CHAPTER 11

ANNUITIES AND RELATED ISSUES
Introduction

11.1 An annuity is a contract sold by an insurance company that provides guaranteed payments at specified intervals for the duration of the purchaser’s lifetime in exchange for an up-front cash lump sum. Upon retirement, the bulk or all of the lump sum is used by the individual to enter into a contract with an insurance company. Variations on this basic model are common but the essence of any arrangement is that the purchaser of the annuity converts his/her savings into a guaranteed income for life.

11.2 Annuity contracts are a well-established feature of the pensions landscape and are likely to remain so. Notwithstanding their advantages, there has been considerable discussion as to whether the market for annuities is operating efficiently and effectively. A perception that annuities are very costly and other factors, including the operation of the Funding Standard (FS) for defined benefit schemes, which is linked to the cost of annuities, have led to proposals for the State to play a more active role in this area. Calls have also been made to extend the availability of certain alternatives to purchasing an annuity.

11.3 This chapter considers the factors affecting the price of annuities. It also examines the role of annuities in the supplementary pension system, the advantages and disadvantages of the alternatives and the issue of ‘annuity purchase’ whereby schemes pay pensions directly from the resources of the fund. It also considers suggestions for a role for the State in the provision of annuities and ways in which the operation of the annuity market may be made more effective.

Annuities – what they are and how they operate

11.4 Pension annuities provide a secure means of converting pension savings into pension income and avoid the danger that pensioners could exhaust their pension savings in their lifetime.

11.5 The longevity and investment risks for those purchasing annuities are ‘pooled’. In essence, this means that people who live longer can expect to receive more than the capital used to purchase the annuity while the capital of those who die shortly after purchasing an annuity effectively enhances the returns for those who live longer. Annuities come in a wide range of types: they may be fixed or escalating with a fixed rate of increase or index linked and may cover single or joint life. In addition, a guaranteed period may be purchased – for example, an annuity may be guaranteed payable for a minimum period in any event i.e. whether the annuitant survives the minimum period or not. Around 90% of annuities sold in Ireland are either level or have fixed increases. The purchase of an annuity is a once-off decision. The terms of the contract are fixed at the moment of the agreement between the purchaser and the company providing the product.

11.6 The price of an annuity depends among other things on the particular type of product sought. Clearly, an annuity income which is guaranteed to rise in line with inflation will always cost more than an annuity which delivers an unchanging stream of income. The same is true of an annuity that covers two lives as opposed to a single life. Price also depends to a significant extent on bond rates and on the life expectancy of the purchaser at the time of concluding the contract. On average, women live longer. Therefore, women (and younger retirees) will always receive less by way of an income in any given period from any given volume of savings than men and older retirees. As in any market situation, there may be some degree of price variation between providers at any point in time.

11.7 Purchasers of annuities include:

(i) holders of personal pensions who do not wish, or are not eligible to take their retirement funds in cash or invest in Approved Retirement Funds (ARFs);

(ii) trustees of defined contribution (DC) schemes when scheme members retire (retiring members of defined contribution...
schemes are allowed to take a tax free lump sum of up to 1.5 times pay subject to a (current) limit of €1.29m - most opt to take the maximum lump sum; members are obliged to use the balance of their pension fund to purchase an annuity;

(iii) trustees of defined benefit (DB) schemes who do not wish to carry post-retirement life expectancy risk in relation to individual pensioners.

Is the annuity market working well?

11.8 In keeping with the Government’s aim of encouraging people to plan properly for their retirement, it is important that the annuity market serves its customers as effectively and efficiently as possible.

11.9 Under Towards 2016, the Government agreed to engage with employers and trade unions in a process to be supported by appropriate expertise, and taking account of the reports of the Pensions Board, and of the operation of the annuity market, in the context of its formulation of a comprehensive approach to future pensions policy. As part of this process, an independent study of the Irish annuity market was commissioned, to evaluate its efficiency and effectiveness. The material presented in this chapter is consistent with what were expected to be the main findings of the consultant’s report.

The role of annuities in the overall provision of pensions

11.10 Annuities play an important part in the overall system of pension provision. It is estimated that over 52,000127 people are currently in receipt of annuity-based pensions and that approximately 239,000128 people are in defined contribution occupational pension schemes leading to the purchase of an annuity contract. In addition, some 311,000129 people who have either personal pensions or PRSAs may also choose to purchase an annuity. In a report commissioned in the context of the National Pensions Review130, it was noted that total annuity premia amounted to some €230m in 2004.

