Occupational Pensions in Europe

An actuarial perspective on some important developments

Bologna, 16 June 2016





Agenda

Revision of the IORP Directive

EIOPA's Quantitative work

Financial Management in Pension Funds





REVISION OF THE IORP DIRECTIVE





IORP II proposal

- Published on 27 March 2014
- As announced: no Pillar 1 changes (quantitative requirements)
- Significant Pillar 2 and Pillar 3 amendments/additions
- Likely that proposal will be amended after discussions with European Council and European Parliament





IORP II proposal

4 Main objectives:



Removing remaining prudential barriers for cross-border IORPs



Ensuring good governance and risk management



Providing clear and relevant information to members and beneficiaries



Ensuring that supervisors have the necessary tools to effectively supervise IORPs





IORP II Commission proposal – Pillar 2

Pillar 2 – qualitative requirements

- Governance
- 4 eyes principle
- Fit and proper requirements
- Sound remuneration policy
- Function holders for:
 - Risk management
 - Internal audit
 - Actuarial function
- Risk evaluation for pensions
- Outsourcing requirements
 - Must appoint a depositary







IORP II Commission proposal – Pillar 3

Pillar 3 – reporting and disclosure requirements

- Information to beneficiaries
 - In common format
 - Correct, understandable, not misleading
 - Easy to read
- Pension Benefit Statement
 - Annually (free of charge)
 - Key information 2 pages A4
 - Electronically available
 - Great detail in content requirements
- Specific information
 - 2 years before retirement and in pay-out phase







Some key amendments by the Council

- Takes out the Delegated Acts on:
 - Risk evaluation
 - Remuneration
 - Communication
- Mitigates requirements by adding:
 - Proportionality
 - "... appropriate to their size and internal organisation, as well as the nature, scale and complexity of their activities" e.g. in:
 - Risk management
 - Internal Control
 - Subsidiarity
 - "Member States may decide not to apply" (e.g. depository)
- Adds an an internal control function to the risk-management function, internal audit function and actuarial function





Some key amendments by Parliament

- "Long-term interests of members and beneficiaries" in e.g.:
 - Cross-border transfers (art. 3)
- "ensure long-term sustainability" in e.g.:
 - Available solvency margin (art. 17)
- "impact of investment decisions on environmental, social, governance or ethical factors" (e.g. art. 20)
- "... taking into account the objective of ensuring the intergenerational balance of the pension scheme" (e.g. art. 20)
- To inform the competent authority "of any finding that could have a significant impact on the interests of members and beneficiaries." (whistle blowing)
 - It is striking that the Council takes the whistle blowing requirement out





Actuarial Function (Article 28)

We were missing in the Commission's proposal:

"The actuarial function shall be carried out by persons who have knowledge of actuarial and financial mathematics, commensurate with the nature, scale and complexity of the risks inherent in the [business] [activities] of the [insurance or reinsurance undertaking] [Institution for Occupational Retirement Provision], and who are able to demonstrate their relevant experience with applicable professional and other standards."

 This text is now added by Parliament in Recital 25, but not yet in Article 28





Own Risk Assessment / Actuarial Function

Need for European Standards of Actuarial Practice?

An AAE working group is already exploring the need

After a first discussion it appeared that it might be too early for standards.

Working group is now studying Educational Notes

Description of good practice

First step on a path towards Standards





STRESS TEST FOR PENSIONS

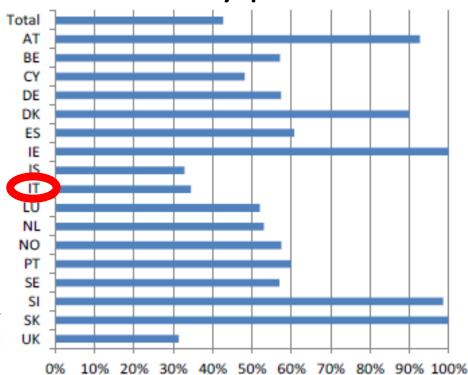




First stress test for pensions

Published 26 January 2016

- 1. Test the resilience of DB and hybrid schemes
- 2. Identify potential vulnerabilities of DC



