

Pensions Forum

Introduction – Keith Burns

10 November 2009



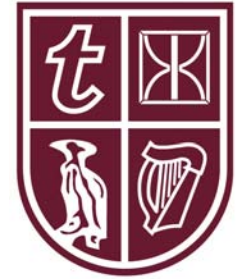
Introduction

- **Forum approach**
 - Emphasis on broader discussions/questions rather than presentations
- **Key aims of today:**
 - Provide a discussion forum on key issues facing scheme actuaries in their day to day job
 - In particular provide greater clarity around Funding Proposal and Section 50/50A process
 - Update members on issues being considered by Pensions Committee
 - Provide an opportunity for members to meet their CPD requirements
- **Extremely challenging operating environment for scheme actuaries**
 - Pensions Committee would welcome member feedback on key issues/concerns



Agenda

- Introduction and update on current issues being considered by Pensions Committee - Keith Burns
- Funding Proposals and Section 50/50A amendments - Cathal Fleming
- Pensions Board perspective on Section 50/50A amendments - Brendan Kennedy
- Results of the recent Pensions Board Funding Survey - Pat O'Sullivan
- Society of Actuaries Online Forum - Yvonne Lynch



Pensions Forum

**Current issues being considered by
Pensions Committee**

10 November 2009



Key Issues/Initiatives

- Public policy issues relating to the Standard Transfer Value (STV) Basis
- Actuarial Funding Certificates
- Conflicts of Interest
- Update of ASPs
- Pensions Insolvency Payments Scheme (PIPS)
- Other issues:
 - Social Welfare and Pensions Act 2009
 - Commission on taxation
 - Investment/Pensions Cross-Practice ERM Group

Public policy issues and the STV basis



- SAI view is that the public policy aspects of the STV basis should be 'owned' by government
- Existing governance process around amendments to the STV may also need to be examined
- Key public policy elements of STV basis are:
 - Use of best estimate assumptions
 - Inclusion of equity risk premium in pre-retirement discount rate
 - Allowance for future mortality improvements
- Have met with the Pensions Board to discuss this issue and there is acceptance in principle that the Pensions Board/DSFA should take ownership of these elements
- SAI has indicated that it is prepared to retain assumption setting role
- Awaiting a paper from the Pensions Board on their thoughts on how this delegation of roles may work in practice



Actuarial Funding Certificates

- Current format of AFCs needs to be updated to reflect changes to priorities on Wind Up introduced as part of the Social Welfare and Pensions Act 2009
- Impacts AFCs with an effective date after 29 April 2009
- Have written to the Pensions Board outlining three possible options:
 - Temporarily remove paragraph (2) of the AFC
 - Include increases under (d) of paragraph (2) but caveat AFC appropriately
 - Include level of pension increases that could be afforded based on funding position of the scheme under the same categories as was the case prior to the change in priorities
- SAI would need written confirmation from the Pensions Board if one of these options was to be adopted
- Pensions Board have undertaken to get back to the SAI asap and by end of November at the latest



Conflicts of Interest

- Critical issue for the SAI going forward
- Member feedback has been received following consultation process and ASP is being re-drafted to reflect feedback and subsequent discussions at Pensions Committee and the Conflicts sub-committee
- Proving very challenging to give the clarity required in the standard given the complexity of our client relationships and current working environment
- Revised draft will soon be available and likelihood is that it will go back to members for further consultation
- Intention is to have member meeting with case study based analysis which should give the required level of clarity to members around how the standard will work in practice



Update on ASPs

- A review of ASP PEN-3 and ASP PEN-4 is currently underway:
- Key issues for consideration under ASP PEN-4 are:
 - In current environment what is “*an appropriate government fixed interest index*”?
 - What is the maximum return that can be assumed for corporate bonds?
 - To what extent should guidance be extended to include alternative investment strategies?
 - Should approach for determining future price inflation be reviewed in current environment?
- Key issues for consideration under ASP PEN-3 are:
 - Date of calculation of assumed rate of price inflation (PI) for purpose of determining pensioner liability
 - Does paragraph 2.12, which defines realisable value, need to be strengthened/clarified? Current wording refers to due allowance being made for expenses of sale where appropriate while pooled assets should be valued at bid price.

