

**Comments Template on
CP-15-011**

**Deadline
22 March 2016
23:59 CET**

**Good Practices on Communication Tools and Channels for communicating
to occupational pension scheme members**

Name of Entity:	Arbeitsgemeinschaft für betriebliche Altersversorgung e.V. (aba) (Association for occupational pensions, Germany)	
Disclosure of comments:	EIOPA will make all comments available on its website, except where respondents specifically request that their comments remain confidential. Please indicate if your comments on this CP should be treated as confidential:	Public
<p>Please follow the following instructions for filling in the template:</p> <ul style="list-style-type: none"> ⇒ Please insert the name of your entity in the box next to "Name of Entity". Please also specify the sector of your entity in brackets (Consumer Associations, Training/Eductaion bodies, Industry), as well as your Country. ⇒ Please fill in your comment in the relevant row, giving reference to the page/Good Practice/Question to stakeholder number where given. If you have <u>no comment</u> on a paragraph or a cell, keep the row <u>empty</u>. ⇒ <u>Do not change the page numbering</u> in the column "reference"; if you change numbering, your comment cannot be processed by our IT tool. ⇒ Leave the last column <u>empty</u>. ⇒ Our IT tool does not allow processing of comments which do not refer to the specific numbers below. <p>Please send the completed template, in Word format, to CP-15-011@eiopa.europa.eu. Our IT tool does not allow processing of any other formats.</p> <p>The numbering of the pages/Good Practices/Questions to stakeholders refers to the Consultation Paper on Good Practices on Communication Tools and Channels for communicating to occupational pension scheme members.</p>		

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Reference	Comment
General Comment	<p>The consultation paper gives a good overview of the different information and communication channels and tools used in the different Member States. The development of good practices and the provision of practical examples could be an opportunity for IORPs as well as for life insurance undertakings providing occupational retirement provision to check and identify potential room for improvement. We welcome that the developed good practices should neither be legally binding for IORPs nor be part of any kind of comply or explain regime. Whether a Good Practice is suitable should be decided at the Member State level and by each individual IORP.</p> <p>To derive Good Practices which will support IORPs and life insurance undertakings in their strife to deliver good occupational pensions to their members and beneficiaries, the following conditions need to be met (set out in detail below):</p> <ul style="list-style-type: none"> • EIOPA’s Good Practices can apply to IORPs and insurance undertakings only • The cost-benefit-ratio of communication strategies has to be reasonable • Handle with care: the move towards more electronic information • EIOPA’s methodology must be sound and clear <p>EIOPA’s Good Practices can apply to IORPs and insurance undertakings only</p> <p>EIOPA must limit its Good Practices to IORPs and insurance undertakings. According to Art. 1.2 (EIOPA Regulation), EIOPA has to act within the scope of the relevant Directives, that is the IORP Directive (relevant for German Pensionskassen und Pensionsfonds) and the Solvency II Directive for insurance undertakings. Sponsoring employers are not covered by these Directives.</p>

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The information requirements an employer has towards its employees are addressed in national labour law and are clearly outside the scope of EIOPA's work.

German occupational pensions are characterised by the relationship between the employer, potentially an IORP and the beneficiary. To avoid unnecessary duplication, it should be possible that the prudential information requirements of the IORPs are met by third parties, e.g. the employer.

To sum this point up, EIOPA has no legal basis to develop any Good Practices for employers; IORPs and insurance undertakings should however be granted the option to comply with their prudential information requirements by passing information via the employer to the beneficiaries.

The cost-benefit-ratio of communication strategies has to be reasonable

Pension information and communication has to create a real added value for members and beneficiaries. The related costs have to be proportional to this added value. A system in which members cannot make any choices needs to inform its members, but it does not need an interactive approach which engages members and actively triggers responses. In collective systems members and/or beneficiaries or their representatives sit in the decision making bodies; in contrast to individual insurance or savings products, the individual has no or only limited choices in collective systems. For members of such schemes a point of contact where they can ask questions if they have any is much more important than an interactive online tool. Finally, it should be considered that additional costs are often borne by the individual and therefore lead to a lower replacement rate. Based on these considerations, we welcome that cost efficiency is one of the three criteria when assessing potential good practices.

