and</p>	Partially Agreed. Text revised accordingly

			<p>general (or better: IORP specific) information. The latter can be used at any time (also before commencement) to compare IORPs so that one is able to make a decision whether to participate in the IORP or not. Personalised information is only applicable to members who participate in the IORP in order to give them the ability to have an overview of their future financial situation. Because personalised and general information serve a different goal this distinction should be added to the current advice.</p> <p>Table 23.1 Difference between IORP-specific and personalised information as an extra dimension to pre-enrolment and ongoing information.</p> <p>pre-enrolment information ongoing information</p> <p>IORP specific Information KID ...</p> <p>Personalised Information ...</p>	
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			<p>annual benefit statement</p> <p>29.2.5 In our view the distinction between DC- and DB-IORPs is not as straightforward as it used to be some 15 years ago. Nowadays there is a variety of IORP designs within DC and DB IORPs. There are even DB-IORPs where most of the risk is shifted towards the member. Within DC-IORPs guarantees can provide more security to members than some DB-IORPs. This means that there is no clear line between DC and DB IORPs on the basis of the risks that members bear. Moreover in almost any kind of IORP members have to bear some risk. A more appropriate distinction between IORPs can therefore be made based on the amount of risk to which members are exposed. Information about risks is essential to have a clear view about the quality of the benefit. The introduction of a holistic balance sheet could be very helpful to distinguish between IORPs. In this holistic balance sheet the various risks are presented. The big challenge is how to communicate to different stakeholders about these risks. Clearly IORP members and beneficiaries need different information about risks than do those responsible for managing the IORP.</p> <p>29.2.27 (first bullet) In conjunction with our remarks on 29.2.5 we want to state that, even when the member is exposed to few risks within the IORP, (s)he has to be able to obtain information about these risks. A KID would be a great leap forward for the members of a pension IORP. However, the text in the advice suggests that a KID will only be useful and applicable for DC IORPs. Because every IORP member has to bear some risk we would like EIOPA to consider applying a KID to all IORPs.</p>	
40.	Groupement Français des Bancassureurs	91.	FBIA is supportive of greater information to members / beneficiaries to capture the relevant features of IORPs to enable members /	Noted

			<p>beneficiaries to understand their pension product and the level of protection they have.</p> <p>FBIA is of the opinion that even though there are some articles on information requirements already in the IORP Directive, they are far from complete.</p>	
41.	PMT-PME-Mn Services	91.	<p>We think that against the background of the good information provision existing in the Netherlands, it is certainly necessary to provide more information to DC members than to DB members considering the risks that a member of an individual DC system is bearing compared to the member of a collective DB system.</p>	Noted
42.	IMA (Investment Management Association)	91.	<p>The nature of information required for DB and DC scheme members is fundamentally different, reflecting the fundamentally different nature of the underlying proposition. At a general level, the key information challenge in DC is to help consumers understand the precise nature of the service that they are receiving for a given fee. A focus on transparency and disclosure with respect only to issues such as charges and expected returns will miss the underlying need to improve the overall communication approach in DC. This is an issue that is a significant feature of the current governance debate in the UK and should be central to governance debates across Europe. To answer the question precisely in the light of these remarks, we do not believe that there are obvious additional requirements. We do believe that the pensions industry (including trust-based schemes operating under IORP) needs to do more to find ways to communicate in a comparable way the value proposition in DC pensions.</p> <p>There is also an important caveat here, and one that is emphasised by consumer representatives in the debate on the evolution of DC disclosure: information without regard for consumer capability is</p>	<p>Noted, consumer capability indeed should be taken into account – information overload should be prevented and information should be concise and understandable</p>

			<p>information without value. It is essential that the policy debate over information requirements is fully cogniscent of differing – and often low – levels of consumer capability in relation to financial services products. Furthermore, as a recent report for the European Commission emphasised, there is an additional challenge for policymakers, which is behavioural: ie. even well-informed consumers provided with the best information may make decisions that appear sub-optimal in a rational welfare maximisation perspective. □</p> <p>Ever more mindful of the general communication issues that arise in DC, a number of pension schemes and interested parties across the EU are experimenting with innovative approaches: for example the National Employment Savings Trust (NEST) in the UK has done a lot of work on the language of pensions; in Sweden, the Government uses the 'Orange Envelope', an approach successful introduced in 1999 to brand pensions differently. EIOPA and the European Commission could potentially examine good practice across the EU as part of its analysis. It would also be important that any harmonisation does not cut across or otherwise limit innovation in this area.</p>	
43.	Institute and Faculty of Actuaries (UK)	91.	<p>As indicated by our general comments on the CfA response, we think it necessary to take a step back and consider the education requirements of the particular IORP's members.</p> <p>We favour a principles-based approach: for example requiring that "sufficient timely information is provided for the member to make a well-informed choice". We agree with the principles set out in the draft advice and, in particular, that for DB IORPs the contents of the information requirements under the current Directive remain appropriate but that any mechanisms for adjusting benefits should be made clear.</p>	Noted

			<p>We believe that the structure of the IORP should dictate the information requirements: for example limited requirements for mandatory arrangements, extensive requirements for voluntary arrangements or where members are required to make many decisions</p> <p>It should also be recognised that:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Standardised projections are usually if not always wrong – they need to be more personalised. Members need to understand what replacement income they need in retirement and to understand how the levers of retirement age, contributions and investment risk together affect the expected outcome and the distribution of possible outcomes.</li> <li><input type="checkbox"/> Good governance requires transparency: e.g. no hidden charges.</li> <li><input type="checkbox"/> Providing members with too much information can be counter-productive.</li> <li><input type="checkbox"/> Past performance figures are often a poor guide to future performance and, in our experience, are largely ignored by IORP members anyway.</li> </ul>	
44.	Le cercle des épargnants	91.	The same information requirements should apply for insurance contracts and IORPs.	Noted, text adjusted: with reference to initiatives of EC on the usefulness of a KIID-like document for other all long-term savings instruments
45.	Mercer	91.	We do not think it is necessary to prescribe additional information requirements on DB schemes in Level 1 regulation. However, the stark	Partially agreed. Text

			distinction between DB and DC made in the consultation document does not reflect reality: in fact, there is a continuum of provision, with some DC schemes providing rules based benefits (for example, a minimum annual rate of return) and some DB schemes sharing investment risk with members (for example, via conditional indexation). Consequently, there should be some basic information requirements that apply to all schemes, and additional information provided depending on the type and size of the risk borne by members.	revised accordingly
46.	MHP (Vakcentrale voor Middengroepen en Hoger Perso)	91.	The MHP thinks that against the background of the good information provision existing in the Netherlands, it is certainly necessary to provide more information to DC members than to DB members considering the risks that a member of an individual DC system is bearing compared to the member of a collective DB system.	Noted
47.	National Association of Pension Funds (NAPF)	91.	<p>INFORMATION TO MEMBERS / BENEFICIARIES</p> <p>59. Do stakeholders believe that additional information requirements - besides the current ones - are not only necessary for DC schemes, but also for DB schemes?</p> <p>The NAPF accepts that additional information requirements for DB schemes could help to improve communications with members. Some high-level EU standards could provide a useful foundation.</p> <p>However, it will be important to take account of the specificities of DB pensions and their differences from DC. Any standards must also allow flexibility for national supervisors to implement them flexibly in each Member State.</p>	Noted

48.	NEST Corporation	91.	<p>We believe that all members of IORPs should have sufficient information to make informed decisions. This includes sufficient information to enable them to compare different IORPs and contract-based schemes that they are, have been, or may become members of. As such, we believe that it is highly desirable that equivalent information disclosure requirements apply to all IORPs, whether they operate on a DB or DC basis and are contract or trust based.</p> <p>Our one concern is that as the types of pension provision between member states vary to such a degree, the revised information requirement should not be overly prescriptive. We would prefer decisions on information requirements rest with individual member states, but be common across all types of pension provision within that jurisdiction. We strongly support the principles that information should be correct, understandable and not misleading; however, given both general levels of financial literacy and the tension between standardisation (enabling cross IORP comparison) and personalisation (facilitating relevance), the challenge of effective implementation is immense.</p>	Noted
50.	Pan-European Insurance Forum (PEIF)	91.	<p>For DB schemes, the KIID for UCITS funds is an appropriate starting point for information to members. For DB schemes, some necessary information requirements could be addressed in the national social and labour law.</p> <p>Information for members and beneficiaries is important both for ensuring adequate protection of members and beneficiaries and for enabling effective pension planning (increasing the transparency and comparability of occupational pension schemes). People need sufficient information to make informed decisions about their retirement plans. Although the current IORP Directive already provides some general</p>	Noted

			<p>rules on information to members and beneficiaries, we suggest consideration of the following:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Identification of the risk sharing mechanisms (benefit adjustment, role of the sponsoring firm) used in the DB scheme.</li> <li><input type="checkbox"/> If the registration/authorization distinction is retained for IORPs, a statement as to whether the IORP is registered or authorized.</li> <li><input type="checkbox"/> Information on who bears the risks (the IORP, the sponsor or member). Any changes in the how the risks are distributed should also be communicated.</li> <li><input type="checkbox"/> Depending on how Question 36 is answered, it may be useful to identify in some simplified way the confidence level.</li> <li><input type="checkbox"/> The information should clarify what elements of the retirement benefit are unconditional, conditional or discretionary. In the latter two cases, members and beneficiaries should be advised of the extent to which conditional commitments or discretionary awards have been executed in the past.</li> <li><input type="checkbox"/> It may be useful to consider the need for information on how the approach to retirement is dealt with, particularly, if annuitisation means a change of provider (e.g. from an IORP to a life insurance company.)</li> <li><input type="checkbox"/> Information on whether the scheme envisages the possibility of reducing benefits or claim additional payments from the employer, how this is decided and whether this has been done in the past.</li> <li><input type="checkbox"/> If the sponsor bears some of the risks: Information on how pension benefits are protected in case of sponsor insolvency.</li> <li><input type="checkbox"/> If the IORP bears some of the risks: information on how pension benefits are protected in case of its insolvency.</li> </ul>	
51.	Pensioenfondsen Zorg en	91.	We are of the opinion that against the background of the good	Noted

	Welzijn (PFZW)		information provision existing in the Netherlands, it is certainly necessary to provide more information to DC members than to DB members considering the risks that a member of an individual DC system is bearing compared to the member of a collective DB system.	
52.	Predica	91.	<p>Predica is supportive of greater information to members / beneficiaries to capture the relevant features of IORPs to enable members / beneficiaries to understand their pension product and the level of protection they have.</p> <p>Predica is of the opinion that even though there are some articles on information requirements already in the IORP Directive, they are far from complete.</p>	Noted
53.	prof.dr. A.A.J. Pelsser HonFIA, Netspar & Maastric	91.	<p>24. Yes, both for DB and DC schemes.</p> <p>25. Just as risk management, disclosure to stakeholders is becoming an increasingly important topic. Especially regarding pensions, public awareness used to be low and confidence regarding the benefits high. Due to successive economic crises, however, both funded and unfunded schemes are arguably affected in their ability to always meet the promised benefits. This has increased public awareness and correspondingly the need to improve communication. We therefore state the central question on disclosure as:</p> <p>26. * Are the nature and risks regarding the benefits clearly and timely disclosed to all stakeholders?</p> <p>27. Disclosure creates trust and facilitates well-informed decisions by all stakeholders. A high level of disclosure is needed where there is more scope for individuals to change the pension fund provider or where beneficiaries are substantially exposed to risks. In case the beneficiaries participate in a defined benefit plan, disclosure of information about the pension fund's assets and liabilities are necessary to assess the exposure to shortfall risk. In case of defined</p>	Noted

			<p>contribution, disclosure should encompass items like expected benefits, default investment options, appropriate diversification and fees. High standards of disclosure will encourage trustees and managers to build transparent, comprehensible and responsible pension organisation and processes. The following questions are at the heart of this topic:</p> <p>28. • Is the pension fund clear about the nature of the benefits and the risks attached to them?</p> <p>* Is the communication tailored to the specific stakeholder groups and suited to their level of understanding?</p>	
54.	PTK (Sweden)	91.	PTK believes that, for DB schemes, requirements in the current IORP Directive are sufficient and that no additional information is needed.	Noted
55.	Railways Pension Trustee Company Limited ("RPTCL	91.	RPTCL do not consider it appropriate to extend the information requirements for DB schemes.	Noted
56.	Standard Life Plc	91.	The information required by members of DB and DC schemes varies in line with the different nature of the two types of scheme, although the fundamental requirement for both is to provide meaningful, but simpler and shorter, communications to members. Many customers do not have a high level of understanding in relation to their pensions and helping them to understand the pension they have and what it provides is key. Customers of DC schemes require information regarding the nature of the service they are receiving, and the nature of the funds they are investing in. Feedback from customers suggests that they currently feel they receive too much information and that much of it is meaningless to them. There is even less benefit to members of DB schemes in receiving additional information. We believe that information requirements should be determined by working with customers to understand what information they value and is meaningful for them, and that any information that does not meet this primary requirement should be excluded.	Noted, and text adjusted: concise information and in simple and understandable language, prevent information overload

58.	TCO	91.	TCO believes that, for DB schemes, requirements in the current IORP Directive are sufficient and that no additional information is needed.	Noted
59.	The Association of Pension Foundations (Finland)	91.	Additional information is not needed. Information regulation in pension funds and pension insurance companies are quite alike. If only requirements for pension funds would be increased then pension insurance companies would avail in competition for not having to do that.	Noted
60.	The Association of the Luxembourg Fund Industry (A	91.	Taking into consideration the fact that under DB schemes, no investment risk is borne by the affiliated, the additional information intended for DC schemes (merely pertaining on investment risks) should not be imposed on DB plans.	Noted
61.	The Society of Actuaries in Ireland	91.	<p>We believe that the information requirements already in place in Ireland, including Statements of Reasonable Projection, comprehensively cover the additional information requirements for both DB and DC plans. However, the question of whether this information is provided in a form that is comprehensible to all is possibly a different but nonetheless equally important question.</p> <p>We would add that, for DB schemes, it may be advisable to consider information requirements which reference risk. For example, clarify which benefits are guaranteed, whether there are sufficient funds to pay these and other benefits and whether a legally enforceable covenant exists.</p>	Noted
62.	THE SOCIETY OF PENSION CONSULTANTS	91.	The requirements already in place for DB schemes cover the principal issues and we consider that no significant additional information is required. Further it is arguable that some of the additional information proposed for DC schemes would be unnecessary or inappropriate.	Noted

63.	Trades Union Congress (TUC)	91.	<p>Information to Members / Beneficiaries</p> <p>Do stakeholders believe that additional information requirements - besides the current ones - are not only necessary for DC schemes, but also for DB schemes?</p> <p>The TUC regards clear, accurate and regular communications to scheme members both on joining and throughout scheme membership, including the annual statement, as crucial. Such information should also be available to potential members prior to joining. We endorse the EIOPA advice that information should be correct, understandable and not misleading.</p> <p>High quality information is required for both defined benefit and defined contribution members, although we recognise that DC scheme members carry a higher degree of risk and therefore are particularly in need of regular good quality, accessible information.</p> <p>The TUC would support the addition of the availability to DC scheme members of personalised pension projections if they are meaningful, true and fair in order to be of real use to members.</p> <p>Access to information in digital and written format is important, whether it is for a DC or DB scheme. If the default form of communication is digital then members should still be able to access written communications. And it essential that safeguards are put in place so that scheme members receive the information they require, for example people with visual impairments have access to information</p>	Noted
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			in the appropriate format.	
64.	UK Association of Pension Lawyers	91.	<p>CfA 23 (Information to members / beneficiaries): Do stakeholders believe that additional information requirements - besides the current ones - are not only necessary for DC schemes, but also for DB schemes?</p> <p>We are of the view that the current information requirements are already adequate so no additional requirements are necessary for either DC schemes or DB schemes. If additional information requirements are considered necessary, then these should be principles based rather than being prescriptive. This is because some Member States, such as the UK, are already heavily regulated in terms of information and disclosure requirements.</p>	Noted
65.	UNI Europa	91.	9.	Noted
66.	Universities Superannuation Scheme (USS),	91.	<p>INFORMATION TO MEMBERS / BENEFICIARIES</p> <p>17. Do stakeholders believe that additional information requirements - besides the current ones - are not only necessary for DC schemes, but also for DB schemes?</p> <p>Additional information requirements for DB schemes could help to improve communications with members. Some high-level EU standards could provide a useful foundation.</p> <p>However, it will be important to take account of the specificities of DB pensions and their differences from DC. Any standards must also allow flexibility for national supervisors to implement them flexibly in each Member State.</p>	Noted

			In addition it should be remembered that scheme members in the context of a defined benefit IORP are not strictly a customer unlike an insurance policyholder or personal pension plan holder.	
67.	Verbond van Verzekeraars	91.	Yes. In our view, there should not be a difference between information requirements for DB and DC schemes. In any case, members and beneficiaries of occupational pension schemes should receive information about the type and risk of the product and benefits. Even if the member is not able to make an investment choice, he or she could bare the investment risk (also to a lesser degree in certain DB schemes, for example in the Netherlands). These risks should be properly communicated.	Noted
68.	VHP2 (Vakorganisatie voor middelbaar en hoger pers	91.	The VHP2 thinks that against the background of the good information provision existing in the Netherlands, it is certainly necessary to provide more information to DC members than to DB members considering the risks that a member of an individual DC system is bearing compared to the member of a collective DB system.	Noted
69.	Whitbread Group PLC	91.	We see no reason for change to the current regulatory regime for UK pension schemes, which provides strong protection for member's pension benefits	Noted
70.	Zusatzversorgungskasse des Baugewerbes AG	91.	We would like to stress the fact that pension funds are not for profit organisations that do not compete on a market. The benefits managed by IORPs are not simple products. They are in most cases mandatory because they are part of collective labour agreements in industry sectors, or because they are part of the employment relation between an employer and his employees. In these cases they do not need as many "pre-contractual information" as customers of insurance companies. Even during their membership their information needs are	Noted

			different from insurance clients, because the contributions paid for them by their employers are an unchangeable part of their salary. IORPs should not be obliged to deliver customer information if accrued benefits have not changed during the previous period (i.e. passing year).	
71.	Towers Watson	91.	<p>92. CfA 23 Information to members / beneficiaries</p> <p>Do stakeholders believe that additional information requirements - besides the current ones - are not only necessary for DC schemes, but also for DB schemes?</p> <p>We favour a principles-based approach: for example requiring that "sufficient timely information is provided for the member to make a well-informed choice". We agree with the principles set out in the draft advice and, in particular, that for DB schemes the contents of the information requirements under the current IORP Directive remain appropriate but that any mechanisms for adjusting benefits should be made clear.</p> <p>We believe that the structure of the IORP should dictate the information requirements: for example limited requirements for mandatory arrangements, extensive requirements for voluntary arrangements particularly where members are required to make many decisions</p> <p>It should also be recognised that:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Providing members with too much information can be counter-productive.</li> <li><input type="checkbox"/> Past performance figures are often a poor guide to future performance</li> <li><input type="checkbox"/> Standardised projections can be misleading</li> </ul> <p>Transparency promotes good governance</p>	Noted, and text adjusted: concise information and in simple and understandable language

72.	OPSG (EIOPA Occupational Pensions Stakeholder Group)	92.	<p>The OPSG agrees about the opportunity to improve pre-enrolment information (the OPSG agrees with EIOPA that the term pre-contractual doesn't suit with IORP's nature) with the adoption of a KIID-like document for DC schemes (a KIID like document can be developed for the pre-enrolment stage but this should not limit the pension fund management decision to provide more information). The aim is, according to our opinion, to provide the possibility to have an immediate idea of the pension fund by a synthetic "picture", written in a simple and plain language. The OPSG clarifies that the KIID-like document has to be considered an information document only and not a source of legal commitments with respect to members. As far as the content is concerned, even if not fully standardized at EU level, according to EIOPA advice, the OPSG considers as necessary the following issues:</p> <ol style="list-style-type: none"> <li>1. Information provided to members/beneficiaries should be correct, understandable (expressed in a simple way), useful and not misleading.</li> <li>2. Identification of the IORP (funding vehicle) which could include financial structure of the IORP.</li> <li>3. A brief description of the occupational pension scheme rules including i.a.: <ul style="list-style-type: none"> <li><input type="checkbox"/> contributions</li> <li><input type="checkbox"/> deferred membership treatment</li> <li><input type="checkbox"/> withdrawal possibility (if available)</li> <li><input type="checkbox"/> insurance coverage offered on a compulsory or on a voluntary basis (death, long term care, critical illness). The kind of annuities</li> </ul> </li> </ol>	Noted
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		<p>offered (it's really a key element, the real aim of a pension fund which is too often considered like a financial instrument) and pay-out options available</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> if any, the guaranteed lines</li> <li><input type="checkbox"/> life cycle mechanism</li> <li><input type="checkbox"/> statement of investment principles including, if relevant, statement of social responsible investment.</li> </ul> <p>4. Performance information (with past performances in a mid/long horizon backward looking, also for giving the message to members/beneficiaries that pension funds are a vehicle to be considered over a consistent period and not in a short term which seems of particular relevance in the context of this turbulent financial period)</p> <p>5. The cost/charges - really a key issue <input type="checkbox"/>.</p> <p>6. Risk/reward profile (it is very difficult to express for pension funds, projected in a long term period)</p> <p>7. Practical information</p> <p>8. Cross references (referred to cross border activity)</p> <p>The OPSG considers it very important that the document offers the opportunity to compare different investment fund options offered through the IORP structure or the occupational pension scheme if the</p>	
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			<p>scheme offers the possibility of choosing among them.</p> <p>The OPSG agrees also “to go beyond the investment”, considering the social purpose of IORP and aiming to improve a better awareness in joining.</p> <p>The OPSG highlights that there are already IT tools available that provide members with information as to their future pension. These tools should be encouraged further as they are simple, straight forward and able to cope with various levels of consumer sophistication in terms of financial literacy.</p>	
73.	AbA Arbeitsgemeinschaft für betriebliche Altersver	92.	<p>Increased information for members of DC pension schemes, where members bear the investment risk and are asked or have the right to make choices at individual level, and the development of a Key Information Document could be helpful for the members. A harmonization at EU level seems difficult because country-specific information is essential. Therefore we prefer Option 1 (No required common format at EU level for the pre-enrolment document and the annual statement).</p>	Noted
74.	ABVAKABO FNV	92.	<p>A KIID like document for DC schemes with contents as envisaged in the draft EIOPA advice seems to be a reasonable information provision to DC members. As EIOPA has rightly stated such a document needs to be tailor-made to the specificities of the IORPs, be it collective or individual. In the Netherlands, IORP members already receive a pre-enrolment document. But according to the PF the introduction of such a document should be left to the discretion of the Member States. They also can better decide whether and which additional information could be useful for the scheme members. As there is no competition between IORPs, a document facilitating the comparisons between IORPs is according to us not useful.</p>	Noted
75.	AEIP	92.	<p>148. AEIP believes in the introduction of a KIID-like document for DC schemes, adapted to the specific situation of IORPs and containing information beyond investment information. (i.e. a more general KID</p>	Noted

			<p>or Key Information Document).</p> <p>149. The purpose should not be comparison between IORP's. The objective of the KID should be to provide for a better understanding of the member of his pension accrual under a DC scheme. The information need will be different according to the type of scheme : collective or individual. It might also be driven by social and labour law requirements, imposing elaborate and specific information requirements.</p> <p>150. Therefore it will be difficult to draft a common format of pre-enrolment document and annual benefit statement, because of the differences in the members states' pension schemes and the specific information requirements based on the national social and labour legislation. The implementation of the principles regarding information requirements as provided in the current IORP Directive can best be decided at a member state-level.</p> <p>AEIP thinks that it should be made clear that this KID is not a source of legal commitments.</p>	
76.	AMONIS OFP	92.	<p>Are stakeholders happy with the potential introduction of a KIID-like document for DC schemes and with its contents as envisaged in the draft EIOPA advise? In particular are stakeholders happy with the introduction of a document (KID) that would contain information beyond investment? How important it is that this document facilitates comparisons between IORPs?</p> <p>As stated earlier AMONIS OFP rejects the approach that pension scheme members are to be considered as consumers. The information requirements as are laid down in Solvency II may fit customers and stakeholders of insurance companies.</p> <p>AMONIS OFP believes however in the introduction of a KIID-like document for DC schemes, adapted to the specific situation of IORPs,</p>	Noted

