

EIOPA-OPSG-17-04

25 January 2017

# OPSG Feedback Statement about the EIOPA Report on Good Practices on Communication Tools and Channels for communicating to occupational pension scheme members

## 1. Background

The OPSG Subgroup on Occupational Pensions decided during the 4<sup>th</sup> of October meeting in Frankfurt that OPSG will make a statement about the EIOPA Report on Good Practices on Communication Tools and Channels for communicating to occupational pension scheme members, [EIOPA-BoS-16/176](#), 31 August 2016.

## 2. The report

The Report summarises the findings of EIOPA from a public consultation on a draft Report about Good Practices regarding the use of communication tools and channels of communication to members of occupational pension schemes operated by Institutions for Occupational Retirement Provision (IORPs) and insurance undertakings.

In the Report EIOPA summarises the different communication tools and channels used in the member-states. It is emphasised that the report is neither binding nor a guideline, but to be used as promotion for transparency and as information for future discussions on communication tools and channels.

## 3. OPSG statement

OPSG supports the Report, and believes it brings forward interesting comparisons between Member States. It is also of great importance to note the movements in communication to pension scheme members.

The Report is not about the *content* of information, but about the *form* of communication. According to OPSG the report could lead to misunderstandings. In some States it might not be allowed/enough with online-information. If it then is considered to be a Good Practice to have information on an online platform, it could be difficult for actors to know how to act. The same could be relevant for combined information, if that is considered a Good Practice.

OPSG does not comment all the findings and Good Practices but gives some general comments to the Report:

- a) It is difficult to give advice on Good Practices in a changing world. Due to new technology the Good Practices in the report must be updated regularly, otherwise the Good Practices will no longer be relevant.
- b) Due to the increasing level of DC the Good Practices will have to be updated regularly, not to be irrelevant in the future.
- c) There has to be a balance between relevant information and information overload. The possibility for a general pension scheme member to absorb all information is limited and caution has to be taken not to give information-overload and not to make the information too complex. This might be done by layered information, where the level of details can be selected by the scheme member.
- d) Information requirements are found in directives and regulations about savings and insurance as well as in the new IORP-II-guideline, and these directives and regulations sometimes prescribes tools and channels for information. It is important not to add requirements to existing demands, and that these existing demands are to be seen as Good Practices on information to pension scheme members.
- e) There is a balance between costs for developing information tools and channels of communication and the need of giving information. The costs are normally put on the pension scheme members. Caution is therefore always necessary in how to express the need of new and developed tools and/or channels for communication not to increase costs.
- f) OPSG explicitly shares EIOPA´s view, that sponsoring employers should not be in the scope of this report, and hence especially not in the scope of the Good Practices, since they are not covered by the Directives mentioned in d).

## **Summary**

According to OPSG the Report is well balanced and brings forward relevant analyses, at the same time the report is not timeless and should therefore be reviewed regularly. It is also important to make sure that there is a level playing field between actors on the occupational pension scheme market.