11.11 Despite their significant role, annuities are not the preferred vehicle for securing a financially stable retirement for some. This may reflect the fact that the actual cost of purchasing an annuity has increased substantially over the last decade and, more recently, the availability of alternatives such as Approved Retirement Funds. There have been two significant factors behind the rising cost of annuities: increased longevity and declining interest rates.

11.11 As has already been noted, the price of an annuity depends to a significant extent on the assumed life expectancy of the purchaser. Rising life expectancy will increase the cost of securing a lifetime income. This factor alone has added around 20% to the purchase price of an annuity contract since the mid 1980s.

11.13 It is important to distinguish between the factors which have pushed up the price of annuity contracts. The longevity factor represents a long-term structural change. Improvements in life expectancy have in the past been consistently underpredicted. Further longevity-related increases in the cost of the annuity contract are widely believed to be likely. The interest rate factor is perhaps more of a cyclical phenomenon. However, while changes in long-term interest rates affect the nominal price of the annuity contract, they do not necessarily affect its real price. This is because long-term interest rates are supposed to reflect future inflation rates. To the extent that this is true, reduced annuity amounts should be offset by the fact that fixed annuities should maintain their real value for longer. However, this may not always be perceived by the purchaser of the contract.

127 Source : Annual Returns to the Financial Regulator (2005)
128 Source : Life Strategies 2006
129 Source : Life Strategies 2006
130 A report on possible State involvement in second pillar provision was commissioned from Hewitt Associates Limited as part of the National Pensions Review.
and when this is so, falling interest rates will diminish the attractions of the annuity contract.131

11.14 Increased life expectancy and the decline in bond rates have combined to create a perception that annuities have become increasingly poor value for money. Even if this perception is not perhaps well founded in reality – increased longevity means that the income stream will be enjoyed for additional years and a low-inflation environment means that the value of the income stream is not eroded as quickly by inflation as it would have been in the past – it is possible that these factors are combining to reduce the appeal of annuities.

Alternatives to annuities

11.15 In recent years, the State has facilitated the development of additional approaches to pension provision. Until 1999, all pension scheme members with an accumulated pension fund were allowed to take a tax free lump sum and were then obliged, as a condition of the tax relief they had received, to use the balance of the fund to purchase an annuity. The Finance Act 1999 removed this obligation in the case of proprietary directors, the self employed and certain others and introduced new retirement options for these groups. These options allowed those retirees to cash in their accumulated savings immediately (subject to tax as appropriate) or to invest in an Approved Retirement Fund (ARF) or an Approved Minimum Retirement Fund (AMRF).

11.16 The Finance Act 2000 extended the new retirement option to employees’ additional voluntary contribution funds. Similar options were made available to holders of PRSAs, which were introduced in 2002.

11.17 There is considerable scope for variation on the investment content of an ARF. An ARF can be invested in a variety of ways including in cash, in shares or held with a life company. It can be used to provide an income during retirement or it can be held and passed on to dependants.

11.18 These flexible options are not generally available to members of defined contribution schemes (except to proprietary directors). Such members are still obliged to use the balance of any fund to purchase an annuity. The undoubted advantages of annuities and the risks attendant on the alternatives notwithstanding, there is evidence of some demand for broadening the access to the ARF vehicle. The relevant report132 included in the National Pensions Review noted that the annuity market in Ireland has not grown in recent years and attributed this primarily to the introduction of ARFs.

11.19 In choosing between annuities and such other forms of pension provision such as ARFs, where such choice is available, factors other than price come into play. One such factor is control. Once the purchase price is handed over to the insurance company, the individual generally has no further access to his/her pension savings and none can be passed on to the individual’s estate. If given the option, it is possible that many members of defined contribution schemes would choose to take their retirement fund in the form of a cash lump sum or invest in alternatives.

11.20 However, to retain the retirement fund as a lump sum may be to overlook the many advantages for the individual which a guaranteed stream of income can provide over time. An annuity ensures an income regardless of how long the purchaser lives, thereby reducing the need for any subsequent income support from the State. Alternatives to annuitisation may involve the adoption of complex investment and withdrawal

131 Research presented in a Consultative Document – ”Modernising Annuities” – which was produced by the Department of Work and Pensions in the UK in 2002 showed that lower inflation can actually help to maintain the real value of retirement incomes. The report also showed that over the period in question (1986-2001) even though nominal annuity rates had fallen in the UK , the investment growth of pension funds had tended to more than compensate for falling annuity rates. This experience of course relates to one particular period and may not always be the reality.

132 Hewitt Associates Report on Possible State Involvement in Second Pillar Provision
strategies, taking account of matters such as life expectancy. Over time, this could become very onerous, particularly as a pensioner increases in age. There is also the possibility of outliving one’s pension assets. Pensioners may also find that their income falls – for example, if the investment performance of their fund has been poor, or if annuity rates have fallen. In such circumstances, a pensioner may find, if he/she eventually decide to buy an annuity, that it yields a lower income than if he/she had bought one sooner. Other factors include the perception of life expectancy, which can tend to be underestimated by individuals, and returns from ARFs, which may be overestimated. The alternatives may be particularly unsuited to holders of small pension funds in view of their likely inability to cope with fluctuations in income and capital deriving from investment performance.

### Annuity Purchase

11.21 Traditionally, larger defined benefit occupational pension schemes have paid pensions directly from the resources of the fund while smaller schemes purchased annuities from a life office. The reason for this was that larger schemes were better placed to take on the longevity risk - the more members there were in a scheme, the more likely it was that the longevity experience would average out. Some schemes may also have had a particular mortality experience that could be factored in when calculating the liability (for example, due to the type of work being carried out by the members).

11.22 Towards the end of the 1990’s, schemes, irrespective of their size, became more likely to pay pensions directly from the fund. This arose for a number of reasons. Firstly, when interest rates were low, annuities were perceived to be “expensive”. Schemes were also more likely to factor in that they were achieving investment returns of the order of 20% per annum and would have considered that purchasing an annuity yielding 5%-6% per annum did not make financial sense. Furthermore, there was a certain lack of clarity about how scheme liabilities should be calculated for the purposes of the Funding Standard and schemes would not necessarily have valued the liabilities by reference to the market annuity price.

11.23 Pensions Board data based on a survey undertaken in 2004, showed that out of 226 schemes surveyed, only 28 were not paying pensions directly from scheme resources. Those 28 schemes either purchased annuities from life offices or did not have any members who had reached retirement age.

11.24 However, according to industry sources, the situation may be changing somewhat as interest rates have risen. Although annuity prices have not fallen, they have stabilised. There appears to be some evidence that schemes are becoming more likely to begin purchasing annuities again, although larger schemes are always more likely to pay pensions directly.

### Future of the annuity market

11.25 While it is not possible to say with certainty, there are reasons to believe that annuities may continue to play a central role in the pensions market. An ageing population with an interest in the maintenance of pre-retirement living standards in retirement can be expected to present a strong incentive for the financial services industry to meet that demand with competitively priced products suited to consumer’s needs. Factors likely to support such growth include:

- A projected large increase in the number reaching retirement – the number reaching age 65 is projected to increase by around 100% over the next 20 years;
- An increase in the proportion of those reaching retirement who have individual pension funds;
- A steady growth in the number of older pensioners; annuities may be seen as relatively attractive to older pensioners [but penalty for delaying];
- A decline in the proportion of persons reaching 65 with only DB benefits.
The role of the State in relation to annuities

11.26 The State is already heavily involved in annuities through its regulatory role and through the generous tax concessions afforded to individuals in accumulating their retirement savings. There has been some discussion as to whether the State should seek to become more directly involved in the annuity market. This issue has arisen for a number of reasons, one of which has no direct link to annuities as such. Rather, it arises from the impact of the Funding Standard (FS) on the financial position of defined benefit schemes.

11.27 The rationale behind the FS is to ensure that a pension promise is backed by sufficient assets, which the FS tests periodically. If the pension scheme fails this test, a plan to return the scheme to a required level of funding is drawn up and submitted to the Pensions Board for approval.

11.28 In assessing the liability of the scheme in respect of accumulated pension rights, the scheme actuary is required to use the market cost of purchasing annuities to meet those liabilities.

11.29 As set out in Chapter 10, economic and financial developments and the exceptional fall in global equity markets in 2000-2002, have had an adverse impact on the value of the assets controlled by a number of defined benefit schemes in recent years. Falling asset values mean that in the event of a wind-up, scheme trustees have a reduced volume of assets available for conversion into annuities. This immediately places pressure on schemes’ ability to meet the FS. On the other side of the equation, annuity costs have risen primarily because of the longevity and interest rate trends discussed above. As the FS assesses schemes’ ability to purchase annuities, the rising cost of annuities puts further pressure on the wind-up position of the scheme. This double impact from lower asset values and increased liabilities pushed some defined benefit schemes into a situation where they would be likely to fail the FS.

11.30 Responses to this development included calls for the FS to be relaxed and suggestions that the establishment of a State Annuity Fund could help address the situation. The Pensions Board in their December 2004 report “Review of the Funding Standard” reviewed the Standard and examined possible alternatives. The Pensions Board recommended that the current Standard be continued. The Board also recommended that the introduction of a State Annuity Fund, which would be available to schemes that are wound up, be explored thoroughly because of potential beneficial effects on the FS. The Report by the Board in December 2004 contained arguments for and against the establishment of a State Annuity Fund and these are reproduced at Appendix G.

11.31 The FS is currently being reviewed again by the Pensions Board. A relevant factor will be the impact that rising bond yields and the upturn in international financial markets have had on typical asset values since the last review was undertaken. Since the beginning of 2006, bond yields have risen from about 3.7% to about 4.6% currently. This, in combination with continued strong asset returns, has begun to ease the funding position of schemes.

11.32 It is important to recognise that the FS does not determine the cost of a defined benefit scheme. The cost is a function of the benefits provided by the scheme, the investment return and the actual experience of the scheme members – salary increases, the numbers who remain until retirement, the cost of providing pensions etc. The key cost drivers are investment returns, long-term interest rates and significantly increased longevity. A change to the FS will assist defined benefit schemes only if contribution rates reduce as a result of the change. It has been estimated by the Pensions Board that the contribution rate is influenced by the FS in less than 15% of defined benefit schemes. Even in these cases, the contribution rate is likely to be determined in many instances not by reference to the FS, but by FRS17, an international accounting standard which dictates how pension costs and liabilities must be treated in the accounts of public companies.
11.33 Given the range of factors impacting on the funding liabilities of defined benefit schemes, the extent to which a State Annuity Fund could actually make a difference may be open to question.

11.34 Chapter 9 of the National Pensions Review (NPR) published in January 2006 dealt with possible state involvement in second pillar provision. As noted above, a report was also commissioned on this topic and was included as an appendix to the NPR. An issue considered in both reports was the possibility of the State becoming directly involved in the annuity market. A broad proposition explored was whether the State could, on a cost-neutral basis, provide cheaper annuities than those currently available from private sector suppliers.

11.35 Two separate proposals were put forward in this regard:
(i) the State would provide annuities to members of DB schemes in the case of involuntary wind-up; and
(ii) the State would provide annuities to holders of small pension funds.

11.36 A third and related proposal was whether the holders of small PRSAs and similar funds could enhance their State pension rather than purchase an annuity from a commercial provider.

11.37 The report concluded that the introduction of such supports was unlikely to have any significant impact on increasing pension coverage or adequacy.

11.38 Advantages and disadvantages of the two proposals at paragraph 11.35 above are considered further below.

Advantages
- a potential saving in administration costs and no requirement for profit margins;
- the State’s life expectancy assumptions would not be as expensive as those made by commercial insurers;
- future investment returns that the State could anticipate could be higher than the bond returns assumed by insurers;
- the State already has a major role in paying pensions;
- there would be no requirement for solvency margins, that is to maintain a reserve, (which commercial insurers are obliged to maintain to provide security for policyholders);
- the State would be incurring extra risk, but would not need to charge for it, as the quantum would be small in relation to the life expectancy risk already borne in regard to public service and Social Welfare pensions.

11.39 In summary, the case made that the State could provide ‘cheaper’ annuities than the private sector is based on the assumption that the State has greater investment freedom, that it would be more “realistic” in its assumptions, it would have no need to make a profit, that it is more efficient in terms of administration, or that it does not require as much capital as the private sector.

Disadvantages

11.40 If any annuity scheme were to be structured on a self-financing basis, there may be difficulties with many of the assumptions made in its favour, viz:
- there is no basis for the contention that the State’s life expectancy assumptions should be any less cautious than those of the market generally;
- annuity prices reflect low interest rates and increased longevity. They also reflect a certain attitude to risk. These issues would face any annuity provider, including the State. In order to assume higher investment returns than the private sector, the State would have to invest in a higher risk portfolio than the private sector. While such investments have historically delivered a higher return, in the long run, there can be no certainty that this will always be the case. Further, even within a long-run period where equities may be expected to outperform bonds, there may well be periods, sometimes quite protracted, where this will not be so. In recent times, there has been ample evidence of significant stock market
volatility. In the context of the pressure on the State to manage its budgets in an annual framework, it would be risky to envisage returns that could be based on a rate higher than bonds;

- the administrative costs would be significant. For instance, the State would have to make appropriate arrangements to handle annuities and would either employ a private sector contractor (who would have to have similar margins to that obtaining in that sector at present) or work through a public service body (in which case, it would be necessary to recruit expensive actuarial, financial and economic expertise);

- being operated under the auspices of the State, it would be unrealistic to assume that the Fund would not be subject to intense pressure to pay pension increases (even where they were not guaranteed under the original scheme);

- it would be difficult to contain the availability of a State Annuity to any original target group. If any such arrangement was introduced as a social protection measure, there would likely be calls for its further extension and moves to generalise such a measure. As well as assuming more risk, this would dilute the social targeting implicit in the original measure;

- a State Annuity in competition with the private sector could raise State aid issues\(^\text{113}\);

- the ability of the State to enter a private market on favourable terms may be contested by existing service providers. On the other hand, if a State Annuity Fund was established on terms which were significantly more attractive from the risk standpoint than existing providers, there is a possibility that the private sector would be incentivised to transfer their risk to the Exchequer;

finally, the State already bears much of the “longevity risk” in the economy through its role in relation to State pensions, public service pensions, healthcare and social services etc. A State Annuity Fund would increase this exposure.

11.41 A related proposal examined in the NPR was that holders of small PRSAs and similar funds could enhance their State pension rather than purchase an annuity from a commercial provider.

11.42 It was contended that the proposal could be implemented on a cost neutral basis and would be likely to provide good value in comparison to commercial annuities because:

(i) it would provide certainty of real income increase, whereas no provider currently offers an annuity fully linked to inflation or to Social Welfare pension increases; there is also a perception that index-linked annuities are very expensive;

(ii) annuities for small annual amounts are likely to be relatively poor value because of administration charges – in contrast, it is contended that the marginal cost to the State of administering the additional benefit would be effectively close to zero.

11.43 However, the concerns expressed about investment and longevity risks also apply here, albeit to a lesser extent. As with the proposals above, there would also be concerns about its legality under EU law.

11.44 If it were to be decided to establish a State Annuity Fund, the following questions would need to be addressed:

- Eligibility
- Funded
- Investment Risk

Eligibility

11.45 Since a benefit would be conferred, because the State is presumably absorbing investment risk, operational expenses, longevity risk or some combination of these, the issue arises as to the extent to which such a benefit should apply. Possible limits on eligibility could include a maximum annuity income of 30% of the average industrial wage, or a maximum

\(^{113}\) Article 87 of the EC Treaty prohibits State aids to undertakings unless the approval of the European Commission has been obtained or unless the aid in question has been exempted from the obligation to give prior notification to the Commission. The concept of State aid covers any use of State resources, including the giving of a State guarantee or a decision by the State not to take a profit from a State undertaking which a private investor would have taken.
investment (lump sum) of €200,000. In reality, it could prove difficult to operate an annuity option that was available only to a certain group or in specified circumstances. Depending on the level of implied subsidy and/or risk taking by the State, it seems inevitable that any restrictions on eligibility would be strongly tested. This potential difficulty was noted in the relevant report commissioned as part of the NPR: “It would in reality be difficult to contain a more favourable SAF annuity option to a small defined group or specified circumstances, such as the involuntary wind up of funded defined benefit schemes. If it were to spread to all potential purchasers of annuities it would eventually remove virtually all commercial annuity providers from the marketplace.”

Funded

11.46 If operated on a pay as you go basis, no ability would exist to track either how cost or risk neutral the operation of the fund would be over time. Even if notionally funded, receipts and expenditures would be basic prerequisites to establishing costs, as would estimates of the evolution and expected value of liabilities. Even though funding would not be obligatory, funding and funded status would be very important inputs in order to establish cost neutrality.

Investment Risk

11.47 Cost depends on many factors, including on the amounts involved and on eligibility. If the proposed fund were universal, in a steady state environment where the State’s offer was attractive, some 35,000 individuals per annum on average could invest lump sums (based on a labour force of 2 million with 70% participation and a 40 year working life). Assuming an average lump sum of €50,000, this would amount to annualised investment of €1.75 billion (of the same order as the National Pensions Reserve Fund), and a total eventual fund size in the €20 – 30 billion range. If the fund were invested in equities, there would be a significant probability (approximately 25%) of a loss in any one-year of operation, and a probability of 15% that such a loss would exceed €2 billion.

Conclusion

11.48 When investment and longevity risks are fully factored in, it may not be possible for the State to offer annuities at rates that are much better than those currently available from commercial insurers. It has been suggested that the State should take a different view of market and longevity risk than private providers, but it is not clear that this would be appropriate, especially given the State’s broad exposure to longevity risk within the economy.

11.49 The establishment of a State Annuity Fund was originally proposed in a comparatively narrow context to deal with situations of involuntary wind-up of defined benefit schemes or to address particular groups of clients. Calls for State annuity provision have broadened beyond this context. The arguments for the State to become directly involved in the provision of annuities and the broader implications of any intervention by the State deserve attention and critical examination. However, there is no evidence to suggest that there is any fundamental failure in the annuities market or that annuities are significantly overpriced. The difficulty of confining any particular arrangement to any original target group must also be recognised.
Annuities and Related Issues

This Chapter considers the operation of the annuity market, the factors determining the price of annuities and the role of annuities in the supplementary pension system.

Annuities provide a secure means of converting pension savings into pension income and avoid the danger that pensioners could exhaust their pension savings before dying. Despite their advantages, there has been debate as to whether the market for annuities is operating efficiently and effectively.

There are reasons to expect that demand for annuities will grow in the future, though this is highly sensitive to policy developments, particularly in relation to any extension of the option to invest in an Approved Retirement Fund (ARF). Certain groups are required to use their retirement funds to buy an annuity while others are allowed the option to convert their pension savings into an ARF. There have been calls for more flexibility in relation to the options available to those obliged to purchase an annuity.

In choosing between an ARF and an annuity, many factors need to be considered including price, charges, control and risks. Many would likely prefer to retain control over their funds by means of an ARF rather than buying an annuity. However with an ARF there is the risk of outliving one’s pension assets since life expectancy generally tends to be underestimated by individuals. Prospective returns from ARFs may also be overestimated. ARFs may be particularly unsuited to holders of small pension funds in view of their likely inability to cope with fluctuations in income and capital deriving from investment performance.

The Chapter also outlines the role of annuities in relation to defined benefit occupational pension schemes and considers suggestions that the State should become a provider of annuities in certain circumstances. It cautions that the broader implications of a 'State Annuity' deserve careful attention and critical examination and questions whether it would be appropriate in view of the State’s existing exposure to longevity risk within the economy. Finally, some questions are raised in relation to the State’s potential role in improving the functioning of the market for both providers and purchasers of annuities.

Questions for consideration

1. Do annuities offer value for money?
2. Should DC holders continue to be compelled to buy an annuity at the precise moment of retirement or should they be allowed some flexibility in timing? Should PRSA and other personal fund holders continue to be allowed to avoid annuitisation and to continue to hold their retirement funds until death?
3. Should the State be more involved in the annuity market and, if so, in what way? Is it appropriate that the State takes on the additional risk involved in the form of a State Annuity Fund?
4. What measures could be introduced to assist individuals to recognise annuity terms that they may find satisfactory?
5. How can the market for annuities be encouraged to diversify and become more competitive? Can measures be taken to encourage new entrants to enter the market?
6. In what ways can employers and trade unions be more proactive? Can more information be provided about annuities and the options available when employees are coming up to the point of retirement?

For example:
- Are there steps which could be taken to better inform customers in relation to the comparative cost of annuities?
- Should providers be obliged to inform a prospective purchaser that their annuity can be bought from a different provider?
- Should measures be introduced to encourage people to look at alternatives to fixed single life annuities?