			<p>ad proposed by EIOPA and containing information beyond investment information. (i.e. a more general KID or Key Information Document). AMONIS OFP agrees that it should be made clear that this KID is not a source of legal commitments.</p> <p>Since there is no competition between occupational pension schemes, the AMONIS OFP does not see added value in giving scheme members information on the comparative “competitively” of the scheme. It is not so important that the KIID facilitates comparisons between IORPs. The main objective of the KIID should be to provide for a better understanding of the members’ risk and rights of his pension accrual under a DC scheme.</p> <p>In this discussion therefore, it should be kept in mind that KIID documents were designed for investment products, whereas occupational pensions, according to the AMONIS OFP, are not “products”.</p> <p>In the AMONIS OFP’s opinion it will be difficult to draft a common format of pre-enrolment document and annual benefit statement, because of the differences in the members states’ pension schemes and the specific information requirements based on the national social and labour legislation. The implementation of the principles regarding information requirements as provided in the current IORP Directive can best be decided upon at a member state-level (as is the case today).</p>	
77.	ANIA – Association of Italian Insurers	92.	In this regard, pre-contractual information requirements are very important and similar principles need to apply across Member States in order to ensure a level playing field. However, the KIID for UCITS funds	Noted, and text adjusted in some places: with reference

		<p>does not provide an appropriate starting point for information to members and beneficiaries of IORPs for the following reasons:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> The occupational pension landscape in the 27 Member States is very heterogeneous. Also each Member State has various types of occupational pension schemes with each of them having particular national characteristics. Compared to this, the investment funds offered by UCITS have been harmonized at European level. Thus, a unifying key information document is possible for the latter but not for the former products.</li> <li><input type="checkbox"/> The characteristics of pension products differ from those of UCITS. The latter comprise of collective investment schemes, whereas the former provide long-term contracts, and could offer protection against biometric risks and insurance guarantees that serve as retirement benefits.</li> <li><input type="checkbox"/> As rightly pointed out by the Commission, members and beneficiaries of occupational pension schemes are neither retail investors nor consumers.</li> <li><input type="checkbox"/> Investment funds, retail structured securities and structured term deposits do not provide any risk coverage, while, in contrast, occupational pension products often do.</li> </ul> <p>In general there is a need for adequate communication about the risk for the scheme members and beneficiaries of the products for both DB and DC schemes. This information should be simple and understandable and take the differences of the products offered into account making sure that the risk is explained appropriately. The ANIA agrees with EIOPA that in the case of DB schemes, the information required under the current Directive are appropriate, however, where relevant, at least the following additional information should be provided to the members:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Information on the provider of the benefit</li> </ul>	<p>to initiatives of EC on the usefulness of a KIID-like document for other all long-term savings instruments; starting point EC decisive for advice; and finally, importance of simple and understandable language added to text</p>
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			<ul style="list-style-type: none"> <li><input type="checkbox"/> Information on who bears the risks: it is of utmost importance that members and beneficiaries are well-informed on how much of the risks are borne by the IORP, the sponsoring undertaking and how much of the risk is shifted to the member.</li> <li><input type="checkbox"/> Information on whether the IORP is allowed to reduce benefits or claim additional payments from the employer. Also give a probability based on assumptions on the likelihood of reducing benefits.</li> <li><input type="checkbox"/> In case the sponsoring undertaking bears some of the risks: Information on how pension benefits are protected in case of the insolvency of the sponsoring undertaking.</li> <li><input type="checkbox"/> In case the IORP bears some of the risks: information on how pension benefits are protected in case of the insolvency of the IORP.</li> <li><input type="checkbox"/> Information regarding the governing body of the plan</li> <li><input type="checkbox"/> Information on the risk coverage provided and the options Members/beneficiaries have</li> <li><input type="checkbox"/> Information about the consequences of leaving the plan early - when needed - or consequences of early retirement</li> </ul> <p>But the situation could be different as regards DC schemes where the members are asked to choose between different investment options. We believe it is important to have information on certain key issues, similar to the CEA's Key Information Checklist (KIC), to help with understanding for those individuals participating in the scheme. But again, as has already been pointed out above and in our responses to Q42 and 49, some Member States have DC schemes where the members of the scheme can choose between different investment alternatives. These alternatives will consist of products with different design features as regards for example the existence of guarantees. In these cases it is important to make a distinction between the scheme itself and the product alternatives offered. There needs to be a certain</p>	
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			<p>amount of flexibility regarding the format of the complete information, or it would become very extensive and difficult for members and beneficiaries to digest. Therefore it should in these cases be possible to include references to the different product alternatives.</p> <p>In any case, the ANIA is fully supportive of increased transparency to the Members and Beneficiaries under the condition that this would not lead to a setback of Member States requirements. Furthermore, maximum harmonisation should be avoided as this might cause an administrative burden.</p>	
78.	Association Française de la Gestion financière (AF)	92.	<p>We support the introduction of a KIID-like document for pension schemes.</p> <p>We consider that the elements of the UCITS KIID give ample possibility to provide essential product information. This said, it is clear that some adjustments will be required, in particular to provide information beyond investment to take into account the very long-term horizon of retirement savings and the specific information that are important to pension scheme members (e.g. employer contribution, tax relief available, etc). This means in particular that performance scenarios should be included in the KID and that the assessment of risk of different investment options and asset allocations in DC schemes should be conditioned to the time horizon of the member and may not be an objective characteristic of the option.</p> <p>Regarding the content, we agree with EIOPA that the presentation of costs and associated charges should be an essential part of the KID. The goal should be to make all costs and types of remuneration transparent.</p>	Noted

			<p>It is very important that the introduction of a KID for pension schemes facilitates comparisons between schemes and IORPs. Indeed, employees may have different schemes to choose from. Often, the underlying investments are similar. This is when it is very important to provide information on which members are able to make sound investment decisions. In these cases, other factors than the ones specified by EIOPA have a great impact on the investment outcome for the individual scheme member. Scheme solvency is mentioned, but there are also administrative fees associated to the scheme itself, costs for benefits and so on. Another important factor differing schemes are longevity assumptions. It is very important to make these factors visible and understandable for the scheme members. Where an IORP is employer sponsored the member may not have a choice of IORPs without loss of the employer contribution, the disclosure must include the value of this investment so that members are able to understand the value of this.</p>	
79.	Association of British Insurers	92.	<p>The ABI believes that improving communication with policyholders is an important part of improving consumers' understanding of pension products. Providing information in a clear, relevant and timely way allows prospective policyholders to compare the key features, benefits and risks of their scheme and therefore decide if it is right for their needs. However, in many cases the choice of an IORP will rest with the employer rather than the individual and any requirement for comparison would be at the employer rather than member level and this will limit the need for comparison information in a KID.</p> <p>Further, the sponsoring employer of the IORP will be best placed to understand the membership demographics, and be able to make their own judgement on the type and level of disclosure applicable, subject of course to statutory disclosure requirements.</p> <p>EIOPA rightly concludes that the variety of DC schemes (and the need</p>	<p>Noted, text adjusted, starting point EC decisive for advice</p>

			<p>to provide country-specific information) will make it hard to achieve standardisation of disclosure. This is exacerbated by the fact that the schemes may invest in several different funds, so a disclosure document designed for one fund cannot simply be expanded to make it a product level disclosure.</p> <p>On this basis, we believe that EIOPA need to be wary of using the KIID developed for UCITS as the starting point for pension (and product) disclosure. EIOPA should start from consideration of how consumers make decisions about products and indeed whether they have a choice (for example with default options and auto-enrolment where no choice is involved) and the kinds of information they are therefore likely to need.</p> <p>The provision of past performance information may also pose a problem. Past performance is no indication of future performance and may be seen as making 'false promises,' Further with the number of health warnings required over the use of past performance data it is questionable as to how much use it actually is to members i.e. providing them with information and then telling them that this information is, in fact, meaningless could be counterproductive. Also, in schemes with a large number of fund choices the provision of past performance information may result in a very large document. Information on individual fund choices may be better placed elsewhere – where the member can access it if they choose to do so.</p> <p>The ABI would also emphasise the need to ensure that disclosures provide useful information which presents the pros and cons of enrolling in a balanced fashion. While we support the provision of information to potential policyholders, we are concerned about the extent to which disclosure which overly focuses on the negatives, may prove a barrier enrolment</p>	
80.	Association of Consulting Actuaries (UK)	92.	We would concur with EIOPA in the rejection of the replication of the KIID approach for the same reasons as stated. We would welcome the	Noted

			introduction of standardised minimum information contents within a KID for DC schemes to ensure clear participants throughout the EU. However, we do not believe that the introduction of any standard KID document would be appropriate in that if there is a “standard” document this may essentially become the common approach and would stifle creativity in the way in which good employers and IORPs seek to communicate to their employees/members. This is consistent with our belief that the most important issue is to communicate members’ choices and entitlements, rather as is the case with UCITS , to aid comparisons between entities.	
81.	Association of French Insurers (FFSA)	92.	98. The FFSA would support the introduction of a unique format for DC schemes, which would provide identical information for all schemes and make them comparable.  However the KIID for UCITS funds does not provide an appropriate starting point for information members and beneficiaries of IORPs.	Noted, text adjusted, starting point EC decisive for advice
82.	Association of Pensioner Trustees in Ireland	92.	In principle, we are supportive of the introduction of a KIID-like document but adapted appropriately fo pension schemes.	Noted
83.	Assoprevidenza – Italian Association for supplementen	92.	We believe in the introduction of a KIID-like document for DC schemes, adapted to the specific situation of IORPs and containing information beyond investment information. (i.e. a more general KID or Key Information Document).  The objective of the KID should be to provide for a better understanding of the member of his pension accrual under a DC scheme. The information need will be different according to the type of scheme : collective or individual. It might also be driven by social and labour law requirements, imposing elaborate and specific information requirements.  The KID sould depend on wheher the IORP’s are in competition or not. It should less detailed for the IORP’s thar are not in competition: in	Noted

			<p>such case it should be considered that IORP's are not publicly quoted and they don't have external shareholders or investors.</p> <p>Therefore it will be difficult to draft a common format of pre-enrolment document and annual benefit statement, because of the differences in the members states' pension schemes and the specific information requirements based on the national social and labour legislation. The implementation of the principles regarding information requirements as provided in the current IORP Directive can best be decided at a member state-level.</p> <p>AEIP thinks that it should be made clear that this KID is not a source of legal commitments..</p>	
84.	Assuralia	92.	<p>Are stakeholders happy with the potential introduction of a KIID-like document for DC schemes and with its contents as envisaged in the draft EIOPA advice? In particular are stakeholders happy with the introduction of a document (KID) that would contain information beyond investment?</p> <p>A pension promise is, firstly, a promise of an employer to his employees. Employers are responsible for keeping that pension promise and for the way it is organised, even if they rely on the services of a pension institution. Information for the employee/beneficiary differs from the information that is relevant for the employer.</p> <p>It is essential for employees/beneficiaries to be adequately informed about those aspects of the pension promise that directly affect their pension claims. This can be done via a document that describes the various aspects of an employer's pension promise to its employees.</p> <p>On the contrary, information about the underlying aspects linked to the management of the pension promise by the pension institution (such as costs, the pension institution's investment strategy, etc.) must be aimed primarily at employers and not at members.</p>	Noted

			<p>Only in the case of a DC plan, where members bear the investment risk and where members can choose from between various investment options, is it necessary for members to be informed via a kind of pre-contractual information document that enables them to correctly estimate the consequences of the choices they are about to make. Assuralia therefore agrees with the suggestion set out in the consultation paper to only provide for a Key Information Document for such DC schemes, as well as the view that the pre-contractual KID will, in that case, differ from what is provided for under the UCITS directive.</p>	
85.	Belgian Association of Pension Institutions (BVPI-	92.	<p>Are stakeholders happy with the potential introduction of a KIID-like document for DC schemes and with its contents as envisaged in the draft EIOPA advise? In particular are stakeholders happy with the introduction of a document (KID) that would contain information beyond investment? How important it is that this document facilitates comparisons between IORPs?</p> <p>As stated earlier BVPI-ABIP rejects the approach that collective pension scheme members are to be considered as consumers. The information requirements as are laid down in Solvency II may fit customers and stakeholders of insurance companies.</p> <p>BVPI-ABIP believes however in the introduction of a KIID-like document for DC schemes, adapted to the specific situation of IORPs, ad proposed by EIOPA and containing information beyond investment information. (i.e. a more general KID or Key Information Document). BVPI-ABIP agrees that it should be made clear that this KID is not a source of legal commitments.</p> <p>Since there is no competition between occupational pension schemes,</p>	Noted

			<p>the BVPI-ABIP does not see added value in giving scheme members information on the comparative “competitively” of the scheme. It is not so important that the KIID facilitates comparisons between IORPs. The main objective of the KIID should be to provide for a better understanding of the member of his pension accrual under a DC scheme.</p> <p>In this discussion therefore, it should be kept in mind that KIID documents were designed for investment products, whereas occupational pensions, according to the BVPI-ABIP, are not “products”.</p> <p>In the BVPI-ABIP’s opinion it will be difficult to draft a common format of pre-enrolment document and annual benefit statement, because of the differences in the members states’ pension schemes and the specific information requirements based on the national social and labour legislation. The implementation of the principles regarding information requirements as provided in the current IORP Directive can best be decided upon at a member state-level (as is the case today).</p>	
86.	BIPAR	92.	<p>When it comes to information requirements, BIPAR supports an adequate level of client information. People need to receive the information they need to plan their retirement.</p> <p>The introduction of a KIID-like document, adapted to the specificities of the pension scheme is welcomed. BIPAR believes that participants in pension schemes, working in one or more Member States, are entitled to the information required to have a good insight in their pension rights and expected pension income at the retirement date. This requires annual pension information.</p>	Noted

			<p>The introduction of a personalised annual statement to be delivered annually by the IORP to each member is an idea we support. In the Netherlands for instance, progress in this respect has been made by the introduction of the UPO, the Uniform Pension Overview.</p> <p>Furthermore, it is currently very difficult for intermediaries and their cross-border working clients to obtain information regarding the different national pension systems. We would therefore like to promote the establishment of a Pension Information Centre that could give legal and fiscal information on the different national pension systems.</p>	
87.	BNP Paribas Cardif	92.	<p>BNP Paribas Cardif would support the introduction of a unique format for DC schemes, which would provide identical information for all schemes and make them comparable.</p> <p>However the KIID for UCITS funds does not provide an appropriate starting point for information members and beneficiaries of IORPs.</p>	Noted, text adjusted, starting point EC decisive for advice
88.	Bosch Pensionsfonds AG	92.	We believe that information requirements in the current Directive are sufficient and no additional requirements are needed.	Noted
89.	Bosch-Group	92.	We believe that information requirements in the current Directive are sufficient and no additional requirements are needed.	Noted
90.	BT Pension Scheme Management Ltd	92.	Given our firm view that these discussions should apply only to information for DC members and not simply read across to DB schemes (see our response to Question 91), we take no view on these issues.	Noted
91.	BVI Bundesverband Investment und Asset	92.	We consider that the elements of the UCITS KIID give ample possibility to provide essential product information. This said, it is clear that some	Noted

	Management		<p>adjustments will be required, in particular to provide information beyond investment to take into account the very long-term horizon of retirement savings and the specific information that are important to pension scheme members (e.g. employer contribution, available tax relief , etc). This means in particular that performance scenarios should be included in the KID and that the assessment of risk of different investment options and asset allocations should be conditioned to the time horizon of the member and may not be an objective characteristic of the option.</p> <p>Regarding the content, we agree with EIOPA that the presentation of costs and associated charges should be an essential part of the KID. The goal should be to make all costs and types of remuneration transparent.</p>	
92.	CEA	92.	<p>In this regard, pre-contractual information requirements are very important and similar principles need to apply across Member States in order to ensure a level playing field. However, the KIID for UCITS funds does not provide an appropriate starting point for information to members and beneficiaries of IORPs for the following reasons:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> The occupational pension landscape in the 27 Member States is very heterogeneous. Also each Member State has various types of occupational pension schemes with each of them having particular national characteristics. Compared to this, the investment funds offered by UCITS have been harmonised at European level. Thus, a unifying key information document is possible for the latter but not for the former products.</li> <li><input type="checkbox"/> The characteristics of pension products differ from those of UCITS. The latter comprise of collective investment schemes, whereas the former provide long-term contracts, and could offer protection against biometric risks and insurance guarantees that serve as retirement benefits.</li> <li><input type="checkbox"/> As rightly pointed out by the Commission, members and</li> </ul>	<p>Noted, text adjusted in some places: with reference to initiatives of EC on the usefulness of a KIID-like document for other all long-term savings instruments; starting point EC decisive for advice; and finally, importance of simple and understandable language added</p>

		<p>beneficiaries of occupational pension schemes are neither retail investors nor consumers.</p> <p><input type="checkbox"/> Investment funds, retail structured securities and structured term deposits do not provide any risk coverage, while, in contrast, occupational pension products often do.</p> <p>The CEA wants to highlight that it is difficult to provide pre-contractual information to the Members/Beneficiaries, since it is the employers who disclose the contracts and in most cases also should be the one responsible for disclosing information about the scheme to the members and beneficiaries. The employees do not always need to compare different pension schemes or products and a summary or overview is not directly needed in these situations. In general there is a need for adequate communication about the risk for the scheme members and beneficiaries of the products for both DB and DC schemes. This information should be simple and understandable and take the differences of the products offered into account making sure that the risk is explained appropriately. The CEA agrees with EIOPA that in the case of DB schemes, the contents of information requirements under the current Directive are appropriate and that the KIID for UCITS funds does not provide an appropriate starting point for information to members and beneficiaries where they do not bear the investment risk.</p> <p>However, where relevant, at least the following additional information should be provided to the members supplementary to articles 9c, 9f by the conclusion of the contract:</p> <p><input type="checkbox"/> Information on the provider of the benefit</p> <p><input type="checkbox"/> Information on who bears the risks: it is of utmost importance that members and beneficiaries are well-informed on how much of the risks are borne by the IORP, the sponsoring undertaking and how much of the risk is shifted to the member.</p>	to text
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			<ul style="list-style-type: none"> <li><input type="checkbox"/> Information on whether the IORP is allowed to reduce benefits or claim additional payments from the employer. Also give a probability based on assumptions on the likelihood of reducing benefits.</li> <li><input type="checkbox"/> In case the sponsoring undertaking bears some of the risks: Information on how pension benefits are protected in case of the insolvency of the sponsoring undertaking.</li> <li><input type="checkbox"/> In case the IORP bears some of the risks: information on how pension benefits are protected in case of the insolvency of the IORP.</li> <li><input type="checkbox"/> Information regarding the governing body of the plan</li> <li><input type="checkbox"/> Information on the risk coverage provided and the options Members/beneficiaries have</li> <li><input type="checkbox"/> Information about the consequences of leaving the plan early - when needed - or consequences of early retirement</li> </ul> <p>But the situation could be different as regards DC schemes where the members (that is, the employees) are asked to choose between different investment options. All in all, there is a need for flexibility as regards whether the IORP or the employer should be responsible for the provision of information to members and beneficiaries. We believe it is important to have information on certain key issues, similar to the CEA's Key Information Checklist (KIC), to help with understanding for those individuals participating in the scheme. But again, as has already been pointed out above and in our responses to Q42 and 49, some Member States have DC schemes where the members of the scheme can choose between different investment alternatives. These alternatives will consist of products with different design features as regards for example the existence of guarantees. In these cases it is important to make a distinction between the scheme itself and the product alternatives offered. There needs to be a certain amount of flexibility regarding the format of the complete information, or it would become very extensive and difficult for members and beneficiaries to</p>	
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			<p>digest. Therefore it should in these cases be possible to include references to the different product alternatives.</p> <p>In any case, the CEA is fully supportive of increased transparency to the Members and Beneficiaries under the condition that this would not lead to a setback of Member States requirements. Furthermore, maximum harmonisation should be avoided as this might cause an administrative burden.</p>	
93.	Charles CRONIN	92.	<p>I strongly support the introduction of a KIID as a pre-enrolment document for DC plans. Before delving into the detail of its construction I suggest that EIOPA consider these two macro issues. First there is some merit in promoting the KIID brand and to discourage its fragmentation when considering that the KIID is being introduced into UCITS and PRIPS. Functionally it is a document that allows investors to compare a range of retail products to help plan their entire wealth portfolio (UCITS, PRIPS in addition to DC IORPs). Hence I discourage using the terminology KID, when KIID is used in the other two Directives. This leads onto the second point; EIOPA raises a number of complexities in constructing a KIID for IORPs. I believe that if the document is limited to a description of the investment vehicle(s) rather than the scheme, the construction becomes a much simpler task. Naturally information on contributions, employer interest, social and labour law, etc., which are not to do with the investment vehicle can be referenced elsewhere. All the KIID has to do is reference one point of contact where all this information can be provided.</p> <p>Specifically for DC schemes; investors carrying the investment risk will be offered a number of investment vehicles and commonly a default vehicle. They may have the option to invest in other vehicles. In either case, the choice of the most appropriate investment vehicle is one of the most key decisions. Hence ready comparison between IORP</p>	Noted

			<p>investment vehicles is extremely helpful.</p> <p>Turning to EIOPA's specific observations, paragraph 29.2.30, contribution arrangements do not have to appear on the KIID, if it is purely conceived as a descriptor of the investment vehicle(s). With respect to the Statement of Investment Policy Principles in the case of a DC scheme, where the member makes the choice of investment, these drop down at the investment strategy of the specific investment vehicle. Past performance in DC investment vehicles should appear where available with dotted line breaks on a graph referencing where the investment policy/strategy has changed. The temptation to permit performance scenarios should be strongly resisted.</p> <p>One criticism that I have of the KIID, which I strongly urge EIOPA to try to remedy, is that in the spirit of making the document comprehensible to the widest population, the document will contain descriptive text common to all KIIDs, which comes at the cost of reducing the opportunity to provide unique information about the underlying investment vehicle to the potential investor. Hence I strongly recommend the production of a document of generic descriptions (a key for KIID) to be published alongside the KIID, possibly produced at a European Supervisory level. I estimate that this would free up an additional two-thirds of a page, for investment vehicle specific information, on this two page document.</p>	
94.	Chris Barnard	92.	<p>I support the introduction of a KID that would contain information beyond investment.</p> <p>I fear that there is quite a lot of information to be disclosed here, which may not easily fit into 2 pages as suggested in Paragraph 29.2.32.</p>	Noted
95.	CMHF (Centrale van Middelbare en Hogere	92.	A KIID like document for DC schemes with contents as envisaged in the draft EIOPA advice seems to be a reasonable information provision to	Noted

	Functionar		DC members. As EIOPA has rightly stated such a document needs to be tailor-made to the specificities of the IORPs, be it collective or individual. In the Netherlands, IORP members already receive a pre-enrolment document. But according to the CMHF the introduction of such a document should be left to the discretion of the Member States. They also can better decide whether and which additional information could be useful for the scheme members. As there is no competition between IORPs, a document facilitating the comparisons between IORPs is according to us not useful.	
96.	De Unie (Vakorganisatie voor werk, inkomen en loop	92.	A KIID like document for DC schemes with contents as envisaged in the draft EIOPA advice seems to be a reasonable information provision to DC members. As EIOPA has rightly stated such a document needs to be tailor-made to the specificities of the IORPs, be it collective or individual. In the Netherlands, IORP members already receive a pre-enrolment document. But according to De Unie the introduction of such a document should be left to the discretion of the Member States. They also can better decide whether and which additional information could be useful for the scheme members. As there is no competition between IORPs, a document facilitating the comparisons between IORPs is according to us not useful.	Noted
97.	Ecie vie	92.	We support the introduction of a unique format for DC schemes which make them comparable.	Noted
98.	EFI (European Federation of Investors)	92.	We are very happy to see that the commission and EIOPA seems to attached so much importance to information. Information has ton be clear, fair, understandable and not misleading. Therefore the introduction of a KIID or KID document is of utmost importance. This document has to contain information that is beyond investment in order to inform correctly and completely the future beneficiary and to facilitate the comparison with other IORPS. Risks should be clearly and precisely and exhaustivelt described including risks like inflation because of the very long term nature of the promise and of its function as a replacement income.	Noted

