

Comments Template on CP-12-003 – Draft Technical Specifications QIS IORP II		Deadline 31 July 2012 18:00 CET
Name of Company:	BAVC (German Federation of Chemical Employers' Association), Wiesbaden	
Disclosure of comments:	Please indicate if your comments should be treated as confidential:	Public
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Reference	Comment	
General Comment	<p>BAVC (Federation of Chemical Employers' Associations; Bundesarbeitgeberverband Chemie) is the voice of the German chemical employers. BAVC represents about 1.900 companies employing roughly 550.000 workers.</p> <p>We would like to thank EIOPA for its thorough consultation exercise. However, rather than going into the details of how the QIS should be operated, we would like to make some general comments:</p> <ul style="list-style-type: none"> • First of all, the proposed technical specifications are heavily inspired from Solvency II – a legislative framework designed for insurance companies. In our view this approach is totally inadequate for IORPs which follow a completely different logic (see below). 	

	<p align="center">Comments Template on CP-12-003 – Draft Technical Specifications QIS IORP II</p>	<p align="center">Deadline 31 July 2012 18:00 CET</p>
	<ul style="list-style-type: none"> • Second, the level of detail in the consultation is well beyond the capabilities of most companies sponsoring IORPs and associations representing such companies. This will lead to the fact that many interested parties, although they would be highly affected by any legislation in this area, will not be able to comment properly. BAVC refers to the reply of aba (Arbeitsgemeinschaft für betriebliche Altersversorgung), the organisation representing IORPs in Germany. We explicitly support aba’s reply to the EIOPA consultation. • Finally, we question whether any additional solvency rules for IORPs are necessary and thus whether the QIS will serve any purpose at all. We will focus our comments in this area. <p>1) A level-playing field?</p> <p>Occupational pension systems are social schemes used by the employers and do not involve financial market products traded on the free market. Occupational pension schemes are specifically offered by employers to their employees whose representatives are frequently involved in the organisation of these schemes at occupational level. The German occupational pension system does not contain any extensive options for the beneficiaries or short-term investment strategies. Rather, it is characterised by long-term benefit. Unlike financial market products, it is the employers who are liable by law for the pension commitment and other forms of occupational pension towards their employees. There is no level-playing field for the products of the financial services industry on the hand and occupational pension systems on the other.</p> <p>2) Safety</p> <p>A special feature of the German occupational pension system is the secondary liability of the employer who is liable by law for the satisfaction of every commitment given to an employee with respect to an occupational pension.</p>	

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	<p>Furthermore, laws are in place in Germany to protect occupational pension schemes: depending on the method, either the Federal Financial Supervisory Authority is the supervisory body or insolvency insurance is provided by the Pensionssicherungsverein aG (PSVaG). The global financial and economic crisis was not triggered by occupational schemes. On the contrary: the occupational pension schemes – at least in Germany – survived the crisis with comparatively few scratches in view of their unique structure, the statutory requirements and precautionary measures. The stability of the schemes proved itself precisely in these times of crisis; the socio-political objectives have been and continue to be achieved.</p> <p>Since occupational pension schemes do not offer financial market products (see above), the application of Solvency II – also in the form of a Holistic Balance Sheet (HBS) as proposed by EIOPA – to occupational pension schemes would be neither necessary nor wise. The European solvency provisions that already apply to occupational pension schemes have led to considerable financial burdens (4-fold increase in equity). Further regulations, such as incorporating occupational pension schemes into Solvency II, would increase the financial burden out of all proportion and jeopardize the objective pursued by them. The additional capital to be formed for protection purposes would be tied up and would not be available for investments and innovation which improve the competitiveness of companies and therefore secure jobs.</p> <p>3) Disproportionate administrative burden</p> <p>The HBS would be no remedy at all: on the one hand, it is far from clear how significant the financial burden for IORPs would be in the case of applying this concept; on the other hand, the administrative burden especially for smaller occupational pension schemes would be enormous: compared to the application of Solvency II, which is already a highly complex set of rules designed specifically for the insurance sector, the additional administrative steps required by the HBS (valuation of security mechanisms such as sponsor support and pension protection schemes) would lead to even more bureaucracy and put IORPs at a clear disadvantage.</p>	

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<p>Q1.</p>	<p>No, we do not agree with the general set-up of the QIS exercise. This because of the following three reasons:</p> <p>1) The QIS will not give all necessary insights for IORP II</p> <ul style="list-style-type: none"> • If this is the only QIS before the proposal of IORP II by the European Commission (as indicated by the European Commission), for sure not all relevant questions can be directed and clearly answered in one run. EIOPA should ask for even more information than it is already going to do in the complex QIS. • There is the risk that IORPs will not have enough time to be – and certainly are at the moment not – sufficiently equipped to reply (leading to a limited number of replies). Focus of responses will be on the technical details and not on general concept and usability of holistic balance sheet. • The resources needed to run a QIS style solvency process will be very expensive to the majority of IORPs (proportionality). Therefore, those that participate will be a biased sample of large pension plans – those that can easily absorb the cost. <p>2) The representativeness of the QIS is insufficient for an IORP II proposal by the EC:</p> <ul style="list-style-type: none"> • Only 8 out of 27 Member States will participate in the QIS. • Municipal/Local Authorities pension schemes are not included, although these are significant providers of second pillar pension schemes. • In some Member States the QIS will not be performed by IORPs, but by supervisory authorities which are using aggregated data (or it is done by actuarial firms on behalf of the supervisory authority). However, it is our opinion that EIOPA and the Commission can only have a good indication of the real impact when the QIS will be performed by IORPs (instead of hypothetical schemes). • The use of aggregated data makes the comparison between funds and countries distorted and it will be very hard for EIOPA to have an adequate overview of the sensitivity to the assumptions. 	