Market coverage in % of total assets of the IORP sector

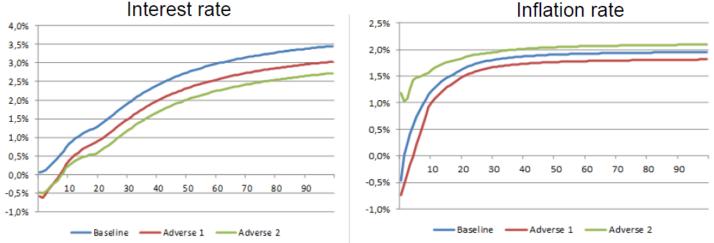
Source: EIOPA



Stress scenarios

- Adverse market scenario's:
 - 1. Negative demand shock
 - 2. Negative demand + supply shock
- Longevity shock scenario for DB IORPs

Main stress impacts in adverse market and longevity scenarios				
	Adverse market 1	Adverse market 2	Longevity	
EU property (price downward shock)	-55%	-36%	-	
EU stock prices (price downward shock)	-45%	-33%	-	
EU government bonds (spread widening)	120 bps	67 bps	-	
Corporate bonds (spread widening)	120 bps	204 bps	-	
Euro-dollar exchange rate	+20%	-2%	-	
Mortality rates (permanent decrease)	-	-	- 20%	
Interest rate		Inflation		



Source: EIOPA

CONGRESSO SATTUAR

Results for DB/Hybrid schemes

RESULTS UNDER DIFFERENT SCENARIOS (Excess of assets over liabilities)

Scenario	NBS	EIOPA Common methodology
DB/Hybrid pre- stress	-78 bn EUR	- 428 bn EUR
DB/Hybrid Market Adverse 1	- 373 bn EUR Δ -295bn	- 755 bn EUR∆-327bn
DB/Hybrid Market Adverse 2	- 346 bn EUR <u>∆</u> -268bn	- 773 bn EUR <u>∆</u> -345bn
DB/Hybrid Longevity	- 164 bn EUR <u>∆</u> - 86bn	- 526 bn EUR∆- 98bn

Important elements to consider:

- ✓ Liabilities have a very long-term nature
- ✓ Regulatory regimes usually include substantial recovery periods
- ✓ Future gaps can usually be covered by sponsor's contributions and/or benefit adjustment mechanisms



AAE comments

- We support presenting effect of adverse scenarios
 - In addition to the expectation
- Results in itself not surprising
- For employers and employees to discuss as pensions are part of the labour relationship
- Supportive of developing a common-market sensitive methodology
- We suggest to look at more forward looking (ALM-like) methods as well





EIOPA

OPINION TO EU INSTITUTIONS ON A COMMON FRAMEWORK FOR RISK ASSESSMENT AND TRANSPARENCY FOR IORPS





EIOPA

- Working on "open issues" from Quantitative Impact Study
- EIOPA's own initiative
 - no brief from European Commission
- Quantitative Impact Study → Quantitative Assessment
- Results and EIOPA's opinion were published 14 April 2016