However, five out of seven Good Practices promote internet-based solutions, which could require both a large up-front investment and are of high maintenance when up and running. While internet-based solutions are likely to be the future, Section 3 of the Consultation Paper (Factual Findings) shows that at present (paper) mail is still the prevalent form of communication. Both

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financial and other factors (see below) call for a cautious approach when supplementing or replacing (paper) mail by electronic communication. For some beneficiary groups and for many pensioners, electronic communication is not the norm yet. Any Good Practice regarding a move towards more electronic information should recognise this.

Handle with care: the move towards more electronic information

The internet affection of the beneficiaries depends very much on the sector, their qualifications and their age. When introducing electronic communication it should be borne in mind that not all members and beneficiaries might be reached, and alternative channels should be used to reach those who do not have access to the internet. Based on these considerations, we welcome that accessibility is one of the three criteria when assessing potential Good Practices.

But access is not the only challenge online communication poses: there are also often issues around the protection of personal data and data security in a wider sense. We therefore doubt that it would be desirable to store all communication (which might include e.g. legal disputes) electronically.

In addition to these general issues, we have further concerns around Good Practice 3 (Employer online platform to combine information about related Human Resource matters and pensions). This Good Practice would be impossible to implement for multi-employer IORPs like for example for the independent multi-employer pension fund that serves Germany's construction industry. This industry-wide scheme has a huge, heterogeneous membership with restricted internet affection. Since 2016 more than 70,000 German construction enterprises participate in the ZVK-Bau which serves around 1.02 million members and beneficiaries. The vast majority of participating employers are small and medium sized enterprises. In Germany 84% of all construction companies have less than 10, 90% less than 20 employees. Only 0.05% have more than 100 employees. That means that the vast majority is unlikely to have an HR Department, let alone an internet platform through which they communicate with their employees. In many

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Member States small and medium-sized enterprises play an important role, but Good Practice 3 does not take into account their reality and day-to-day challenges.

EIOPA's methodology must be sound and clear

We welcome the long fact finding section in this consultation paper. However, it is not clear to us how the proposed Good Practices relate to the factual findings. If a sound and clear methodology was used, the Good Practices should be derived from the factual findings. To us it is not clear whether and if so, how, this is the case for this consultation paper. But even if the Good Practices were derived from the factual findings, it should be taken into account that a mechanism which has been shown to work in one Member State cannot just be elevated to a Good Practice example across the EU. Occupational pensions vary significantly in different Member States, and lessons learnt in one Member State might not necessarily be valid for another. To enhance the quality of the Good Practices, they should be clearly related to the factual findings and the question whether it is possible to export proven success to other countries should be addressed.

Page 4

The first paragraph rightly puts the focus of this consultation on IORPs and insurance undertakings. However, paragraph three also includes employers and other relevant entities.

As stated in the General Comments, EIOPA must limit its Good Practices to the information and communication by IORPs and insurance undertakings. According to Art. 1.2 (EIOPA Regulation), EIOPA has to act within the scope of the relevant Directives, that is the IORP Directive (relevant for German Pensionskassen und Pensionsfonds) and the Solvency II Directive for insurance undertaking. Sponsoring employers are not covered by these Directives.

The information requirements an employer has towards its employees are addressed in national labour law and are clearly outside the scope of EIOPA's work.

German occupational pensions are characterised by the relationship between the employer, potentially an IORP and the beneficiary. To avoid unnecessary duplication, it should be possible

