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## Presentation to the Pension Commission

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Department of Housing, Planning,  
Community and Local Government



# **Presentation to the Pension Commission — Age Action**

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## Presentation to the Pension Commission — Age Action

### Introduction and Summary

The goal of pension policy must be to ensure that everyone has a secure and sufficient retirement income, so that they can grow older with dignity while continuing to be socially included and active in their communities.

- Ireland's population has a relatively young age profile.<sup>1</sup> There is still a real opportunity to take the necessary steps across the whole of government to change policies so that everyone can have security and adequate income in retirement.
- The debate about security in retirement has sometimes been wrongly framed as just a mathematical problem of managing the cost of the state pension. But behind the statistics are the people whose lives have been badly affected by recent reforms and who are still anxious about their financial security in retirement.
- Even with the state pension, more than one in ten older people (10.5%) is at risk of poverty, and more than one in every nine (11.2%) experiences material deprivation. Three-quarters of older people (75%) rely on the state pension as their main or sole source of income. Two in every five workers (40%) aged 20-69 lack any occupational pension coverage.
- Mandatory retirement clauses in private contracts still require many people to retire at 65, even though the state pension will not be available to them for another year. Age discrimination in the labour market is also still a major concern, with over 90% of workers over 55 believing age is an issue when seeking work.
- The incidence of disability and limiting impairments increase significantly as people grow older. As such, there is still a real physiological basis for retirement. This particular affects manual workers, but even sedentary work, such as deskwork, has been shown to be harmful to people's long-term health.
- The COVID-19 pandemic provides a case study in how older people are more vulnerable to a shock to their incomes.
- Not everyone will reach average life expectancy. Sadly, a large number of people will not survive long enough to access the state pension. According to World Bank data, one in every nine men and one in 13 women in Ireland will die before age 65. Every additional year added to the state pension age will deny any retirement at the end of their lives to additional thousands of people and will take away a significant proportion of retirement for others.

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<sup>1</sup> 14.5% of people are over 65, compared to the EU average of 20.5%.

<https://data.worldbank.org/indicator/SP.POP.65UP.TO.ZS>

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- Further research is needed to index current and future pension rates, which would facilitate planning, provide greater peace of mind to recipients, and crucially it would take a lot of the politics out of the budget process as far as the state pension is concerned.
- Ireland's current pension age of 66 is already higher than 27 developed countries with larger proportions of older people in their populations than Ireland. Many countries pay state pensions to a greater proportion of older people than in Ireland, at lower retirement ages, and have done so for generations despite predictions that it was unsustainable.
- There is a massive gap between the experience of men and women in terms of their retirement income. More action is needed to ensure gender equality in retirement.
- Ireland's current pension age of 66 is already higher than 27 developed countries with larger proportions of older people in their populations than Ireland. Many countries pay state pensions to a greater proportion of older people than in Ireland, at lower retirement ages, and have done so for generations despite predictions that it was unsustainable.
- Ireland's current pension age of 66 is already higher than 27 developed countries with larger proportions of older people in their populations than Ireland. Many countries pay state pensions to a greater proportion of older people than in Ireland, at lower retirement ages, and have done so for generations despite predictions that it was unsustainable.
- A holistic, all-of-government approach is essential, not least to deal with continued poverty in old age, major costs for older people (housing, healthcare, disability) and to ensure gender equality and equality between different occupational groups. Issues like mandatory retirement clauses and the availability of pension schemes at work need to be addressed. The cost of private pension tax breaks and options around raising revenue and social insurance also provide alternative options to ensuring a sustainable pension system. To date, there is a lack of evidence that the hardship that would be caused by a higher pension age is justified in terms of the savings, compared to the wide range of other fiscal and wider public policy options available.
- Ultimately, while any government has to provide leadership, eligibility for the state pension is a democratic decision. A recent opinion poll reports that fewer than a quarter (23%) believe it should rise to 67 and two-thirds (66%) of all voters support retaining the pension age at 66; including across all ages, socio-economic groups, regions, voting intentions and between men and women.<sup>2</sup>

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<sup>2</sup> <https://www.redcresearch.ie/wp-content/uploads/2021/03/Business-Post-RED-C-Opinion-Poll-Report-Feb-2021.pdf>

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### **Age Action**

Age Action is the leading advocacy organisation on ageing and older people in Ireland. Our mission is to achieve fundamental change in the lives of all older people by eliminating age discrimination, promoting positive ageing and securing their right to comprehensive and high-quality services.

