

# Consultation on the Green Paper on Ageing

Fields marked with \* are mandatory.

## Introduction

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### **GREEN PAPER ON AGEING – Fostering solidarity and responsibility between generations**

This Commission has put demography high on the EU policy agenda. In June 2020, it presented the [report on the impact of demographic change](#) setting out the key facts of demographic change and its likely impacts. The [green paper on ageing](#) is the first outcome to this report and launches a debate on one of the defining demographic transformations in Europe - namely ageing.

Never before have so many Europeans enjoyed such long lives. This is a major achievement that is underpinned by the EU's social market economy. One of the most prominent features of ageing is that the share and the number of older people in the EU will increase. Today, 20% of the population is above 65. By 2070, it will be 30%. The share of people above 80 is expected to more than double, reaching 13% by 2070.

This demographic trend is having a significant impact on people's everyday lives and on our societies. It has implications for economic growth, fiscal sustainability, health and long-term care, social cohesion and intergenerational fairness, and it concerns every age. In addition, the pandemic's disproportionate impact on older people – in terms of hospitalisations and deaths - has highlighted some of the challenges an ageing population poses to health and social care systems. However, ageing also provides new opportunities for creating new jobs, boosting prosperity, for instance in the 'silver' and care economies, and fostering intergenerational cohesion.

This consultation enables all European citizens, Member States and relevant stakeholders to provide their views on the [green paper on ageing](#) and contribute to the debate.

## About you

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### \* Language of my contribution

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- English

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- Academic/research institution
- Business association
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- EU citizen
- Environmental organisation
- Non-EU citizen
- Non-governmental organisation (NGO)
- Public authority
- Trade union
- Other

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\* Organisation name

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European Association of Paritarian Institutions (AEIP)

\* Organisation size

- Micro (1 to 9 employees)
- Small (10 to 49 employees)
- Medium (50 to 249 employees)
- Large (250 or more)

Transparency register number

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Check if your organisation is on the [transparency register](#). It's a voluntary database for organisations seeking to influence EU decision-making.

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The following questionnaire includes all the questions contained in the [green paper on ageing](#).

You may provide your opinion in the text boxes under each question. Please feel free to either answer all the questions, or choose to answer the questions that are of most interest or concern you directly.

You can also upload your written contribution, if you so wish, by using the button available at the end of the questionnaire.

**Laying the foundations** (chapter 2 of the green paper)

1. How can healthy and active ageing policies be promoted from an early age and throughout the life span for everyone? How can children and young people be better equipped for the prospect of a longer life expectancy? What kind of support can the EU provide to the Member States?

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- Member States should create more awareness on the repercussions that ageing has on people's lives, labour markets and institutions of social protection. For example, they could organize informational initiatives with the support of schools and all those entities that provide social services at national level, including occupational social protection providers.

This awareness campaign should cover aspects related to healthcare, continuous learning as well as financial literacy. This would translate, for example, on informing individuals on the importance of consumption and nutrition aspects as well as physical activity to develop healthy habits from early stage and prevent diseases in later stages of their life. Financial literacy would be important to first ensure that individuals have access to information regarding their social protection benefits and secondly to inform them on the importance of having supplementary pension schemes, in particular earnings-related occupational pensions. For example, our Dutch member PGGM, an occupational pension provider that operates in the health and welfare sector, has developed a tool (Werkurenberekenaar) that gives employees insights in the benefits of extending their contract hours. Within a matter of minutes, thanks to this tool, people have insights in what enlarging their contract hours would yield in terms of additional income, as well as creating insights in income over the long-term such as additional pension savings. Other interesting examples come from our French member Agirc-Arrco, a complementary pension scheme which regularly organizes informative sessions to employees ("retirement days") to inform them on how to make the best of the retirement allocation and provide advice on how to achieve health at work. Another remarkable example is the provision of about 1000 traineeships that the organization offers to high school students, to increase awareness on the challenges linked to retirement in younger age-groups.

- The EU should evaluate the investments that Member States make in life-long learning and, if needed, guide them to relevant reforms through the Country Specific Recommendations of the European Semester and through the actions foreseen by the Pillar of Social Rights. Structural funds and other EU resources can help them to achieve goals related to life-long learning in line with their conditionality requirements.

2. What are the most significant obstacles to life-long learning across the life-cycle? At what stage in life could addressing those obstacles make most difference? How should this be tackled specifically in rural and remote areas?