			<p>A Key Information Document should be mandatory for all IORPS and would detail more precisely the features of the regime:</p> <ul style="list-style-type: none"> <li>- its guarantees,</li> <li>- the consolidated and detailed costs at inception and during the life of the product,</li> <li>- the possible outcomes through different positive and negative scenarios,</li> <li>- the minimum underlying units performance required to offset all charges on a real (net of inflation) basis,</li> <li>- the past performance of the underlying assets</li> <li>- and more globally all necessary information to understand completely how the product works, what are the risks assumed, what are the reward to be expected from such an investment.</li> </ul>	
99.	European Association of Public Sector Pension Inst	92.	<p>Are stakeholders happy with the potential introduction of a KIID-like document for DC schemes and with its contents as envisaged in the draft EIOPA advice? In particular are stakeholders happy with the introduction of a document (KID) that would contain information beyond investment? How important it is that this document facilitates comparisons between IORPs?</p> <p>The distinction made by EIOPA between financial products, notably UCITS, and IORPs is a key factor. While any initiative to increase awareness of occupational pensions is welcome, there is a real danger that, by providing a quantity of complex information, the potential member could actually be discouraged from joining a pension scheme.</p>	Noted

			<p>Human beings tend to put off making decisions in situations where information is complex and choices will make a difference relatively far in the future. Automatic enrolment is an example of best practice which seeks to transform individual inertia into a positive outcome. In pension savings, in the long run, the most important factors are the initial early decision to join an occupational pension scheme, the level of contributions paid in and the maintenance of contributions over the whole career of the person.</p> <p>EAPSPI agrees with the analysis of EIOPA concerning the impossibility to fully standardise information documents at EU level (29.2.27). Any Key Information Document should be regarded as an attempt to provide key information in a simple, clear way. The Open Method of Coordination would seem to be an efficient way of comparing best practice in this complex area.</p>	
100.	European Federation for Retirement Provision (EFRP)	92.	<p>The introduction of a KIID-like document for DC schemes could be useful. Its objective is to increase the understanding of members of pension accrual in the DC scheme, its functioning and the risks. The KIID-like document should be adapted to the nature of the scheme (collective or individual) and to the specific Member State context. The EFRP believes that the quality and the usability of information are key in the design of the KIID-like document and more generally in information provision to members. Financial education efforts are essential and should be promoted in order to increase members' understanding.</p> <p>Since there is no competition between occupational pension schemes, the EFRP does not see added value in giving plan members information on the comparative "competitiveness" of the scheme.</p>	Noted

			<p>In this discussion therefore, it should be kept in mind that KIID documents were designed for investment products, whereas occupational pensions, are not “products”.</p> <p>In addition, the EFRP believes that information requirements towards members should not be more onerous for IORPs than for insurance companies towards their clients.</p> <p>New European rules should not preclude Member States from maintaining existing, higher standards. Where the social partners have responsibilities in relation to the form or content of information provided to members in the KIID-like document or otherwise, their role should not be impacted by new rules.</p> <p>The EFRP believes that it will be difficult to draft a common European format for a pre-enrolment document and annual benefit statement, because of the differences in the members states’ pension schemes and the specific information requirements based on national SLL. The implementation of the principles regarding information requirements as provided in the current IORP Directive can best be decided upon at a Member State level, as is the case today.</p>	
101.	European Fund and Asset Management Association (EF)	92.	<p>We support the introduction of a KIID-like document for pension schemes.</p> <p>We consider that the elements of the UCITS KIID give ample possibility to provide essential product information. This said, it is clear that some adjustments will be required, in particular to provide information</p>	Noted

			<p>beyond investment to take into account the very long-term horizon of retirement savings and the specific information that are important to pension scheme members (e.g. employer contribution, tax relief available, etc). This means in particular that performance scenarios should be included in the KID and that the assessment of risk of different investment options and asset allocations in DC schemes should be conditioned to the time horizon of the member and may not be an objective characteristic of the option.</p> <p>Regarding the content, we agree with EIOPA that the presentation of costs and associated charges should be an essential part of the KID. The goal should be to make all costs and types of remuneration transparent.</p> <p>It is very important that the introduction of a KID for pension schemes facilitates comparisons between schemes and IORPs. Indeed, employees may have different schemes to choose from. Often, the underlying investments are similar. This is when it is very important to provide information on which members are able to make sound investment decisions. In these cases, other factors than the ones specified by EIOPA have a great impact on the investment outcome for the individual scheme member. Scheme solvency is mentioned, but there are also administrative fees associated to the scheme itself, costs for benefits and so on. Another important factor differing schemes are longevity assumptions. It is very important to make these factors visible and understandable for the scheme members. Where an IORP is employer sponsored the member may not have a choice of IORPs without loss of the employer contribution, the disclosure must include the value of this investment so that members are able to understand the value of this.</p>	
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102.	FAIDER (Fédération des Associations Indépendantes)	92.	<p>We are very happy to see that the commission and EIOPA seems to attached so much importance to information. Information has ton be clear, fair, understandable and not misleading. Therefore the introduction of a KIID or KID document is of utmost importance. This document has to contain information that is beyond investment in order to inform correctly and completely the future beneficiary and to facilitate the comparison with other IORPS. Risks should be clearly and precisely and exhaustivelt described including risks like inflation because of the very long term nature of the promise and of its function as a replacement income.</p> <p>A Key Information Document should be mandatory for all IORPS and would detail more precisely the features of the regime:</p> <ul style="list-style-type: none"> <li>- its guarantees,</li> <li>- the consolidated and detailed costs at inception and during the life of the product,</li> <li>- the possible outcomes through different positive and negative scenarios,</li> <li>- the minimum underlying units performance required to offset all charges on a real (net of inflation) basis,</li> <li>- the past performance of the underlying assets</li> <li>- and more globally all necessary information to understand completely how the product works, what are the risks assumed, what are the reward to be expected from such an investment.</li> </ul>	Noted
103.	FairPensions	92.	Yes. We would suggest that Key Information Documents should include a brief description of the organisation's investment policies, which should include:	Noted

			<ul style="list-style-type: none"> <li>- its approach to stewardship (i.e. the exercise of its ownership rights), and</li> <li>- its approach to managing investment risk, including environmental, social and governance (ESG) risks.</li> </ul> <p>In our experience dealing with queries from our supporters, many individuals are interested in this information and feel it is relevant to decisions about their retirement savings. In addition, this would help to embed the understanding among IORPs that these factors are not optional extras but an integral part of the prudent management of their beneficiaries' assets.</p> <p>Although we understand EIOPA's clarification that the KID would not serve the same function as the SIPP, we note that UK regulations already require information about voting policies and about the approach taken to environmental and social issues to be included in pension funds' Statement of Investment Principles. A similar provision was considered at EU level although this was not ultimately adopted.</p> <p>We believe it is fairly important that this document should facilitate comparisons between IORPs, as it enables benchmarking of best practice and, where relevant, also enables consumers to make more informed choices in what can be a difficult and confusing field. Measures to facilitate comparison could make the documents less rather than more burdensome for IORPs to produce – for example, providing a standard template for IORPs to complete should reduce the administrative cost of compiling the document.</p>	
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104.	Federation of the Dutch Pension Funds	92.	A KIID like document for DC schemes with contents as envisaged in the draft EIOPA advice seems to be a reasonable information provision to DC members. As EIOPA has rightly stated such a document needs to be tailor-made to the specificities of the IORPs, be it collective or individual. In the Netherlands, IORP members already receive a pre-enrolment document. But according to the PF the introduction of such a document should be left to the discretion of the Member States. They also can better decide whether and which additional information could be useful for the scheme members. As there is no competition between IORPs, a document facilitating the comparisons between IORPs is according to us not useful.	Noted
105.	Financial Reporting Council	92.	The proposal appears reasonable but it would be helpful to see examples of the statement. A KIID-like document might achieve consistency of information which would be of benefit to consumers but it could also result in less creativity by providers and lower quality communication. We would suggest consumer research is carried out on the benefits of a KIID-like document.	Noted
106.	FNV Bondgenoten	92.	A KIID like document for DC schemes with contents as envisaged in the draft EIOPA advice seems to be a reasonable information provision to DC members. As EIOPA has rightly stated such a document needs to be tailor-made to the specificities of the IORPs, be it collective or individual. In the Netherlands, IORP members already receive a pre-enrolment document. But according to FNV BG the introduction of such a document should be left to the discretion of the Member States. They also can better decide whether and which additional information could be useful for the scheme members. As there is no competition between IORPs, a document facilitating the comparisons between IORPs is according to us not useful.	Noted
107.	Generali vie	92.	We support the introduction of a unique format for DC schemes which make them comparable.	Noted

108.	Groupe Consultatif Actuariel Européen.	92.	<p>A KID is an important document for (especially future) IORP members. With a KID members are able to compare their current and (possible) new IORP as a very important part of their individual labour agreement. We should keep in mind that the information should not be too difficult to understand.</p> <p>For employers this document will be important as well. With the KID they will be able to compare the quality of their IORP with that of their competitors.</p>	Noted
109.	Groupement Français des Bancassureurs	92.	<p>FBIA would support the introduction of a unique format for DC schemes, which would provide identical information for all schemes and make them comparable.</p> <p>However the KIID for UCITS funds does not provide an appropriate starting point for information members and beneficiaries of IORPs.</p>	Noted, text adjusted, starting point EC decisive for advice
110.	PMT-PME-Mn Services	92.	<p>A KIID like document for DC schemes with contents as envisaged in the draft EIOPA advice seems to be a reasonable information provision to DC members. As EIOPA has rightly stated such a document needs to be tailor-made to the specificities of the IORPs, be it collective or individual. In the Netherlands, IORP members already receive a pre-enrolment document. But according to us the introduction of such a document should be left to the discretion of the Member States. They also can better decide whether and which additional information could be useful for the scheme members. As there is no competition between IORPs, a document facilitating the comparisons between IORPs is according to us not useful.</p>	Noted
111.	IMA (Investment Management Association)	92.	<p>The use of the KIID in investment funds reflects the high standards of transparency and disclosure that exist in the investment funds market, which has helped to make UCITS in particular a successful global brand. These high standards should in principle also exist in the DC environment, and should help consumers to undertake comparison,</p>	Noted

			<p>where they are in a position to exercise choice. However, the retail market for UCITS and the DC pensions markets are very different, not least where it is employers and not employees who are choosing schemes and default options for members. These differences need to be recognised and their implications fully understood as a part of any process of policy change in this area.</p>	
112.	Institute and Faculty of Actuaries (UK)	92.	<p>We welcome the principle of a KIID-like document to the extent that it satisfies the conditions set out in our response to Q91. We have reservations about the extent to which it is proposed to standardise the information because we believe that the diversity of information requirements arises from diversity of IORPs and the wider social security framework in which they operate.</p> <p>We believe that the amount of information supplied to the member should be limited to the information relevant to the choices available to them. That information needs to be in a form designed to induce members to take appropriate retirement planning actions. Members therefore need to understand why they're receiving that information, the impact it will have on them and the action they need to or are expected to take.</p> <p>We also have a concern that providing information in a KID could inappropriately shift responsibility from those running the IORP to members and encourage EIOPA to consider this point further.</p> <p>Standardisation of information is usually linked to a goal of ensuring comparability. Comparisons between IORPs are rarely relevant. Members only need information that is relevant to them.</p> <p>Moreover standardised information is usually sub-optimal -: i.e. standardisation may hinder innovation (and hence member choice) and result in some levelling down by those IORPs whose disclosures to members represent current best practice.</p>	Noted

			<p>Supervisors could play an important role by providing generic information for members – indeed, supervisors through economies of scale could usefully provide much more public education and relevant tools to IORP members.</p> <p>Any effect of charges on members’ benefits should be disclosed to them.</p> <p>If the information requirement is as we describe above then we do believe that this information should be issued automatically.</p>	
113.	Italian Banking Association	92.	<p>ABI agrees with EIOPA’s advice which suggests some modifications to the IORP directive inspired by essential general principles common also to other Directives (MiFid, UCITS and Solvency II) and strongly supports the introduction of a KIID-like document adapted to the specific situation of IORPs and containing information that goes beyond investment information. This document would help potential members to focus their attention on essential information and to compare IORPs. The importance of comparisons between IORPs is very high in those Member States (as in the case of Italy) where potential members can sometimes choose between different IORPs.</p> <p>ABI believes that it is not possible to propose the same level of harmonization for pre-enrolment information documents (standardised documents for all members) and the personalised annual statement (which contains personalised information based on heavy organisational investments already carried out by IORPs). Therefore ABI agrees with option 2, but limited to the pre-enrolment document.</p>	Noted
114.	Le cercle des épargnants	92.	<p>We support the introduction of a unique format for DC schemes which make them comparable.</p>	Noted
115.	Mercer	92.	<p>Yes. We think it is important for members to be given information that enables them to understand the investment choices available, but they should also know where the responsibility for choosing investment funds and operating the scheme lies, for example.</p>	Noted

			However, we do not agree it is sufficiently important for members to be able to compare different IORPs that this should become part of the information prescribed in the Directive.	
116.	MHP (Vakcentrale voor Middengroepen en Hoger Perso)	92.	A KIID like document for DC schemes with contents as envisaged in the draft EIOPA advice seems to be a reasonable information provision to DC members. As EIOPA has rightly stated such a document needs to be tailor-made to the specificities of the IORPs, be it collective or individual. In the Netherlands, IORP members already receive a pre-enrolment document. But according to the MHP the introduction of such a document should be left to the discretion of the Member States. They also can better decide whether and which additional information could be useful for the scheme members. As there is no competition between IORPs, a document facilitating the comparisons between IORPs is according to us not useful.	Noted
117.	National Association of Pension Funds (NAPF)	92.	<p>60. Are stakeholders happy with the potential introduction of a KIID-like document for DC schemes and with its contents as envisaged in the draft EIOPA advice? In particular are stakeholders happy with the introduction of a document (KID) that would contain information beyond investment? How important it is that this document facilitates comparisons between IORPs?</p> <p>The NAPF strongly supports the provision of clear information to members of DC schemes. This is why the NAPF's Pension Quality Mark, which has now been awarded to 128 schemes, identifies communications as one of the three sets of criteria (alongside contributions and governance) by which the quality of applicant for the Mark are assessed.</p> <p>The NAPF is also working to help pension schemes provide clearer</p>	Noted

			<p>information to savers about the costs and charges levied by their DC scheme. We recently convened a Charges Summit, bringing together the key stakeholders across the pensions sector. The Summit's aim was to develop an industry code of practice on the transparency of fees and charges, and to make it easier for people to compare pensions. A code could also help wider monitoring and comparison of industry charges in the public interest.</p> <p>An EU-level KID could help to strengthen communications with DC members, but (as in our answer to Q.41 above on information for members of DB pension schemes), it would need to be very high-level, leaving plenty of room for detailed implementation at Member State level.</p>	
118.	NEST Corporation	92.	<p>UK Pension legislation already requires that most of the information described in the draft advice be provided to a member as of right, and the slight extension in scope should not create significant problems for UK providers.</p> <p>While re-iterating our preference that the actual information requirements be decided by member states based on the characteristics of their individual pension environments, we recommend that the KID requirements closely mirror the provisions of the KIID document under the UCITS directive. It is imperative that an individual is also able to compare an IORP to an insurance product designed for non-occupational retirement provision, such as the UK 'personal pension' product.</p> <p>The disclosure of risk should have equal prominence with the disclosure of returns. An effective way of disclosing risk to a lay member of the public is yet to be discovered.</p>	Noted

			<p>NEST's fund factsheets already provide a risk comparator that utilises UCITS methodology but personal annual statements are still under development. As an occupational scheme, NEST needs only to provide information as set out in UK legislation implementing the IORP Directive. However, we felt that as many future members are likely to have a mixture of contract based and trust based pension provision, it would be helpful to provide information that is similar to the requirements for both legislative regimes.</p> <p>NEST would be happy to share information on our communications to members with EIOPA.</p>	
120.	Pan-European Insurance Forum (PEIF)	92.	<p>Standardisation of the information to be provided between different types of IORPS and across countries could help the growth of cross border activity (although elements of national diversity would still be present due to difference in social and labour law).</p> <p>The legal status of any pension projections would need to be clarified.</p>	Noted
121.	Pensioenfonds Zorg en Welzijn (PFZW)	92.	<p>A KIID like document for DC schemes with contents as envisaged in the draft EIOPA advice seems to be a reasonable information provision to DC members. As EIOPA has rightly stated such a document needs to be tailor-made to the specificities of the IORPs, be it collective or individual. In the Netherlands, IORP members already receive a pre-enrolment document. But according to the Pensioenfederatie the introduction of such a document should be left to the discretion of the Member States. They also can better decide whether and which additional information could be useful for the scheme members. As there is no competition between IORPs, a document facilitating the comparisons between IORPs is according to us not useful.</p>	Noted
122.	Predica	92.	<p>Predica would support the introduction of a unique format for DC schemes, which would provide identical information for all schemes and make them comparable.</p> <p>However the KIID for UCITS funds does not provide an appropriate</p>	Noted, text adjusted, starting point EC decisive for advice

			starting point for information members and beneficiaries of IORPs.	
123.	PTK (Sweden)	92.	<p>The introduction of a KIID-like document for DC schemes could be useful. Its objective is to increase the understanding of members of pension accrual in the DC scheme, its functioning and the risks. The KIID-like document should be adapted to the nature of the scheme (collective or individual) and to the specific Member State context. PTK believes that the quality and the usability of information are key in the design of the KIID-like document and more generally in information provision to members. Financial education efforts are essential and should be promoted in order to increase members' understanding.</p> <p>Since there is no competition between occupational pension schemes, PTK does not see added value in giving plan members information on the comparative "competitiveness" of the scheme.</p> <p>PTK believes that it will be difficult to draft a common European format for a pre-enrolment document and annual benefit statement, because of the differences in the members states' pension schemes and the specific information requirements based on national SLL. The implementation of the principles regarding information requirements as provided in the current IORP Directive can best be decided upon at a Member State level, as is the case today.</p>	Noted
124.	Railways Pension Trustee Company Limited ("RPTCL)	92.	In many cases, members are not making a choice of IORP as they are enrolled in the IORP sponsored by their employer. Therefore, this proposal may need some further consideration.	Noted

125.	Standard Life Plc	92.	<ul style="list-style-type: none"> <li><input type="checkbox"/> Effective communication is a crucial element not only of improving consumer understanding of pensions but also in engaging them in saving for their future. Information should be clear, meaningful and engaging. We also agree that it should enable customers to make effective comparisons between different products, features and funds. However, there are a number of important factors for consideration.</li> <li><input type="checkbox"/> Firstly, the variety of DC schemes, the need to satisfy national requirements, and the range of funds and investment approaches (and sometimes multiple funds within one product) will make it very difficult to effectively standardise the approach without building an unnecessarily complex document.</li> <li><input type="checkbox"/> There is a very real need to ensure that customers are engaged in the benefits of saving for the long-term and that any disclosure of risks does not encourage customers to focus overly on potential dangers or negatives.</li> <li><input type="checkbox"/> The starting point for any document of this kind should be the customer, and their circumstances. This means that considerations such as whether the funds are chosen for them by an employer, the level of understanding they have, and the sophistication of their financial needs will all impact on what they are looking for from a disclosure document.</li> <li><input type="checkbox"/> The basic principle should be to make information as simple and accessible as possible in the first instance, with guidelines for any additional information that may be required. We should respect the fact that customers have asked for less information, and focus on making what we provide as simple as possible, rather than on making it as comprehensive as possible. The use of technology – such as internet based video and other such on-line tools – can also be encouraged to provide engaging communication and education for customers that will help them to understand what they are investing in and the benefits of saving for their long-term goals.</li> </ul>	Noted, partially agreed and text adjusted, information actively delivered should be concise and simple
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126.	TCO	92.	<p>The introduction of a KIID-like document for DC schemes could be useful. Its objective is to increase the understanding of members of pension accrual in the DC scheme, its functioning and the risks. The KIID-like document should be adapted to the nature of the scheme (collective or individual) and to the specific Member State context. TCO believes that the quality and the usability of information are key in the design of the KIID-like document and more generally in information provision to members. Financial education efforts are essential and should be promoted in order to increase members' understanding.</p> <p>Since there is no competition between occupational pension schemes, TCO does not see added value in giving plan members information on the comparative "competitiveness" of the scheme.</p> <p>TCO believes that it will be difficult to draft a common European format for a pre-enrolment document and annual benefit statement, because of the differences in the members states' pension schemes and the specific information requirements based on national SLL. The implementation of the principles regarding information requirements as provided in the current IORP Directive can best be decided upon at a Member State level, as is the case today.</p>	Noted
127.	The Association of Pension Foundations (Finland)	92.	<p>We should keep in mind that scheme member is not consumer. Consumer makes always individual choices and with correct information he can make correct choices on individual basis between different service providers. As pension scheme is collective agreement and collective by nature. Different member countries may have regulated issues of choices to be made inside pension scheme taking in consideration of its national laws. In explanatory text EIOPA highlights that scheme members should be provided only useful information. In</p>	Noted

		<p>Finland scheme members may choose to join or not to join collective DC-scheme and scheme members may terminate their membership in pension scheme. And if a sponsor makes all contributions, it doesn't see rational to decline of membership. Different member countries have already regulated information needs of DC-pension as this is situation in Finland. Any new requirements of information would exceed the amount of information provided for the same kind of pensions in insurance companies. If new requirements is seen important, same kind of requirements should be applied to insurance companies also. Occupational pension are not investment products.</p> <p>As what comes in DB-pensions we highly oppose KIID-kind of information as occupational pension are linked to national pensions and the more scheme member works, the less amount of occupational pension is as whole pension is seen as pension promise. So given information of the amount of occupational pension is irrelevant and impossible. Scheme members in Finland don't make choices at individual level.</p> <p>Would costs and expenses would be relevant information to scheme member if plan sponsor pays administration costs?</p> <p>There are no potential members in occupational pensions.</p> <p>SIPP has overlapping functions with suggested KIID-document (investment objectives and investment policy).</p> <p>Pension insurance companies doesn't provide information on public of</p>	
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			<p>expenses and investment returns of II pillar pensions. On the other hand sponsor of the pension scheme already knows figures of DC-pension scheme without KIID-document. We don't see any use of KIID-kind of document for sponsor of the plan.</p> <p>We see that information requirements could best be taken care with subsidiarity principle and by national laws. In that way we support the option 1: No required common format at EU level for the pre-enrolment document and annual statement.</p>	
128.	The Association of the Luxembourg Fund Industry (A	92.	<p>A simplified KID seems indeed an appropriate solution for DC schemes. But based on the principle of level playing field, one should avoid that an insurer offering unit linked group insurance products would be exempted from any obligation in terms of financial information to the affiliates on those products. All pension funding vehicles must be on an equal footing in this respect. Under the existing European directives, when an insurer has an obligation to provide financial information on the underlying assets of an insurance contract, this information must be given to the policyholder. (see annex III of Directive 2002/83/EC concerning life insurance). One should bear in mind that, under a group insurance contract, the policyholder is the employer and not the affiliated. If the communication of financial information on the underlying assets of a DC plan funded through a pension fund becomes compulsory, the same rule should apply to group insurance schemes.</p> <p>For this adopted KID, one could learn from art. 78 - point 3 of the UCITS IV Directive, taking up the following (both at joining the scheme and on an on-going basis, in the case of modification):</p> <ul style="list-style-type: none"> <li>- Identification of the investment fund</li> <li>- Brief description of investment objectives and investment policy</li> <li>- Presentation of past performance <input type="checkbox"/> but not the performance scenarios</li> </ul>	<p>Noted, partially agreed and text adjusted: with reference to initiatives of EC on the usefulness of a KIID-like document for other all long-term savings instruments</p>