Age Action supports and advocates for equality and human rights for all older people. Everything we do is based on a recognition of the diversity of identity and situation among older people and a concern for equality for all older people. In addressing ageing, our work includes a concern to influence perspectives on and responses to ageing. This pursuit of equality and human rights is underpinned by our work to promote ageing in place, life-long learning, and health and wellbeing for older people, empowering them to live as active citizens.

### **Terms of Reference of the Pension Commission**

Based on the published Terms of Reference of the Pension Commission,<sup>3</sup> Age Action's presentation focuses in on the following topics:

- The view of older people (presented by Age Action as a representative/advocacy organisation)
- Current state pension arrangements
- Earnings and the labour market
- The position of people who have provided long-term care
- Retirement ages specific in private sector contracts
- Demographic change
- The situation in other countries
- Proposals on options for the government to consider in terms of pension age, calculation methods and payment rates

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<sup>3</sup> <https://www.gov.ie/en/publication/02859-about-the-pensions-commission/>

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### Why the State Pension is So Important

The state pension system should be fair, integrated, evidence-informed and sustainable as well as being gender and poverty proofed.

As part of the social contract that developed in democratic countries following the Second World War, people have a legitimate expectation that they can look forward to a comfortable and secure retirement for a number of years after their working lives. The report on the Developmental Welfare State published by the National Economic and Social Council (NESC) provides insight into why older age should be a separate category that is distinct from working age adults:

“Older people receive priority because of their growing numbers and the realisation that, in old age, there is effectively nothing individuals can any longer do if their income from all sources is insufficient to keep them from poverty.”<sup>4</sup>

The state pension is so important in Ireland because:

- Without the state pension, the vast majority of older people would be living in deep poverty and deprivation.
- Even with the state pension, more than one in ten older people (10.5%) is at risk of poverty, and more than one in every nine (11.2%) experiences material deprivation. One in every 43 people aged 65 or older (2.3%) lives in consistent poverty. As such, the adequacy of the state pension is still a concern for many older people.<sup>5</sup>
- Older people’s situation (as measured by each of the above three poverty statistics) is worse today than in 2009, when risk of poverty was 9.6%, deprivation was at 9.5% and the experience of consistent poverty was 1.1%.
- Three-quarters of older people (75%) rely on the state pension as their main or sole source of income, compared to an average of 55% of people across countries in the OECD. Ireland is one of just two OECD countries that does not yet have a public system through which people can save for top-up or supplementary pensions.<sup>6</sup>

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<sup>4</sup> <https://www.nesc.ie/publications/the-developmental-welfare-state/>

<sup>5</sup> <https://data.cso.ie/table/SIA52>

<sup>6</sup> OECD *Pensions at a Glance 2019*. <https://www.oecd.org/publications/oecd-pensions-at-a-glance-19991363.htm>

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- Two in every five workers (40%) aged 20-69 lack any occupational pension coverage.<sup>7</sup> In most sectors of the economy, a majority of employers do not offer a company pension scheme.
- The profile of the labour force is also changing over time. In Census 2016, more than a fifth of workers (21.5%) aged 45 to 64 were in skilled, semi-skilled or unskilled manual work, compared to 17.8% of those aged 20 to 44. There are more than three times as many farmers in the older age cohort (4.6% aged 45-64 versus 1.2% among 20-44 year olds).<sup>8</sup> Lower paid workers of any age are vulnerable to being unable to save for retirement beyond the state pension, but older workers on low incomes are particularly vulnerable to changes which mean they need to pay for extra social insurance credits to secure a full state pension on retirement.
- Those who have worked in manual jobs are also much more likely to acquire physical impairments or disabilities from their work, which leaves them vulnerable to being unable to work in their fifties or early sixties. This can leave them on a low fixed income for years before access to the state pension. And it can also leave them short of the social insurance credits they need to secure a full pension, despite the fact that many manual workers now in their fifties may have begun work in their teens.
- Unlike some other countries, most Irish people do not benefit from intergenerational wealth passed down through families to provide a basis for a supplementary income. People are more reliant on what they have saved during their lifetimes. Additionally, most household wealth in Ireland is in the form of property, especially the family home, which does not typically provide older people with a supplementary income.