PIPS



- Cross-Practice Working Group led by Paul O’Faherty prepared a ‘thought leadership’ piece on extending PIPS over the summer
- Purpose was to influence the debate on PIPS and the broader debate on securing pension benefits
- Paper is designed to raise a range of options for discussion along with there various pros and cons
- It examines the idea of allowing schemes to satisfy their pension benefits by utilising the higher yields currently available from Irish bonds
- This approach would:
 - Alleviate the deficits of many DB schemes;
 - Be cost neutral (or better) for the Exchequer. The funds raised will be on no worse terms than we are currently borrowing on the international money markets with a mean duration of 12 to 15 years;
 - Give the Exchequer access directly or indirectly to a very significant source (€bns) of new funding;
 - Increase transfer value payouts to active and deferred members;
 - Reduce cash calls for employers and members.

Alternative approaches



Approach 1

- **Extend the scope of PIPS to give access to ongoing schemes, and those which are winding up where the employer is not insolvent, to buy out their pensioner liabilities.**
- Price PIPS so that it is cost neutral relative to other sources of long term funding. This should make possible a discount of up to 20% to current annuity rates.
- This opportunity to be available to schemes for a limited time period and possibly with an upper limit on the total issuance.
- Consistent with recent changes in the priority rules on scheme wind ups, future pension increases would be excluded from the scope of the extended PIPS.
- This could be in conjunction with a move to de-risk schemes' residual pension obligations.

Approach 2

- **Enable commercial insurers to issue annuities based on Irish bond yields and allow ongoing schemes to use these as a basis for testing their Minimum Funding Standard solvency.**
- Issue long bonds of matching durations (12 to 15 years).
- Provisions needed to protect trustees/insurers in the event of a default

Approach 3

- **Allow ongoing schemes to use existing PIPS as a basis for testing their Minimum Funding Standard solvency,**
- Make this subject to a requirement by schemes to hold appropriate matching assets.
- Issue long bonds of matching durations (12 to 15 years).
- Provisions needed
 - To protect trustees in the event of a default
 - To access PIPS in the event of a subsequent wind up



Other issues

- Standard Transfer Value basis review
- Commission on Taxation
- Investment/Pensions Cross-Practice ERM Group

Pensions Fourm

10th November 2009



**Funding Proposals and Section 50/50A
amendments**

Cathal Fleming

Agenda



- **Funding Proposals**
 - Recap on options
 - Market information
- **Section 50/50A amendments**
 - Pensions Act amended in April 2009 and Pensions Board published guidelines in May 2009
 - Developments since May 2009
 - Pensions Board published FAQs in November 2009
 - Observations and items to discuss

Funding Proposals – recap on options



- Options to consider in preparing a Funding Proposal include
 1. Lump sum contribution
 2. Schedule of contributions over a term up to 3 years
 3. Schedule of contributions over a term greater than 3 years
 - May also involve changes to future service benefits, employee contributions and investment strategy
 - Requires approval of Pensions Board
 4. Section 50 application (more later)
- Contingent assets could be included with any of the options
- If no option is feasible, the Scheme may have to wind-up (or Board may direct the Scheme to reduce benefits)

Funding Proposals – market information



- Vast majority of schemes require Funding Proposals
- Pensions Act timeframes for submission of Funding Proposals were extended with the following result:
 - Sizeable number of schemes are due to submit Funding Proposals by end of 2009/early 2010
 - Remainder due before end of 2010
- Recent surveys indicate that
 - 70% of schemes intend to prepare Funding Proposals
 - About 15% are considering wind-up
 - Another 15% are considering section 50 applications

Section 50/50A amendments – Act & guidelines



- Pensions Act amended in April 2009 to allow schemes restructure benefits for:
 - current and former members
 - future increases to pensions currently in payment
- Pensions Board guidelines (May 2009)
 - Recommended that Trustees get legal and actuarial advice
 - Pensions Board will consent where it is satisfied that the proposed future operation of the scheme is “robust enough to make any further application unlikely”
 - Aggregate reduction in benefits in conjunction with a Funding Proposal must be sufficient that the scheme will satisfy the Minimum Funding Standard

Section 50/50A amendments - guidelines



- Pensions Board guidelines (May 2009) - continued
 - Scheme review
 - Trustees expected to undertake a comprehensive review with the objective of long-term stability and sustainability
 - Review must include benefits, investments, contributions and risk management
 - Member communication and consultation
 - Application form
 - Funding and investment policy
 - Short and long term risks and Trustees response
 - Long term cost using long term Irish gilt yields