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- In recent years, European countries and European institutions have taken steps to promote lifelong learning and have recognized its importance for the well-being and competitiveness of individuals, companies, and the society. However, after building individuals' competences during childhood and adolescence, life-long learning is no longer a clear episode on the timeline of a linear working career and its management is ambiguous and unstructured. Therefore, the legislators (at the EU and national level) should start recognizing life-long learning as an independent objective that has an intrinsic value and steering it with the guidance processes of old governance paradigms.

At national level, for example, countries should create a permanent unit (for instance within the Ministry of Education) that functions as a coordinator and assembles dispersed operators and services under a full-service principle.

Countries should also commit themselves to a lifelong learning policy that goes beyond government terms: social partners and social dialogue can be paramount for launching this policy, which requires a close co-operation between governments and the private sector. In fact, underlined in the publication "Towards lifelong learning" (Finnish Innovation Fund Sitra, 2019, Towards lifelong learning – The shared aim, funding principles and challenges. Studies 159, March 2019), political and administrative leaders need to be aware of the situational picture of lifelong learning so to manage it on the whole and avoid a top-down approach that would not be beneficial to develop the policy. This would help them in addressing questions such as who should bear the costs for securing the learning, whether the individuals entirely or the employees.

- Policy makers should guarantee that in rural and remote areas learning centres are created and expanded. Another step should be to secure the availability of broadband and internet connection in these areas, which in many EU countries is still not guaranteed.

### **Making the most of our working lives** (chapter 3 of the green paper)

### **3. What innovative policy measures to improve participation in the labour market, in particular by older workers, should be considered more closely?**

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- Policy makers should promote and further investigate alternatives retirement schemes to propose to workers when they are approaching their retirement age. For example, our Dutch member PGGM has developed a series of options to stretch the working years of its employees, while making sure that they are still physically and mentally able to cope with the workload. These options include the possibility to take a part-time pension or the so called “80-90-100 arrangement”. In the first case participants reduce their working hours but keep the same level of income by using part of their pension. This measure helps to retain qualified staff, while preventing the inability to work and early retirement. In the second case, employees work 80% of the contractual hours, they are entitled to 90% of the salary, but still have 100% of their pension accrual. Such a measure helps employees to retain a vital working life while simultaneously making additional pension savings.
- At national level, policy makers should make a better use of vocational rehabilitation services. Likewise, the EC should make use of the available tools, such as the European Semester and the EPSR, to promote human and economic resources into these services, which are currently not adequately considered. In fact, today, very little is done to support individuals who experience health issues and, as a consequence, lose their job and/or experience long absences at work that eventually compromise their return into the labour market. Vocational rehabilitation services can play a crucial role in this regard as they can help in keeping people in employment despite related limitations that might be related to health and/or ageing. Policymakers should then develop a sort of “steering ability” within social security systems, to equip them with automatic mechanisms for directing individuals who are at risk of early exit pension routes (because of disability) towards the rehabilitation services.
- Governments should also devote more resources to organize trainings to upskills older workers. This should be done in cooperation with the social partners at sectorial level, so to build on the expertise that they have within the sector and its workforce.
- Finally, an increased awareness of the retirement benefits linked to longer working life (see response n.1) would also contribute to an improved participation in the labour market.

#### 4. Is there a need for more policies and action at EU level that support senior entrepreneurship? What type of support is needed at EU level and how can we build on the successful social innovation examples of mentorship between young and older entrepreneurs?

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- At EU but also at national level there is certainly a need to better support senior entrepreneurship. This consists in acknowledging the potential that older workers have in the labour markets, setting up policies for their inclusion, while shaking up preconceptions and stereotypes about the employment of seniors. The European Commission should follow up on the Council Conclusions on the Economy of Wellbeing that the EPSCO Council adopted in October 2019 and ensure their implementation especially through the EPSR and the Semester. Social partners should also be involved, because of their deep knowledge of the labour markets trends and workers skills.  
Moreover, the EU can provide funding to Member States to incentivize the creation of employment agencies that focus their recruitment activities to older employees.

#### 5. How can EU policies help less developed regions and rural areas to manage ageing and depopulation? How can EU territories affected by the twin depopulation and ageing challenges make better use of the silver economy?

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• The depopulation phenomenon does not concern only the move from rural to urban areas, but also the relocation from a Member State to another one. This is the case for example with doctors, who move from countries with a low GDP and/or income per capita to others that have better conditions and higher GDP /income per capita. This provokes imbalances on the European level. Policy makers, including social partners, should address this issue to create better conditions and mitigate the so called “brain drain” phenomenon.

• For further reference, please see the replies we provided to questions 2 and 4.

