

Response to COM Call for Advice on Personal Pensions

IRSG meeting Frankfurt, 16 February 2016

Why personal pensions?

- **Inadequate pension** provision is common
- Challenged national budgets and pensions
- Aging populations across Europe
- Low levels of consumer trust in pensions
- Increasingly **mobile** workforce
- Behavioural aspects







The story so far.....



- Call for Advice from COM 2013 leading to Preliminary Report February 2014
- Further Call for Advice July 2014
- New European Commission announced focus on Capital Markets Union (CMU) in July 2014
- 18 February 2015 Green Paper: CMU role for (personal) pensions
- COM CMU Action Plan published: summer 2015
- EIOPA June 2015 Consultation Paper focussed on 2nd regime (PEPP)
- February 2016 Consultation Paper addresses July 2014 Call for Advice

2014 Call for Advice



- Detailed Call for Advice on personal pensions received from COM July 2014
- 8 topic areas covered
- 50 detailed questions in Annex

Objectives of the PEPP



- Encourage more EU citizens to save for an adequate retirement income
- Safe, cost-effective, transparent and sufficiently flexible product
 - o to accommodate the current economic and labour market environment in Europe
 - o to promote a Single Market for personal pensions
- In the form of a **2nd regime**:
 - o facilitates cross-border business;
 - o will encourage providers from different sectors, on a level playing field

Mandatory PEPP features (1) PIDD

- Provider level standardised high level investment principles
- **Product level** limited investment options
 - o One default option
 - o Limited number of investment options

Mandatory PEPP features (2)

- Effective information disclosure (basis is PRIIPS KID): pre-contractual, regular and at specified points during the life of the product
 - Risks/returns
 - performance
 - Costs and charges
 - Transfers/switching/decumulation

Mandatory PEPP features (3) $\Box\Box\Box$

- Conduct of business requirements
 - > Overall **duty of care** to the customer
 - Direct & indirect distribution options advice optional
 - Appropriateness test for complex investment options; default option to be designed so as to be non-complex
 - > Appropriate **knowledge and ability** requirements
 - > **Conflict of interest** avoidance requirements
 - > Effective **redress** systems

Flexible PEPP features



- Flexible **retirement date** possible
- Different forms of **decumulation** possible
- Adding a financial or biometric risk cover to the PEPP possible
- Investment options where costs and charges are capped possible
- **Switching** during the life of the product possible
 - at fair value and with fair charges
 - some limitations, such as minimum holding periods, should be possible

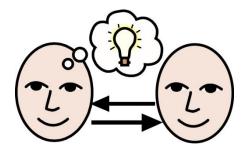
Summary of PEPP features



| Pan-European Personal Pension Product (PEPP) | | | |
|--|-------------------------------------|--|----------------------------|
| Standardised elements: | information provision | Flexible guarantees elements: cap on cos charges switching | guarantees |
| | default "core" investment option | | cap on cost and charges |
| | limited investment choices | | switching |

Engagement with IRSG (PEPP)

- Discussion with IRSG strategic areas sub-group 3 June 2015
- Presentation to IRSG 10 June 2015
- IRSG input to consultation process



 IRSG input to Attractiveness/Feasibility of PEPP (November 2015)

Attractiveness/feasibility industry survey (PEPP)



- Online survey
- **Targeted survey** of selected industry participants
- **Roundtable discussions** with companies
- Key views expressed:
 - PEPP broadly attractive esp. in less developed pensions markets
 - o Needs strong stable legislation
 - **o** Multiple distribution channels

Which legal approach?



- Both harmonising Directives or a Regulation are possible approaches to the development of a Single Market for personal pensions
- Superior outcomes expected from a 2nd regime Regulation
- Through benefits of standardisation, efficiency gains and enabling cross-border activities
- Promoting an efficient Single Market for personal pensions





• **Consultation** on PPPs: extending EIOPA's views on PEPP to PPPs

o closes on 26th April 2016

o analysis of responses, further research



Thank you

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