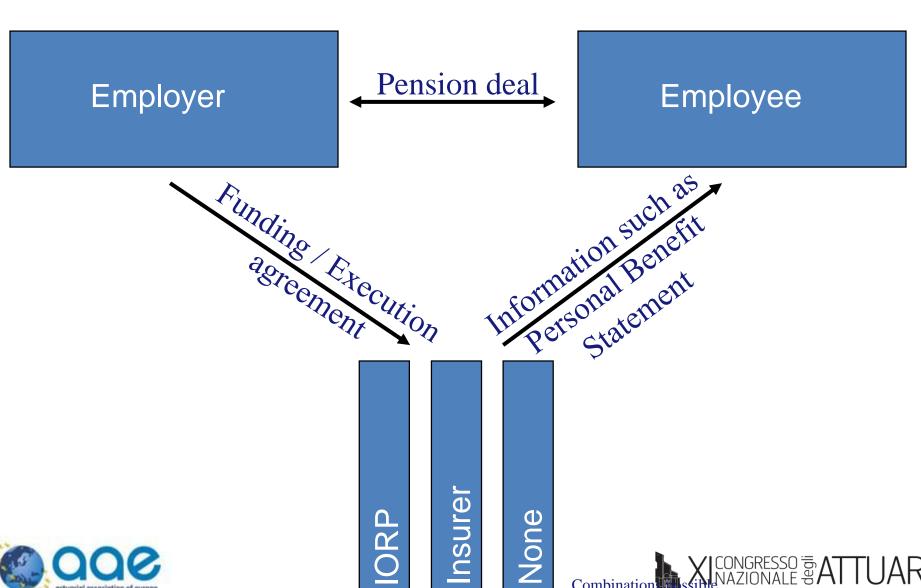


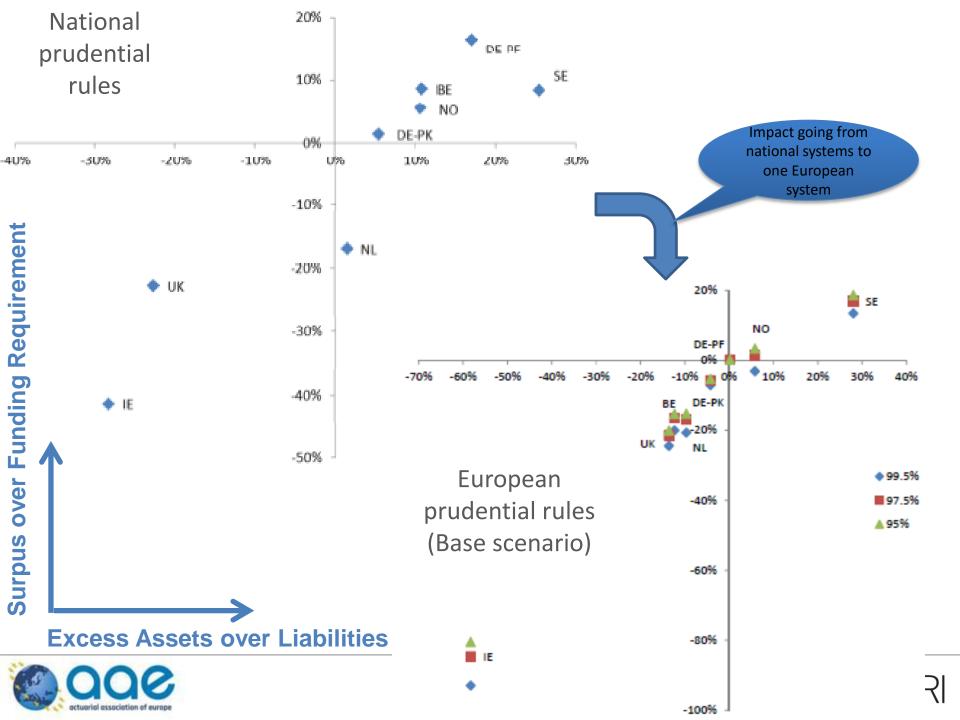






Supervising Pension Deal or IORP?





Market Consistency for Pensions Discount rate

Debate

- Level A, risk-free interest rate
- Level B, expected return on assets

Considerations

- It is about putting a value on a pension scheme

pension scheme!!

There is a single interest rate curve for each and every type of There is more than just one single interest rate curve



The 10 "S's" of Dutch Pension Risk Management

S1: interest rate risk S6: insurance risk;

S2: equity and property risk S7: liquidity risk;

S3: exchange rate risk; S8: concentration risk;

S4: commodity risk; S9: operational risk

S5: credit risk; S10: active management risk

VEV

$$= \sqrt{S_1^2 + S_2^2 + 2 \cdot \rho_{12} S_1 S_2 + S_3^2 + S_4^2 + S_5^2 + 2 \cdot \rho_{15} S_1 S_5 + 2 \cdot \rho_{25} S_2 S_5 + S_6^2 + S_7^2 + S_8^2 + S_9^2 + S_{10}^2}$$

waarbij $\rho_{12} = 0.40$ en $\rho_{15} = 0.40$ indien voor S_1 wordt uitgegaan van een rentedaling en nihil indien S_1 is gebaseerd op een rentestijging, en $\rho_{25} = 0.50$.





