

(C) Main recommendations for improvements

(1) Develop a full baseline scenario and strengthen the case for a new EU level initiative. First, the report should give a better overview of the state of play in Member States as regards the adequacy, sustainability and safety of national pensions systems and their chosen reform paths. Secondly, the report should assess the effectiveness of existing EU measures, regarding both (a) governance activities (e.g. Social OMC, Pensions Forum, governance measures under the Europe 2020 Strategy and the Sustainability and Growth Pact) and (b) substantive actions (e.g. targeted support via the European Social Fund, measures facilitating transferability of pension rights or ensuring prudence of pension schemes). The report should assess, in general terms, to what extent these different measures function well and in what terms they need to be reinforced or complemented. It should also be clearer about the dynamics of the baseline scenario by indicating which relevant initiatives are already in the pipeline (e.g. several financial sector regulations). On this basis the report should make a clearer case for where the main problems lay and (given the limited competences) how the planned EU strategic approach could add value. The claim that the current EU policy orientations (including the Europe 2020 Strategy) are mostly sustainability focused, while the adequacy aspect might lack attention, needs to be much better substantiated.

(2) Clarify the scope, content and ambition of the options. In addition to the baseline, the report proposes two exclusive sets of actions in seven policy areas, one (Option IIb) being in general more ambitious than the other (Options IIa). The report should better demonstrate the extent to which the actions under the preferred Option IIa differ from those contained in a fully developed baseline scenario, in particular to what extent this difference concerns substantive rather than governance actions. It should also consider whether, depending on the policy area, certain more and less ambitious measures could be combined (e.g. soft measures on pensionable age could be accompanied by a more ambitious coordination framework). In addition, the synergies between the actions in different policy areas should be better highlighted. As regards the chosen policy instrument, the report should consider whether an option of a standard 'Communication' rather than 'White Paper' could be a relevant alternative option, given that the main goal of the initiative seems to be enhancing the synergies of the existing policy framework, rather than proposing any substantive change to it.

(3) Justify and analyse in more detail the impacts of the planned measures as regards pensionable age. The report should discuss in more detail the proposed recommendations on (a) equalising pensionable age for men and women, (b) abolishing mandatory retirement age and (c) limiting early retirement opportunities. It should explain the rationale and relevance of respective national provisions and discuss why certain Member States have already taken (some of) these measures, while others have not (e.g. only the UK has decided to abolish mandatory retirement). Against this background the report should assess to what extent the Member States are expected to follow the recommendations. The report should also consider in a more balanced and substantiated manner the impacts these measures could have. While the report outlines the positive impacts in terms of longer working lives, it should assess in more detail the possible negative impacts, such as reduced flexibility of labour markets, lower average productivity or spill-over effects on other welfare schemes. The impacts that the increased retirement age could have on employment opportunities for young people should be discussed in much more detail.

Some more technical comments have been transmitted directly to the author DG and are expected to be incorporated in the final version of the impact assessment report.

(D) Procedure and presentation

Given that the White Paper should follow up the Green Paper on Pensions, the results of the consultation (including different stakeholder views) should be much better reflected throughout the report, particularly in the sections on objectives, options and their analysis.

(E) IAB scrutiny process

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