

Central Statistics Office

Re: Green Paper on Pensions

Firstly may I congratulate the Dept. of Social and Family Affairs on the Green Paper on Pensions consultation document. It is well articulated, and the use of statistics, in particular the Survey on Income and Living Conditions to support the arguments made is excellent.

When developing key policy initiatives or targets it is important not only to make the best use of the available but also to ensure that opportunities to develop improved metrics or indicators are not missed. For example, our understanding of pension holdings would be greatly enhanced if analysis could be conducted on individual data rather than at scheme level. In particular, consideration should be given to further facilitating the linkages between SILC data and other administrative income records, such as individual employee and employer contributions to pensions.

On the issue of regulation, I note the focus appears to be towards provision of information to scheme members. I would suggest equal consideration should be given to the provision of good quality information to the regulator in particular but perhaps to other state agencies also. As is noted in 12.27, the effectiveness of provision of information to scheme members as a regulatory tool is debatable. This is particularly important if there is a desire to move to a risk-based supervision system, as such a system will require a significant improvement in available data to make any assessment of risk. It is also very important if the state is to ensure a sufficient level of confidence and security do exist.

I would draw your attention to the extensive data demands pertaining to pension provision under the statistical legislation under EU Regulation No. 2056/2002 which amended Council regulation No. 58/97 regarding Structural Business Statistics (see attached appendix). In addition pensions data, relating to financial accounts are also required under EU Regulation No. 2223/96. Currently Ireland cannot comply fully with these regulations as there is inadequate statistical infrastructure regarding pensions to even implement a survey of pensions. Therefore it is essential that sufficient information on pensions are provided to the regulator to maintain a comprehensive and up to date register of pensions schemes. At a minimum such a register should contain accurate information on:

- scheme type (insured or self-administered);
- Size and type of membership (active, deferred or pensioner);
- Asset value of each scheme;
- Premiums paid into each scheme in the last 12 months; and
- Benefits paid out by each scheme in the past 12 months.

In conclusion, the CSO welcomes the opportunity to contribute to this important topic. Once again I congratulate the Dept. again on their excellent document and confirm that CSO will help to realise the ambitions set out in any way we can.

Yours faithfully,
Steve MacFeely,
Director of Business Statistics

**COUNCIL REGULATION (EC, EURATOM) No 58/97
of 20 December 1996
concerning structural business statistics**

**amended by Council Regulation No 410/98, Commission Regulation No 1614/2002 and
European Parliament and Council Regulation No 2056/2002**

ANNEX 7

A DETAILED MODULE FOR STRUCTURAL STATISTICS ON PENSION FUNDS

Section 1

Aims

The aim of this Annex is to establish a common framework for the collection, compilation, transmission and evaluation of Community statistics on the structure, activity, performance and competitiveness of the pension funds sector. This module includes a detailed list of characteristics on which statistics shall be compiled in order to improve knowledge of the national, Community and international development of the pension funds sector.

Section 2

Scope

The statistics to be compiled shall relate to the domains referred to in points (i), (ii) and (iii) of Article 2 of this Regulation, and in particular to:

1. the detailed analysis of the structure, activity, performance and competitiveness of pension funds,
 2. the development and distribution of total business, patterns of pension funds members, international activities, employment, investments and liabilities.
-

Section 3

Coverage

1. The statistics are to be compiled for all activities within the scope of NACE Rev. 1 class 66.02. This class covers the activities of autonomous pension funds.
2. Some statistics are to be compiled for enterprises with non-autonomous pension funds which are carried out as ancillary activities.

Section 4

Characteristics

1. The list of characteristics and statistics set out below indicate, where relevant, the type of statistical unit for which the statistics are to be compiled. The statistics and characteristics in *italics* are also included in the common module lists of Annex 1. When characteristics are derived directly from the annual accounts, accounting years ending within a reference year shall be assimilated to the said reference year.
2. Demographic and enterprise characteristics for which yearly statistics are to be compiled (for autonomous pension funds only):

Code	Title (Structural data)	Comments
11 11 0	Number of enterprises	
11 11 8	Number of enterprises broken down by size of investments	
11 11 9	Number of enterprises broken down by size classes of members	
11 61 0	Number of pension schemes	Optional

Code	Title (Accounting data: profit and loss (income and expenditure account))	Comments
12 11 0	<i>Turnover</i>	
48 00 1	Pension contributions receivable from members	

Code	Title	Comments
48 00 2	Pension contributions receivable from employers	
48 00 3	Incoming transfers	
48 00 4	Other pension contributions	
48 00 5	Pension contributions to defined benefits schemes	
48 00 6	Pension contributions to defined contributions schemes	
48 00 7	Pension contributions to hybrid schemes	
48 01 0	Investment income (PF)	
48 01 1	Capital gains and losses	
48 02 1	Insurance claims receivable	
48 02 2	Other income (PF)	
12 12 0	<i>Production value</i>	
12 14 0	<i>Value added at basic prices</i>	Optional
12 15 0	<i>Value added at factor cost</i>	
48 03 0	Total expenditure on pensions	

