

<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:	Ernst & Young LLP	
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>		
<b>Reference</b>	<b>Comment</b>	
General Comment	<p>We provide only general comment on the technical specifications, whose publication we welcome and which appears to us to cover the necessary aspects of an initial Quantitative Impact Study .</p> <ul style="list-style-type: none"> <li>• We approve of the inclusion of options in the proposed technical specifications, to enable analysis of areas left open in the EIOPA response to the Call for Advice.</li> <li>• We suggest that it would be helpful, for parties planning participation in the QIS, to provide greater clarity as to the tools and templates that will be provided, particularly for the purposes of calculating technical provisions.</li> <li>• We note that the results of the QIS will depend crucially on the presence (and nature) or absence of protection mechanisms, and in view of the wide range of such mechanisms in</li> </ul>	

	<p align="center"><b>Comments Template on CP-12-003 – Draft Technical Specifications QIS IORP II</b></p>	<p align="center"><b>Deadline 31 July 2012 18:00 CET</b></p>
	<p>different environments it is important that the QIS deals transparently with the nature of such mechanisms as are in place, and if appropriate with their absence. We note the risk that in stressed conditions a pension protection scheme may be unable to meet all the calls made on it.</p> <p>We note the assertion that the proposed technical specifications are not to be read as proposals for possible future level 2 measures, and that they address objectives as set out by the Commission. Whilst acknowledging that EIOPA is constrained by the original Call for Advice, we note with concern the degree of opposition to the Commission’s preliminary suggestions as reflected in the Call for Advice, and particularly the distribution of that opposition among Member States. We believe that it is important to deal sensitively with differences between (and within) Member States in the structure of retirement benefits that are offered by IORPS and specifically to address the impact of introducing change on the employers who pay for the pension benefits and on their Member States.</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>
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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.10.7.		
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MCR.1.1.		
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MCR.2.3.		
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MCR.2.7.		
MCR.2.8.		
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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>
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