## Why the Pension Age Matters

The pension age matters because:

- Many people have planned their lives on the basis of a known retirement age that has been thrown into doubt, which means that they entered the system under one set of rules but are facing the “goalposts” being moved just before they reach them, which is unfair and is a frequent cause of stress for older people.
- The Pension Commission is also looking at how mandatory retirement clauses in private sector contracts may put more pressure on the public finances around the state pension or pre-pension welfare payments. The Public Service Superannuation (Age of Retirement) Act 2018 changed the compulsory retirement age for public servants from 65 to 70. However, mandatory retirement

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<sup>7</sup> <https://www.cso.ie/en/releasesandpublications/ep/p-pens/pensioncoverage2019/>

<sup>8</sup> <https://data.cso.ie/table/E9014>

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clauses in private contracts still require many people to retire at 65, even though the state pension will not be available to them for another year. An amendment is needed to the Employment Equality Act to make it illegal to set a mandatory retirement age lower than the state pension age.

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*“There was no objective reason for my retirement. I was still rated fit for purpose by the Medical Council ... The forced retirement of experienced, able and willing workers is commonplace and represents an enormous waste of human resources.”*  
– Dr E. Shanahan

*“The frustration of losing my job for no other reason than because I had turned 65 years of age was exacerbated by the financial hardship ... I was trying to pay a mortgage to the bank and a loan to the credit union at the same time. It was very difficult to keep going.”*  
–A. Gallagher

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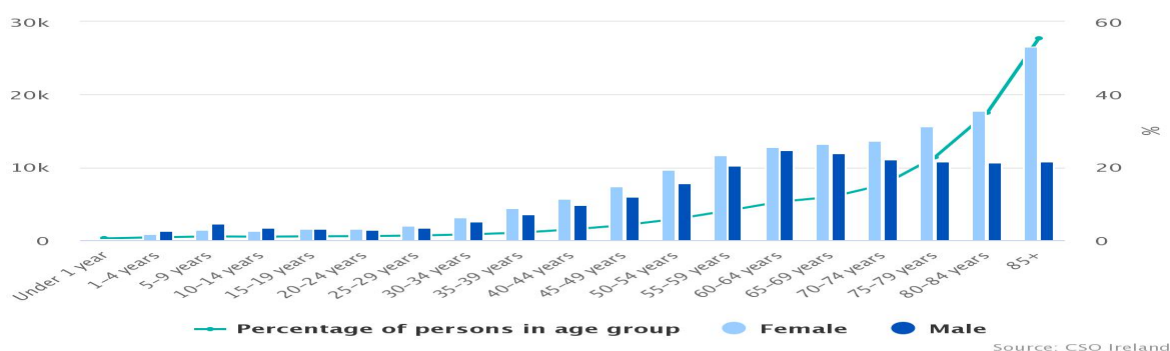
- The goal of removing mandatory retirement clauses should not be represented as based on a desire for a higher pension age. It is a separate issue that some people can and wish to work for longer, for a multitude of reasons. However, the majority of people (as shown in surveys) wants the state pension age to remain at 66.
- The introduction of a new Benefit Payment for 65 Year Olds is welcome to the extent that it alleviates the stress and unfairness felt by many older people who were forced to sign on as jobseekers for a year. However, the rate of the new payment is inadequate. The rate should be raised to the same level as the Contributory State Pension and some or all of the secondary payments (such as Fuel Allowance) should also be extended to people at this age level for as long as mandatory retirement continues to force them to retire before the regular state pension is available to them.
- The incidence of disability and limiting impairments increase significantly as people grow older. As shown in Figure 1, at least 20% of men and women in Ireland aged 60 or older have a physical difficulty that limits their activities, including a growing incidence of sensory disabilities (i.e. sight loss or hearing loss). As such, there is still a real physiological basis for retirement. This particular affects manual workers, but even sedentary work, such as deskwork, has been shown to be harmful to people’s long-term health.