			<p>(too uncertain and even dangerous - see below)</p> <ul style="list-style-type: none"> <li>- Costs and expenses</li> <li>- Profile of risk and management fees.</li> </ul> <p>By cons, it seems useless to provide for comparisons between IORPs, in any case, the employee has, in most of the cases no choice of membership (with the exception of pension rules allowing for the possibility to opt out). Usually, the employee has to join the pension fund sponsored by his employer.</p> <p>This situation is totally different from that of an individual investor or saver who has the choice between different investment vehicles available on the market.</p>	
129.	The Society of Actuaries in Ireland	92.	<p>We are generally supportive of this initiative. As this is only a short summary document which provides key information, we would favour the document to be provided in electronic format to facilitate links to other important scheme documentation and websites.</p>	Noted
130.	THE SOCIETY OF PENSION CONSULTANTS	92.	<p>The UK already provides much of the information which would appear in the proposed KID and has a great deal of experience in gauging what works for consumers, what is necessary from a regulatory perspective and what may be too complex or problematic to include. Indeed there is evidence to support the view that providing too much information is detrimental to member engagement.</p> <p>Rather than starting from a blank page, the experience of Member States which already provide such information should to utilised.</p>	Noted

			<p>The choice of an IORP rests with the employer rather than the individual – with schemes linked to employment, the options available to individuals will likely be limited. Any requirement for comparison would be at the employer rather than member level and this will limit the need for comparison information in a KID. Most of the choices available will be internal to the scheme (i.e. choosing different options within the scheme).</p> <p>Some information beyond investment only could be useful to members as a 'quick guide' but two pages would significantly limit the amount of useful (and regulatory) information which could be included (especially if this were to be presented in a useful pictorial form). This would be especially true where the scheme in question contained a number of different options (such as a wide range of fund choices) which increase the ability to 'tailor-make' the product but add to the complexity of choice.</p>	
131.	Trades Union Congress (TUC)	92.	<p>Are stakeholders happy with the potential introduction of a KIID-like document for DC schemes and with its contents as envisaged in the draft EIOPA advice? In particular are stakeholders happy with the introduction of a document (KID) that would contain information beyond investment? How important it is that this document facilitates comparisons between IORPs?</p> <p>We strongly support the availability of clear, ongoing information to members of DC pension schemes throughout their membership.</p> <p>The TUC would particularly welcome the availability of further information on scheme costs and associated charges, including the</p>	Noted

			<p>costs of share turn-over, as we believe that transparency and low charges are vital.</p> <p>We recognise that a KID-like document could act as a helpful guide to DC scheme members. There should be minimum level of harmonisation at the EU level on a KID-type document.</p>	
132.	UK Association of Pension Lawyers	92.	<p>CfA 23 (Information to members / beneficiaries): Are stakeholders happy with the potential introduction of a KIID-like document for DC schemes and with its contents as envisaged in the draft EIOPA advice? In particular are stakeholders happy with the introduction of a document (KID) that would contain information beyond investment? How important it is that this document facilitates comparisons between IORPs?</p> <p>We believe that the introduction of a KIID-like document for DC schemes will not always be appropriate. The KII Document aims to provide protection for investors of financial products due to the investment risks involved. However, trust based DC schemes do not always offer members with investment choices and the level of details contained in a KII Document would therefore not be appropriate. The introduction of a KID may be appropriate for some Member States. However, care should be taken as to how it is introduced. For instance, in the UK, similar information is already available for most DC schemes so any introduction of a KID should reflect this to ensure that there is not an overload in regulations.</p> <p>There does appear to be a disconnect in the EIOPA framing of this question between the EIOPA world and what happens in practice in the UK. The question of which IORP an employer contributes to and, in turn, may permit an employee also to pay contributions to, is determined by the employer after taking appropriate expert advice.</p>	Noted

			<p>The employer's goal is aligned with that of the employee – namely, to maximise retirement benefits for the employee in a DC IORP. So, the concept of the employee going round "shopping" for IORPs is a concept that can be viewed as coming from a different planet.</p> <p>The concept is, of course, relevant to UK personal pension schemes, where the member may choose to pay contributions to the personal pension scheme without any employer contributions.</p>	
133.	Universities Superannuation Scheme (USS),	92.	<p>18. Are stakeholders happy with the potential introduction of a KIID-like document for DC schemes and with its contents as envisaged in the draft EIOPA advice? In particular are stakeholders happy with the introduction of a document (KID) that would contain information beyond investment? How important it is that this document facilitates comparisons between IORPs?</p>	Noted
134.	Verbond van Verzekeraars	92.	<p>We support the idea of a similar approach as the KID document. However, the introduction of a new harmonized format should not lead to a setback of member states activities. Furthermore, we do not agree with proposing different measures for DC/DB schemes. The Netherlands has high standards with regard to consumer information. Member States should always be able and/or allowed to implement a higher level of requirements.</p>	Noted
135.	VHP2 (Vakorganisatie voor middelbaar en hoger pers	92.	<p>A KIID like document for DC schemes with contents as envisaged in the draft EIOPA advice seems to be a reasonable information provision to DC members. As EIOPA has rightly stated such a document needs to be tailor-made to the specificities of the IORPs, be it collective or individual. In the Netherlands, IORP members already receive a pre-enrolment document. But according to the VHP2 the introduction of such a document should be left to the discretion of the Member States. They also can better decide whether and which additional information could be useful for the scheme members. As there is no competition between IORPs, a document facilitating the comparisons between</p>	Noted

			IORPs is according to us not useful.	
136.	Whitbread Group PLC	92.	We see no reason for change to the current regulatory regime for UK pension schemes, which provides strong protection for member's pension benefits	Noted
137.	Zusatzversorgungskasse des Baugewerbes AG	92.	The objective of the KID should be to provide a better understanding of the member of his pension accrual under a DC scheme. The information need will be different according to the type of scheme: collective or individual. It might also be driven by social and labour law requirements, imposing elaborate and specific information requirements.	Noted
138.	Towers Watson	92.	<p>93. Are stakeholders happy with the potential introduction of a KIID-like document for DC schemes and with its contents as envisaged in the draft EIOPA advice? In particular are stakeholders happy with the introduction of a document (KID) that would contain information beyond investment? How important it is that this document facilitates comparisons between IORPs?</p> <p>We welcome the principle of a KIID-like document to the extent that it satisfies the conditions set out in our response to Q91, but not on a prescriptive basis. We have reservations about the extent to which it is proposed to standardise the information because we believe that the diversity of information requirements arises from diversity of IORPs and the wider social security framework in which they operate.</p> <p>We believe that the amount of information supplied to the member should be limited to the information relevant to the choices available to them. The range of choices and different pension plan designs mean that (unlike insurance contracts) the degree of standardisation is likely to be very limited.</p> <p>Standardisation of information is usually linked to a goal of ensuring comparability. Comparisons between IORPs are rarely relevant – as the member will not have a 'choice' (beyond, where possible, the choice of</p>	Noted

			<p>not joining the IORP). There is, however, some merit in having a broadly standardised approach for those few situations where a bona fides cross-border arrangement is established. The benefit in this case being that the variations in IT systems (and administrative processes) to accommodate different countries' information requirements are minimised.</p> <p>Moreover standardised information is often sub-optimal - the good is the enemy of the best: i.e. standardisation may hinder innovation (and hence member choice) and result in some levelling down by IORPs whose disclosures to members represent current best practice.</p> <p>Supervisors and Member State governments can also play an important role by providing generic information for members</p> <p>We understand the desire for showing the effect of charges, where this affects member outcomes. However, requirements here should not be too prescriptive. In many situations the sponsoring undertaking will bear all or part of the costs (for example, administration and governance costs). It could be difficult, time consuming and of little (or no) value to try to quantify these for members.</p> <p>As a general tenet, information should be made available rather than issued automatically.</p> <p>We welcome EIOPA's acknowledgement that the KID should make it clear that it is only an information document and not a "legal source of commitments".</p>	
139.	OPSG (EIOPA Occupational Pensions Stakeholder Group)	93.	<p>The OPSG considers that it is very difficult to communicate the risk/reward profile. It could be useful to consider it over different time horizons. It's very important that the member fully understands that a pension fund is not a financial investment but a retirement plan linked with pension age. Performance scenarios could be represented in a standardized way defined at national level by the competent authority considering also the effect of inflation. It's also important to consider</p>	Noted

			different asset allocations.	
140.	AbA Arbeitsgemeinschaft für betriebliche Altersver	93.	We believe that the introduction of a Key Information Document could be useful, but it should be developed on the national level.	Noted
141.	ABVAKABO FNV	93.	As EIOPA rightly states, scenarios about the performance of IORPs seem to be rather difficult looking at the long-term investment horizon and the change of investment policy in the course of this horizon. The members of individual or collective DC systems certainly need to be aware of the risks that are implied in the current investment portfolio of an IORP. A risk ranking should vary with the time horizon and also with the different investment portfolios. A question is how this can be appropriately communicated to the members who normally are no specialists in investments. In case of a life styling type of DC contract, it would be useful to draw the attention of a member to the different risks that he/she is facing. Some scenarios could be useful for individual DC members in order to help them to make an informed decision.	Noted
142.	AEIP	93.	151. Risk/reward profiles and/or the time horizon of different investment options can only be based on assumptions, and there will allways be a risk premium and an unpredictable outcome involved. It should in any event be made clear that the information does not contain any guarantees as to risk and/or performance.  AEIP suggests that the directive should not go into too much detail, but rather leave room to member states to regulate further.	Noted
143.	AMONIS OFP	93.	How would stakeholders suggest communicating in the KID the risk/reward profile and/or the time horizon of different investment options? Do they think that the risk ranking should be the same for all time horizons, or should vary with time horizons, allowing for a more favourable ranking of equity-oriented investment options for long horizons? How should performance scenarios be conceived? Should they vary for different asset allocations, allowing for a risk premium for	Noted

			<p>equity-oriented investment options? What a reasonable measure of the risk premium would be?</p> <p>AMONIS OFP indeed feels that the risk ranking should vary with the time horizon. In addition, performance scenarios should vary for different asset allocations allowing for a risk premium for equity-oriented investment options. It should in any event be clear that this information does not contain any guarantees as to risk and/or performance.</p>	
144.	ANIA – Association of Italian Insurers	93.	<p>The ANIA strongly suggests at least the inclusion of a narrative explanation in plain simple language of elements reducing the risk, eg risk mitigation aspects such as maturity guarantees and or the existence of pension protection schemes.</p> <p>But again, as has already been pointed out above and in our responses to Q42 and 49, some Member States have DC schemes where the members of the scheme can choose between different investment alternatives. These alternatives will consist of products with different design features as regards for example the existence of guarantees. In these cases it is important to make a distinction between the scheme itself and the product alternatives offered. It would be unduly burdensome to include this product information in a KIID about the scheme. Instead there needs to be a certain amount of flexibility regarding the format of the complete information, or the KIID would become very extensive and difficult for members and beneficiaries to digest. Therefore it should in these cases be possible to include references in the KIID to the different product alternatives.</p> <p>In any case, the ANIA considers the synthetic risk indicator used by UCITS-Funds as inappropriate for the following reasons:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Too many classes</li> <li><input type="checkbox"/> Unstable classification</li> </ul>	<p>Noted, text adjusted, information actively delivered should remain concise, understandable and simple</p>

			<input type="checkbox"/> Wrong risk measure (Volatility -> return above average is considered as a risk) <input type="checkbox"/> No consumer perspective	
145.	Association Française de la Gestion financière (AF	93.	<p>AFG agrees with EIOPA that finding an appropriate way of presenting a risk/reward profile that is meaningful for all pension schemes will be challenging.</p> <p>In general, we consider that short-term risk measures (such as the one-year VAR used in the solvency II framework) would not be appropriate to use for the long-term assessment of risk.</p> <p>We strongly believe that the risk ranking should vary with time horizons, and allow for a more favourable ranking of equity-oriented investment options for long horizons. It would be even better if the risk measure was adjusted according to each scheme members time to pension – thus illustrating increasing equity risk for shorter investment horizons. We also agree with EIOPA that it would be worth exploring the pros and cons of labeling the investment options according to their investment horizon and not to the level of risk.</p> <p>We agree that that performance information should always be included in a KID, as it is an important part of members’ decision-making process. And we strongly support EIOPA’s view that performance scenarios would be very useful in the presentation of performance information. Dealing with this via level 2 implementing measures is a good idea.</p>	Noted

146.	Association of British Insurers	93.	<p>Risk/reward profiles can vary over time but other options (and features) add to the complexity of the investment situation (such as different forms of life-styling and time-based risk management). The situation will also vary with how long the individual remains active in the scheme (rather than being a deferred member), how much additional contribution they make, what their long term risk strategy is etc. The number of potential variables involved in ascertaining an accurate investment risk profile is such that anything other than a basic risk comparator soon becomes virtually meaningless without full, individually tailored, professional advice.</p> <p>To avoid this complex, and arguably unnecessary level of information, the ABI believes risk comparisons should be kept simple and understandable – pitched at an appropriately high level.</p>	Noted, more generally text adjusted, information should remain simple and understandable
147.	Association of Consulting Actuaries (UK)	93.	<p>We do not believe that these items should be specified within any EU-wide legislation or regulation. However, we believe it essential that IORPs should always be allowed the ability to allow for longer-term differences in return and volatility in relation to asset classes when communicating to members.</p>	Noted
148.	Association of French Insurers (FFSA)	93.	<p>99. The FFSA considers the synthetic risk indicator used by UCITS-Funds as inappropriate for the following reasons:</p> <p>100. • Too many classes</p> <p>101. • Unstable classification</p> <p>102. • Wrong risk measure (Volatility -&gt; return above average is considered as a risk)</p> <p>• No consumer perspective</p>	Noted
149.	Assoprevidenza – Italian Association for supplement	93.	<p>We suggests that the directive should not go into too much detail, but rather leave room to member states to regulate further.</p> <p>Risk/reward profiles and/or the time horizon of different investment</p>	Noted

			options can only be based on assumptions, and there will always be a risk premium and an unpredictable outcome involved. It should in any event be made clear that the information does not contain any guarantees as to risk and/or performance.	
150.	Assuralia	93.	Cfr. Q 92	Noted
151.	Belgian Association of Pension Institutions (BVPI-	93.	<p>How would stakeholders suggest communicating in the KID the risk/reward profile and/or the time horizon of different investment options? Do they think that the risk ranking should be the same for all time horizons, or should vary with time horizons, allowing for a more favourable ranking of equity-oriented investment options for long horizons? How should performance scenarios be conceived? Should they vary for different asset allocations, allowing for a risk premium for equity-oriented investment options? What a reasonable measure of the risk premium would be?</p> <p>BVPI-ABIP indeed feels that the risk ranking should vary with the time horizon. In addition, performance scenarios should vary for different asset allocations allowing for a risk premium for equity-oriented investment options. It should in any event be clear that this information does not contain any guarantees as to risk and/or performance.</p>	Noted
152.	BNP Paribas Cardif	93.	<p>BNP Paribas Cardif considers the synthetic risk indicator used by UCITS-Funds as inappropriate for the following reasons:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Too many classes</li> <li><input type="checkbox"/> Unstable classification</li> <li><input type="checkbox"/> Wrong risk measure (Volatility -&gt; return above average is</li> </ul>	Noted

			considered as a risk) <input type="checkbox"/> No consumer perspective	
153.	BT Pension Scheme Management Ltd	93.	Given our firm view that these discussions should apply only to information for DC members and not simply read across to DB schemes (see our response to Question 91), we take no view on these issues.	Noted
154.	BVI Bundesverband Investment und Asset Management	93.	<p>BVI agrees with EIOPA that finding an appropriate way of presenting a risk/reward profile that is meaningful for all pension schemes will be challenging.</p> <p>In general, we consider that short-term risk measures (such as the one-year VAR used in the solvency II framework) only would not be appropriate to use for the long-term assessment of risk. As the risk/reward profile of an investment option is contingent on the time horizon of the prospective investment, the risk/reward profiles should be shown for different selected time horizons, e.g. 1 year, 5 years, 10+ years. This approach would also allow for a more favourable long term risk ranking of investment options with a higher short term risk (like equity). Using only one risk ranking for all time horizons as decision factor would induce a bias against certain investment options, depending on which time horizon was chosen for calculating the respective risk/reward profiles.</p> <p>Considering the number of assumptions about key economic and even individual variables, the creation of performance scenarios is necessarily complex. It should be communicated to the plan members that the results of performance scenarios are highly dependent on the assumptions used. To achieve a maximum of transparency and comparability of different KIDs, as many variables as possible should be uniform across IORPs. Setting variables on a national level seems to be best suited to achieve this aim.</p> <p>We agree that performance information should always be included in a</p>	Noted

			<p>KID as it is an important part of members' decision-making process. And we strongly support EIOPA's view that performance scenarios would be very useful in the presentation of performance information. Dealing with this via level 2 implementing measures is a good idea.</p>	
155.	CEA	93.	<p>The CEA strongly suggests at least the inclusion of a narrative explanation in plain simple language of elements reducing the risk, eg risk mitigation aspects such as maturity guarantees and or the existence of pension protection schemes.</p> <p>But again, as has already been pointed out above and in our responses to Q42 and 49, some Member States have DC schemes where the members of the scheme can choose between different investment alternatives. These alternatives will consist of products with different design features as regards for example the existence of guarantees. In these cases it is important to make a distinction between the scheme itself and the product alternatives offered. It would be unduly burdensome to include this product information in a KIID about the scheme. Instead there needs to be a certain amount of flexibility regarding the format of the complete information, or the KIID would become very extensive and difficult for members and beneficiaries to digest. Therefore it should in these cases be possible to include references in the KIID to the different product alternatives.</p> <p>In any case, the CEA considers the synthetic risk indicator used by UCITS-Funds as inappropriate for the following reasons:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Too many classes</li> <li><input type="checkbox"/> Unstable classification</li> <li><input type="checkbox"/> Wrong risk measure (Volatility -&gt; return above average is considered as a risk)</li> <li><input type="checkbox"/> No consumer perspective</li> </ul>	<p>Noted, text adjusted, information actively delivered should remain concise, understandable and simple</p>

156.	Charles CRONIN	93.	<p>If the KIID was restricted to a description of an underlying investment vehicle, rather than presented as a scheme, the risk/reward indicator, though certainly not perfect for UCITS, can be translated from the UCITS. It is highly probable that the scheme member's choice of investment vehicle will be based on an underlying UCITS product and hence the risk/reward indicator should be easily translated.</p> <p>With respect to the time horizon of the risk/reward indicator, this should be consistent with UCITS. Scheme members will have the option to switch between investment vehicles to suit their own circumstances and indeed make their own choices on their best collection of assets given the economic situation and current value of the financial markets. As stated above performance scenarios should be strongly resisted.</p>	Noted
157.	Chris Barnard	93.	<p>Concerning investment options and their different risk/reward profiles, a balance needs to be struck between risk and reward. Within risk, the key risks should be disclosed first.</p> <p>I would not support that the risk ranking should vary with time horizons, allowing for a more favourable ranking of equity-oriented investment options for long horizons. This is very dangerous, and may create false expectations concerning the relative performance of different investment options. Given that IORPs usually invest to a particular point in time (retirement), rather than open-ended, the actual risk of investing in equities is quite high. We must also be careful not to give the wrong signals concerning investments, or else any potential investor would simply pick the "best looking" option.</p> <p>I would recommend that at least three performance scenarios should be disclosed: Unfavourable, medium (or most likely or best estimate) and favourable. I would recommend one of two options to allow for the different asset allocations:</p>	Noted

			<ul style="list-style-type: none"> <li>- 1) the three scenarios could be chosen from a stochastic set, which would allow explicitly for the expected risk and return profiles of the different assets in its parameter settings and calibration. E.g. 1000 such scenarios could be created, and the mean (middle) scenario could be disclosed along with the 25th and 975th best scenarios after ranking. I accept that this is probably too complicated for most IORPs to implement.</li> <li>- 2) The three scenarios could be run deterministically. A risk premium could be included for equity-oriented investment options within the three deterministic scenarios, but also a wider spread of outcomes, which would thus explicitly illustrate the greater expected range of returns for equity-oriented investment options. This could then fairly show the greater risk and reward profile for equity-oriented investment options.</li> </ul> <p>After considering the proportionality principle, I would suggest option 2 above. At least this would fairly and reasonably manage expectations concerning the relative risk/reward profiles for different investment options, which is probably the key issue here.</p>	
158.	CMHF (Centrale van Middelbare en Hogere Functionar	93.	<p>As EIOPA rightly states, scenarios about the performance of IORPs seem to be rather difficult looking at the long-term investment horizon and the change of investment policy in the course of this horizon. The members of individual or collective DC systems certainly need to be aware of the risks that are implied in the current investment portfolio of an IORP. A risk ranking should vary with the time horizon and also with the different investment portfolios. A question is how this can be appropriately communicated to the members who usually are no specialists in investments. In case of a life styling type of DC contract, it would be useful to draw the attention of a member to the different risks that he/she is facing. Some scenarios could be useful for individual DC members in order to help them to make an informed decision.</p>	Noted

159.	De Unie (Vakorganisatie voor werk, inkomen en loop	93.	As EIOPA rightly states, scenarios about the performance of IORPs seem to be rather difficult looking at the long-term investment horizon and the change of investment policy in the course of this horizon. The members of individual or collective DC systems certainly need to be aware of the risks that are implied in the current investment portfolio of an IORP. A risk ranking should vary with the time horizon and also with the different investment portfolios. A question is how this can be appropriately communicated to the members who usually are no specialists in investments. In case of a life styling type of DC contract, it would be useful to draw the attention of a member to the different risks that he/she is facing. Some scenarios could be useful for individual DC members in order to help them to make an informed decision.	Noted
160.	EFI (European Federation of Investors)	93.	We have to look more deeply into the communication about risk and reward. Risks have to be identified (never forget the inflation, for example). We would suggest to have a specific consultation on this subject because it is very difficult to determine in a few words how to choose a horizon, a risk/reward profile etc...	Noted
161.	European Association of Public Sector Pension Inst	93.	How would stakeholders suggest communicating in the KID the risk/reward profile and/or the time horizon of different investment options? Do they think that the risk ranking should be the same for all time horizons, or should vary with time horizons, allowing for a more favourable ranking of equity-oriented investment options for long horizons? How should performance scenarios be conceived? Should they vary for different asset allocations, allowing for a risk premium for equity-oriented investment options? What a reasonable measure of the risk premium would be?  See also answer to question 92.  For the last few years, in the context of the turmoil on the markets,	Noted

			<p>questions concerning the risk premium are particularly challenging, especially for investment professionals. The OECD project mentioned above provides interesting input for the questions, but to legislate on the basis of this input seems a little premature.</p>	
162.	European Federation for Retirement Provision (EFRP)	93.	<p>The EFRP believes that the risk ranking should change with the time horizon and performance scenarios should vary for different asset allocations, allowing for a risk premium for equity-oriented investment options. It should in any event be clear that this information does not contain any guarantees as to risk and/or performance.</p>	Noted
163.	European Fund and Asset Management Association (EF)	93.	<p>EFAMA agrees with EIOPA that finding an appropriate way of presenting a risk/reward profile that is meaningful for all pension schemes will be challenging.</p> <p>In general, we consider that short-term risk measures (such as the one-year VAR used in the solvency II framework) would not be appropriate to use for the long-term assessment of risk.</p> <p>We strongly believe that the risk ranking should vary with time horizons, and allow for a more favourable ranking of equity-oriented investment options for long horizons. It would be even better if the risk measure was adjusted according to each scheme members time to pension – thus illustrating increasing equity risk for shorter investment horizons. We also agree with EIOPA that it would be worth exploring the pros and cons of labeling the investment options according to their investment horizon and not to the level of risk.</p>	Noted