What is risk-free?

Ultimate Forward Rate changed in Netherlands

- Since 1-7-2013 level fixed at 4.2% (EIOPA)
- Since 15-7-2015: dynamic, starting at 3.3%
 - based on 20-year forward rates of last 10 years
- First Smoothing Point: 20 year

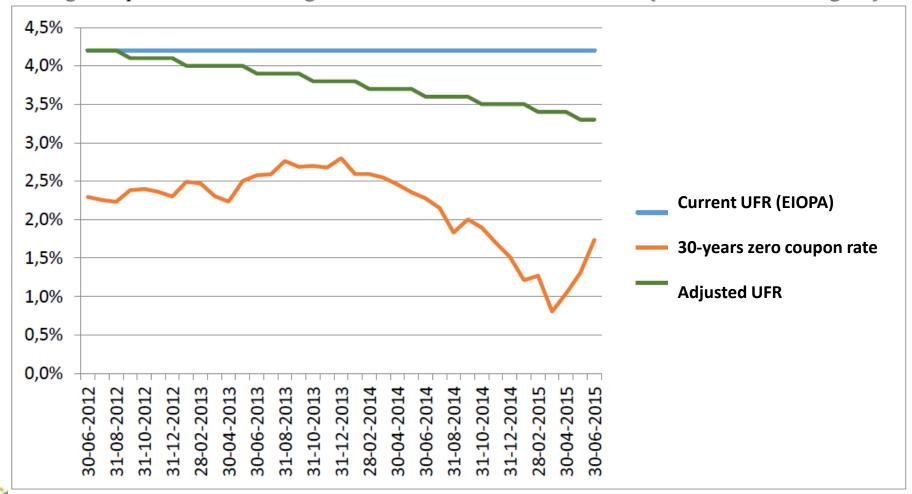
- Rate climbs gradually towards UFR
 - however UFR level will never be reached



