

<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:	Akzo Nobel	
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, <u>in Word Format</u>, 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	The consultation does not explain what the methodologies in the QIS will be used for. Nor does it address the wider implications of applying a Solvency II-type regime to pensions. Requiring defined benefit pension funds to be funded like insurance companies would impose very substantial burdens on sponsoring employers and would be likely to lead to further reduction or removal of defined benefit pension provision. Increasing the commonality of regulatory regimes is likely to drive common behaviours thereby increasing risk e.g. adopting similar investment strategies. In the context of the holistic balance sheet, it is difficult to understand why unfunded plans are excluded: this creates an incentive not to fund pensions.	
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Q4.	No. The costs of assessment will be high and especially in the current difficult economic climate, these costs are not appropriate. The timeline is too short to properly consider the questions that follow, especially when it remains unclear how the results of holistic balance sheet calculations will be used e.g. will they be used for disclosure purposes or will they drive funding obligations by forcing companies to make good deficits within defined periods.	
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SCR.7.73.		
SCR.7.74.		

	<b>Comments Template on CP-12-003 – Draft Technical Specifications QIS IORP II</b>	<b>Deadline 31 July 2012 18:00 CET</b>
SCR.7.75.		
SCR.7.76.		
SCR.7.77.		
SCR.7.78.		
SCR.7.79.		
SCR.7.80.		
SCR.7.81.		
SCR.7.82.		
SCR.7.83.		
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SCR.7.86.		
SCR.7.87.		
SCR.8.1.		
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SCR.8.3.		
SCR.8.4.		
SCR.8.5.		
SCR.8.6.		
SCR.8.7.		
SCR.9.1.		
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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>
SCR.9.7.		
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SCR.9.32.		

	<b>Comments Template on CP-12-003 – Draft Technical Specifications QIS IORP II</b>	<b>Deadline 31 July 2012 18:00 CET</b>
SCR.9.33.		
SCR.9.34.		
SCR.10.1.		
SCR.10.2.		
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SCR.10.4.		
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SCR.10.6.		
SCR.10.7.		
SCR.10.8.		
SCR.10.9.		
SCR.10.10.		
SCR.10.11.		
MCR.1.1.		
MCR.2.1.		
MCR.2.2.		
MCR.2.3.		
MCR.2.4.		
MCR.2.5.		
MCR.2.6.		
MCR.2.7.		
MCR.2.8.		
MCR.2.9.		
PRO.1.1.		
PRO.2.1.		
PRO.2.2.		

	<b>Comments Template on CP-12-003 – Draft Technical Specifications QIS IORP II</b>	<b>Deadline 31 July 2012 18:00 CET</b>
PRO.2.3.		
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PRO.3.23.		
PRO.3.24.		
PRO.3.25.		
PRO.3.26.		
PRO.3.27.		
PRO.3.28.		
PRO.4.1.		
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PRO.4.15.		
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PRO.4.17.		