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- By age 75, the incidence of substantial physical limitations affects nearly half of all people (49.5%).<sup>9</sup> There is also a higher prevalence of long-term illness among the population of older people than among the general population, including cancer, heart and lung conditions and cognitive/neurological illness such as dementia.

Figure 1. Men and women with a difficulty that substantially limits their physical activities<sup>10</sup>



- It is not only unfair to force people to continue working who are experiencing significant disabilities and illnesses, which will exacerbate these problems, but it is also counter-productive as whatever savings may be achieved by delaying the state pension are likely to be lost through higher public spending on health and social care.
- It would be a mistake to assume that rising average life expectancy means that everyone will live to the average age. Sadly, a large number of people will not survive long enough to access the state pension. According to World Bank data, one in every nine men and one in 13 women in Ireland will die before age 65.<sup>11</sup> Also not everyone who retires will reach average life expectancy. Every additional year added to the state pension age will deny any retirement at the end of their lives to additional thousands of people and will take away a significant proportion of retirement for others.
- Ultimately, while any government has to provide leadership in the area of pension sustainability, issues such as eligibility age for the state pension are democratic decisions. A recent opinion poll reports that fewer than a quarter (23%) believe it should rise to 67 and two-thirds (66%) of all voters support retaining the pension age at 66. This finding is consistent across all ages, socio-economic groups, regions, voting intentions and between men and women.<sup>12</sup>

<sup>9</sup> <https://www.cso.ie/en/releasesandpublications/ep/p-cp9hdc/p8hdc/p9d/>

<sup>10</sup> Data from Census 2016; CSO <https://www.cso.ie/en/releasesandpublications/ep/p-cp9hdc/p8hdc/p9tod/>

<sup>11</sup> <https://data.worldbank.org/indicator/SP.DYN.TO65.MA.ZS> and <https://data.worldbank.org/indicator/SP.DYN.TO65.FE.ZS>

<sup>12</sup> <https://www.redcresearch.ie/wp-content/uploads/2021/03/Business-Post-RED-C-Opinion-Poll-Report-Feb-2021.pdf>

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### COVID-19 and Older People's Incomes

The COVID-19 pandemic provides a case study in how older people are more vulnerable to a shock to their incomes.

COVID-19 disproportionately impacted older people, with people aged over 65 accounting for 25% of all COVID-19 cases, 54% of all hospitalised cases, and 93% of all COVID-19 related deaths. Many older people lost their jobs or were unable to work during COVID: 14% of those over-65 saw their employment affected. While eligible according to normal criteria for the Temporary Wage Subsidy, older people who had lost their jobs during the pandemic were prohibited from availing of the Pandemic Unemployment Payment. Of concern, some 70% of people on the State pension did not qualify for the welcome extra weeks of Fuel Allowance provided during COVID-19.

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*"I live alone in a semi-rural area and was able to do all for myself but now I must pay...for everything. Can't shop, can't select bargain offers, can't avail of specials and find that my shoppers buy dearest items" –respondent to Age Action survey*

*"My utility bill having been a lot higher as I am home alone all day every day now. My food bills are also a lot higher as my shopping is been doing locally and not in the cheaper supermarkets...I really need some assistance during these times. I am using my phone a lot to stay in touch." –respondent to Age Action survey*

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### The Rate of the State Pension

Ireland is highly unusual in setting the rate of the state pension in annual budgets without reference to a formula or benchmarks linked to the cost of living.