Section 50/50A amendments - developments



- Legal issues with section 50A (and possibly section 50)
- Some changes not possible under section 50
 - Increase to Normal Retirement Age due to Preservation requirements
 - Abolition of statutory revaluation
- Scope for different interpretation of guidelines
- No application approved so far
- Informal contact with Pensions Board for a number of schemes
 - Some close to the end of the application process
 - Others in progress
- And now FAQs

Section 50/50A amendments - FAQs



- Items the Board will consider to make a further application unlikely:
 - Proposed contribution rate
 - Proposed responses to short and long term risks
 - Ability of Scheme to withstand investment losses
- **Contribution rate**
 - Calculated by reference to a “long term Irish gilt yield” (4.5%) and most recent mortality projections of Society
- **Intended approach to risk management**
 - Trustees to consider what steps to take with unmatched assets, poor investment returns, longevity and sponsor covenant

Section 50/50A amendments - FAQs



- Ability of Scheme to withstand investment losses
 - Stress test comprises a fall in equity values of 15% and a reduction in interest rates of 0.5%
 - Asset allocation for assessments will be based on proposed investment strategy 3 years after submission of application
 - When combined with a Funding proposal, only yield on a government fixed interest index will be assumed as investment return
- Other items
 - Maximum term for the Funding Proposal is up to 10 years unless there are legally enforceable remedies
 - Meeting the Pensions Board - volume of enquiries means it is not possible to grant all requests for meetings

Section 50/50A amendments - observations



- Are the FAQs coming too late for some schemes?
- Suitability of calculating the contribution rate by reference to a discount rate of 4.5%?
- No advance credit for equity holding in investment return and investment stress test at end – too onerous?
- Will members have to take larger benefit cuts as a result of these FAQs?
- Reduced benefit will have higher security but do all parties want this?
 - Appears to be a big change from existing defined benefit model where members and employers take some risk
 - Alternatives? Maybe cover pensioners with government bonds?



Items to discuss

- Views on FAQs
- Experience of working with Trustees and Employers on Section 50 application process
- Types of changes being considered for Section 50 applications
 - Pensions increases, Pensionable Salary restrictions, reduced accrual rate and increase in Normal Retirement Age
- Suggestions for the section 50 process
 - Variation when only change is removal of pension increases?
- Section 50 application v Wind up ?



SAI Online Discussion Forum

November 2009



www.actuaries.ie



$$p(y) = \exp \left\{ \frac{y_1 \theta_1 - b(\theta_1)}{a_1(\phi)} + d(\phi) \right\}$$

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Yvonne Lynch

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Joe Bloggs

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Consultations Please note: All members of SAI who have registered have access to this "Consultations" area.	1	1	by Yvonne Lynch Thu Nov 05, 2009 12:47 pm
General Discussion - Students Please note: All members of SAI who have registered have access to this "General Discussion" area.	2	2	by Yvonne Lynch Mon Feb 09, 2009 4:10 pm

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 Capital Requirements for Variable Annuities - have your say by Yvonne Lynch » Mon Oct 12, 2009 3:07 pm	0	24	by Yvonne Lynch  Mon Oct 12, 2009 3:07 pm
 Member consultation: updates to ASPs GI-2, GI-3 and LA-11 by Yvonne Lynch » Mon Oct 12, 2009 2:47 pm	0	9	by Yvonne Lynch  Mon Oct 12, 2009 2:47 pm
 "Life Office Valuation Evolution & The Actuary" by Yvonne Lynch » Tue Oct 06, 2009 5:30 pm	0	22	by Yvonne Lynch  Tue Oct 06, 2009 5:30 pm
 Proposed ASP: Conflicts of Interests - Pensions Actuaries by Yvonne Lynch » Thu Jul 30, 2009 12:02 pm	1	41	by Yvonne Lynch  Mon Sep 14, 2009 6:24 pm
 "Crash course in corporate governance" by Yvonne Lynch » Wed Sep 09, 2009 10:59 am	2	50	by James Maher  Wed Sep 09, 2009 5:44 pm
 Forum suggestion by Dermot_Marron » Tue Mar 24, 2009 10:24 am	5	101	by Dermot_Marron  Wed Apr 29, 2009 10:33 am
 How risky does the public think their investments are? by Dermot_Marron » Wed Apr 22, 2009 2:27 pm	1	68	by Brian Woods  Thu Apr 23, 2009 3:53 pm
 IAA submission to IASB Financial Crisis Advisory Group by Yvonne Lynch » Fri Apr 03, 2009 10:15 am	0	18	by Yvonne Lynch  Fri Apr 03, 2009 10:15 am
 Consultation on ASP PEN-12, ASP LA-8 and ASP PRSA-2	0	00	by Yvonne Lynch 

