

Comments Template on CP-12-003 – Draft Technical Specifications QIS IORP II		Deadline 31 July 2012 18:00 CET
Name of Company:	The Goldsmiths' Company Goldsmiths' Hall, Foster Lane, London EC2V 6BN	
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, <u>in Word Format</u>, 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	Recent changes to the regulation of DB pension schemes has greatly increased the complexity and cost of their provision. Whilst the Goldsmiths' Company scheme has now necessarily been closed to further accruals, it is still burdened by unnecessary expenditure (such as the Pension Protection Fund contribution) and the need to produce endless reports and strategies. The possibility of requiring pension funds to be funded like insurance companies, with the consequential financial and administrative burdens, fills me with horror. It is also surely highly pertinent that those institutions that employers consult on pension issues, such as Slaughter & May, think this is an astonishingly bad idea. Please think again and come up with something that eases the burden and costs on the employers thereby improving their ability to fund their schemes.	

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	Most employers have a responsible attitude to their obligations – it is those that do not who should be inconvenienced. R G Melly, Clerk/CEO	
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PRO.4.17.		