

## **Occupational Pensions Stakeholder Subgroup on "Consumer Protection" Mandate**

### **I. Background**

During the 26 November 2013 meeting in Frankfurt, the OPSG Chair, based on the draft work plan of the Occupational Pensions Committee (OPC), proposed to establish three standing subgroups for the duration of the OPSG mandate on:

1. Solvency issues
2. Occupational Defined Contribution (DC) schemes: "Occupational DC"
3. Consumer protection issues

It was further agreed that the focus of the subgroup on Consumer protection should be further refined: whether to cover issues that affect only occupational pensions or personal pensions as well. Amongst the potential areas to be covered:

- Information/terminology/transparency
- Governance/ supervision/ representation
- Investment returns + cost + charges
- Transferability of pensions
- Conflicts of interest
- Advise
- Decumulation

EIOPA will also have an upcoming consultation on a Report on good practices on portability of acquired rights within occupational pension schemes with planned consultation in Q3 2014, and the subgroup may wish to provide feedback on this.

This subgroup is organised in respect of the Article 10 of the Rules of Procedures.

Following discussions at the May and July 2015 meetings, it was agreed to update the mandate in line with the revised OPSG Work Plan for the interval 2015-2016.

### **II. Tasks of the Subgroup**

- Task 1: to prepare an OPSG opinion on consumer protection issues in relation to the following, including any current identified detriments and where appropriate proposals for mitigation:
  - a. Information/terminology/transparency

- b. Governance and conflicts of interest
  - c. Investment returns/costs/charges
  - d. Transferability
  - e. Advice and education
- Task 2: to prepare an OPSG Feedback on EIOPA Questionnaire on gathering input for the EIOPA Consumer Trends Report
  - Task 3: To prepare an OPSG response to EIOPA Consultation Paper on a Report on Good Practices on individual transfers of supplementary occupational pension rights
  - Task 4: A general handover note to be prepared for the new OPSG.

### **III. Expiration of mandate**

The mandate of the OPSG Consumer protection subgroup expires upon completion of a report on the above tasks and latest on the date of expiry of the OPSG, namely March 2016.

### **IV. Organisation of work**

Each work stream will include at least two members of the subgroup, members may choose to participate in more than one work stream. Drafts from each work stream will be circulated to all members of the subgroup for comment and input. The work is organized through conference calls with the members of the subgroup and one or two representatives of EIOPA for organisational/technical support.

The Subgroup leader sends documents at least one half-day before the conference call gathering the working Group members' comments.

The Subgroup leader sends draft documents to the full OPSG at least 2 weeks ahead of the regular meetings.

### **V. Subgroup lead**

- Subgroup co-leaders: Ruth Goldman [Professional Associations] and Doug Taylor [Employee]
- Members allocated to the specific areas:
  - a. Information/terminology/transparency:
    - *Lead: Klaus Struwe; Marianne Osterkorn, Marius Serban, Bruno Gabellieri, Charlotta Carlberg, Manuel Peraita and Pierpaolo Marano*
  - b. Governance and conflict of interest:
    - *Lead: Ruth Goldman; Marianne Osterkorn, Guillaume Prache, Klaus Struwe, Bruno Gabellieri, Pierpaolo Marano, Jan Sebo, Marius Serban and Charlotta Carlberg*
  - c. Investment costs and charges:
    - *Lead: Doug Taylor; Marianne Osterkorn, Laure Delahousse, Jan Sebo, Guillaume Prache, Bruno Gabellieri, Manuel Peraita and Michaela Koller*
  - d. Work stream transferability:
    - *Lead: Ruth Goldman; Guillaume Prache, Marius Serban, Bruno Gabellieri*

and Pierpaolo Marano

e. Advice and education:

- *Lead: Charlotta Carlberg; Laure Delahousse, Jan Sebo, Klaus Struwe and Pierpaolo Marano*

▪ **VI. Members**

- Subgroup members: Michaela Koller [Industry representative]; Charlotta Carlberg, Laure Delahousse and Ruth Goldman [Professional Associations]; Bruno Gabellieri, and Doug Taylor [Employees]; Marianne Moscoso-Osterkorn, Guillaume Prache, Marius Serban and Klaus Struwe [Beneficiaries]; Manuel Peraita, Pierpaolo Marano and Ján Šebo [Academics].

**VII. Deliverables**

<b>OPSG Subgroup on Consumer Protection</b>	<b>Timeline</b>	<b>OPSG expected date of discussion/ approval*</b>	<b>Priority</b>
<b>Milestones and deliverables</b>	(Q2-Q4 2014- Q1-Q4 2015)		<b>High (H), Medium (M), Low (L)</b>
OPSG Feedback on: - EIOPA Questionnaire on gathering input for the EIOPA Consumer Trends Report 2014	2 June 2014	Discussion on 19 May 2014	Delivered
OPSG Feedback on: - EIOPA Questionnaire on gathering input for the EIOPA Consumer Trends Report 2015	Q2 2015	Discussion on 10 March 2015 Submission April 2015	Delivered
OPSG Feedback on: - Consultation Paper on a Report on Good Practices on individual transfers of supplementary occupational pension rights	Q2 2015	Discussion on 10 March 2015 Submission April 2015	Delivered
Own initiative opinion/report on: - Information/terminology and transparency	Q4 2015	Discussion October 2015	L
Own initiative opinion/report on: - Governance and conflict of interest	Q4 2015	Discussion October 2015	M
Own initiative opinion/report on: - Advice and education	Q4 2015	October 2015	L
Own initiative opinion/report on: - Investments costs and charges -	Q1 2016	Joint work with the Occupational DC Subgroup	H

\*OPSG meeting dates 2014: 19/05; 07/07; 15/10 and Joint BoS-IRSG 26/11

\*OPSG meeting dates 2015: 10/03; 08/05; 08/07; 20/10 and Joint BoS-IRSG 01/12

\*OPSG final meeting date in 2016: 24/02