

### **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 2<sup>nd</sup> 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 **2<sup>nd</sup> 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

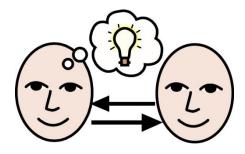
# **Summary of PEPP features**



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 2<sup>nd</sup> 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 26<sup>th</sup> April 2016

o analysis of responses, further research



#### Thank you

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