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Tips on using the Forum

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Tips on using the Forum

by **Yvonne Lynch** » Mon Feb 09, 2009 4:10 pm

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- Click on User Control Panel in the top left corner of the screen;
- Click on Profile on the horizontal bar about a third of the way down the screen;
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QUOTE

Yvonne Lynch

Secretariat

Posts: 204

Joined: Thu Sep 11, 2008 12:05 pm

Location: Dublin, Ireland





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Subject: nDCent Exposure - making DC safer for members

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Many thanks to Eoghan Burns, Damian Fadden and David Harney for a great paper and presentation this evening on "InDCent Exposure - making DC safer for members".

If you have any comments or questions on the paper / presentation, post them here and the authors will respond.

Regards,

Yvonne

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General Discussion - SAI Members

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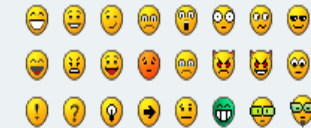
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by **Yvonne Lynch** » Tue Oct 20, 2009 10:48 pm

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Yvonne

Yvonne Lynch
Secretariat

Posts: 205
Joined: Thu Sep 11, 2008 12:05 pm
Location: Dublin, Ireland



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Topic review

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TOPIC REVIEW: INDCENT EXPOSURE - MAKING DC SAFER FOR MEMBERS

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by **Yvonne Lynch** » Tue Oct 20, 2009 10:48 pm

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Why do I need to register at all?
Why do I get logged off automatically?
How do I prevent my username appearing in the online user listings?
I've lost my password!
I registered but cannot login!
I registered in the past but cannot login any more?!
What is COPPA?
Why can't I register?
What does the "Delete all board cookies" do?

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How do I change my settings?
The times are not correct!
I changed the timezone and the time is still wrong!
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What is my rank and how do I change it?
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How do I edit or delete a post?
How do I add a signature to my post?
How do I create a poll?
Why can't I add more poll options?
How do I edit or delete a poll?
Why can't I access a forum?
Why can't I add attachments?
Why did I receive a warning?
How can I report posts to a moderator?
What is the "Save" button for in topic posting?
Why does my post need to be approved?
How do I bump my topic?

Formatting and Topic Types

What is BBCode?
Can I use HTML?
What are Smilies?
Can I post images?
What are global announcements?
What are announcements?
What are sticky topics?
What are locked topics?
What are topic icons?

User Levels and Groups

What are Administrators?
What are Moderators?
What are usergroups?
Where are the usergroups and how do I join one?
How do I become a usergroup leader?
Why do some usergroups appear in a different colour?
What is a "Default usergroup"?
What is "The team" link?

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I cannot send private messages!
I keep getting unwanted private messages!
I have received a spamming or abusive e-mail from someone on this board!

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What are my Friends and Foes lists?
How can I add / remove users to my Friends or Foes list?

Searching the Forums

How can I search a forum or forums?
Why does my search return no results?
Why does my search return a blank page!?
How do I search for members?
How can I find my own posts and topics?

Topic Subscriptions and Bookmarks

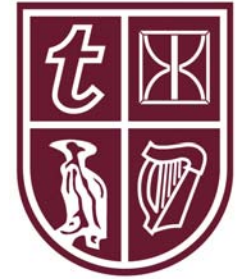
What is the difference between bookmarking and subscribing?
How do I subscribe to specific forums or topics?
How do I remove my subscriptions?

Attachments

What attachments are allowed on this board?
How do I find all my attachments?

phpBB 3 Issues

Who wrote this bulletin board?
[Why isn't X feature available?](#)
Who do I contact about abusive and/or legal matters related to this board?



SAI Online Discussion Forum

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