- Many people's worries about the cost of living are made worse each year by the uncertainty of whether the budget will deliver any increase to the state pension and what changes might be made to either eligibility or the level of support provided by secondary payments such as the Fuel Allowance.
- Age Action strongly advocates for the indexing of the state pension against objective benchmarks that measure the real cost of living experienced by older people. Research is needed similar to what is being done about the costs associated with disability. Existing measurements like the Minimum Essential

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Standard of Living (MESL) makes a useful contribution,<sup>13</sup> but the MESL is limited for calculating adequacy of income in old age as it assumes home ownership and good health, neither of which may be true for many older people. Further research to index current and future pension rates would facilitate planning, provide greater peace of mind to recipients, and crucially it would take a lot of the politics out of the budget process as far as the state pension is concerned.

- In the Roadmap for Pension Reform 2018-2023, the Government committed to work towards a benchmark for pension rates. It also committed to introduce a “triple lock” on pension rates, which guarantees that the basic state pension will rise each year by a minimum of whichever is the largest between 2.5%, the inflation rate and average earnings growth. Both of these measures should be implemented as a matter of urgency.
- There is a massive gap between the experience of men and women in terms of their retirement income. In 2010, the average pension income of women was only two-thirds the income of men (at €280 compared to €433). Fewer than 3 in 10 retired women (28%) receive a private or occupational pension compared to more than half of all men (55%).<sup>14</sup> There remains a substantial pension injustice for women, in particular, who have spent a large proportion of their working age lives involved in care for dependent relatives. This work has saved the state immeasurable sums of money in terms of social care services, yet care-givers have been penalised by the loss of pension income in retirement. While some steps have been taken to rectify this issue, it remains a significant concern for many women in particular. More action is needed to ensure gender equality in retirement.
- There are new challenges to the adequacy of the state pension, for example in relation to housing costs. A greater proportion of people is likely to be still repaying a mortgage in their 60s and 70s in future years and a larger proportion are likely to be renting from the private sector. In both cases, not only do housing costs represent a greater outgoing than experienced by home owners, but mortgages and rents are more vulnerable to annual increases at rates beyond any increase in the state pension.
- More research is needed on a range of issues, especially the detailed cost of living for older people, including additional costs associated with ageing. This kind of research is essential to any sustainable pension policy that is to be evidence-informed.

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<sup>13</sup> <https://www.budgeting.ie>

<sup>14</sup> <https://www.esri.ie/publications/gender-pensions-and-income-in-retirement>

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### Whole of Government Approach

Achieving the goal of a secure, sufficient retirement income for all can only be achieved on a whole-of-government basis, with policy change needed in many departments and agencies.

- It is implausible that simply changing the pension age or any other characteristic of the state pension system will be sufficient to achieve the goal of a secure and sufficient retirement income for all. On the contrary, such changes risk being counter-productive if taken in isolation.
- For example, the initial Total Contributions Approach (TCA) policy had to be revised, which caused unnecessary stress and confusion among older people, many of whom are still uncertain of where the changes leave their future retirement income. The abolition of the Transition Pension while mandatory retirement clauses were still forcing 65-year olds to retire left people forced to register as jobseekers on a much reduced income, which caused indignity and stress among many of those who were affected.
- As an example of the other issues to be addressed, a recent report shows that age discrimination in the labour market is still a major concern, with over 90% of workers over 55 believing that age is an issue when seeking employment.<sup>15</sup> Age discrimination, including in relation to mandatory retirement clauses, has been raised by the Human Rights and Equality Commission as a major concern.<sup>16</sup> The Future Skills Strategy, for example, should take greater account of the issue of age discrimination in the labour market. A higher state pension age is based on the assumption that older people can continue to work. Aside from the issue of mandatory retirement clauses, the lived experience of older people is that there is a great deal of age discrimination in the labour market when it comes to seeking working in your late fifties, let alone your mid-sixties.
- Before the COVID-19 pandemic, a third (32%) of those aged 55-64 at work were involuntary working part-time, and three-quarters (75%) of those aged 55-64 who were unemployed were long-term unemployed (i.e. unemployed for more than one year). Such age discrimination and barriers to employment should of course be removed, but it would be wrong to make changes to the pension age in the meantime on the assumption that such barriers do not currently exist or can be easily overcome.
- Social changes such as divorce and remarriage have also changed the characteristics of households as people approach the pension age. This has

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<sup>15</sup> <https://www.irishtimes.com/business/work/age-discrimination-alive-and-well-in-irish-workplaces-1.4532213>

<sup>16</sup> <https://www.ihrec.ie>

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major implications for income adequacy at household level, as well as for housing, care and other issues.