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	that the prudential information requirements of the IORPs are met by third parties, e.g. the employer.	
Page 5		
Page 6	The third paragraph references the EIOPA paper „Report on issues leading to detriment of occupational pension scheme members and beneficiaries and potential scope of action for EIOPA“ from June 2014. We would like to point out that we are overall critical of the cited paper, because it ignored national social and labour law and cited a lot of evidence from the UK and from a large Dutch insurance provider. It is obvious that this approach will lead to a supervisory regime which is adequate for personal pension and savings products, but not for (collectively organised) occupational pensions.	
Page 7		
Page 8		
Page 9	<p>„Furthermore, where relevant, the Report covers also communication by employers and any other parties.“</p> <p>As stated in the General Comments and in response to page 4, EIOPA must limit its Good Practices to the information and communication by IORPs and insurance undertakings. According to Art. 1.2 (EIOPA Regulation), EIOPA has to act within the scope of the relevant Directives, that is the IORP Directive (relevant for German Pensionskassen und Pensionsfonds), and the Solvency II Directive for insurance undertaking. Sponsoring employers are not covered by these Directives.</p> <p>The information requirements an employer has towards its employees are addressed in national labour law and are clearly outside the scope of EIOPA’s work.</p> <p>German occupational pensions are characterised by the relationship between the employer, potentially an IORP and the beneficiary. To avoid unnecessary duplication, it should be possible that the prudential information requirements of the IORP are met by third parties, e.g. the</p>	

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	employer.	
Page 10		
Page 11		
Page 12		
Page 13	In Germany, the prudential framework for information requirements follows a rules-based approach.	
Page 14		
Page 15		
Page 16		
Page 17	In Germany (not only in UK), benefit statements may be passed to members via their employer.	
Page 18		
Page 19		
Page 20		
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Page 22		
Page 23		
Page 24		
Page 25	<p>The three chosen criteria make sense for some IORPs, but not for others. From our perspective, it depends i.a. on the following points whether they are sensible for an IORP :</p> <ul style="list-style-type: none"> - The type of pension promise – who bears the risk: for example for collective DB systems, the following criterion does not add value: « Scheme member engagement: Is a practice 	

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of using a certain communication tool/channel effective at engaging scheme members? Is it interactive? »

- Collective or individual decisions : in particular individual decisions in the pay-out phase and regarding the asset allocation are almost never possible in Germany, therefore engagement and interactive tools add much less value than they probably do in other systems.
- Who bears the cost of running the IORP?

Based on the points above, we suggest adding « Usefulness of the information » as an additional criterion.

It is also important to bear in mind that IORPs have to comply with legal information requirements – in the future we expect them to be defined especially in the IORP II Directive and substantiated by the Member States. The first duty of IORPs is to comply with the existing legal requirements, rather than finding new and innovative ways of engaging with their members.

EIOPA Good Practices should be limited to IORPs and insurance undertakings (see General Comments). If national policy-makers take them into account when designing new information and / or communication requirements, unnecessary duplication should be avoided. Therefore it should be possible that the prudential information requirements of the IORP are met by third parties, e.g. the employer. Information requirements should be sensible and it should be possible to fulfil them at a reasonable cost.

<p>Good Practice 1</p> <p>Coherent communication strategy</p>	<p>Occupational pensions are diverse across the EU, we therefore welcome that EIOPA recognises that “one size does not fit all”. In addition, however, it should be taken into account that the cost-benefit-ratio as well as the need for and benefit of interactive ways of communication depend on the promises given (DB/DC) and whether members and beneficiaries can / have to make decisions.</p> <p>Good reasons for physical mail</p> <p>As the Consultation Paper states, paper based communication is still prevalent. Most IORPs in Germany are monitoring every information document undeliverable via physical mail. In such cases, they will actively look for the new contact data of the member via requests to the national competent registration offices (Meldebehörde nach dem Bundesmeldegesetz und den korrespondierenden Ländergesetzen). We can confirm that sending information via physical mail is currently the prevailing standard communication tool. However, to inform the members and beneficiaries via electronic means is more and more becoming a standard. Therefore, in future, to use physical mail could become a fall-back option for more IORPs if a member or beneficiary does not like to be informed via electronic means or does not like to use the online account provided.</p>	
<p>Good Practice 2</p> <p>Storing of all communication in one online space</p>	<ul style="list-style-type: none"> • Cost-benefit-ratio has to be reasonable • Occupational pensions are characterized by their diversity across the EU • Even at the Member State level, challenges vary significantly: Most of the large sponsoring employers are likely to already have an online platform for their employees, but a small construction company is very unlikely to consider this. • « any point in time » : While of course an online platform can be accessed at any point in time, cost containment is likely to mean that the portal is updated in regular intervals rather than instantly when further communication has taken place. • Storing of « all » information in one online space: Does this also apply to individual information, including legal disputes? It is unlikely that the representatives of the employees in the sponsoring undertaking or the unions will agree to the online data storage. • Based on the legal backdrop at Member State level (co-decision procedures, data protection law, personal rights), it should be possible to exclude certain information from storage. 	

