

<b>Comments Template on CP-12-003 – Draft Technical Specifications QIS IORP II</b>		<b>Deadline 31 July 2012 18:00 CET</b>
Name of Company:	UK Association of Pension Lawyers of the United Kingdom (the "APL")	
Disclosure of comments:	Please indicate if your comments should be treated as confidential:	Public
<p>Please follow the following instructions for filling in the template:</p> <ul style="list-style-type: none"> <li>⇒ Do <b>not</b> change the numbering in the column "reference"; <b>if you change numbering, your comment cannot be processed by our IT tool</b></li> <li>⇒ Leave the last column <u>empty</u>.</li> <li>⇒ Please fill in your comment in the relevant row. If you have <u>no comment</u> on a paragraph or a cell, keep the row <u>empty</u>.</li> <li>⇒ Our IT tool does not allow processing of comments which do not refer to the specific numbers below.</li> </ul> <p><b>Please send the completed template, in Word Format, to CP-12-003@eiopa.europa.eu. Our IT tool does not allow processing of any other formats.</b></p> <p>The numbering of the paragraphs refers to Consultation Paper 12-003.</p>		
Reference	Comment	
General Comment	<p>This document sets out the comments of the UK Association of Pension Lawyers of the United Kingdom (the "APL") on the EIOPA call to comments on CP 003/2012 – Draft Technical Specifications for the QIS of EIOPA's Advice on the Review of the IORP Directive. The APL represents members of the UK legal profession with a particular interest in pensions. Currently it has over 1100 members. Our members include most, if not all, of the leading practitioners in the UK in this field. This response is submitted by the International Sub-Committee of the APL.</p> <p>We think it is more appropriate for actuarial/covenant organisations to comment on the detail of the consultation. However, we are concerned that the consultation does not contain any details as to how EIOPA intends to use the information. Whilst the respondents can suggest methods and assumptions, it is difficult to know the range to suggest without knowing what the assumptions</p>	

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	<p>are going to be used for (i.e.what impact varying a certain assumption will make).</p> <p>We would also say that the level of work and detail involved in participating in the proposed impact assessment looks to be very high (these are not calculations that are routinely carried out by occupational pension schemes or their sponsoring employers). There is therefore a significant risk that it will not lead to representative results.</p>	
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	<b>Comments Template on CP-12-003 – Draft Technical Specifications QIS IORP II</b>	<b>Deadline 31 July 2012 18:00 CET</b>
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	<b>Comments Template on CP-12-003 – Draft Technical Specifications QIS IORP II</b>	<b>Deadline 31 July 2012 18:00 CET</b>
SCR.8.6.		
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	<b>Comments Template on CP-12-003 – Draft Technical Specifications QIS IORP II</b>	<b>Deadline 31 July 2012 18:00 CET</b>
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SCR.10.11.		
MCR.1.1.		
MCR.2.1.		
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	<b>Comments Template on CP-12-003 – Draft Technical Specifications QIS IORP II</b>	<b>Deadline 31 July 2012 18:00 CET</b>
MCR.2.5.		
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PRO.1.1.		
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PRO.3.15.		
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PRO.4.1.		
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PRO.4.13.		
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PRO.4.16.		
PRO.4.17.		