- Pension policy and related policies have been characterised by anomalies in recent years, which has caused many people in their fifties and sixties to be uncertain and anxious about their future. For some of them, sudden changes to policy have not given them enough time to adjust by making up pension contributions.
- A holistic approach must be taken across all government departments to the issue of providing security and sufficiency in retirement, as issues to do with employment, housing, healthcare and other policies all help provide the context in which people can retire in security, alongside the income policies affected by the Department of Social Protection and Department of Finance. This holistic approach would be in line with the Public Sector Equality and Human Rights Duty, which requires all public bodies “to promote equality, prevent discrimination and protect the human rights of their employees, customers, service users, and everyone affected by their policies and plans. This is a legal obligation and is contained in Section 42 of the Irish Human Rights and Equality Act 2014.”<sup>17</sup>
- Unless care is taken to balance a wide range of public policies, there is a serious risk that reforms to the state pension will reinforce existing inequalities in society and worsen the situation of those who are already facing cumulative disadvantages. Pension reform must avoid compounding disadvantage and economic inequality.

## The Economics of the State Pension

The debate about pension sustainability has been framed by some analysts as a question of whether today’s higher life expectancy means that the state pension is simply unaffordable. This negative framing of the issue is not helpful. While there is no doubt that careful planning is needed to ensure a sustainable, sufficient pension for all people in retirement, some important facts need to be reiterated in this debate:

- Many countries pay state pensions to a greater proportion of older people than in Ireland, at lower retirement ages, and have done so for generations despite predictions that it was unsustainable. For example, despite Japan’s large proportion of older people (28% of the population), the Japanese economy still produces economic output (GDP per capita) that is 15% higher than in the EU.<sup>18</sup>
- At 14.5%, the proportion of older people (aged 65+) in Ireland is among the lowest among the world’s developed economies (see Table 1 below).

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<sup>17</sup> <https://www.gov.ie/en/organisation-information/59bac-public-sector-equality-and-human-rights-duty/>

<sup>18</sup> <https://data.worldbank.org/indicator/NY.GDP.PCAP.CD?locations=JP-IE-EU>

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- Ireland's current pension age of 66 is already higher than 27 developed countries with larger proportions of older people in their populations than Ireland.
- Several factors assist in keeping the cost of the state pension lower than in other jurisdictions. The state pension is structurally flat compared to many other pension schemes across EU and OECD countries, where social insurance pensions are linked to people's former earnings in the workplace. Also Ireland has one of the highest exit age rates from employment and a relatively low level of early retirement.<sup>19</sup>
- Productivity in Ireland's economy is many multiples higher than what it was even in the mid-twentieth century, due to education, technology, infrastructure and other factors of long-term economic development. This productivity translates into much higher levels of national wealth, upon which to fund state pensions into the future.<sup>20</sup>
- While the state pension is a major part of gross public spending at €8.83 billion,<sup>21</sup> (9.9% of gross public spending and 2.4% of GDP),<sup>22</sup> it manages to provide an income for most people over the age of 65, who constitute 14.5% of the Irish population.
- Gross spending on the state pension is reduced by tax receipts from older people. A significant proportion of the state pension is returned to the state in the form of VAT, excise, carbon tax and other taxes and charges, including prescription charges. The Contributory State Pension is also subject to income tax. As such, net public spending on the state pension is significantly lower than the gross amount.
- In terms of fostering changes in the attitudes and behaviours of working age adults towards saving for retirement, Age Action supports the proposal for people to receive annual social insurance statements that give them clear information on their future pension entitlement as well as on options to top-up their retirement income.
- In addition, many people lack financial literacy – and in many cases basic literacy and numeracy – that is necessary for them to manage pension options. Much more intervention is needed to assist people with the development of these skills and with making it mandatory for pension providers to give regular updates in plain English so that more people can manage their own financial arrangements.