#### **New opportunities and challenges in retirement** (chapter 4 of the green paper)

6. How could volunteering by older people and intergenerational learning be better supported, including across borders, to foster knowledge sharing and civic engagement? What role could a digital platform or other initiatives at EU level play and to whom should such initiatives be addressed? How could volunteering by young people together with and towards older people be combined into cross-generational initiatives?

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• A digital platform and information campaigns could foster knowledge sharing and civic engagement and at the same time help people to stay healthy and active. However, given the generational gap concerning the use of digital tools, policy makers should verify whether this is the most appropriate approach which could engage the elderly as well.

• Civic engagements that include the possibility of exchanges between young and old people should be promoted especially at local level. In France for example, some employees of our French member Agirc-Arrco provide intergenerational programmes in collaboration with young civil service workers, which help against isolation of the elderly.

7. Which services and enabling environment would need to be put in place or improved in order to ensure the autonomy, independence and rights of older people and enable their participation in society?

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- The autonomy and rights of older people are strongly linked with an adequate level of old age retirement benefits as well as affordable healthcare and quality long-term care: we therefore suggest consulting the replies we gave to questions 8-9-10. In addition to this, policy makers should implement policies that ensure a better transition from an active working life to the retirement age, by promoting, for example, part time activities or progressive retirement before reaching the retirement age.
- Policy makers should also develop policies that allow older people to remain in their own homes, while benefitting of assistance for adapting them to their needs. In fact, to keep the elderly safe in their houses, adaptations are often needed, for example, to provide automatic lighting for staircases and easy accessibility to the bathrooms, toilets, stairs etc. With this regard, we would like to highlight the initiative of our French member Agirc-Arrco, which puts at disposal of the elderly a network of 500 ergo therapists who evaluate the possibility of adapting the homes to the needs of these population in an efficient and affordable way.
- Policymakers, especially at municipal level, should also make sure that as many facilities, services and infrastructures as possible are accessible to older people, who often experience physical limitations. As it is only in recent years that the planning of our cities/towns take these needs into account, more adaptations, and hence investments, are needed to allow older people to continue carrying out their tasks and remain involved in their communities.

## 8. How can the EU support vulnerable older persons who are not in a position to protect their own financial and personal interests, in particular in cross-border situations?

- We need to ensure that older persons have access to an adequate level of pensions as well as good healthcare and long-term care services. By promoting occupational pensions and earnings-related pensions and enhancing the people's trust to collective institutions of 2nd pillar and 1st pillar bis ensures the individual's protection.
- In general, pensions which included in the scope of the regulation on social security systems coordination (EU 883/2004) support worker mobility at the EU internal labour markets by ensuring fair pension accrual and in the end cross-border pension benefit payments. Some MSs have introduced limited restrictions related to national minimum support benefits (also for old age) paid to those EU citizens who have used their right to move from one MS to another. Limitations to paid support benefits have their basis in legislation and ECJ has also made some rulings regarding this issue. Social security pensions are basically sole providers of minimum benefits according to each MS legislation.
- Digitalized tools can also support better living standards for older persons. Specific measures such as an electronic wallet or dematerialized checks exist in order to secure payments.
- The consumer protection units of National Supervisors make constant efforts to protect the elderly from financial fraud. In France for example, this is addressed among other institutions, by the financial supervisors (L'Autorité des marchés financiers or AMF and L'Autorité de contrôle prudentiel et de resolution or ACPR).

## 9. How can the EU support Member States' efforts to ensure more fairness in the social protection systems across generations, gender, age and income groups, ensuring that they remain fiscally sound?

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- Paritarian redistribution-based systems of social protection have shown their resilience and important role over the years. Their efficiency and transparency is evident not only as a result of their tight budgetary control but, importantly, due to their good governance and active involvement of social partners.
- By promoting role of supplementary pensions and by showing in practice how a capital-funded social security system complements the traditional pay-as-you-go setup, a substantial amount of fiscal and budgetary pressure can be taken away from public finances. In some MSs where pension adequacy can be compromised, supplementary pensions may have a larger role, but it is important to stress that this is a matter of a national decision-making processes.
- Key to balanced pension reforms is knowledge-based decision making, where all interests of different socio-economic groups and stakeholders are taken into consideration. This requires ambitious research orientation from national decision makers and in the end also rather long preparation period into achieving pension reforms. Pension policies are an integral part of Member State competencies thus the subsidiarity principle of the EU should remain a constant in this field.
- Another important aspect is the ability of decision makers, whether they are social partners or political parties, to make relevant, balanced and substantial pension reforms according to national conditions. It can be seen at the European level, that some MSs with strong corporatist structures and rather positive negotiation relationships between social partners have also managed to come up with meaningful pension reforms (including Finland, the Netherlands and Sweden).
- For Italian pension funds in particular, family members (children included) can be member of the fund, also in order to increase awareness on supplementary pension plans.

