

Comments Template on CP-12-003 – Draft Technical Specifications QIS IORP II		Deadline 31 July 2012 18:00 CET
Name of Company:	Zusatzversorgungskasse des Maler- und Lackiererhandwerks VVaG	
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>Comment of Zusatzversorgungskasse des Maler- und Lackiererhandwerks VVaG (zvK Maler) on the planned impact study (QIS) in the review of the IORP Directive.</p> <p>We are convinced that the present form of the QIS study form considers the interest and particular conditions of regulated pension funds only insufficient. At present we don't see us in the position to give qualified comments on the technical specifications.</p> <p>We are a medium sized regulated pension fund established by the social partners of the painting and decorating industry. We service approximately 250,000 candidates and retirees of this industry in respect of an additional retirement pension based on a collective wage agreement.</p>	

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	<p>Since 1972 employees of the painting and decorating industry are part of a system which offers on the basis of a collective wage agreement a retirement pension supplement which is funded by the employer. Starting in 2003, the employees also have the possibility to choose a retirement provision based on deferred compensation.</p> <p>A significant tightening of the regulation, as it is intended by the revision of the IORP Directive is not feasible with our current capacity. Additional resources would be needed to implement the requirements. The bureaucracy would be bloated and the profitability in favour of our members would be reduced dramatically. An increase in staff produces would produce less benefit for the pensioners in the industry.</p> <p>We always fulfill the requirements set by the German regulator. By a conservative investment policy, which among other things is expressed by a low equity exposure, we generate stable returns in favour of our members. This approach is closely monitored.</p> <p>We disagree with the considerations and reject the proposals.</p>	
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