			We agree that that performance information should always be included in a KID, as it is an important part of members' decision-making process. And we strongly support EIOPA's view that performance scenarios would be very useful in the presentation of performance information. Dealing with this via level 2 implementing measures is a good idea.	
164.	FAIDER (Fédération des Associations Indépendantes)	93.	We have to look more deeply into the communication about risk and reward. Risks have to be identified (never forget the inflation, for example). We would suggest to have a specific consultation on this subject because it is very difficult to determine in a few words how to choose a horizon, a risk/reward profile etc...	Noted
165.	Federation of the Dutch Pension Funds	93.	As EIOPA rightly states, scenarios about the performance of IORPs seem to be rather difficult looking at the long-term investment horizon and the change of investment policy in the course of this horizon. The members of individual or collective DC systems certainly need to be aware of the risks that are implied in the current investment portfolio of an IORP. A risk ranking should vary with the time horizon and also with the different investment portfolios. A question is how this can be appropriately communicated to the members who usually are no specialists in investments. In case of a life styling type of DC contract, it would be useful to draw the attention of a member to the different risks that he/she is facing. Some scenarios could be useful for individual DC members in order to help them to make an informed decision.	Noted
166.	Financial Reporting Council	93.	This is a very complex area and we suggest there is a separate consultation on it.	Noted
167.	FNV Bondgenoten	93.	As EIOPA rightly states, scenarios about the performance of IORPs seem to be rather difficult looking at the long-term investment horizon and the change of investment policy in the course of this horizon. The	Noted

			<p>members of individual or collective DC systems certainly need to be aware of the risks that are implied in the current investment portfolio of an IORP. A risk ranking should vary with the time horizon and also with the different investment portfolios. A question is how this can be appropriately communicated to the members who normally are no specialists in investments. In case of a life styling type of DC contract, it would be useful to draw the attention of a member to the different risks that he/she is facing. Some scenarios could be useful for individual DC members in order to help them to make an informed decision.</p>	
168.	Groupe Consultatif Actuariel Européen.	93.	<p>As a general remark more information is definitely not always better information. Pensions are a complex financial arrangement and providing too much or overly complex information may turn members of IORPs completely away instead of doing the job of informing them about their prospects (see the literature on behavioural finance).</p> <p>When a risk/reward profile is set, the outcome of scenarios should reflect the risk that is being taken. The use of a fixed time horizon would be helpful to show the impact of the chosen risks. How to communicate about scenarios to different members has to be examined thoroughly, because different groups of IORP members probably have to be informed differently, e.g. to use a fixed time horizon of say 15 years for a 30-year old member is different from a 64-year old member who is awaiting his first pension payments.</p> <p>The effect of a risk/reward profile would preferably be set as a personalized outcome over a fixed time horizon. Hence this outcome cannot be put in a KID that deals with IORP-specific information (see table 23.1). The outcome should apart from the expected value show the downward risk and upward potential due to the chosen asset mix. The spread of the downward risk and upward potential is risk information that has to be provided in our view. The downward risk and upward potential assumptions about, for example, risk levels have to be set at EU level so that the information is comparable.</p>	Noted

			<p>Detailed remarks</p> <p>29.2.23 When a member is informed throughout all phases of his/her membership with the IORP we would like to emphasize that not only the expected (value of) benefits are projected, but also the risks that are involved. In order to make clear to which risks members are exposed, the CfA should define:</p> <ul style="list-style-type: none"> <li>- what risks are to be taken into account;</li> <li>- how to measure the risk impact;</li> <li>- what the level of risk is that we think of as 'risk free'.</li> </ul> <p>29.2.42 What financial assumptions have to be made to deal with scenarios?</p>	
169.	Groupement Français des Bancassureurs	93.	<p>FBIA considers the synthetic risk indicator used by UCITS-Funds as inappropriate for the following reasons:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Too many classes</li> <li><input type="checkbox"/> Unstable classification</li> <li><input type="checkbox"/> Wrong risk measure (Volatility -&gt; return above average is considered as a risk)</li> <li><input type="checkbox"/> No consumer perspective</li> </ul>	Noted
170.	PMT-PME-Mn Services	93.	<p>As EIOPA rightly states, scenarios about the performance of IORPs seem to be rather difficult looking at the long-term investment horizon and the change of investment policy in the course of this horizon. The members of individual or collective DC systems certainly need to be aware of the risks that are implied in the current investment portfolio of an IORP. A risk ranking should vary with the time horizon and also</p>	Noted

			with the different investment portfolios. A question is how this can be appropriately communicated to the members who usually are no specialists in investments. In case of a life styling type of DC contract, it would be useful to draw the attention of a member to the different risks that he/she is facing. Some scenarios could be useful for individual DC members in order to help them to make an informed decision.	
171.	IMA (Investment Management Association)	93.	<p>The existing SRRI methodology works far better for static asset allocation (eg. an emerging market equity fund) than it does for dynamically managed funds (ie. those where the asset allocation and hence the risk profile will be changing over time, particularly during a de-risking phase in the run-up to retirement). Indeed, given the likelihood of asset allocation adjustment over the course of the accumulation phase, there may be a case for a risk/reward indicator forming part of an annual pensions statement and hence reflecting any allocation changes. Currently, the SRRI is essentially a pre-sale tool for investment funds, although it is available in the annual report and accounts for fund holders.</p> <p>In terms of adapting the SRRI methodology, a significant practical obstacle is posed by the current approach. Against the advice of a number of stakeholders including the IMA, the SRRI methodology was built on fund rather than asset class performance. □ Using asset classes as a starting point would allow access to a long-run data set that would facilitate the reflection of both the risk premium and mean reversion across time scales that are more akin to the duration of pension accumulation. There may, therefore, well be a case for constructing a different form of indicator for DC pensions.</p>	Noted
172.	Institute and Faculty of Actuaries (UK)	93.	We consider standardisation of the information requirements in respect of these details to be undesirable, unlikely to be cost-effective and	Noted

			<p>potentially counter-productive – indeed many members will not understand it.</p> <p>We think it would be much better to define objectives that such disclosures are intended to meet with specific reference to the decisions actually available to members.</p> <p>Information should be relevant to members’ lifestyles. Members need to understand what replacement income they need and the likely impact of changing retirement age, contributions and investment risk on the outcome.</p> <p>Any information provided should therefore be in terms of education and provide appropriate tools such as models, short videos etc.</p>	
173.	Mercer	93.	<p>Members need to be provided with sufficient information that they can, perhaps with some support, understand the risk reward profile of the choices available to them. But this equation will vary according to the member’s own risk preferences and characteristics, so to be most useful the information provided will need to be tailored to individual member’s circumstances. In practice, this is expensive to achieve and so it might not be proportionate to prescribe this in Level 1 regulation, but we do think it important that investment mix and duration are taken into account.</p> <p>The answers to the questions asked here are non-trivial and a considered response would fill several pages, but some suggestions are:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Risk and reward can be shown using sliding scales, or summary, descriptive, phrases. These should be related to different objectives, so that those approaching retirement understand the different investment horizon available to them, and the different risks they face. This is not as simple as saying that equity works better over longer time horizons.</li> <li><input type="checkbox"/> Performance scenarios need to be carefully conceived and communicated so as not to raise members’ expectations. One approach</li> </ul>	Noted

			<p>would be to include an example with no future growth, but continued contributions, for comparison.</p> <p><input type="checkbox"/> The choice of risk premium should be left to member state supervisors, since access to deep investment markets differs throughout the EU.</p> <p>Although we agree that it is important for members to be provided with sufficient information that they should be able to take a view about the risk reward profile of the funds available to them, we think it unlikely that all members will use the information.</p>	
174.	MHP (Vakcentrale voor Middengroepen en Hoger Perso)	93.	<p>As EIOPA rightly states, scenarios about the performance of IORPs seem to be rather difficult looking at the long-term investment horizon and the change of investment policy in the course of this horizon. The members of individual or collective DC systems certainly need to be aware of the risks that are implied in the current investment portfolio of an IORP. A risk ranking should vary with the time horizon and also with the different investment portfolios. A question is how this can be appropriately communicated to the members who usually are no specialists in investments. In case of a life styling type of DC contract, it would be useful to draw the attention of a member to the different risks that he/she is facing. Some scenarios could be useful for individual DC members in order to help them to make an informed decision.</p>	Noted
175.	National Association of Pension Funds (NAPF)	93.	<p>61. How would stakeholders suggest communicating in the KID the risk/reward profile and/or the time horizon of different investment options? Do they think that the risk ranking should be the same for all time horizons, or should vary with time horizons, allowing for a more favourable ranking of equity-oriented investment options for long horizons? How should performance scenarios be conceived? Should they vary for different asset allocations, allowing for a risk premium for equity-oriented investment options? What a reasonable measure of the</p>	Noted

			risk premium would be?  62.	
177.	Pensioenfonds Zorg en Welzijn (PFZW)	93.	As EIOPA rightly states, scenarios about the performance of IORPs seem to be rather difficult looking at the long-term investment horizon and the change of investment policy in the course of this horizon. The members of individual or collective DC systems certainly need to be aware of the risks that are implied in the current investment portfolio of an IORP. A risk ranking should vary with the time horizon and also with the different investment portfolios. A question is how this can be appropriately communicated to the members who usually are no specialists in investments. In case of a life styling type of DC contract, it would be useful to draw the attention of a member to the different risks that he/she is facing. Some scenarios could be useful for individual DC members in order to help them to make an informed decision.	Noted
178.	Predica	93.	Predica considers the synthetic risk indicator used by UCITS-Funds as inappropriate for the following reasons:  <input type="checkbox"/> Too many classes <input type="checkbox"/> Unstable classification <input type="checkbox"/> Wrong risk measure (Volatility -> return above average is considered as a risk) <input type="checkbox"/> No consumer perspective	Noted
179.	prof.dr. A.A.J. Pelsser HonFIA, Netspar & Maastric	93.	Reporting both on short-term and long-term horizons is very important. A useful tool for this is a so-called "continuity analysis".	Noted

			<p>29. A continuity analysis is an important building block in regulating pension funds with long term commitments and long term investment strategies. It allows pension funds to gain grip on their dynamics in a situation fraught with uncertainty (DNB, 2007). The continuity analysis thus contributes to the assessment of a sustainable financial prospect for the pension fund and as a result, to the protection of beneficiaries' interests in both DB and DC schemes. The continuity analysis is strongly related to the common practice in the pension fund industry of Asset-Liability Management studies and has become increasingly important (see also, De Jong and Pelsser, 2010).</p>	
180.	PTK (Sweden)	93.	<p>PTK believes that the risk ranking should change with the time horizon and performance scenarios should vary for different asset allocations, allowing for a risk premium for equity-oriented investment options. It should in any event be clear that this information does not contain any guarantees as to risk and/or performance.</p>	Noted
181.	Railways Pension Trustee Company Limited ("RPTCL	93.	<p>It is important that information provided is clear and understandable and hence useful to members of IORPs. It may be appropriate for there to be separate consultation to cover communications to members and beneficiaries once other aspects of the review of the IORP Directive have been progressed.</p>	Noted
182.	Standard Life Plc	93.	<p><input type="checkbox"/> We agree with the principle that some investment classes can potentially achieve higher performance over the longer term than others. However, the nature of long-term saving means that risk/reward profiles will vary over time and features such as life-styling and time-based risk management have a significant impact on performance scenarios. This reinforces the need both for effective ongoing communication, and also for professional advice where it is needed to make informed investment decisions that are tailored for individual needs.</p>	Noted

			<p><input type="checkbox"/> We would be concerned if efforts to provide appropriate risk comparison information documents to customers resulted in the production of complex, detailed documents when simple, meaningful documents - together with a recommendation to seek professional advice - would be preferable.</p>	
183.	TCO	93.	<p>TCO believes that the risk ranking should change with the time horizon and performance scenarios should vary for different asset allocations, allowing for a risk premium for equity-oriented investment options. It should in any event be clear that this information does not contain any guarantees as to risk and/or performance.</p>	Noted
184.	The Association of the Luxembourg Fund Industry (A	93.	<p>The simplified KID should obviously define the risk profile based on the investment horizon or other criteria.</p> <p>In this respect, it would be good to bear in mind the primary purpose of pension funds and the fact that they operate in a specific context: i.e. the constitution of deferred retirement benefits aimed at supplementing legal pensions. Therefore, pension funds that shelter DC schemes should only offer their members the possibility to invest in financial instruments involving a level of risk compatible with the constitution of retirement benefits. Risk-taking through a pension fund should be limited in any case. Pension funds are not to encourage risky investments. It is not their role.</p> <p>Scenarios of performance do not seem necessary: they are dangerous in that they can dangle unrealistic prospects of gains.</p> <p>The Respondents share the view that the information requirements are of primary for DC schemes, where an investment risk is borne by the affiliate and a choice is given between several underlying investments.</p> <p>Since the 2008 crisis, the need for better protection of affiliates to DC</p>	Noted

		<p>schemes is undisputable.</p> <p>However, in the context of pension funds, we have to bear in mind the specificities of this sector (given the long-term vision of a pension fund), which differ from insurance and investment funds business.</p> <p>In addition, we are not partisans, in DC plans, to give the possibility to each affiliate, to get personalized projections of his supplementary pension "in order to estimate future returns."</p> <p>It is a difficult, unrealistic and dangerous exercise that may not be imposed on pension funds. A pension fund could be liable if it is deemed that it dangled illusory results.</p> <p>The annual information to be provided to each affiliate should be designed to provide a factual overview of his supplementary pension, at a given date, without having to embark on random projections.</p> <p>One should not forget that pension funds will, in this respect, rely upon external financial service providers (banks or investment advisors). What is the financial service provider who would not present its product as the most efficient?</p> <p>It is worth to mention that the purpose of a pension fund is not to achieve the best possible financial performance of savings. A pension fund must secure a supplementary pension for the retirement of its affiliates, by investing in a stable manner. It is not to suggest risky investments, focused at all costs on return.</p> <p>Those principles are clearly laid down in the existing IORP directive, under the preamble (point 6) and article 18, where the "prudent person rule" is at the heart of investment rules.</p>	
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			In the guidelines issued by the Commission to pension funds, this is to be reminded. The Commission might also consider taking measures in order to monitor this aspect of pension funds management.	
185.	The Society of Actuaries in Ireland	93.	<p>We believe that scenarios should be shown, with high, medium and low risk events. We do not believe that the communication should be too precise as this could be misleading. We believe the time factor to be a very important component in any profile.</p> <p>We believe risk ranking should take account of time horizons as the relative risks vary for members with different time horizons to retirement.</p> <p>Ideally, we believe members should be provided with the facility to enter their own investment strategies within the model. The model would provide the outcome of various scenarios for a range/spread of risk. We believe it would be appropriate for members to be able to interactively do their own scenario testing in a simplistic manner which would show a high level measure of volatility for each scenario.</p> <p>We believe this should be considered at a later level.</p>	Noted
186.	THE SOCIETY OF PENSION CONSULTANTS	93.	Risk/reward does vary over time but other options (and features) add to the complexity of the investment situation (such as different forms of life-styling and time-based risk management). The situation will also vary with how long the individual remains active in the scheme (rather than being a deferred member), how much additional contribution they make, what their long term risk strategy is etc. The number of potential variables involved in ascertaining an accurate investment risk profile are such that anything other than a basic risk comparator soon becomes virtually meaningless without full, individually tailored, professional advice.	Noted, more generally text adjusted, emphasise information should be simple and understandable

			To avoid this complex, and arguably unnecessary, level of information risk comparisons should be kept simple and understandable – pitched at an appropriately high level.	
187.	UK Association of Pension Lawyers	93.	<p>CfA 23 (Information to members / beneficiaries): How would stakeholders suggest communicating in the KID the risk/reward profile and/or the time horizon of different investment options? Do they think that the risk ranking should be the same for all time horizons, or should vary with time horizons, allowing for a more favourable ranking of equity-oriented investment options for long horizons? How should performance scenarios be conceived? Should they vary for different asset allocations, allowing for a risk premium for equity-oriented investment options? What a reasonable measure of the risk premium would be?</p> <p>Care should be taken in the level of information that should be set out in a KID, if one is introduced, concerning risk/reward profile and/or time horizon of different investment options. Clearly, the choice of asset allocation will depend on such factors as risk/reward profile and time horizon. However, the IORP should not be seen to be providing members with financial advice in relation to the choice of investments unless this is through an appropriately regulated financial adviser.</p>	Noted
188.	Universities Superannuation Scheme (USS),	93.	<p>19. How would stakeholders suggest communicating in the KID the risk/reward profile and/or the time horizon of different investment options? Do they think that the risk ranking should be the same for all time horizons, or should vary with time horizons, allowing for a more favourable ranking of equity-oriented investment options for long horizons? How should performance scenarios be conceived? Should they vary for different asset allocations, allowing for a risk premium for equity-oriented investment options? What a reasonable measure of the</p>	Noted

			risk premium would be?	
189.	Verbond van Verzekeraars	93.	There is a difference between information disclosure regarding financial advice when it comes to investment choices, and annual information about the performances of the benefits, the scheme and the pension product. According to our view, these two types and aims of communication should be kept separate.	Noted
190.	VHP2 (Vakorganisatie voor middelbaar en hoger pers)	93.	As EIOPA rightly states, scenarios about the performance of IORPs seem to be rather difficult looking at the long-term investment horizon and the change of investment policy in the course of this horizon. The members of individual or collective DC systems certainly need to be aware of the risks that are implied in the current investment portfolio of an IORP. A risk ranking should vary with the time horizon and also with the different investment portfolios. A question is how this can be appropriately communicated to the members who usually are no specialists in investments. In case of a life styling type of DC contract, it would be useful to draw the attention of a member to the different risks that he/she is facing. Some scenarios could be useful for individual DC members in order to help them to make an informed decision.	Noted
191.	Whitbread Group PLC	93.	We see no reason for change to the current regulatory regime for UK pension schemes, which provides strong protection for member's pension benefits	Noted
192.	Zusatzversorgungskasse des Baugewerbes AG	93.	We suggest that the directive should not go into too much detail, but rather leave room to member states to regulate further.	Noted
193.	Towers Watson	93.	94. How would stakeholders suggest communicating in the KID the risk/reward profile and/or the time horizon of different investment options? Do they think that the risk ranking should be the same for all time horizons, or should vary with time horizons, allowing for a more favourable ranking of equity-oriented investment options for long	Noted

			<p>horizons? How should performance scenarios be conceived? Should they vary for different asset allocations, allowing for a risk premium for equity-oriented investment options? What a reasonable measure of the risk premium would be?</p> <p>We consider standardisation of the information requirements in respect of these details to be undesirable, unlikely to be cost-effective and potentially counter-productive.</p> <p>We think it would be much better to define objectives that such disclosures are intended to meet with specific reference to the decisions actually available to members.</p> <p>In particular, it is impossible to make meaningful and absolute statements about members' risk appetites and what is high/low risk without knowing more about their individual circumstances.</p>	
194.	OPSG (EIOPA Occupational Pensions Stakeholder Group)	94.	<p>The OPSG considers that it is essential to provide a personalized annual statement to be delivered to each member. Particularly for DC schemes, it could be really important to include personalized pension projections, linking first and second pillar. It could be useful to report also information on costs actually levied, the OPSG considers that it is a better way of informing members ex ante of the level of costs.</p> <p>In this context, the OPSG emphasises the importance of IT tools allowing a simple and straight forward way to provide information to members/beneficiaries.</p>	Noted
195.	AbA Arbeitsgemeinschaft für betriebliche Altersver	94.	<p>We emphasize that the information requirements should be adapted to the benefit structure. If there are no changes in the accrued entitlements over several years, an annual information requirement is not necessary.</p>	Noted
196.	ABVAKABO FNV	94.	<p>In the Netherlands IORP members do receive annual information and in addition have the possibility to access their pension information concerning the state and the occupational pension at all times via the Pensioenregister. Information provision should be – as mentioned</p>	Noted

			above – left to the discretion of the Member States. The PF is certainly ready to provide information about this tool to other Member States and have a project at European level where countries where such a system already exists could work on a European pilot. Reference is made here as well to the EU Green Paper and the question about a European Tracking Service.	
197.	AEIP	94.	AEIP believes that scheme members should receive ample information on their rights. The information should however be adapted to the type of scheme.	Noted
198.	AMONIS OFP	94.	<p>Are stakeholders happy with the introduction of a personalised annual statement to be delivered to each member? Whether and how should it contain information on costs actually levied, and how should it be coordinated with the ex-ante information on costs to be included in the KID?</p> <p>AMONIS OFP agrees with the introduction of a personalised annual statement to be delivered to each member, but remembers that this might strongly interfere with the existing social and labour law (e.g. Belgium where a personalised annual statement is already requirement under SSL).</p> <p>The statement should contain information on the costs.</p> <p>To the extent that the KIID would only be an information document, making clear that no legal rights can be derived from it, AMONIS OFP doubts whether there should be coordination between the annual statement and the KIID.</p>	Noted
199.	ANIA – Association of Italian Insurers	94.	This information should be consistent between the different providers and easily understandable by the scheme members. Furthermore depending on the pension scheme more information should be provided	Noted

			<p>for example DC schemes with investment options, as described in our response to Q93.</p> <p>Further inspiration might be sought when the IMD II comes out as it might possibly involve information requirements on costs for life insurance companies providing occupational pensions. Thus similar information on the costs actually levied will also be relevant for Members of a DC scheme that will be regulated by the revised IORP Directive.</p>	
200.	Association Française de la Gestion financière (AF	94.	<p>AFG believes that a personal annual statement is essential. We would like to stress the importance of providing consistent information on levied costs, including administrative costs and the costs of specific benefits/guarantees.</p> <p>While taking note that it might be “impossible and undesirable” to fully harmonize the information requirements regarding occupational pensions foreseen in Article 20(7), we strongly agree with EIOPA that the minimum harmonization level could be raised especially for DC schemes.</p>	Noted
201.	Association of British Insurers	94.	<p>Providing scheme members with a personalised annual statement, such as currently done in the UK for DC schemes, would allow the individual the opportunity to make informed decisions about their retirement savings.</p> <p>However the information is only of use if members actually read it and anecdotal evidence suggests that the shorter the document is the more likely people are to read it. Therefore the ABI believes there is an important balance to be struck between useful, relevant, information and overloading individuals with too much information (which is likely to result in them not reading any of it).</p>	Noted, text adjusted, prevent overloading members and beneficiaries with information

202.	Association of Consulting Actuaries (UK)	94.	Yes as regards a requirement for annual statements for DC (or similar) plans (only for DC, since DB entitlements often do not change significantly from year to year – for example for deferred pensioners) and that those “DC” statements should contain information on charges/costs. The detailed format of such statements and the treatment of ante and actual costs should, we believe, be left to local regulators to decide on the principle of subsidiarity and given national differences in the regimes concerned (e.g. the degree to which choice is given, the state of development of existing local IORP disclosure regulation and local preferences for type of communication). For instance, it would not be appropriate to apply a UK-style SMPI document structure to a Spanish Qualified Pension Plan where employees have no choice of funds.	Noted
203.	Association of French Insurers (FFSA)	94.	In this regard, the FFSA would suggest that IORPs at least provide their members with the information requirements of article 185(5) of the solvency II Framework directive. This information should be consistent between the different providers and easily understandable by the scheme members.	Noted, text adjusted, with reference to initiatives of EC on the usefulness of a KIID-like document for other all long-term savings instruments; and information should be understandable
204.	Assoprevidenza – Italian Association for supplementen	94.	We believe that scheme members should receive ample information on their rights. The information should however be adapted to the type of scheme.	Noted
205.	Assuralia	94.	Are stakeholders happy with the introduction of a personalised annual statement to be delivered to each member? Whether and how should it	Noted