## 10. How can the risks of poverty in old age be reduced and addressed?

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- Occupational pensions and earnings-related pensions are key institutions for the provision of adequate pensions for all. Old age poverty risk can be reduced by making sure that individuals from early on make informed decisions on their retirement and that they are covered by retirement institutions. For that reason, the state and the social partners should promote this kind of collective insurance model, making sure that occupational and earning-related pension schemes are available as well as appealing at national level. Compared to individual products, collective occupational schemes combine solidarity and risk sharing with better investment opportunities at lower costs, resulting in better returns and a higher pension. Furthermore, complementary schemes of social protection enable reliable predictions on risks related to old age poverty and take anticipative actions. For example, the French first pillar bis pension scheme Agirc-Arrco, produces a detailed career analysis of its 23 million active members, thus providing a multi-year vision based on forecasts. This also opens up many opportunities in terms of counselling services to younger workers.
- The European Semester can be an important vehicle for promoting and enhancing pension adequacy through its Country Specific Recommendations and social indicators. Pension adequacy indicators should be addressed side by side with pension sustainability indicators. In that way, the European Pillar of Social Rights and its principle of 'access to social protection' can be properly implemented.
- With regard to mobile workers, the European Commission should focus on implementing further measures to facilitate access to individualized pension information and for raising awareness on individuals' future retirement income.
- Poverty reduction policies targeting old people can learn from successful national examples. For instance, in France the poverty ratio of old age persons is much below average (7% against 14% in the EU), which reflects the recent history of full careers, including women's careers.
- Adequate statutory 1st pillar pension benefits are eventually the only resource of income which can broadly alleviate old age poverty horizontally for all vulnerable socioeconomic groups.
- Working public services accompanied with accessible and affordable healthcare is a key to holistic well-being and quality of life in old age. Healthcare costs can make up a significant share of individual

## 11. How can we ensure adequate pensions for those (mainly women) who spend large periods of their working life in unremunerated work (often care provision)?

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- Gender pension gaps can be explained primarily to different conditions and experiences in the labour market, to the detriment of older women. Raising employment rates, especially of women, is key to improving pension adequacy of future pensioners. Despite the fact that MSs' employment performance of women varies significantly, there is a clear need for improvement in some MSs. In countries where female employment is still inadequate, there are often no structural interventions to help families and there is a need for family caregivers. It is thus necessary to structure a family support system to facilitate the return to work.
- Undeclared work should be addressed in a way that ensures that vulnerable workers are properly included in the social security system. In that way, employees can participate in an occupational plan and build up an adequate sum for their retirement. The establishment of the European Labour Authority (ELA) is a good initiative for enhancing cooperation between MSs regarding undeclared work. The European Commission should involve paritarian institutions that provide social protection coverage for workers in the construction sector in the operation of the ELA and that of the Platform on Undeclared Work.
- Having in mind that pensions are a national competence, Member States should reflect on recognizing the accrual of pension rights during child care periods, at least in pillar I systems.

12. What role could supplementary pensions play in ensuring adequate retirement incomes? How could they be extended throughout the EU and what would be the EU's role in this process?

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- AEIP recognizes that auto-enrolment can be a positive development in countries with low 1st bis and 2nd pillar coverage, but this should not be enforced through EU law. Each national social protection and pensions system has its own particular characteristics, formed by historical legacy and participation of stakeholders and social partners, so a 'one-fits-all' approach is not the preferred way to go forward. AEIP also believes that, in the context of the European Semester, Country Specific Recommendations focusing on occupational pensions and pension adequacy should be more prominent over the years.
- In particular with regard to the 2nd pillar, AEIP would like to stress that Institutions for Occupational Retirement Provision (IORPs) are inherently different from other financial market entities such as insurance companies or banks, and therefore should not be treated as such. Their social function as well as the triangular relationship between the employee, the employer and the IORP should be acknowledged and supported, since they hold an important social purpose. Contrary to other financial institutions, IORPs do not sell financial products and execute the pension scheme that has been designed and agreed by social partners. Nevertheless, recent regulatory developments at the EU level, such as the Sustainable Finance Disclosure Regulation and the Digital Operational Resilience Act, fail to properly take into account the particularities of IORPs. In that regard, a right implementation of the proportionality principle is lacking, thus imposing additional burdensome costs on IORPs in a non-gradual way. An ever-increasing burden for pension funds of the 2nd pillar will have detrimental effects on the retirement income of their members and beneficiaries.
- Support for financial literacy programmes to strengthen the trust of the general public in collective social protection schemes, as this gives the opportunity to citizens to take better life decisions and also contributes to the consolidation of solidarity.
- The extension of supplementary pensions goes hand in hand with the promotion of paritarian institutions and the paritarian model across the EU, which are prerequisite for inclusive and sustainable social protection.
- Overall, 3rd pillar pension products should not be emphasized in relation to the pensions of the 1st and 2nd pillar due to their inherent inequalities and lack of risk-sharing mechanisms.