48 03 1 Regular pensions payments
 48 03 2 Pension payments of lump sums
 48 03 3 Outgoing transfers
 48 04 0 Net change in technical provisions (reserves)
 48 05 0 Insurance premiums payable
 48 06 0 Total operational expenses
 13 11 0 Total purchases of goods and services
 13 31 0 Personnel costs
 15 11 0 Gross investment in tangible goods
 48 07 0 All taxes

Balance sheet data: assets

48 11 0 Land and buildings (PF)
 48 12 0 Investments in affiliated enterprises and participating interests (PF)
 48 13 0 Shares and other variable-yield securities
 48 13 1 Shares traded on a regulated market
 48 13 2 Shares traded on a regulated market specialised in SMEs
 48 13 3 Non publicly traded shares
 48 13 4 Other variable yield securities
 48 14 0 Units in undertakings for collective investment in transferable securities
 48 15 0 Debt securities and other fixed-income securities
 48 15 1 Debt securities and other fixed-income securities issued by public administrations Optional
 48 15 2 Other debt securities and other fixed income securities Optional
 48 16 0 Participation in investment pools (PF)
 48 17 0 Loans guaranteed by mortgages and other loans not covered elsewhere
 48 18 0 Other investments
 48 10 0 Total investments of pension funds
 48 10 1 Total investments invested in 'the sponsoring enterprise'

Code	Title	Comments
------	-------	----------

48 10 4	Total investments at market values	
48 20 0	Other assets	

Balance sheet data: liabilities

48 30 0	Capital and reserves	
48 40 0	Net technical provisions (PF)	
48 50 0	Other liabilities	

Data on the internal market and internationalisation

48 61 0	Geographical breakdown of turnover	
48 62 0	Shares and other variable-yield securities broken down by location	Optional
48 63 0	Total investments broken down by location	Optional
48 64 0	Total investments broken down into euro and non-euro components	

Data on employment

16 11 0	Number of persons employed	
---------	----------------------------	--

Residual data

- 48 70 0 Number of members
- 48 70 1 Number of members of defined benefits schemes
- 48 70 2 Number of members of defined contributions schemes
- 48 70 3 Number of members of hybrid schemes
- 48 70 4 Number of active members
- 48 70 5 Number of deferred members
- 48 70 6 Number of retired persons

3) Enterprise characteristics for which yearly statistics are to be compiled (for enterprises with non-autonomous pension funds only):

Code	Title	Comments
11 15 0	Number of enterprises with non-autonomous pension funds	
48 08 0	Turnover of non-autonomous pension funds	Optional

Section 5

First reference year

The first reference year for which annual statistics shall be compiled for the characteristics listed in Section 4 is the calendar year 2002.

Section 6

Production of results

1. The results for the characteristics listed in section 4 paragraph 2 are to be broken down according to the NACE Rev. 1, 4-digit level (class).
2. The results for the characteristics listed in section 4 paragraph 3 are to be broken down according to the NACE Rev. 1 section level.

Section 7

Transmission of results

The results shall be transmitted within 12 months from the end of the reference year.

Section 8

Insurance Committee

The Commission shall inform the Insurance Committee about the implementation of this module and about all such measures for adjustment to economic and technical developments concerning the collection and statistical processing of data and the processing and the transmission of results.

Section 9

Pilot studies

For the activities covered by this annex, the Commission will institute the following pilot studies to be carried out by Member States:

- the following more in-depth information on cross-border activities of pension funds:

Code	Title
11 71 0	Number of enterprises with members in other EEA countries
11 72 0	Number of enterprises with active members in other EEA countries
48 65 0	Geographical breakdown of number of members
48 65 1	Geographical breakdown of number of members of defined benefits schemes
48 65 2	Geographical breakdown of number of members of defined contributions schemes
48 65 3	Geographical breakdown of number of members of hybrid schemes
48 65 4	Geographical breakdown of number of active members
48 65 5	Geographical breakdown of number of deferred members
48 65 6	Geographical breakdown of number of retired persons
48 65 7	Geographical breakdown of number of persons receiving a derived pension
48 70 7	Number of female members

- the following additional information on non-autonomous pension funds:

Code	Title
11 15 1	Number of enterprises with non-autonomous pension funds, broken down by size classes of members
48 40 1	Net technical provisions of non-autonomous pension funds
48 72 0	Number of members of non-autonomous pension funds
48 66 1	Geographical breakdown of number of active members of non- autonomous pension funds
48 66 2	Geographical breakdown of number of deferred members of non- autonomous pension funds

- 48 66 3 Geographical breakdown of number of retired persons receiving a pension of non- autonomous pension funds
- 48 66 4 Geographical breakdown of number of persons receiving a derived pension of non- autonomous pension funds
- 48 09 0 Pension payments by non- autonomous pension funds

- information on derivatives and off-balance sheet items.

The pilot studies shall be carried out in order to assess the relevance and feasibility of obtaining data, taking into account the benefits of the availability of the data in relation to the cost of collection and the burden on business.

Section 10

Transitional period

For the purposes of this detailed module, the transition period will not exceed three years from the beginning of the first reference year for the compilation of the statistics indicated in Section 5. This transition period may be extended by a further period of up to three years in accordance with the procedure laid down in Article 13 of this Regulation.