			<p>contain information on costs actually levied, and how should it be coordinated with the ex-ante information on costs to be included in the KID?</p> <p>Employees and pension beneficiaries must be correctly and clearly informed about their supplementary pensions. Assuralia is therefore in favour of the suggestion that members would be informed annually about various factors relating to their pension claims, such as:</p> <ul style="list-style-type: none"> <li>- What are the acquired rights for the past years of service?</li> <li>- What is the current funding level for these acquired rights?</li> <li>- What is the specific “degree of guarantee” regarding the proposed pension benefits, in other words to what extent is the pension promise guaranteed and who is providing that guarantee?</li> <li>- What is the pension amount that can be expected when one works for the employer until retirement age?</li> </ul> <p>The provision of information should focus on the key components of the pension promise that are actually relevant to members. Information about the underlying aspects linked to the management of the pension promise by the pension institution (such as costs, the pension institution’s investment strategy, etc.) is aimed primarily at employers, not members. It is preferable not to include this kind of information in the annual communication unless it has a direct impact on members’ pension claims.</p>	
206.	Belgian Association of Pension Institutions (BVPI-	94.	Are stakeholders happy with the introduction of a personalised annual statement to be delivered to each member? Whether and how should it contain information on costs actually levied, and how should it be	Noted

			<p>coordinated with the ex-ante information on costs to be included in the KID?</p> <p>BVPI-ABIP agrees with the introduction of a personalised annual statement to be delivered to each member, but remembers that this might strongly interfere with the existing social and labour law (e.g. Belgium where a personalised annual statement is already a requirement under SSL).</p> <p>Only when the costs are actually levied on the return or the premium (and not if the cost is 100% borne by e.g. the sponsoring undertaking), should the annual statement contain information on the costs. This information should remain general (for instance : percentage of return attributed to costs in total).</p> <p>To the extent that the KIID would only be an information document, making clear that no legal rights can be derived from it, BVPI-ABIP doubts whether there should be coordination between the annual statement and the KIID.</p>	
207.	BNP Paribas Cardif	94.	<p>In this regard, BNP Paribas Cardif would suggest that IORPs at least provide their members with the information requirements of article 185(5) of the solvency II Framework directive. This information should be consistent between the different providers and easily understandable by the scheme members.</p>	<p>Noted, with reference to initiatives of EC on the usefulness of a KIID-like document for other all long-term savings instruments; and information should be understandable</p>
208.	Bosch Pensionsfonds AG	94.	<p>We believe that information requirements in the current Directive are sufficient and no additional requirements are needed.</p>	<p>Noted</p>

209.	Bosch-Group	94.	We believe that information requirements in the current Directive are sufficient and no additional requirements are needed.	Noted
210.	BT Pension Scheme Management Ltd	94.	Given our firm view that these discussions should apply only to information for DC members and not simply read across to DB schemes (see our response to Question 91), we take no view on these issues.	Noted
211.	BVI Bundesverband Investment und Asset Management	94.	<p>BVI welcomes the idea of a personal annual statement. We would like to stress the importance of providing consistent information on levied costs, including administrative costs and the costs of specific benefits/guarantees.</p> <p>While taking note that it might be “impossible and undesirable” to fully harmonize the information requirements regarding occupational pensions foreseen in Article 20(7), we strongly agree with EIOPA that the minimum harmonization level could be raised especially for DC schemes.</p>	Noted
212.	CEA	94.	<p>This information should be consistent between the different providers and easily understandable by the scheme members. Furthermore depending on the pension scheme more information should be provided for example DC schemes with investment options, as described in our response to Q93.</p> <p>Further inspiration might be sought when the IMD II comes out as it might possibly involve information requirements on costs for life insurance companies providing occupational pensions. Thus similar information on the costs actually levied will also be relevant for Members of a DC scheme that will be regulated by the revised IORP Directive.</p>	Noted
213.	Charles CRONIN	94.	I support EIOPA’s proposal for ongoing disclosure through the introduction of a personalised annual statement. This needs to be distinct from the KIID, as it is a pre-enrolment document; it can work	Noted

			<p>sympathetically with ongoing disclosures (on a request only basis). For instance the annual statement might provoke the scheme member to rearrange his/her portfolio. This could provoke a request to see the KIIDs of other investment vehicles of the scheme, in order to inform his/her choice.</p> <p>The personalised annual statement should contain the itemised cost structure that resides in the KIID: entry and exit fees, ongoing fees and performance related fees (plus any changes levied by the IORP). As the statement is personalised, charges should be portrayed in actual monetary terms as well as percentage of fund value.</p>	
214.	Chris Barnard	94.	<p>It is important that all costs are transparently disclosed for DC schemes. The effect of costs can be illustrated in a harmonised way by disclosing the expected "reduction in yield" after allowing for all costs.</p> <p>For more information on the benefits of regulation in this area, including on the effect of charges and the reduction in yield, please refer to: <a href="http://www.fsa.gov.uk/pubs/other/cra_report_benefits.pdf">http://www.fsa.gov.uk/pubs/other/cra_report_benefits.pdf</a></p>	Noted
215.	CMHF (Centrale van Middelbare en Hogere Functionar	94.	<p>In the Netherlands IORP members do receive annual information and in addition have the possibility to access their pension information concerning the state and the occupational pension at all times via the Pensioenregister. Information provision should be – as mentioned above – left to the discretion of the Member States. The CMHF is certainly ready to provide information about this tool to other Member States and have a project at European level where countries where such a system already exists could work on a European pilot. Reference is made here as well to the EU Green Paper and the question about a European Tracking Service.</p>	Noted
216.	De Unie (Vakorganisatie voor werk, inkomen en	94.	<p>In the Netherlands IORP members do receive annual information and in addition have the possibility to access their pension information</p>	Noted

	loop		concerning the state and the occupational pension at all times via the Pensioenregister. Information provision should be – as mentioned above – left to the discretion of the Member States. De Unie is certainly ready to provide information about this tool to other Member States and have a project at European level where countries where such a system already exists could work on a European pilot. Reference is made here as well to the EU Green Paper and the question about a European Tracking Service.	
217.	Ecie vie	94.	We consider Article 185(5) of Solvency II is suitable to IORPs.	Noted
218.	European Association of Public Sector Pension Inst	94.	<p>Are stakeholders happy with the introduction of a personalised annual statement to be delivered to each member? Whether and how should it contain information on costs actually levied, and how should it be coordinated with the ex-ante information on costs to be included in the KID?</p> <p>Individualised pension information for all parts of the pension system is already an obligation in several Member States of the EU. The measures are in many cases relatively recent and evaluation of these policies has not been carried out in all States. It would therefore seem premature to legislate at EU level at present.</p>	Noted
219.	European Federation for Retirement Provision (EFRP)	94.	The EFRP supports the idea of a personalised annual statement providing members with a good- quality, useful information on accrued rights, fees and possible expected benefits. This information could be presented in a uniform fashion but should also take into account national and scheme-specific circumstances (e.g. liability for disclosure of information) as well as cost implications for IORPs. There could be some harmonised common features, such as contributions paid in, investment returns, charges and expected benefits..	Noted

220.	European Fund and Asset Management Association (EF)	94.	<p>EFAMA believes that a personal annual statement is essential. We would like to stress the importance of providing consistent information on levied costs, including administrative costs and the costs of specific benefits/guarantees.</p> <p>While taking note that it might be "impossible and undesirable" to fully harmonize the information requirements regarding occupational pensions foreseen in Article 20(7), we strongly agree with EIOPA that the minimum harmonization level could be raised especially for DC schemes.</p>	Noted
221.	European Metalworkers Federation	94.	EMF believes that scheme members should receive regular and sufficient information on the general performance of their IORP and their personal entitlements in a comprehensive, transparent and accessible way.	Noted
222.	European Mine, Chemical and Energy workers' Fede	94.	EMCEF believes that scheme members should receive regular and sufficient information on the general performance of their IORP and their personal entitlements in a comprehensive, transparent and accessible way.	Noted
223.	FairPensions	94.	<p>Yes, we support the introduction of a personalised annual statement to be delivered to each member. We would suggest that personalised annual statements should include a brief narrative summary of the IORP's voting and engagement activity throughout the year, for the same reasons outlined in our response to Q92: i.e. 1) many members are interested in this information about what is being done with their money, and 2) it would help to ensure that IORPs take their ownership responsibilities seriously as part of their duty to beneficiaries.</p> <p>It is also important that information on costs in the personalised annual</p>	Noted

			<p>statement and in the KID is understandable and comprehensive. This issue was recently debated in the UK parliament; a transcript of the debate can be found at <a href="http://www.publications.parliament.uk/pa/cm201011/cmhansrd/cm111207/halltext/111207h0001.htm#11120744000003">http://www.publications.parliament.uk/pa/cm201011/cmhansrd/cm111207/halltext/111207h0001.htm#11120744000003</a>.</p> <p>For example, in the UK, reported information on costs (such as the Total Expense Ratio) is generally incomplete, since it does not include 'hidden' costs such as the transaction costs associated with portfolio turnover. It is important that this information is available, both to give members an accurate picture of the costs they are incurring, and to facilitate analysis of trends in IORP investment strategies. For the purposes of the personalised annual statement, the most sensible approach would likely be to factor this information into a single figure for total costs (with a breakdown available on request), rather than to provide detailed information about cost breakdowns, since most pension fund members will find such information confusing and obscure.</p> <p>It has also been pointed out that most members find it difficult to conceptualise the implications of costs and charges due to the counter-intuitive effects of compound interest. For example, members may not realise that a 1.5% annual management charge will result in close to a 40% reduction in the ultimate value of their pension. It might be useful for personalised annual statements to provide a cumulative figure of the total losses they are likely to incur from costs and charges at current rates, rather than simply providing information about current costs.</p>	
224.	Federation of the Dutch	94.	In the Netherlands IORP members do receive annual information and in	Noted

	Pension Funds		addition have the possibility to access their pension information concerning the state and the occupational pension at all times via the Pensioenregister. Information provision should be – as mentioned above – left to the discretion of the Member States. The PF is certainly ready to provide information about this tool to other Member States and have a project at European level where countries where such a system already exists could work on a European pilot. Reference is made here as well to the EU Green Paper and the question about a European Tracking Service.	
225.	Financial Reporting Council	94.	We are happy with the introduction of a requirement for a personalised annual statement to be delivered to each member. The question on whether statements should include information on costs has been debated in the UK. It is of benefit to IORP members to understand costs and to be able to compare costs of different products. However, providing the information is not easy due to the different costs incurred and the way they are incurred.	Noted
226.	FNV Bondgenoten	94.	In the Netherlands IORP members do receive annual information and in addition have the possibility to access their pension information concerning the state and the occupational pension at all times via the Pensioenregister. Information provision should be – as mentioned above – left to the discretion of the Member States. FNV BG is certainly ready to provide information about this tool to other Member States and have a project at European level where countries where such a system already exists could work on a European pilot. Reference is made here as well to the EU Green Paper and the question about a European Tracking Service.	Noted
227.	Generali vie	94.	We consider Article 185(5) of Solvency II is suitable to IORPs.	Noted
228.	Groupe Consultatif Actuariel Européen.	94.	Every IORP member should be entitled to receive details on request about his/her accrued benefits, although Member States should be permitted to restrict the frequency with which members have a right to receive such information, to forestall frivolous or vexatious enquiries.	Noted

			<p>Active IORP member (employee) should be informed more frequently than so-called inactive IORP members (former employees with vested benefits) because the accrued benefits of active members will change more rapidly due to contribution payments. Currently some countries already have national legislation in place concerning the frequency of personalized statements.</p> <p>Costs should be included in a KID, because this is essential information for the member at least before joining a pension IORP. If IORP members are not able to make choices based upon costs, costs should not be mandatory on the annual overview. Apart from this, information about costs should always be available to IORP members.</p> <p>Detailed remarks</p> <p>29.2.70 The market assessment does not work in the same way for IORPs as for insurance companies through member communication. On the other hand IORPs could be influenced by such an assessment. Costs are an important factor for comparing IORPs. By comparing each other along a benchmark IORPs have to explain why they have a certain level of service for a certain price. This can also trigger the employer to ask for higher service levels and awareness that higher service levels mean higher costs.</p>	
229.	Groupement Français des Bancassureurs	94.	<p>In this regard, FBIA would suggest that IORPs at least provide their members with the information requirements of article 185(5) of the solvency II Framework directive. This information should be consistent between the different providers and easily understandable by the scheme members.</p>	<p>Noted, text adjusted: with reference to initiatives of EC on the usefulness of a KIID-like document for other all long-term savings</p>

				instruments
230.	PMT-PME-Mn Services	94.	In the Netherlands IORP members do receive annual information and in addition have the possibility to access their pension information concerning the state and the occupational pension at all times via the Pensioenregister. Information provision should be – as mentioned above – left to the discretion of the Member States. We are certainly ready to provide information about this tool to other Member States and have a project at European level where countries where such a system already exists could work on a European pilot. Reference is made here as well to the EU Green Paper and the question about a European Tracking Service.	Noted
231.	IMA (Investment Management Association)	94.	All members should have access to a personalised annual statement. There is a broader issue about the distinction between charges (ie. services provided by fund managers, depositaries, auditors etc..) and the costs of investment (including tax, where applicable), and how these should be disclosed. The IMA believes that current practice in the investment funds environment based on the Total Expense Ratio constitutes a good starting point, with the separate disclosure of investment costs. A similar although not identical methodology is being used in the UCITS KIID, which will provide a consistent basis for comparison.	Noted
232.	Institute and Faculty of Actuaries (UK)	94.	We consider that a mandatory annual statement would be inappropriate for pure defined benefit IORPs but we support the concept of a personalised annual statement to be delivered to each member of DC IORPs. However, many IORP members will be in receipt of both DB and DC benefits and need to understand the interaction between the two.  The personalised Member Statement needs to consider the members' objectives (e.g. outcomes), needs to be educative, should induce members take appropriate retirement planning actions and should	Noted

			<p>signpost other information and tools.</p> <p>We agree that cost is an important component in determining the outcome for the member and we do think that DC statements should show the effect of charges on the accumulating benefit (where these are non-zero) and that this should be done in a form that can be reconciled to the corresponding disclosure in the KID. However any information about the way in which cost and investment performance are influenced by the other should be presented in ways that fairly indicate the relationship between the two, otherwise members may be led to inappropriate decisions.</p>	
233.	Le cercle des épargnants	94.	We consider Article 185(5) of Solvency II is suitable to IORPs.	Noted
234.	Mercer	94.	It should contain information about the current level of costs and the ability of the provider to alter the costs charged. It should cross refer to the KID, but not have to be co-ordinated, since the KID content is likely to change with time.	Noted
235.	MHP (Vakcentrale voor Middengroepen en Hoger Perso	94.	In the Netherlands IORP members do receive annual information and in addition have the possibility to access their pension information concerning the state and the occupational pension at all times via the Pensioenregister. Information provision should be – as mentioned above – left to the discretion of the Member States. The MHP is certainly ready to provide information about this tool to other Member States and have a project at European level where countries where such a system already exists could work on a European pilot. Reference is made here as well to the EU Green Paper and the question about a European Tracking Service.	Noted
236.	National Association of Pension Funds (NAPF)	94.	63. Are stakeholders happy with the introduction of a personalised annual statement to be delivered to each member? Whether and how should it contain information on costs actually levied, and how should it be coordinated with the ex-ante information on costs to be included in	Noted

			<p>the KID?</p> <p>This is already required under the UK's Disclosure regulations for DC pension schemes.</p> <p>However, the NAPF accepts that there is a role for high-level standards to improve pension provision across all Member States. These standards could require information on:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> contributions paid in;</li> <li><input type="checkbox"/> investment returns;</li> <li><input type="checkbox"/> charges; and</li> <li><input type="checkbox"/> expected benefits</li> </ul> <p>64.</p>	
237.	NEST Corporation	94.	<p>It has long been a requirement that members of defined contribution UK pension arrangements are supplied with an annual statement detailing contribution and valuation information, together with a standardised illustration of potential future growth based on set assumptions on investment return. Whilst we see value in adding information on costs levied to this information, it is difficult to perceive how a similar requirement could be extended to IORPs operating on a defined benefit basis whilst retaining the ability of a member to compare retained holdings in IORPs operating on different benefit bases.</p>	Noted
239.	Pensioenfonds Zorg en Welzijn (PFZW)	94.	<p>In the Netherlands, IORP members already receive annual information and in addition have the possibility to access information on their</p>	Noted

			pension -both state and occupational pension(s)- at all times via the Dutch Pensioenregister. Any information provision should be left to the discretion of the individual Member States. The Pensioenfederatie has indicated to be willing to provide information about this national pensions registration tool to other Member States, e.g. by initiating a project at EU-level in which countries where such a system already exists could join forces and cooperate in a European pilot. Reference is made here as well to the Green Paper on Pensions and the question about a European Tracking Service.	
240.	Predica	94.	In this regard, Predica would suggest that IORPs at least provide their members with the information requirements of article 185(5) of the solvency II Framework directive. This information should be consistent between the different providers and easily understandable by the scheme members.	Noted
241.	prof.dr. A.A.J. Pelsser HonFIA, Netspar & Maastric	94.	Yes, very good idea. This has already been introduced in NL (the so-called "UPO" = Uniform Pension Statement)	Noted
242.	PTK (Sweden)	94.	PTK supports the idea of a personalised annual statement providing members with a good- quality, useful information on accrued rights, fees and possible expected benefits, taking into account national and scheme-specific circumstances (e.g. liability for disclosure of information).	Noted
243.	Railways Pension Trustee Company Limited ("RPTCL	94.	We are happy with the concept of a personalised annual statement but further consideration will need to be given to its contents. As with our response to Q93, we consider it appropriate for there to be separate consultation to cover the contents of a personalised annual statement once other aspects of the review of the IORP Directive have been progressed.	Noted

244.	Standard Life Plc	94.	<p><input type="checkbox"/> We currently provide DC scheme members with personalised annual statements, and we know that customers place significant value on these annual statements and the opportunity it gives them each year to review their retirement saving and the performance of their investments.</p> <p><input type="checkbox"/> However, as we have covered elsewhere, customers tell us that they value simple, concise and accessible information that is relevant to their needs and provides a high-level view of their retirement saving. Feedback suggests there is still too much – rather than too little – information included, some of which has been introduced through successive regulation and could be rationalised and simplified for the benefit of the customer.</p>	Noted
246.	TCO	94.	TCO supports the idea of a personalised annual statement providing members with a good- quality, useful information on accrued rights, fees and possible expected benefits, taking into account national and scheme-specific circumstances (e.g. liability for disclosure of information).	Noted
247.	Tesco PLC	94.		Noted
248.	The Association of Pension Foundations (Finland)	94.	<p>As highlighted, information should be linked to the choices that members may make. Taking in consideration of different schemes in different member countries we do not see it possible to have too strict harmonisation. Accurate information should take into account the specifics of national legislation and practise as EIOPA has stated.</p> <p>In preliminary impact assessment EIOPA explains that functioning of the pension market would benefit form enchanced comparability and competition. This argument fails to notice that competition and comparability in occupational pensions are limited even if information on occupational pensions in pension funds would be increased. Information is provided to schme members who cannot at individual</p>	Noted

			<p>level contribute where pension scheme is arranged or how investments are placed. On the other hand sponsor follows very carefully expenses of scheme, receives all crucial information via sponsor nominated board members and may allways decide to transfere assets and liabilities to pension insurance company. On the other hand sponsor doesn't receive crucial information on pension provision expenses or investment returns in pension insurance company. Choises are made more or less information provided by pension insurance company as an advertisement which may not be accurate information.</p> <p>EIOPA fails to notice that in some countries competition between pension provision in pillar II may be limited or one-sided. In Finland sponsor may allways transfere assets and liabilities to pension insurance compay, but at least DB-pensions assets and liabilities may never be trasfered to pension fund even if would be seen as desirable by sponsor.</p>	
249.	The Association of the Luxembourg Fund Industry (A	94.	<p>Section 11 of the IORP Directive provides for a number of information, but to be given only at the request of the affiliate. In many countries, annual information is mandatory. A compulsory minimum annual information to affiliates, on the four points a) to d) of art. 11 of the existing IORP Directive should be generalized.</p> <p>It would also be useful to consider the obligation for pension plans sponsors to provide for minimum information on</p> <p><input type="checkbox"/> topics such as social security benefits so that the affiliates may have a fair idea of the global income they may expect at retirement and</p> <p>- personal taxation in respect of retirement benefits.</p>	Noted

			<p>This obligation should of course not be restricted to pension funds but also affect other types of pension funding.</p> <p>However, providing for information on the effective cost during membership is certainly interesting but very difficult to customize. In some cases (a.o. in the case of DB schemes, for which contributions are calculated on the basis of collective actuarial methods). This would unnecessarily increase the cost of annual information, already sufficient on the basis of art. 11. In addition, any affiliate would have received full information on the cost at the time of affiliation.</p> <p>If there are changes in this respect, they could be circulated to all members outside the yearly info.</p>	
250.	The Society of Actuaries in Ireland	94.	<p>In Ireland, we already provide members with a personal annual benefit statement. We don't explicitly show costs on these statements.</p> <p>Typically if a member entered a scheme the costs would have been set out at the outset and should not have changed in that time. However, we do believe that it is important to ensure that the charges members are informed of are aligned to those actually charged to the member. Therefore it may be considered appropriate to be able to demonstrate this to the member.</p> <p>We believe it is important for an IORP to effectively have processes in place to ensure that the charges in place reflect the pre contractual agreements. However, we do not believe it is practical to quantify these charges on an annual benefit statement. As an intermediate step the statements could contain a note to state that the charges levied are as set out at the outset. Overall, we believe that the Trustee Annual Report is a more appropriate document within which to provide a</p>	Noted

			central source of information on costs.	
251.	THE SOCIETY OF PENSION CONSULTANTS	94.	<p>A personalised annual statement, such as those utilised in the UK, allows the individual the opportunity to make informed decisions about their retirement savings.</p> <p>However the information is only of use if members actually read it and anecdotal evidence suggests that the shorter the document is the more likely people are to read it. Therefore there is an important balance to be struck between useful, relevant, information and overloading individuals with too much information (which is likely to result in them not reading any of it).</p>	Noted, text adjusted, prevent overloading members and beneficiaries with information
252.	Trades Union Congress (TUC)	94.	<p>Are stakeholders happy with the introduction of a personalised annual statement to be delivered to each member? Whether and how should it contain information on costs actually levied, and how should it be coordinated with the ex-ante information on costs to be included in the KID?</p> <p>A personalised annual statement for defined benefit and defined contribution members would be a helpful guide for schemes at a national level where this information is not already be required to be circulated. The details on this should be determined at the national level, and should not be the subject of harmonisation.</p>	Noted
253.	UK Association of Pension Lawyers	94.	<p>CfA 23 (Information to members / beneficiaries): Are stakeholders happy with the introduction of a personalised annual statement to be delivered to each member? Whether and how should it contain information on costs actually levied, and how should it be coordinated with the ex-ante information on costs to be included in the KID?</p>	Noted

