

Comments Template on CP-12-003 – Draft Technical Specifications QIS IORP II		Deadline 31 July 2012 18:00 CET
Name of Company:	Dutch Association of Insurers (Verbond van Verzekeraars)	
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"> ⇒ Do not change the numbering in the column "reference"; if you change numbering, your comment cannot be processed by our IT tool ⇒ Leave the last column <u>empty</u>. ⇒ 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>. ⇒ Our IT tool does not allow processing of comments which do not refer to the specific numbers below. <p>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.</p> <p>The numbering of the paragraphs refers to Consultation Paper 12-003.</p>		
Reference	Comment	
General Comment	<p>The Dutch Association of Insurers welcomes EIOPA's consultation on "draft technical specifications QIS of EIOPA's advice on the review of the IORP Directive". The Dutch insurance companies are important providers of pension products (20% of the 2nd Pillar market).</p> <p>In the discussion concerning the IORP review, the link with the Solvency II directive for insurers should be further examined. Therefore we welcome the decision to conduct a QIS with a view to better assess the proposed review of the IORP directive, and more specifically to test the proposed Holistic Balance Sheet approach and the specific features related to occupational pension schemes. This is a critical step in the</p>	

	<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>
	<p>process of the review of the IORP Directive. Furthermore, it is important that these mechanism are adequately and sufficiently tested to ensure that they accurately reflect the economic reality faced by the IORP. Even if this would require more than one QIS.</p> <p>We consider the basic principle of 'same risks, same rules, same capital' to be a good point starting point for the discussion on the review of the IORP directive. The Solvency II principles should serve as the basis for regulating financial institutions providing occupational pension products. Not the legal vehicle through which pension products are provided should determine the level of protection towards members and beneficiaries, but the risks related to the different pension products. Significant characteristics of the different pension products or schemes should consequently be taken into account. However, these differences should be fully transparent and explicitly communicated towards the (future) members and beneficiaries of the concerning pension products. It is necessary to aim for appropriate solutions in both the IORP and the Solvency II Framework.</p> <p>As a member of the InsuranceEurope, the Dutch Association of Insurers fully endorses the InsuranceEurope response on the Call for Advice on the draft technical specifications QIS of EIOPA's advice on the review of the IORP Directive. For the specific (technical) questions in the consultation document, the Dutch Association of Insurers refers to the answers in the InsuranceEurope statement.</p>	
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SCR.10.11.		
MCR.1.1.		
MCR.2.1.		
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MCR.2.3.		
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MCR.2.5.		
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PRO.1.1.		
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