	<ul style="list-style-type: none"> • In the past, the introduction of online tools for members and beneficiaries was met with a large number of objections. We therefore doubt that EIOPA’s assumption that it is in the interest of all beneficiaries to store all communication in one online space is correct. The electronic provision of information should therefore be an offer to members and beneficiaries; under no circumstance should it be mandatory or the only way to provide information. 	
<p>Good Practice 3</p> <p>Employer online platform to combine information about related Human Resources matters and pensions</p>	<p>We have a number of concerns regarding Good Practice 3.</p> <ul style="list-style-type: none"> • Most importantly, EIOPA steps beyond its scope with this Good Practice: as pointed out in the General Comments, EIOPA must limit its Good Practices to the information and communication by IORPs and insurance undertakings. According to Art. 1.2 (EIOPA Regulation), EIOPA has to act within the scope of the relevant Directives, that is in Germany the IORP Directive for German Pensionskassen und Pensionsfonds, and the Solvency II Directive for insurance undertakings. Sponsoring employers are not covered by these Directives. The information requirements an employer has towards its employees are addressed in national labour law and are clearly outside the scope of EIOPA’s work. • Assuming this Good Practice was within EIOPA’s scope, it would in any case be impossible to implement for multi-employer IORPs like for example for the independent multi-employer pension fund that serves Germany’s construction industry. This industry-wide scheme has a huge, heterogeneous membership with restricted internet affection. Since 2016 more than 70.000 German construction enterprises participate in the ZVK-Bau which serves around 1.02 million members and beneficiaries. The vast majority of participating employers are small and medium sized enterprises. In Germany 84 % of all construction companies have less than 10, 90 % less than 20 employees. Only 0.05 % have more than 100 employees. That means that the vast majority is unlikely to have an HR Department, let alone an internet platform through which they communicate with their employees. In many Member States small and medium-sized enterprises play an important role, but Good practice 3 does not take into account their reality and day-to-day challenges. • But even if all involved employers would have an online platform to communicate with their employees, Good Practice 3 would still be difficult (if not impossible) to implement for multi-employer IORPs with numerous sponsoring undertakings. The connecting or 	

	<p>updating of information on the online platforms of the employers could be very time-consuming and work-intensive especially for multi-employer institutions. Where employers provide an online platform, the embedding of a link to the IORPs online platform on the online platform of the respective employer could be suitable and provides for a fast and easy connection to the information storage of the IORP.</p>	
<p>Good Practice 4</p> <p>Pension calculators</p>	<p>Good Practice 4 should be limited to plans where a pensions calculator is sensible (i.e. plans where members can change certain parameters, e.g. when they retire or the level of contributions). The Good Practice should take into account that a pension calculator will only be cost-efficient for schemes with a certain number of members.</p> <p>Most of the larger IORPs offer a pension calculator on their website, where every member can fill in the desired contributions to the scheme and execute the desired pension projections. Often members can also ask for detailed pension projections via e-mail etc.</p>	
<p>Good Practice 5</p> <p>Advanced tracking services</p>	<p>A tracking system does not exist in Germany (there is no legal framework for it), IORPs can therefore not act upon this Good Practice.</p> <p>In addition, we are not convinced that the implementation of a tracking service could create additional value for the members and beneficiaries in Germany/in all Member States. A tracking system is relatively easy to set up if the occupational pension system is highly standardised and the number of pension funds is relatively small. In Germany, however, occupational retirement provision in the private sector is voluntary. This has led to a diverse occupational pensions landscape – there are five different ways to deliver occupational pensions (Direktzusage, Unterstützungskasse, Pensionsfonds, Pensionskasse and Direktversicherung), which operate different forms of DB pension promises.</p>	
<p>Good Practice 6</p> <p>Evaluation of communication strategy effectiveness</p>	<p>In relations to Good Practice 6, we would like to point out that neither the employer nor the IORP can provide real advice on issues like tax and social insurance contributions and potentially be liable for it. Considering the regulation of tax and financial advisors, they might not even be legally allowed to provide advice.</p>	