			In the UK, there is already a requirement for IORPs to provide members with annual statements of their benefit entitlements. We agree that, for transparency, it would be appropriate to include information on costs and charges which have been levied on members. However, how this can be achieved will depend very much on the relevant IORP, its structure and the terms by which it is governed. Flexibility should therefore be provided in this context.	
254.	UNI Europa	94.	UNI Europa believes that scheme members should receive regular and sufficient information on the general performance of their IORP and their personal entitlements in a comprehensive, transparent and accessible way.	Noted
255.	Universities Superannuation Scheme (USS),	94.	20. Are stakeholders happy with the introduction of a personalised annual statement to be delivered to each member? Whether and how should it contain information on costs actually levied, and how should it be coordinated with the ex-ante information on costs to be included in the KID?	Noted
256.	Verbond van Verzekeraars	94.	In the Netherlands, both insurers and IORP's provide a mandatory annual (full) information disclosure format to their members with information about the type of contract, the amount of savings and an indication of the future pension benefit. These aspects are being regarded as essential communication towards members, which should be provided annually.	Noted
257.	VHP2 (Vakorganisatie voor middelbaar en hoger pers	94.	In the Netherlands IORP members do receive annual information and in addition have the possibility to access their pension information concerning the state and the occupational pension at all times via the Pensioenregister. Information provision should be – as mentioned above – left to the discretion of the Member States. The VHP2 is certainly ready to provide information about this tool to other Member States and have a project at European level where countries where	Noted

			such a system already exists could work on a European pilot. Reference is made here as well to the EU Green Paper and the question about a European Tracking Service.	
258.	Whitbread Group PLC	94.	We see no reason for change to the current regulatory regime for UK pension schemes, which provides strong protection for member's pension benefits	Noted
259.	Zusatzversorgungskasse des Baugewerbes AG	94.	We believe that scheme members should receive ample information on their rights. The information should however be adapted to the type of scheme. If there are no changes in the accrued rights during the previous period, an annual information requirement is only cost consuming but not helpful for the member.	Noted
260.	Towers Watson	94.	<p>95. Are stakeholders happy with the introduction of a personalised annual statement to be delivered to each member? Whether and how should it contain information on costs actually levied, and how should it be coordinated with the ex-ante information on costs to be included in the KID?</p> <p>We consider that a mandatory annual statement would be inappropriate for defined benefit schemes – at least in relation to 'deferred' members who are no longer employed by the sponsoring employer - but support the concept of personalised annual statement to be delivered to each member of DC IORPs.]</p> <p>We think that DC statements should show the effect of charges on the accumulating benefit (where these are non-zero) and that this – as with other key information - should be done in a form that can be reconciled to the corresponding disclosure in the KID. Information about charges should be subsidiary to key information about ongoing choices and planning and employees should be given some guidance on the context of charges: for example, the cost relationship of passive vs active funds</p>	Noted
261.	OPSG (EIOPA)	95.	Considering the wide variety of IORPs all over Europe due to structural	Noted

	Occupational Pensions Stakeholder Group)		and legal differences of all kinds and to differences in Social and Labour Legislation, it is preferable to aim at a minimum level of harmonization among Member States, maintaining in any case the competence of SLL regulation to host country (in a cross border perspective there will be a close cooperation between host and home Authority)	
262.	AbA Arbeitsgemeinschaft für betriebliche Altersver	95.	No, we do not see any other parts of the regulation that should be harmonized. We agree with EIOPA that (see section 29.2.73) that “there is no need to disclose a report on solvency and financial condition to the public”.	Noted
263.	ABVAKABO FNV	95.	Information requirements need to be correct, understandable, in due time and not misleading as stated by EIOPA. How this is going to be put into practice should be left to the Member States. The information requirements as laid out in the Solvency II framework should not be applicable to IORPs.	Noted
264.	AEIP	95.	AEIP agrees with EIOPA’s analysis.	Noted
<b>C</b> <b>265.</b>	<b>Allianz SE</b>	<b>95.</b>		Noted
266.	AMONIS OFP	95.	<p>What is the view of stakeholders as regards the level of harmonisation of information requirements that can be reasonably achieved with the revised IORP directive? Besides those envisaged by the EIOPA advise, are there other parts of the regulation that should be harmonized?</p> <p>AMONIS OFP supports the idea of good information provision to the scheme members</p> <p>AMONIS OFP agrees with the EIOPA statement in 29.2.79</p> <p>“For all these reasons, EIOPA believes that it is not appropriate to extend Articles 51-56 of Directive 2009/138/EC to IORPs. Still, EIOPA believes that it is important for members to have key information and a</p>	Noted

			<p>basic understanding of the financial solidity of the IORP. Therefore a slight redrafting of article 11.4.d would be useful. It should refer to the need for members to receive yearly information on the financial solidity of the IORP.”</p> <p>Stating that Articles 51-56 from Solvency II should not apply to IORPs.</p>	
267.	ANIA – Association of Italian Insurers	95.	<p>Public disclosure requirements are important to enhance market discipline, if appropriate, and complement requirements under Pillars I and II. In the Solvency II framework the rules on public disclosure are addressed in Articles 51-56. These provisions should apply to IORPs without amendments, although the disclosure of confidential information about the sponsoring undertaking should be avoided. In addition a high level of transparency for employers is needed to be able to find the product that fits his and the needs of his employees best if this is relevant. In particular should the employer information contain the employers’ responsibilities in case of underfunding (e.g. additional funding) and the general solvency conditions of the IORPs.”</p> <p>Finally, concrete measures on information requirements should be dealt with at the level 2 implementing measures after a proper assessment from the information required for the scheme members.</p>	Noted
268.	Association Française de la Gestion financière (AF	95.	<p>We agree that the format of a potential KIID-document couldn’t be fully standardized at EU level, as country-specific information is often essential.</p> <p>This said, standardization of the KIID is crucial to foster comparability among pension schemes, one of the key aspects of this initiative. Tailoring of the KIID will be necessary to a certain extent, but it should be limited in order to ensure comparability, and some key elements should be required for all KID. Concretely, in our view, the structure of the document needs to be standardized and the basic elements/building blocks should be the same for all schemes,</p>	Noted

			<p>extending to aspects beyond investment. Certain parts of the key information and its presentation should also be standardized and consistent as possible, irrespective of tailoring otherwise allowed.</p> <p>We agree with EIOPA's suggestion to define principles at Level 1, while detailed technical requirements would be tailored by means of implementing measures. With regard to the latter, the implementing measures to the UCITS Directive should be considered a starting point for regulatory action.</p>	
269.	Association of British Insurers	95.	<p>Many of the information requirements proposed are sensible, and while some basic information may be appropriate for harmonisation, due to differences in provision, culture and options within Member States, minimum harmonisation would be appropriate. Therefore, the ABI does not support the inclusion, at Level 1, of a mandatory list of information with the disclosure document and suggest more work needs to be done to establish what information is required by potential policyholders. It is vital that information to scheme members is succinct and relevant – this is more important than harmonisation. Over harmonisation will lead to members receiving information which is not appropriate, relevant or useful and this would be counterproductive.</p>	Noted
270.	Association of French Insurers (FFSA)	95.	<p>Public disclosure requirements are important to enhance market discipline, if appropriate, and complement requirements under Pillars I and II. In the Solvency II framework the rules on public disclosure are addressed in Articles 51-56. These provisions should apply to IORPs without amendments.</p>	Noted
271.	Assoprevidenza – Italian Association for supplement	95.	We agree with EIOPA analysis	Noted
272.	Assuralia	95.		Noted

			The extremely short delay for responding to the technical consultation document has forced the members of Assuralia to prioritize and to focus on a number of questions. Our lack of response to this question must not be regarded as a lack of interest or opinion.	
273.	Bayer AG	95.	<p>What is the view of stakeholders as regards the level of harmonisation of information requirements that can be reasonably achieved with the revised IORP directive? Besides those envisaged by the EIOPA advice, are there other parts of the regulation that should be harmonized?</p> <p>No, we do not see other parts of regulation that should be harmonized.</p>	Noted
274.	BDA Bundesvereinigung der Deutschen Arbeitgeberver	95.	<p>What is the view of stakeholders as regards the level of harmonisation of information requirements that can be reasonably achieved with the revised IORP directive? Besides those envisaged by the EIOPA advice, are there other parts of the regulation that should be harmonized?</p> <p>No, we do not see other parts of regulation that should be harmonized.</p>	Noted
275.	Belgian Association of Pension Institutions (BVPI-	95.	<p>What is the view of stakeholders as regards the level of harmonisation of information requirements that can be reasonably achieved with the revised IORP directive? Besides those envisaged by the EIOPA advice, are there other parts of the regulation that should be harmonized?</p> <p>BVPI-ABIP supports the idea of good information provision to the scheme members</p> <p>BVPI-ABIP agrees with the EIOPA statement in 29.2.79</p> <p>"For all these reasons, EIOPA believes that it is not appropriate to extend Articles 51-56 of Directive 2009/138/EC to IORPs. Still, EIOPA</p>	Noted

			<p>believes that it is important for members to have key information and a basic understanding of the financial solidity of the IORP. Therefore a slight redrafting of article 11.4.d would be useful. It should refer to the need for members to receive yearly information on the financial solidity of the IORP.”</p> <p>Stating that Articles 51-56 from Solvency II should not apply to IORPs.</p>	
276.	BNP Paribas Cardif	95.	Public disclosure requirements are important to enhance market discipline, if appropriate, and complement requirements under Pillars I and II. In the Solvency II framework the rules on public disclosure are addressed in Articles 51-56. These provisions should apply to IORPs without amendments.	Noted
277.	BT Pension Scheme Management Ltd	95.	Given our firm view that these discussions should apply only to information for DC members and not simply read across to DB schemes (see our response to Question 91), we take no view on these issues.	Noted
278.	Bundesarbeitgeberverband Chemie e.V. (BAVC)	95.	No, BAVC does not see other parts of regulation that should be harmonized.	Noted
279.	BUSINESSEUROPE	95.	<p>There may also be room for improvement in the area of provision of information and transparency to scheme members. As highlighted in the consultation document, providing information to individuals is crucial in ensuring that they understand and can take informed decisions regarding the options within the pension plan. Engagement of plan members is an essential part of this and individuals have a certain amount of responsibility in saving for retirement. In DB schemes, plan members benefit from the schemes’ decision-making structure. With DC schemes, provision of information is even more crucial, as the investment risk lies solely with the plan member.</p> <p>We strongly agree with the consultation document, that the information</p>	Noted

			<p>on the occupational pension plan is only one part of what an individual needs to make choices regarding their broader retirement planning.</p> <p>The consultation document rightly acknowledges the importance of taking into account the principles of subsidiarity, in ensuring a minimum of information provision in EU member states. Information requirements have to be adapted to the national circumstances, whereby people's understanding of pension saving via an IORP is very much linked to the characteristics and history of the pension system, and national social and labour law. We therefore adhere to the principle that detailed rules on information requirements in combination with maximum harmonisation would often be inappropriate.</p>	
280.	BVI Bundesverband Investment und Asset Management	95.	<p>We agree that the format of a potential KIID-document couldn't be fully standardised at EU level, as country-specific information is often essential. As to the proposed content, the level of harmonisation envisaged by EIOPA seems appropriate, subject to the implementation provisions to be formulated on level 2.</p> <p>We agree with EIOPA's suggestion to define principles at Level 1, while detailed technical requirements would be tailored by means of implementing measures. With regard to the latter, the implementing measures to the UCITS Directive should be considered a starting point for regulatory action.</p>	Noted
281.	CEA	95.	<p>Public disclosure requirements are important to enhance market discipline, if appropriate, and complement requirements under Pillars I and II. In the Solvency II framework the rules on public disclosure are addressed in Articles 51-56. These provisions should apply to IORPs without amendments, although the disclosure of confidential information about the sponsoring undertaking should be avoided. In addition a high level of transparency for employers is needed to be able to find the product that fits his and the needs of his employees best if this is relevant. In particular should the employer information contain</p>	Noted

			<p>the employers' responsibilities in case of underfunding (e.g. additional funding) and the general solvency conditions of the IORPs."</p> <p>Finally, concrete measures on information requirements should be dealt with at the level 2 implementing measures after a proper assessment from the information required for the scheme members.</p>	
282.	Charles CRONIN	95.	I believe that there is good scope increasing harmonisation of disclosure for the ongoing and payout phases of pension schemes, in addition to the comments made specifically for pre-enrolment in DC schemes. Besides those mentioned by EIOPA, I cannot think of any that have been overlooked. I am supportive of an annual statement of financial solidity in place of the insurance style solvency document, referred to in paragraph 29.2.79	Noted
283.	Chris Barnard	95.	I would suggest that a minimum level of harmonisation can be achieved above and beyond that contained in the IORP Directive.	Noted
284.	CMHF (Centrale van Middelbare en Hogere Functionar	95.	Information requirements need to be correct, understandable, in due time and not misleading as stated by EIOPA. How this is going to be put into practice should be left to the Member States. The information requirements as laid out in the Solvency II framework should not be applicable to IORPs.	Noted
285.	CONFEDERATION OF BRITISH INDUSTRY (CBI)	95.	See answer to question 63 above.	Noted
286.	De Unie (Vakorganisatie voor werk, inkomen en loop	95.	Information requirements need to be correct, understandable, in due time and not misleading as stated by EIOPA. How this is going to be put into practice should be left to the Member States. The information requirements as laid out in the Solvency II framework should not be applicable to IORPs.	Noted
287.	Ecie vie	95.	We consider Articles 51-56 of Solvency II should apply to IORPs.	Noted

288.	European Association of Public Sector Pension Inst	95.	<p>What is the view of stakeholders as regards the level of harmonisation of information requirements that can be reasonably achieved with the revised IORP directive? Besides those envisaged by the EIOPA advice, are there other parts of the regulation that should be harmonized?</p> <p>Digital means of supplying information is clearly a vector that is becoming more and more common. However, different Member States may choose different arrangements. The added-value of EU legislation is unclear.</p>	Noted
289.	European Federation for Retirement Provision (EFRP)	95.	<p>The EFRP supports the idea of improving information requirements. Where there are broad similarities between schemes and there is a high degree of commonality between them, it could make sense to harmonise in order to achieve some degree of comparability between schemes for members.</p> <p>The EFRP agrees with the EIOPA statement in 29.2.79 that Articles 51-56 from Solvency II should not apply to IORPs.</p>	Noted
290.	European Fund and Asset Management Association (EF)	95.	<p>We agree that the format of a potential KIID-document couldn't be fully standardized at EU level, as country-specific information is often essential.</p> <p>This said, standardization of the KID is crucial to foster comparability among pension schemes, one of the key aspects of this initiative. Tailoring of the KIID will be necessary to a certain extent, but it should be limited in order to ensure comparability, and some key elements should be required for all KID. Concretely, in our view, the structure of the document needs to be standardized and the basic elements/building blocks should be the same for all schemes, extending to aspects beyond investment. Certain parts of the key</p>	Noted

			<p>information and its presentation should also be standardized and consistent as possible, irrespective of tailoring otherwise allowed.</p> <p>We agree with EIOPA's suggestion to define principles at Level 1, while detailed technical requirements would be tailored by means of implementing measures. With regard to the latter, the implementing measures to the UCITS Directive should be considered a starting point for regulatory action.</p>	
291.	European Metalworkers Federation	95.	EMF agrees with EIOPA's analysis.	Noted
292.	European Mine, Chemical and Energy workers' Fede	95.	EMCEF agrees with EIOPA's analysis.	Noted
293.	FairPensions	95.	We agree that Member States should have discretion to go beyond minimum disclosure requirements. Please see also our response to Q91.	Noted
294.	Federation of the Dutch Pension Funds	95.	Information requirements need to be correct, understandable, in due time and not misleading as stated by EIOPA. How this is going to be put into practice should be left to the Member States. The information requirements as laid out in the Solvency II framework should not be applicable to IORPs.	Noted
295.	Financial Reporting Council	95.	We consider that it would be beneficial to members of IORPs if information was produced in a consistent format to that produced by insurance companies. For example in the UK there should be consistency between information produced for members of occupational DC schemes and personal pension schemes operated by insurance companies.	Noted, text adjusted: with reference to initiatives of EC on the usefulness of a KIID-like document for

				other all long-term savings instruments
296.	FNV Bondgenoten	95.	Information requirements need to be correct, understandable, in due time and not misleading as stated by EIOPA. How this is going to be put into practice should be left to the Member States. The information requirements as laid out in the Solvency II framework should not be applicable to IORPs.	Noted
297.	Generali vie	95.	We consider Articles 51-56 of Solvency II should apply to IORPs.	Noted
298.	GESAMTMETALL - Federation of German employer	95.	<p>What is the view of stakeholders as regards the level of harmonisation of information requirements that can be reasonably achieved with the revised IORP directive? Besides those envisaged by the EIOPA advice, are there other parts of the regulation that should be harmonized?</p> <p>There may be also room for improvement in the field of information and transparency to scheme members on EU level, taking into account the principles of subsidiarity and the diversity of national pensions systems and especially IORPs.</p> <p>No, we do not see other parts of regulation that should be harmonized.</p>	Noted
299.	Groupe Consultatif Actuariel Européen.	95.	Harmonization of information is important if it is intended that members should be able to add up different accrued benefit entitlements. This would improve members' understanding of their total 'consolidated' retirement benefits. The information also has to be understandable and comparable. Different countries have different pension systems, which would imply that it will be very difficult to fully harmonize pension information in practice. Harmonizing the definition of some parts of the content (e.g. what term to use for the annuity from your retirement age, in order to be able to add up benefits from	Noted

			<p>different provisions) would improve the possibility of adding up different benefits from different pension arrangements. At the EU-level EIOPA should propose a definition of key elements of pension provisions. These key elements are retirement pension, spouse pension and disability pension. The rest of the information should be set at national level because of the variety of pension provisions throughout the EU.</p> <p>To compare risks between pension IORPs, confidence levels as a means to inform IORP members about risks should be set at EU-level.</p> <p>Detailed remarks</p> <p>29.2.81 Providing information by digital means should indeed be encouraged. A few remarks have to be added to this:</p> <ul style="list-style-type: none"> <li>- Digital information would be best developed through a common approach at national level. This would mean that costs are being distributed over a large amount of participants and would therefore be relatively low.</li> <li>- Digital information would give the opportunity to give information on request, which would mean that information can be tailor made according to the needs of the individual member. Some members want to have a basic view on what they probably will get when they retire. Other members want to know everything about the risks that are involved, about possible choices they have at the retirement age, etc.</li> <li>- Digital information in itself is only a matter of a different way of presentation compared to the current distribution on paper. The information can be extended with modelling. Modelling can provide extra information about scenarios, for example about the impact of early retirement. With digital information accompanied by modelling, members will be able to make deliberate choices about his or her pension.</li> </ul>	
300.	Groupement Français des	95.	Public disclosure requirements are important to enhance market	Noted

	Bancassuranceurs		discipline, if appropriate, and complement requirements under Pillars I and II. In the Solvency II framework the rules on public disclosure are addressed in Articles 51-56. These provisions should apply to IORPs without amendments.	
301.	PMT-PME-Mn Services	95.	Information requirements need to be correct, understandable, in due time and not misleading as stated by EIOPA. How this is going to be put into practice should be left to the Member States. The information requirements as laid out in the Solvency II framework should not be applicable to IORPs.	Noted
302.	HM Treasury/Department for Work and Pensions	95.	In terms of the questions 91-95, UK legislation already requires the provision of very similar information. We emphasise, however, that: <ul style="list-style-type: none"> <li><input type="checkbox"/> there is a fundamental difference between UCITS and IORPs because IORPs are not commercial products;</li> <li><input type="checkbox"/> comparisons between IORPs are irrelevant as members and prospective members are not faced with making a choice between competing products;</li> <li><input type="checkbox"/> any legal requirements on information provision must be relevant, and proportionate, both in relation to the costs imposed on the scheme (which may ultimately be borne by the member) and the risk of actively discouraging individuals from joining schemes.</li> </ul>	Noted
303.	IBM Deutschland Pensionskasse VVaG and IBM Deutsch	95.	There may also be room for improvement in the area of provision of information and transparency to scheme members. As highlighted in the consultation document, providing information to individuals is crucial in ensuring that they understand and can take informed decisions regarding the options within the pension plan. Engagement of plan members is an essential part of this and individuals have a certain amount of responsibility in saving for retirement. In DB schemes, plan	Noted

			<p>members benefit from the schemes' decision-making structure. With DC schemes, provision of information is even more crucial, as the investment risk lies solely with the plan member.</p> <p>We strongly agree with the consultation document, that the information on the occupational pension plan is only one part of what an individual needs to make choices regarding their broader retirement planning.</p> <p>The consultation document rightly acknowledges the importance to take into account the principles of subsidiarity, in ensuring a minimum of information provision in EU member states. Information requirements have to be adapted to the national circumstances, whereby people's understanding of pension saving via an IORP is very much linked with the characteristics of the pension system, the social and labour law and the history of the pension system in their country. We therefore adhere to the principle that detailed rules on information requirements in combination with maximum harmonisation would often be inappropriate.</p>	
304.	IMA (Investment Management Association)	95.	Given the different nature of European DC regimes, it would be very difficult and potentially undesirable to seek to fully harmonise disclosure requirements. An initial piece of work should identify key information that pension savers might benefit from, and then assess the extent to which EU regulatory intervention can help to assist in its dissemination.	Noted
305.	Institute and Faculty of Actuaries (UK)	95.	We do not believe that a useful level of harmonisation can be achieved without simultaneously harmonising the wider social security framework in which the IORPs operate.	Noted
306.	Le cercle des épargnants	95.	We consider Articles 51-56 of Solvency II should apply to IORPs.	Noted

307.	Mercer	95.	Since there is such a variety of IORPs, including structure, legal status, and designs, throughout the EU, harmonisation should be at a very high level. For example, prescribing the basic content and perhaps a risk related approach would seem adequate.	Noted
308.	MHP (Vakcentrale voor Middengroepen en Hoger Perso	95.	Information requirements need to be correct, understandable, in due time and not misleading as stated by EIOPA. How this is going to be put into practice should be left to the Member States. The information requirements as laid out in the Solvency II framework should not be applicable to IORPs.	Noted
309.	National Association of Pension Funds (NAPF)	95.	65. What is the view of stakeholders as regards the level of harmonisation of information requirements that can be reasonably achieved with the revised IORP directive? Besides those envisaged by the EIOPA advice, are there other parts of the regulation that should be harmonized?  66.	Noted
310.	NEST Corporation	95.	We believe that the benefits for members in a harmonized set of information requirements are significant. However, the differing styles of IORP across the member states suggests that harmonization between states may not be reasonable. Harmonization of information requirements across all methods of pension provision (whether or not under an IORP) in a single member state, however, should be achievable and the benefits of such an approach will be almost as great. We would suggest that information requirements, therefore, remain at a member state level.  We retain doubts, however, as to the ability of any prescriptive measures applying to both defined benefit and defined contribution	Noted

			bases to provide information which will enable accurate comparison between IORPs.	
311.	NORDMETALL, Verband der Metall- und Elektroindustr	95.	<p>What is the view of stakeholders as regards the level of harmonisation of information requirements that can be reasonably achieved with the revised IORP directive? Besides those envisaged by the EIOPA advice, are there other parts of the regulation that should be harmonized?</p> <p>No, we do not see other parts of regulation that should be harmonized.</p>	Noted
312.	Pan-European Insurance Forum (PEIF)	95.	The information contained in Article 51- 56 of the Solvency II Framework Directive is irrelevant for IORPs with one sponsor. For IORPs with more than one sponsor the provisions of Articles 51-56 of the Solvency II Framework Directive should apply.	Noted
313.	Pensioenfonds Zorg en Welzijn (PFZW)	95.	Information requirements need to be correct, understandable, in due time and not misleading as stated by EIOPA. How this is going to be put into practice should be left to the Member States. The information requirements as laid out in the Solvency II framework should not be applicable to IORPs.	Noted
314.	Predica	95.	Public disclosure requirements are important to enhance market discipline, if appropriate, and complement requirements under Pillars I and II. In the Solvency II framework the rules on public disclosure are addressed in Articles 51-56. These provisions should apply to IORPs without amendments.	Noted
315.	PTK (Sweden)	95.	PTK supports the idea of improving information requirements. Where there are broad similarities between schemes and there is a high degree of commonality between them, it could make sense to	Noted

			<p>harmonise in order to achieve some degree of comparability between schemes for members.</p> <p>PTK agrees with the EIOPA statement in 29.2.79 that Articles 51-56 from Solvency II should not apply to IORPs.</p>	
316.	Railways Pension Trustee Company Limited ("RPTCL	95.	We have not considered this question.	Noted
317.	TCO	95.	<p>TCO supports the idea of improving information requirements. Where there are broad similarities between schemes and there is a high degree of commonality between them, it could make sense to harmonise in order to achieve some degree of comparability between schemes for members.</p> <p>TCO agrees with the EIOPA statement in 29.2.79 that Articles 51-56 from Solvency II should not apply to IORPs.</p>	Noted
318.	The Association of Pension Foundations (Finland)	95.	As suggested articles 51-56 of solvency II should not be applied to occupational pensions.	Noted
319.	The Association of the Luxembourg Fund Industry (A	95.	<p>Full harmonization as such is not a primary objective and is probably difficult to achieve in view of the diversity of complementary pension systems existing in the EU. But imposing an annual information based on the current points a) to d) of art. 11 of the IORP Directive are certainly to be considered.</p> <p>To facilitate cross-border funds, it would also be appropriate to try to harmonize as much as possible the content and the presentation of the annual information.</p> <p>In their joint contribution to the "Consultation of the European Commission green paper towards adequate, sustainable and safe European pension systems" (November 2010) the respondents already</p>	Noted