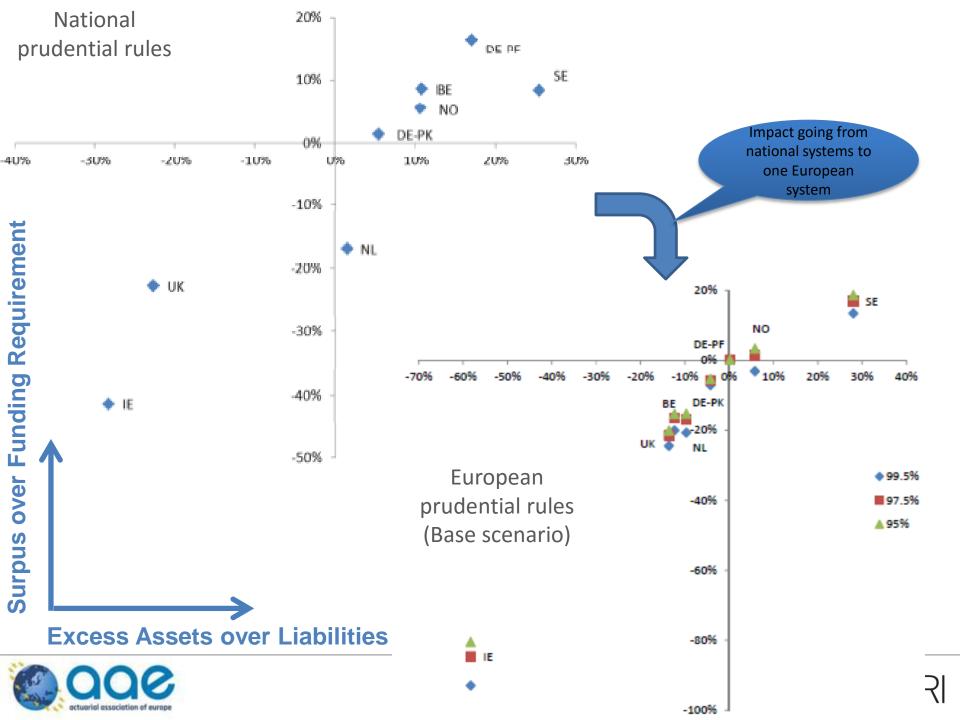


UFR adjustment as per 15 July 2015

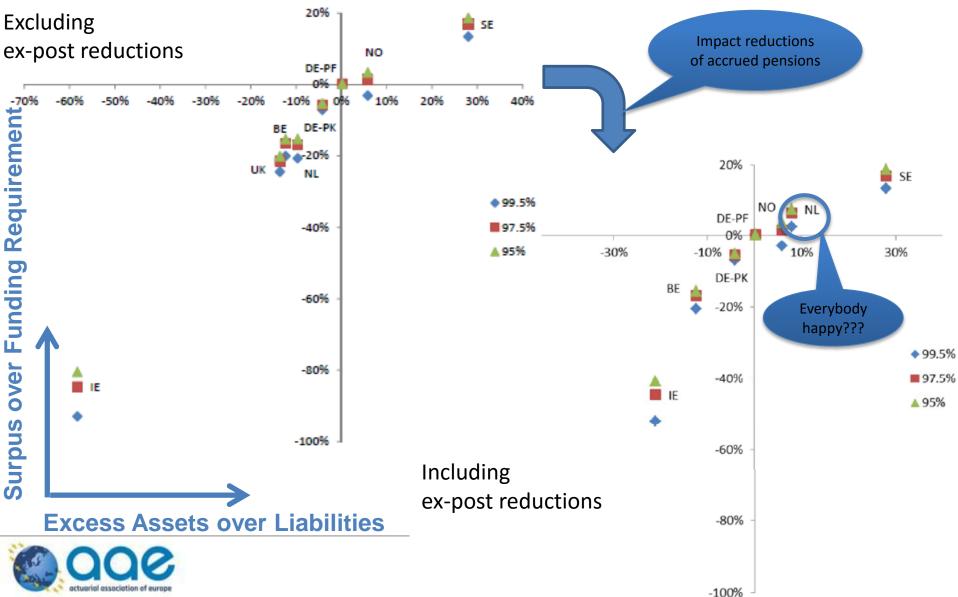
Ultimo juni 2015 was de 30-jaars zero coupon rente 1,735% en zou de aangepaste UFR 3,3% bedragen in plaats van het huidige vaste niveau van de UFR van 4,2% (zie onderstaande figuur).



Figuur 1: Vergelijking van de huidige UFR, 30-jaars zero coupon rente en aangepaste UFR sinds de introductie van de UFR



Impact ex-post benefits reductions



Dan Brown presents in his latest book 'Inferno' a quote from Dante Alighieri

THE HOTTEST PLACES IN HELL ARE RESERVED FOR THOSE WHO MAINTAIN THEIR NEUTRALITY IN TIMES OF GREAT MORAL CRISIS.

My take: we, actuaries, should speak up





Paolo Fazioli (1944)

LA STAMPA ITALIA

I pianoforti dell'ingegnere che ha sposato arte e scienza

A Sacile Paolo Fazioli costruisce gli strumenti ricercati da musicisti di mezzo mondo



Source:

La Stampa 25 January 2016
XI CONGRESSO ATTUAR

Concluding remarks

A model will always cause debate

It is never completely accurate

If we don't like the results we could

- Fight against the introduction of the model
 - And push financial issues forward (to the next generation)
- Assess whether the pension promise is sustainable
 - And address the issue together and find new ways forward

I believe that The New Retirement Story is about

"Creating a Life & Work You Love and Never want to Retire from"





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