	<p>The information can only be free of charge if it concerns material the IORP or the employer already holds. External advice has to be paid for by the employee.</p> <p>From our perspective Good Practice 6 would require an assessment e.g. by using feedback forms for members and beneficiaries. Considering the overall challenges IORPs are facing (addressing the current low interest rate environment; providing cost-efficient pensions; legal uncertainty because of the IORP Review), EIOPA seems far from reality when suggesting to hand out feedback forms to potentially thousands of members and beneficiaries. It should be sufficient if the IORP provides the required information in an overall comprehensible form (consistent with the requirements in the future IORP II Directive and its national implementation), evaluation should remain voluntary.</p>	
<p>Good Practice 7</p> <p>Multi-channel strategy</p>	<p>The implementation of a multi-channel strategy could give every member and beneficiary the opportunity to choose the adequate communication tool on an individual basis. However, the objective must be an adequate strategy which is cost-efficient. Building up a multi-channel strategy could be expensive, in particular for small IORPs.</p> <p>Good Practice 7 again refers to “employers”. As pointed out in the General Comments, EIOPA must limit its Good Practices to the information and communication by IORPs and insurance undertakings. According to Art. 1.2 (EIOPA Regulation), EIOPA has to act within the scope of the relevant Directives, that is the IORP Directive (relevant in Germany for Pensionskassen und Pensionsfonds) and the Solvency II Directive for insurance undertakings. Sponsoring employers are not covered by these Directives.</p> <p>The information requirements an employer has towards its employees are addressed in national labour law and are clearly outside the scope of EIOPA’s work.</p>	

<p>Question 1 to stakeholders</p> <p>Do you consider the above criteria i) level of scheme member engagement, ii) cost-efficiency of the communication and iii) accessibility to a wide variety of members) that were considered when choosing among possible Good Practices appropriate?</p>	<p>The proposed criteria already cover quite important points, however, we would like to propose one additional criterion, to drop an existing one and rank the new criteria by their importance:</p> <ol style="list-style-type: none"> 1. As already stated above, from our perspective an important angle is missing in the proposed criteria: the usefulness of the information. The channels and tools which are used for information and communication depend on the kind of information transmitted and the interaction needed. For example the need for interactive ways of communications depends on the promises given (DB/DC) and the option for the members and beneficiaries to choose. 2. The «level of scheme member engagement» seems to be of no special importance if the information was received and understood. The members may decide then if they want to engage directly or via their representative, usually unions or work councils. In Germany, engagement mostly takes place at the point of retirement and when changing employers. 3. From our perspective the importance of the criteria is not equal, we therefore propose to rank the criteria: The usefulness of the information should be the top priority, with cost efficiency and accessibility following. The usefulness of the information should top the list because if the information is not useful, it will never be cost-efficient and questions around accessibility are of no importance if the information provided is not useful. The first and most important question is whether the information provided is useful. We consider «cost efficiency of the communication» the second most important criterion. Communication costs form an important part of the total costs of a pension fund. They consist of direct costs for mailing (stamps, paper, and envelopes), IT costs for hardware (professional printing machines), software (mail processing programmes, interfaces to external service providers) and IT staff, call center staff answering to members' and beneficiaries' questions etc. Communication costs therefore directly affect the benefit level. Especially in a low return situation like today where safe investments sometimes deliver even negative returns any cost component has to be effective. The smaller a pension fund the bigger the issue due to the bigger proportional amount of fixed costs that has to be evenly distributed to each 	
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	<p>member and beneficiary.</p> <p>Every scheme member and beneficiary should be able to receive the information provided by the entity. For these reasons, accessibility is an important third criterion for assessing potential Good Practices. Currently, providing information by (paper) mail seems to ensure the highest level of accessibility possible, because every scheme member is in general obliged to submit his or her address via the application form and to inform the IORP if anything changes. Although some IORPs are operating a multi-channel information strategy, the communication via physical mail is considered as the prevailing/default option to get in contact with members at the moment (as was also confirmed by EIOPA in Section 3: Factual Findings).</p>	
<p>Question 2 to stakeholders</p> <p>What additional criteria should EIOPA consider and why?</p>	<p>Usefulness of the information (see Question 1; important issues are risk, individual / collective decisions; and who bears the costs) should be an additional criterion.</p> <p>In addition, the general complexity and the size of the IORP should be considered. The general complexity for example depends on the number of plans administered, the different promises given by the employer over time etc. This is particularly important if information is to be provided free of charge. While this does not necessarily need to be a criterion as the ones discussed above, it should be clear that the Good Practices take these two points into account:</p> <ul style="list-style-type: none"> • Small IORPs face almost the same fixed costs as larger ones, but have fewer members to carry them, which makes it more likely that high communication costs will lower benefits. • IORPs with a very heterogeneous membership might face higher implementation costs, because they have to introduce more complex strategies to reach all their members. 	
<p>Question 3 to stakeholders</p> <p>Do you consider the Good Practices outlined above appropriate to address the occasions and/or specific scheme members indicated? If not, please</p>	<p>As outlined above, the most important criterion when establishing Good Practices is usefulness, followed by cost-efficiency. From our perspective this has not sufficiently been taken into account when the Seven Good Practices were set up:</p> <p>Good Practice 2 (Storing of all communication in one online space) does not seem cost-efficient. In particular when seen in conjunction with Good Practice 7, which calls for a multi-channel strategy – storing all written, oral and electronic communication will be time-consuming and</p>	