			<p>underlined that “Within DC pension schemes, where the investment and longevity risks weigh on pension scheme members, individuals must understand the information provided to them on the investment products available in order to make informed choices.</p> <p>Financial education would also be required with regard to the use of retirement benefits, in particular with regard to the choice between lump sum payment and annuities.</p> <p>Individuals’ abilities to make well-informed investment decisions must be improved.”</p> <p>Our opinion did not vary in this respect.</p>	
320.	The Society of Actuaries in Ireland	95.	<p>We are of the view the there should be a minimum level of information which all countries must include. Countries may then be given the ability to enforce additional requirement as are appropriate to their culture, social security and taxation systems.</p> <p>No, we do not believe that there are other parts of the regulation that should be harmonized.</p>	Noted
321.	THE SOCIETY OF PENSION CONSULTANTS	95.	<p>Some basic information may be appropriate for harmonisation – there are some underlying similarities. However due to differences in product design, culture and options within Member States minimum harmonisation would be appropriate.</p> <p>In most, if not all States, retirement provision is tied into the local taxation system and this leads to a number of differences, which would need to be reflected in the information given.</p> <p>It is vital that information to members is succinct and relevant – this is</p>	Noted

			more important than harmonisation. Over-harmonisation will lead to members receiving information which is not appropriate, relevant or useful and this would be counter productive.	
322.	Trades Union Congress (TUC)	95.	<p>What is the view of stakeholders as regards the level of harmonisation of information requirements that can be reasonably achieved with the revised IORP directive? Besides those envisaged by the EIOPA advice, are there other parts of the regulation that should be harmonized?</p> <p>See question 93.</p>	Noted
323.	UK Association of Pension Lawyers	95.	<p>CfA 23 (Information to members / beneficiaries): What is the view of stakeholders as regards the level of harmonisation of information requirements that can be reasonably achieved with the revised IORP directive? Besides those envisaged by the EIOPA advice, are there other parts of the regulation that should be harmonized?</p> <p>We think it would be helpful to harmonise some of the information requirements but this would need to be at a relatively basic level due to different pension systems, laws and taxation policies being operated by individual Member States.</p>	Noted
324.	UNI Europa	95.	UNI Europa agrees with EIOPA's analysis.	Noted
325.	Universities Superannuation Scheme (USS),	95.	21. What is the view of stakeholders as regards the level of harmonisation of information requirements that can be reasonably achieved with the revised IORP directive? Besides those envisaged by the EIOPA advice, are there other parts of the regulation that should be harmonized?	Noted

326.	vbw – Vereinigung der Bayerischen Wirtschaft e. V.	95.	<p>What is the view of stakeholders as regards the level of harmonisation of information requirements that can be reasonably achieved with the revised IORP directive? Besides those envisaged by the EIOPA advice, are there other parts of the regulation that should be harmonized?</p> <p>No, we do not see other parts of regulation that should be harmonized.</p>	Noted
327.	Verbond van Verzekeraars	95.	The revision of the IORP directive should not lead to a setback of the information activities of occupational pension providers in Member States, therefore we propose minimum harmonization. (See the answer to question 92.)	Noted
328.	VHP2 (Vakorganisatie voor middelbaar en hoger pers	95.	Information requirements need to be correct, understandable, in due time and not misleading as stated by EIOPA. How this is going to be put into practice should be left to the Member States. The information requirements as laid out in the Solvency II framework should not be applicable to IORPs.	Noted
329.	Whitbread Group PLC	95.	We see no reason for change to the current regulatory regime for UK pension schemes, which provides strong protection for member's pension benefits	Noted
330.	Zusatzversorgungskasse des Baugewerbes AG	95.	We agree with EIOPA's analysis not to disclose a report on solvency and financial conditions to the public.	Noted
331.	Derek Scott of D&L Scott	95.	While the proposals in relation to disclosures to members might appear reasonable, there is considerable risk in leaving, as is proposed, much of the detail of these to subsequent implementing measures. The framework Directive will need to be sufficiently focused such that it does not allow for requirements beyond those reasonably expected (protecting against 'mission creep'). Implementation measures will require careful scrutiny and must themselves be subject to a full cost/benefit analysis. Of concern in the UK, for example, is the presumption that pensioners should receive annual statements and	Noted

			that there need be no difference between DC and DB pensioners.	
332.	Towers Watson	95.	<p>What is the view of stakeholders as regards the level of harmonisation of information requirements that can be reasonably achieved with the revised IORP directive? Besides those envisaged by the EIOPA advice, are there other parts of the regulation that should be harmonized?</p> <p>We believe that it is possible to achieve a degree of harmonisation in the 'look and feel' of information provided to members. However, there will be considerable variation dependent on the particular plan features of the IORP concerned and the IORP's place within the wider social security framework in which the IORPs operate.</p>	Noted
333.	OPSG (EIOPA Occupational Pensions Stakeholder Group)	96.	Yes, the OPSG agrees	Noted
334.	AbA Arbeitsgemeinschaft für betriebliche Altersver	96.	Yes. We emphasize, that additional information requirements will lead to additional costs. Therefore a proper impact assessment of all the consequences is needed.	Noted
335.	ABVAKABO FNV	96.	The PF agrees with the impact assessment made by EIOPA, but underlines the need to have a proper impact assessment of all the consequences before proposing a revised directive.	Noted
336.	AEIP	96.	AEIP believes that the additional information requirements as proposed by EIOPA will indeed lead to additional compliance costs for IORPs and additional supervisory costs for supervisory authorities, which might ultimately be reflected in a charge towards the IORP. AEIP would therefore urge for a proportionality between the additional information requirements (mostly for DC schemes) and the additional costs they would lead to.	Noted
337.	AMONIS OFP	96.	<p>Do stakeholders agree with the impact assessment of the EIOPA proposals?</p> <p>AMONIS OFP is of the opinion that the additional information</p>	Noted

			requirements as proposed by EIOPA will indeed lead to additional compliance costs for IORPs and additional supervisory costs for supervisory authorities. AMONIS OFP would therefore urge for proportionality between the additional information requirements (mostly for DC schemes) and the additional costs they would lead to.	
338.	ANIA – Association of Italian Insurers	96.	Yes, the ANIA can agree on the preliminary impact assessment of EIOPA. However, there is still a need for a full impact assessment including quantitative aspects. As such the ANIA welcomes the commitment of EIOPA to undertake a QIS in 2012	Noted
339.	Association Française de la Gestion financière (AF	96.	<p>AFG considers it is very important to introduce information requirements not only for DC schemes but also for DB schemes. This is because of the arguments in response to Question 92. AFG agrees that the additional costs for IORPs are less significant than the benefits in terms of protection of members and in terms of information and help in taking informed decisions.</p> <p>We recognize the difficulties of the task, and therefore recommends that sufficient time be given to in-depth analysis and stakeholder testing.</p>	Noted
340.	Association of British Insurers	96.	While the ABI agrees with some of the qualitative impacts identified in EIOPA's CfA, we would suggest that the potential negative impacts of providing members with too much information which is either irrelevant, inappropriate or overly complex should also be taken into account. The primary consideration must be retirement scheme members and encouraging and reinforcing retirement provision as a positive step. Causing members to refuse to read information due to length, complexity or lack of relevance would be entirely counter-productive to the aim of increasing member protection through the	Noted

			<p>provision of harmonised information.</p> <p>In addition, IORP II must be set at a minimum harmonisation level, which provides members with the relevant investment risks, warnings and information in a way suitable to the circumstances of the Member State would be the best way to achieve the desired member protection.</p>	
341.	Association of Consulting Actuaries (UK)	96.	No – we believe that there will be considerable costs associated with any KID implementation. Even the best run IORPs may not include all the information set out in EIOPA’s draft response on page 505 in that particular document. Some may use websites, scheme booklets rather than a KID-type document, or split the information between this and a KID. A much more rigorous impact assessment would need to be undertaken to determine the costs to IORPs of such implementation.	Noted
342.	Association of French Insurers (FFSA)	96.	The FFSA can agree on the impact assessment.	Noted
343.	Assoprevidenza – Italian Association for supplement	96.	WE believe that the additional information requirements as proposed by EIOPA will indeed lead to additional compliance costs for IORPs and additional supervisory costs for supervisory authorities, which might ultimately be reflected in a charge towards the IORP. AEIP would therefore urge for a proportionality between the additional information requirements (mostly for DC schemes) and the additional costs they would lead to.	Noted
344.	Assuralia	96.	The extremely short delay for responding to the technical consultation document has forced the members of Assuralia to prioritize and to focus on a number of questions. Our lack of response to this question must not be regarded as a lack of interest or opinion.	Noted
345.	Belgian Association of Pension Institutions	96.	Do stakeholders agree with the impact assessment of the EIOPA proposals?	Noted

	(BVPI-		BVPI-ABIP is of the opinion that the additional information requirements as proposed by EIOPA will indeed lead to additional compliance costs for IORPs and additional supervisory costs for supervisory authorities. BVPI-ABIP would therefore urge for proportionality between the additional information requirements (mostly for DC schemes) and the additional costs they would lead to.	
346.	BNP Paribas Cardif	96.	BNP Paribas Cardif can agree on the impact assessment.	Noted
347.	BT Pension Scheme Management Ltd	96.	Given our firm view that these discussions should apply only to information for DC members and not simply read across to DB schemes (see our response to Question 91), we take no view on these issues.	Noted
348.	BVI Bundesverband Investment und Asset Management	96.	BVI agrees that the additional costs for IORPs are less significant than the benefits in terms of protection of members and in terms of information and help in taking informed decisions.  We recognize the difficulties of the task and therefore recommend that sufficient time be given to in-depth analysis and stakeholder testing in order to avoid undue or disproportionate cost and effort for IORPs and their beneficiaries.	Noted
349.	Cable & Wireless Communications Plc.	96.		Noted
350.	CEA	96.	Yes, the CEA can agree on the preliminary impact assessment of EIOPA. However, there is still a need for a full impact assessment including quantitative aspects. As such the CEA welcomes the commitment of EIOPA to undertake a QIS in 2012.	Noted
351.	Charles CRONIN	96.	Yes.	Noted
352.	Chris Barnard	96.	I broadly agree with the impact assessment of the proposals.	Noted

353.	CMHF (Centrale van Middelbare en Hogere Functionar	96.	The CMHF agrees with the impact assessment made by EIOPA, but underlines the need to have a proper impact assessment of all the consequences before proposing a revised directive.	Noted
354.	De Unie (Vakorganisatie voor werk, inkomen en loop	96.	De Unie agrees with the impact assessment made by EIOPA, but underlines the need to have a proper impact assessment of all the consequences before proposing a revised directive.	Noted
355.	Direction Générale du Trésor, Ministère des financ	96.	Yes we obviously agree with the principle of an impact assessment of the EIOPA proposals but we also expect the directive proposal to be on time for the end of 2012 as recently announced by the Commission.	Noted
356.	Ecie vie	96.	Yes	Noted
357.	European Association of Public Sector Pension Inst	96.	<p>Do stakeholders agree with the impact assessment of the EIOPA proposals?</p> <p>Applying some simple information requirements to DC schemes would seem to be a sensible step. However, it is not clear if EU legislation in the area would really add value.</p> <p>Different pension misselling cases over the last 3 decades, most notably in the UK, should perhaps alert us to the danger of adopting apparently simple solutions without a solid impact assessment. The problems can take decades to resolve and destroy confidence in the system.</p>	Noted
358.	European Federation for Retirement Provision (EFRP	96.	The EFRP agrees with the preliminary impact assessment.	Noted
359.	European Fund and Asset Management Association	96.	EFAMA considers it is very important to introduce information requirements not only for DC schemes but also for DB schemes. This is	Noted

	(EF		<p>because of the arguments in response to Question 92. EFAMA agrees that the additional costs for IORPs are less significant than the benefits in terms of protection of members and in terms of information and help in taking informed decisions.</p> <p>We recognize the difficulties of the task, and therefore recommends that sufficient time be given to in-depth analysis and stakeholder testing.</p>	
360.	European Metalworkers Federation	96.	The additional information requirements as proposed by EIOPA will indeed lead to additional compliance costs for IORPs and additional supervisory costs for supervisory authorities, which might ultimately be reflected in a charge towards the IORP. EMF would therefore urge for a proportionality between the additional information requirements (mostly for DC schemes) and the additional costs they would lead to.	Noted
361.	European Mine, Chemical and Energy workers' Fede	96.	The additional information requirements as proposed by EIOPA will indeed lead to additional compliance costs for IORPs and additional supervisory costs for supervisory authorities, which might ultimately be reflected in a charge towards the IORP. EMCEF would therefore urge for a proportionality between the additional information requirements (mostly for DC schemes) and the additional costs they would lead to.	Noted
362.	Federation of the Dutch Pension Funds	96.	The PF agrees with the impact assessment made by EIOPA, but underlines the need to have a proper impact assessment of all the consequences before proposing a revised directive.	Noted
363.	Financial Reporting Council	96.	The limited impact assessments in the consultation paper are not sufficient for us to be able to understand the impact of the proposals which are discussed. The review of the IORP Directive is a major exercise which could result in significant additional costs and could change behaviour, both in positive and negative ways. We consider	Noted

			that it is essential that a thorough impact assessment is carried out before the proposals are developed further.	
364.	FNV Bondgenoten	96.	FNV BG agrees with the impact assessment made by EIOPA, but underlines the need to have a proper impact assessment of all the consequences before proposing a revised directive.	Noted
365.	Generali vie	96.	Yes	Noted
366.	Groupe Consultatif Actuariel Européen.	96.	We agree with EIOPA's impact assessment. In our view information should be available to and tested by the stakeholders involved, to make sure that the informed stakeholder is able to understand the information.  Above all the benefits of adequate information provision will by far outweigh the costs.	Noted
367.	Groupement Français des Bancassureurs	96.	FBIA can agree on the impact assessment.	Noted
368.	PMT-PME-Mn Services	96.	We agree with the impact assessment made by EIOPA, but underlines the need to have a proper impact assessment of all the consequences before proposing a revised directive.	Noted
369.	HM Treasury/Department for Work and Pensions	96.	See general comments	Noted
370.	IMA (Investment Management Association)	96.	The real test of the impact of changing information will be consumer behaviour. This is obviously difficult to predict and can be very hard to measure in clear causal terms. However, we think that the impact assessment should try to take account of – or at least acknowledge – the two elements that we identify in our answer to Q91: the potential that information disclosure requirements and consumer capability could be fundamentally mismatched; and that even where capability is high, behaviour may not follow expectations.	Noted

371.	Institute and Faculty of Actuaries (UK)	96.	<p>We are in favour of improving information to members, however we consider that EIOPA may be too optimistic about the impact and we are not persuaded that providing members with more information necessarily leads to a better outcome in terms of their retirement provision, particularly when many members will not understand it. It simply shifts the responsibility to them and away from supervisors and the professionals running the IORP.</p> <p>It would helpful if EIOPA published the evidence that supports the contention that the additional costs are less significant than the benefits in terms of protection for members. Our experience is that even a small change to member disclosures can be costly to implement.</p> <p>Similarly until there is harmonisation of the wider social security framework, we would not agree that the proposals will materially benefit the market for pension provision as, in practice, members are rarely choosing between IORPs and, where the choice is between an IORP and an alternative arrangement, it is usually skewed by the availability or otherwise of some attractive feature like enhanced employer contributions so that differences in the available information are not material to the members' decision.</p>	Noted
372.	Le cercle des épargnants	96.	Yes	Noted
373.	Long-Term Practical Perspectives Limited	96.	<p>Do stakeholders agree with the impact assessment of the EIOPA proposals?</p> <p>In assessing the likely impact on UK defined benefit pensions, it is important to understand that by far the greatest part of the total past service liabilities already accrued by fund members are linked to an inflation index (whether retail prices RPI or consumer prices CPI), usually modified (whether by scheme rules or by legislation prevailing when liabilities were accrued) by a limit of 5% per annum and a floor of</p>	Noted

			<p>0%.</p> <p>The total value of such inflation protected liabilities is some four or five times greater than the total sterling index linked bond and swap market. An "insurance approach" of any kind to committed index-linked pension liabilities would put such index linked assets at an even greater premium than currently.</p> <p>This makes the estimation of the impact of such an approach highly uncertain, depending on whether or not the resulting regulations allow and incentivise most UK employers to maintain sufficient covenant strength to support existing liabilities in a manner broadly consistent with the existing investment style in the UK pensions industry. In other words, pressure to strengthen funding standards would need to be concentrated in practice on only those employers with the weakest covenants, or on those who wilfully weaken an existing covenant for shareholder gain (e.g. by selling out to highly- leveraged takeover bids.)</p> <p>If, however, the EU fails to allow and incentivise the majority of UK employers to continue funding UK index-linked pensions in a manner broadly consistent with existing investment strategies, the cost of matching assets is likely to escalate wildly. Given the severe undersupply, large financial buffers would then be needed by all those employers left behind in the race to acquire matching assets. In such circumstances, it becomes simply impossible to estimate how extravagantly expensive an ill-considered solvency standard might be for UK pension schemes.</p>	
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374.	Mercer	96.	Until a quantitative impact assessment is provided, it is hard to have an opinion. We agree that more cost will be imposed on DC schemes, and there will be some benefit, but we are not sure the extra cost will be worth the likely marginal benefit achieved.	Noted
375.	MHP (Vakcentrale voor Middengroepen en Hoger Perso	96.	The MHP agrees with the impact assessment made by EIOPA, but underlines the need to have a proper impact assessment of all the consequences before proposing a revised directive.	Noted
376.	National Association of Pension Funds (NAPF)	96.	Do stakeholders agree with the impact assessment of the EIOPA proposals?	Noted
378.	Pan-European Insurance Forum (PEIF)	96.	It has to be ensured that additional burdens imposed by any future regulation, either at Level 1 or Level 2, could be fulfilled by the IORP without undue or disproportionate cost and effort.	Noted
379.	Pensioenfonds Zorg en Welzijn (PFZW)	96.	In its response, the Pensioenfederatie has agreed on the impact assessment made by EIOPA, but underlined the need to have a proper impact assessment of all the consequences before proposing a revised directive.	Noted
380.	Predica	96.	Predica can agree on the impact assessment.	Noted
381.	PTK (Sweden)	96.	PTK agrees with the preliminary impact assessment.	Noted
382.	Railways Pension Trustee Company Limited ("RPTCL	96.	RPTCL considers that the limited impact assessments in the consultation paper have not been sufficient for us to be able to understand the impact of many of the proposals which are discussed.	Noted

			Given the importance of the review of the IORP Directive to pension provision within the EU, we suggest that a thorough impact assessment is carried out for each Member State before the proposals are developed further.	
383.	Standard Life Plc	96.	We agree with the majority of the qualitative impacts, but we would reiterate that customers tell us that they do not want to receive overly long or complex information. The primary aim should be to produce information that customers value, that enables them to make informed decisions, or encourages them to seek professional advice if they need it, and – crucially – that engages them in the need to save in order to achieve their aspirations for the future. Information which does not meet these objectives should be discounted.	Noted
384.	TCO	96.	TCO agrees with the preliminary impact assessment.	Noted
385.	The Society of Actuaries in Ireland	96.	We believe the impact assessment is appropriate for some countries. However, from an Irish perspective the impact is likely to be more modest as we have a number of the requirements already in place	Noted
386.	THE SOCIETY OF PENSION CONSULTANTS	96.	<p>We would agree with much of the impact assessment, but would suggest that the potential negative impacts of providing members with too much information which is either irrelevant, inappropriate or overly complex is also taken into account. The primary consideration must be the benefit to retirement scheme members – encouraging and reinforcing retirement provision as a positive step.</p> <p>Hoping that members will read information, despite length, complexity or lack of relevance, would be entirely naïve and counter-productive to the aim of increasing member protection through the provision of harmonised information.</p> <p>Minimum harmonisation which provides members with the relevant</p>	Noted

			investment risks, warnings and information in a way suitable to the circumstances of the Member State would be the best way to achieve the desired member protection.	
387.	UK Association of Pension Lawyers	96.	<p>CfA 23 (Information to members / beneficiaries): Do stakeholders agree with the impact assessment of the EIOPA proposals?</p> <p>We agree with the EIOPA that introducing changes to the information requirements will involve additional costs for IORPs - the extent of this will depend on the extent of the changes.</p>	Noted
388.	UNI Europa	96.	The additional information requirements as proposed by EIOPA will indeed lead to additional compliance costs for IORPs and additional supervisory costs for supervisory authorities, which might ultimately be reflected in a charge towards the IORP. UNI Europa would therefore urge for a proportionality between the additional information requirements (mostly for DC schemes) and the additional costs they would lead to.	Noted
389.	Universities Superannuation Scheme (USS),	96.	<p>Do stakeholders agree with the impact assessment of the EIOPA proposals?</p> <p>As mentioned in sub-paragraph 2.7.3, it is acknowledged that the impact assessment contained in each Call for Advice is preliminary and more research is required. USS reiterates the position outlined in question 1, that is a thorough and in-depth assessment should be an integral part of the consultation process.</p>	Noted
390.	Verbond van Verzekeraars	96.	There is a need for a full quality impact assessment including quantitative aspects per national scheme.	Noted
391.	VHP2 (Vakorganisatie voor	96.	The VHP2 agrees with the impact assessment made by EIOPA, but	Noted

	middelbaar en hoger pers		underlines the need to have a proper impact assessment of all the consequences before proposing a revised directive.	
392.	Whitbread Group PLC	96.	We see no reason for change to the current regulatory regime for UK pension schemes, which provides strong protection for member's pension benefits	Noted
393.	Zusatzversorgungskasse des Baugewerbes AG	96.	We believe that the additional information requirements as proposed by EIOPA will indeed lead to additional compliance costs for IORPs and additional supervisory costs for supervisory authorities, which might ultimately be reflected in a charge towards the IORP. We would therefore urge for a proportionality between the additional information requirements and the additional costs they would lead to. Impact assessments should reveal the amount of costs before any decisions about the information requirements are taken.	Noted
394.	Derek Scott of D&L Scott	96.	EIOPA's strong recommendation that there should be a full cost/benefit analysis of proposals is arguably its most helpful contribution to this review. The analysis should include quantitative and qualitative impact assessments, on both pension schemes and the broader economy e.g. how the capital requirements might affect equity and bond markets. Given the significant implications, this analysis should take place before the Commission considers the options.	Noted
395.	Towers Watson	96.	96. Do stakeholders agree with the impact assessment of the EIOPA proposals?  We support the broad thrust of the proposals however we consider that EIOPA may be too optimistic about the impact and we are not persuaded that providing members with more information necessarily leads to a better outcome in terms of their retirement provision – it simply shifts the responsibility to them and away from supervisors and the professionals running the IORP. Indeed, evidence points to a very limited appetite for information, with a preference for greater guidance "what should I do?".	Noted

			<p>We consider that EIOPA needs to publish the evidence that supports the contention that the additional costs are “clearly less significant than the benefits in terms of protection for members”. Our experience is that even a small change to member disclosures can be costly to implement.</p> <p>Similarly until there is harmonisation of the wider social security framework, we would not agree that the proposals will materially benefit the market for pension provision as, in practice, members are rarely choosing between IORPs and, where the choice is between an IORP and an alternative arrangement, it is usually skewed by the availability or otherwise of some attractive feature like enhanced employer contributions so that differences in the available information are not material to the members’ decision.</p>	
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