### **Meeting the growing needs of an ageing population** (chapter 5 of the green paper)

## **13. How can the EU support Member States' efforts to reconcile adequate and affordable healthcare and long-term care coverage with fiscal and financial sustainability?**

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- On healthcare and long-term care the European Commission should better target its Country Specific Recommendations within the European Semester and help governments to consider the resources allocated in this branch as a valuable investment rather than a mere economic burden. Moreover, healthcare and long term care are two branches with different problems, which should also be explored separately.
- Once more, the EU should promote paritarian institutions and the paritarian model across the EU as basis for sustainable and inclusive social protection.

14. How could the EU support Member States in addressing common long-term care challenges? What objectives and measures should be pursued through an EU policy framework addressing challenges such as accessibility, quality, affordability or working conditions? What are the considerations to be made for areas with low population density?

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- An EU policy framework on long-term care LTC should build on two elements. Firstly, when considering how to develop this branch of social protection, stakeholders should shift the focus of the debate from the mere disease to the person, by taking into account not only the clinical profile but also the family, economic and environmental context. Secondly, it should encourage stakeholders to adopt an integrated approach which would build on the synergies between social and healthcare services providers, operating both in the private and public domain.
- Overall, the European Commission should dedicate more resources to increase the evidence about LTC practices within the EU. In its contribution for the EPSR, AEIP called to set up a permanent group (an institutionalized platform or a steering group) at EU level on LTC, where interested stakeholders could share views and practices on the topic. AEIP also invited the EC to support countries in developing minimum quality requirements for LTC providers, as this would increase pressure on policymakers to better monitor the provision of services in this area.
- Informal carers, who are usually the relatives, spouses and friends of the care recipient, provide 80% of LTC across the EU. This situation entails several risks, therefore AEIP suggests to launch a reflection at EU level on the role of informal carers and start exploring the possibility of reforming the social and fiscal framework in their support. Paritarian social protection schemes have started this process some years ago. For example, our French member Agirc-Arrco developed a guide (“Helping employees”) to help employees to better manage this reality. The guide provides a list of existing solutions which include financial and technical assistance, legal holidays, working time arrangements, respite solutions, sources of information, support associations, etc. Another AEIP French member, the Technical Centre for provident Institutions (CTIP) since a couple of years has put at the disposal of its employees /a set of services that range from phyco-social support to financial help. This last tool is paramount to compensate workers for the unpaid-leave that they have to take, while avoiding a further burden for the social security systems. We believe that many other examples exist across Europe, which would benefit MSs through a structured exchange of best practices and might also lead to a reform of the social and fiscal framework in their support.

15. How can older people reap the benefits of the digitalisation of mobility and health services? How can the accessibility, availability, affordability and safety of public transport options for older persons, notably in rural and remote areas, be improved?

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Technology and digital solutions have the potential to reach out to individuals who live in remote areas; however, they are not fully exploited yet. In many cases this is due to the fact that older persons do not possess neither the health literacy nor the digital skills to access these services. Local municipalities should provide learning courses, perhaps in collaboration with the general practitioners and the local health units to develop these skills and encourage old people to use them.

16. Are we sufficiently aware of the causes of and impacts of loneliness in our policy making? Which steps could be taken to help prevent loneliness and social isolation among older people? Which support can the EU give?

*2500 character(s) maximum*

Whereas this question goes beyond the business of our organization, we would suggest exploring the concept of cohousing, meaning living arrangements that combine private living quarters with common activity areas. The EU could facilitate the exchange of best practices among EU countries. Another concept that should be further explored is that of multigenerational living.

17. Which role can multigenerational living and housing play in urban and rural planning in addressing the challenges of an ageing population? How could it be better harnessed?

*2500 character(s) maximum*

Multigenerational living is a powerful tool to combat loneliness and weariness of life. In some countries such as France, Germany, Belgium and The Netherlands, these realities start to exist. Policy-makers should investigate more these concepts through projects, to verify the feasibility of putting this in practice in other European countries.

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