<p>explain the reasons and provide further details (e.g. with regard to concrete experience made).</p>	<p>expensive. The online storage of information is further complicated because often one individual holds several entitlements with one IORP.¹</p> <p>For schemes with a large number of small employers who often do not have an online HR platform, Good Practice 3 (Employer online platform to combine information about related Human Resource matters and pensions) is even less cost-efficient: preparing information for an online platform which only a fraction of employers will use is very unlikely to be cost-efficient.</p> <p>Turning to Good Practice 4 (Pension calculators), the usefulness of pension calculators very much depends on the amount of factors that have to be considered. For DB schemes with limited future paths a pension calculator may be a benefit. However they should not require access to any personal data from an internal database of the pension institution but should be restricted to information entered manually via a website.</p> <p>Tracking services (Good Practice 5) in general lack any added value / are not very useful compared to a personal file with yearly written information. In addition, they produce significant costs for development and maintenance of personal accounts.</p> <p>Overall, we welcome that the Good Practices are neither legally binding nor part of any kind of comply or explain principle. There should be no need for any changing of approved operation plans by the entities (If it ain't broke, don't fix it).</p>	
<p>Question 4 to stakeholders</p> <p>In respect to proportionality, do you see any limitations to the applicability of the Good</p>	<p>Yes, the principle of proportionality (nature, scale and complexity) should be adequately taken into account. As we outlined in our response to Question 2, we think that the complexity and size of the IORP should be considered. In addition, the heterogeneity of its members should be taken into account: a heterogeneous membership will increase the costs of automated online information, and smaller pension funds will find it more difficult to bear extra costs. The Good Practices should recognise this by introducing a minimum level under which the Good Practices</p>	

¹ As the example of the German construction industry fund shows: In case of this industry-wide scheme members have automatically one entitlement by being an employee of a construction company because of a legally binding social contract. For this entitlement only the employer pays contribution, and it is restricted in terms of the maximum pension (88 EUR a month). Construction workers may voluntary become a member in a second scheme with completely different conditions. Employers and employees pay their individually negotiated parts of the contributions. These entitlements are managed in separate systems because their actuarial basis, processes and benefit conditions are completely different. These entitlements are managed in separate systems because their actuarial basis, processes and benefit conditions are completely different.

