



## **PensionsEurope's answer to the EC call for evidence on the digital omnibus package**

October 2025

[www.pensionseurope.eu](http://www.pensionseurope.eu)

We acknowledge the Commission's initiative to simplify the EU digital rules, while the full implications still need to be clarified. We recognize the importance of protecting digital infrastructure from cyber threats as well as supporting the EU's commitment to establishing a digital operational resilience framework for the financial sector.

IORPs remain fully committed to meeting the extensive requirements set out under DORA. However, we wish to reiterate a broader concern that PensionsEurope has repeatedly raised in the past. Second-pillar pension funds differ significantly from other financial entities, as occupational pensions are typically managed through social partners and are linked to employer affiliation. Including IORPs within horizontal financial market regulation - without taking into account their specific characteristics and without applying a level of proportionality that properly reflects their specific role as pension institutions with a social purpose providing financial services - continues to be a fundamentally problematic approach.

Building on this, we believe there is a broader need for a more comprehensive simplification of DORA - extending beyond incident reporting - since the specific characteristics of IORPs and their service providers have not been sufficiently considered within the current regulatory framework.

### **Major ICT incidents reporting must be simplified**

Technical adjustments to DORA, or supervisory guidance, could help to deliver genuine simplification in the field of major ICT-related incidents reporting by reducing the number of reporting fields and extending reporting deadlines in ICT incident reporting. Together, these modifications would considerably ease the compliance burden on IORPs while ensuring that supervisors continue to receive timely and meaningful information.

Simplification must not be interpreted as requiring the creation of a centralized EU reporting hub, as suggested by the ESAs in their recent report<sup>1</sup>. From the perspective of the funded pension sector, such a hub would not deliver simplification but rather increase cost and complexity, disrupt already established communication channels with competent national authorities, and risk introducing delays and fragmentation.

It should also be recalled that [level 1 of DORA](#) already establishes effective mechanisms for the sharing of information. Article 19(6) requires competent authorities, upon receipt of incident notifications, to transmit details of major ICT-related incidents in a timely manner to the ESAs, the ECB, CSIRTs, resolution authorities and the SRB, as well as other relevant public authorities under national law. This provision ensures comprehensive cross-authority information flows without the need for a new centralised structure.

### **Consistent application of the principle of proportionality should be strengthened**

Broader aspects of DORA also present opportunities for simplification. DORA should allow for a principle-based approach and, for IORPs, ensure the application of the principle of proportionality defined in the IORP II Directive. A double layer of regulation should be avoided.

---

<sup>1</sup> ESAs Report on the feasibility for further centralisation of reporting of major ICT-related incidents issued in January 2025 (available [here](#))

Thus, smaller and less complex entities, such as IORPs, should not be subject to the same obligations as systemically critical players. Obligations stemming from the oversight regime of critical ICT third-party providers should be streamlined, as they are excessively burdensome.

### **The subcontracting requirements are unnecessarily burdensome**

Additionally, requiring pension fund managers to maintain detailed records of their ICT service providers and their subcontractors creates an excessive regulatory burden that is inconsistent with the principle of proportionality. For instance, it is both disproportionate and duplicative to oblige pension fund managers to exercise oversight over third-party ICT service providers that are themselves directly subject to the same regulatory framework, such as critical third-party ICT providers governed by DORA. This approach risks turning the requirement into a formalistic compliance exercise with limited risk management value, diverting resources from core operational responsibilities, and ultimately diminishing the overall efficiency of the regulatory framework.

Addressing these issues - alongside simplifying incident-reporting requirements- would enable the Digital Omnibus to deliver genuine regulatory simplification while fully maintaining the objectives of operational resilience and supervisory objectives.

### **A principle-based approach would address the specificities of IORPs**

The funded pension sector views Digital Omnibus as a vehicle to achieve real simplification on digital operational resilience. We urge the Commission to strengthen the principles of proportionality and materiality, to continue avoiding duplicative regulation, and to start taking meaningful steps toward simplification with major ICT-related incidents reporting.

We would also like to emphasise that substantial simplification cannot be achieved by merely switching from a very granular legislative approach to an only slightly less granular one. On the contrary, in view of the high compliance costs IORPs currently experience with implementation and audits of DORA requirements, we would like to encourage the Commission and the co-legislators, in future initiatives, to embrace a more principle-based approach - at least for IORPs. Indeed, IORPs are governed by minimum harmonisation prudential rules under the IORPII directive. