



Council of European Employers  
of the Metal, Engineering and  
Technology-based industries



Brussels, 19 February 2013

Dear Member of the Economic and Monetary Affairs Committee,

With regard to the discussion of **an agenda for adequate, safe and sustainable pensions (2012/2234 (INI))** CEEMET, ECEG and industriAll European Trade Union share a concern regarding a suggestion **to apply Solvency II-like own-funds requirement to occupational pensions provided by employers to their employees**. If Solvency II-like own-funds requirements were adopted, it would burden the concerned companies and hinder investment and innovation. There is also a real risk it would lead to the closing of occupational pension schemes and loss of benefits for employees.

Currently, there are three different pillars of the pension system – statutory, occupational and individual pension schemes. **In a number of countries, companies or sectors widely use occupational pensions that are not based on insurance products and are very different from those: such company pension schemes are often negotiated by social partners and are not offered to clients but to employees only**. Employees are frequently trustees of such schemes. Occupational pensions are not financial products aimed at making a profit.

We fully share the general view that occupational pension schemes will be of increasing importance to secure adequate old-age provisions in all Member States. It is also necessary to secure pension claims against the risks of financial markets. However, **occupational pension schemes are usually secured through national security instruments against those risks**.

**The landscape of pension systems in Europe is highly diversified. This is due to the equally diversified national systems of social security, labour law, and the organisation of the labour markets**. Any existing rules regarding pension systems, and any possible further developments on this topic must always take into account the extremely different national systems, especially as regards occupational pension schemes, and must by no means jeopardise their possible future development and enhancement.

**As is rightly pointed out in many of the amendments made in your Committee, the increased costs that would follow from applying Solvency II like own-funds requirements to occupational pension schemes could lead to reduced company pensions or ending them altogether**.

**We also welcome many amendments rejecting the establishment of equal competition between life insurance and occupational pension systems as the latter are not financial service providers and can therefore not be compared with life insurance providers.** Occupational pensions were never meant to be sold on the open market and are only limited to employees of a certain company.

**In general, employers and trade unions of chemical and manufacturing industries welcome plans to add more transparency to European pension schemes by creating an overview of existing schemes.** We do not support, however, plans to make the schemes comparable via regulation due to the very unique national nature of the pension schemes.

Regarding the vote on the dossier, we would invite you to support the following amendments:  
12, 40, 49, 51, 53, 59, 66, 67, 72, 75, 77, 82 and 90.

And on the other hand, we would invite you to reject the following amendments:  
45, 52, 55, 70, 78, 85 and 86.

**Uwe Combüchen, Director General, CEEMET**

**Ulrich Eckelmann, General Secretary, industriAll European Trade Union**

**Andreas Ogrinz, Secretary of the Board, ECEG**

**About CEEMET, industriAll European Trade Union and ECEG:**

**CEEMET (Council of European Employers of the Metal, Engineering and Technology-Based Industries)** is the European employers' organisation representing the interests of the metal, engineering and technology-based industries. Through its national member organisations it represents 200 000 companies across Europe. The vast majority of them are SMEs, providing over 13 million jobs of direct employment.

**industriAll European Trade Union** represents 7.1 million workers across supply chains in manufacturing, mining and energy sectors on European level.

**ECEG (European Chemical Employers Group)** is the social affairs organisation of the European chemical industry, grouping national employers' federations of the sector from 24 countries. Via its national member federations ECEG represents some 10,000 companies of the chemical industry with more than 1 million employees in Europe.