<p>Practices suggestions that should be taken into consideration (e.g. size of scheme in terms of number of members; single-employer or multi-employer schemes etc.)? If so, please name the Good Practice in question and provide further details.</p>	<p>do not apply (similar to the IORP Directive).</p> <p>In addition, relative small pension promises which will only play a minor role in overall retirement income do not need the same systems of information around them as occupational pensions which will make up larger chunks of retirement income. The costs related to information and communication will also be relatively larger if the occupational income is lower. Smaller entitlements do neither require yearly information nor advanced tracking services, pension calculators or online platforms / storage.</p>	
<p>Question 5 to stakeholders</p> <p>With regard to ensuring that information has been understood, what measures / practices to apply in practice? Please describe your experience.</p>	<p>Examples of measures used in German occupational pensions:</p> <ul style="list-style-type: none"> • Positive experience if the information material was discussed beforehand with the employee representatives • Number of visits to the online platform as an indicator of engagement • Reports on call volume and content by the call centre • Asking members directly about their satisfaction with the given information • If it comes to complaint procedures, these are governed by prudential law. 	
<p>Question 6 to stakeholders</p> <p>How do you check the effectiveness of communication strategies in combination with the use of particular tools and channels? Please describe your experience.</p>	<p>See our answers to questions 5.</p> <p>In addition and as stated above, most IORPs in Germany are monitoring every information document undeliverable via physical mail. In such cases, they will actively look for the new contact data of the member via requests to the national registration offices.</p>	
<p>Question 7 to stakeholders</p> <p>With regard to layering of information, do you have any experience with regard to the</p>	<p>No, we are not aware of any German IORP having experience with the layering of information: German national law (VAG) provides which information has to be given to members and beneficiaries. It does not include any reference to the layering of information. German IORPs will make sure to provide good information to their members and beneficiaries within the legal framework given. Layering information might lead to questions whether the legal requirements have been met, and all IORPs are likely to avoid this legal uncertainty by providing the required</p>	

<p>use of particular communication tools/channels?</p>	<p>information without layering it.</p>	
<p>Question 8 to stakeholders</p> <p>Would you like to suggest any other/additional Good Practice(s) on communication tools and channels? If so, please explain the reasons and provide further details (e.g. with regard to concrete experience made).</p>	<p>We have a couple of remarks in response to Question 8:</p> <ul style="list-style-type: none"> • Posters and flyers seem to work – in particular if members can take a flyer / piece of paper with them. • Town-hall-style meetings organised together with employer representatives have also been successful in the past. • Organising an information day for multipliers such as employee representatives • Provide a mailbox where all members can leave their communication with the IORP <p>➤ While internet-based solutions might be the future, traditional information channels still hold value and should not be dismissed outright.</p> <ul style="list-style-type: none"> • Members and beneficiaries very often react annoyed if they consider the information costs higher than the information value. For example if a stamp of 70 cents is needed to inform members about a rise of the pension entitlement of 1 EUR (or no rise at all) they regard this information as wasted money feeding back on their further entitlements. And – they are right! Therefore it should be best practice to weight every information against the costs of delivering them instead of working along a – legally – fixed set of regular pension information. 	
<p>Question 9 to stakeholders</p> <p>Would you like to make any other comments and/or suggestions? If so, please indicate the topic/section of the Report that the comment refers to.</p>	<p>As pointed out in the General Comments, we welcome the long fact finding stage of this consultation. However, it is not clear to us how the proposed Good Practices relate to the factual findings. If a sound and clear methodology was used, the Good Practices should be derived from the factual findings. To us it is not clear whether and if so, how, this is the case for this consultation paper. But even if the Good Practices were derived from the factual findings, it should be taken into account that a mechanism which has been shown to work in one Member State cannot just be elevated to a Good Practice example across the EU. Occupational pensions vary significantly in different Member States, and lessons learnt in one Member State might not necessarily be valid for another. To enhance the quality of the Good Practices, they should be clearly related to the factual findings and the question whether it is possible to export proven</p>	

	success to other countries should be addressed.	
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Annex I	This Annex is very UK-focused.	
Annex II		
Annex III		