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	<ul style="list-style-type: none"> • If IORPs will not participate in the QIS, they will also not be able to respond (properly) to the qualitative questionnaire, while it is the purpose of the qualitative questionnaire to obtain an assessment by the IORPs of the clarity of the technical specifications, the quality of inputs and results, the methodology of the QIS, the practicability of the calculations involved and the use of simplifications. In addition, IORPs will be invited to give a first impression of the outcomes of the QIS and the potential policy reaction by the IORPs and other stakeholders. <p>3) This exercise is very exhaustive:</p> <ul style="list-style-type: none"> • The exercise is dependent on many – debatable – assumptions like stable correlations, normal curves, absence of tail-risk and the ability for analysts to accurately predict the future. • The underlying principles of the Holistic Balance Sheet are based on full market valuation and a Value at Risk (VaR) methodology. However, based on the experiences over the last years, there are some second thoughts if this kind of models should be still applicable. • We have identified 972 scenarios that IORPs will be expected to compute. Many will not have inputs in the appropriate format. 	
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	Comments Template on CP-12-003 – Draft Technical Specifications QIS IORP II	Deadline 31 July 2012 18:00 CET
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	Comments Template on CP-12-003 – Draft Technical Specifications QIS IORP II	Deadline 31 July 2012 18:00 CET
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	Comments Template on CP-12-003 – Draft Technical Specifications QIS IORP II	Deadline 31 July 2012 18:00 CET
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	Comments Template on CP-12-003 – Draft Technical Specifications QIS IORP II	Deadline 31 July 2012 18:00 CET
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	Comments Template on CP-12-003 – Draft Technical Specifications QIS IORP II	Deadline 31 July 2012 18:00 CET
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	Comments Template on CP-12-003 – Draft Technical Specifications QIS IORP II	Deadline 31 July 2012 18:00 CET
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	Comments Template on CP-12-003 – Draft Technical Specifications QIS IORP II	Deadline 31 July 2012 18:00 CET
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	Comments Template on CP-12-003 – Draft Technical Specifications QIS IORP II	Deadline 31 July 2012 18:00 CET
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	Comments Template on CP-12-003 – Draft Technical Specifications QIS IORP II	Deadline 31 July 2012 18:00 CET
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	Comments Template on CP-12-003 – Draft Technical Specifications QIS IORP II	Deadline 31 July 2012 18:00 CET
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	Comments Template on CP-12-003 – Draft Technical Specifications QIS IORP II	Deadline 31 July 2012 18:00 CET
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	Comments Template on CP-12-003 – Draft Technical Specifications QIS IORP II	Deadline 31 July 2012 18:00 CET
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	Comments Template on CP-12-003 – Draft Technical Specifications QIS IORP II	Deadline 31 July 2012 18:00 CET
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	Comments Template on CP-12-003 – Draft Technical Specifications QIS IORP II	Deadline 31 July 2012 18:00 CET
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	Comments Template on CP-12-003 – Draft Technical Specifications QIS IORP II	Deadline 31 July 2012 18:00 CET
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	Comments Template on CP-12-003 – Draft Technical Specifications QIS IORP II	Deadline 31 July 2012 18:00 CET
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	Comments Template on CP-12-003 – Draft Technical Specifications QIS IORP II	Deadline 31 July 2012 18:00 CET
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	Comments Template on CP-12-003 – Draft Technical Specifications QIS IORP II	Deadline 31 July 2012 18:00 CET
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	Comments Template on CP-12-003 – Draft Technical Specifications QIS IORP II	Deadline 31 July 2012 18:00 CET
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	Comments Template on CP-12-003 – Draft Technical Specifications QIS IORP II	Deadline 31 July 2012 18:00 CET
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	Comments Template on CP-12-003 – Draft Technical Specifications QIS IORP II	Deadline 31 July 2012 18:00 CET
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	Comments Template on CP-12-003 – Draft Technical Specifications QIS IORP II	Deadline 31 July 2012 18:00 CET
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	Comments Template on CP-12-003 – Draft Technical Specifications QIS IORP II	Deadline 31 July 2012 18:00 CET
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	Comments Template on CP-12-003 – Draft Technical Specifications QIS IORP II	Deadline 31 July 2012 18:00 CET
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	Comments Template on CP-12-003 – Draft Technical Specifications QIS IORP II	Deadline 31 July 2012 18:00 CET
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	Comments Template on CP-12-003 – Draft Technical Specifications QIS IORP II	Deadline 31 July 2012 18:00 CET
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	Comments Template on CP-12-003 – Draft Technical Specifications QIS IORP II	Deadline 31 July 2012 18:00 CET
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	Comments Template on CP-12-003 – Draft Technical Specifications QIS IORP II	Deadline 31 July 2012 18:00 CET
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	Comments Template on CP-12-003 – Draft Technical Specifications QIS IORP II	Deadline 31 July 2012 18:00 CET
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