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<sup>19</sup> See, for example, OECD *Pensions at a Glance 2019*. <https://www.oecd.org/publications/oecd-pensions-at-a-glance-19991363.htm>

<sup>20</sup> See, for example, <https://www.oecd.org/sdd/productivity-stats/>

<sup>21</sup> <https://wheremyourmoneygoes.gov.ie/en/2021/>

<sup>22</sup> Based on the Government's estimated GDP for 2021  
[http://budget.gov.ie/Budgets/2020/Documents/Budget/Budget%202020%20Economic%20and%20Fiscal%20Outlook\\_A.pdf](http://budget.gov.ie/Budgets/2020/Documents/Budget/Budget%202020%20Economic%20and%20Fiscal%20Outlook_A.pdf)

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- When considering the cost of pension policy in more holistic terms, attention should be paid to the considerable cost of tax breaks which the state gives to private pension savings. Contrary to some opinion, tax breaks are not “cost neutral” as they represent tax forgone that could have been used to fund essential public services, including the state pension. The National Pensions Framework calls for the reduction of tax relief for private pensions to be reduced to 33%, which should be implemented.
- It is important to recall that tax relief is often claimed at the higher rate of income tax (40%) but may never be taxed at all (in the case of tax-free lump sums on retirement of up to €200,000). A lump sum of €200,001 to €500,000 is also taxed at 20%, which is a further example of how a tax relief at 40% can represent a net gain to the recipient above any future tax liability. The taxation of annual retirement incomes is often more likely to be at the standard rate of 20% rather than the 40% rate at which the tax relief was gained. The large benefit of pension tax relief goes only to high income households.<sup>23</sup>
- The potential to curtail private pension tax reliefs is an example of how there are wider policy options available to any government seeking to strengthen the pension system, alongside options to increase tax or social insurance, or to changes a wide range of other policies across government departments. No consideration of raising the pension age can be taken seriously as an option in the absence of a holistic analysis that takes account of the many other pieces of the puzzle that need to be in place to ensure a secure and sufficient income for all in retirement.

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<sup>23</sup> See, for example, [https://www.esri.ie/system/files/media/file-uploads/2018-05/QEC2018SUM\\_SA\\_Doorley.pdf](https://www.esri.ie/system/files/media/file-uploads/2018-05/QEC2018SUM_SA_Doorley.pdf)

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### International Pension Ages

Table 1. World Bank data on demographics, life expectancy and pension ages

Country	% of population aged 65 or older	Life expectancy at birth	Pension age (male/female)
Japan	28	84.2	65
Italy	23	83.3	60/65
Portugal	22	81.3	65
Finland	22	81.7	65
Greece	22	81.8	65
Germany	22	80.9	67
Bulgaria	21	75.0	60/63
Croatia	21	78.1	60/65
Malta	21	82.4	65
France	20	82.7	65
Latvia	20	74.8	62
Sweden	20	82.6	65
Slovenia	20	81.4	59½/62
Lithuania	20	75.7	60/62½
Estonia	20	78.2	60½/63
Denmark	20	81.0	67
Czechia	20	79.0	55-61/62½
Hungary	20	76.1	62
Spain	20	83.4	65
Netherlands	20	81.8	65
Austria	19	81.7	65
Belgium	19	81.6	65
Switzerland	19	83.8	64/65
Romania	19	75.4	59/64
UK	19	81.3	68
Poland	18	77.6	60/65
Canada	18	81.9	65
Norway	17	82.8	67
USA	16	78.5	67
Slovakia	16	77.3	59½/62
New Zealand	16	81.9	65
Australia	16	82.7	67
Russia	15	72.7	55/60
<b>Ireland</b>	<b>14</b>	<b>82.3</b>	<b>66</b>
Israel	12	82.8	67
China	11	76.7	50/60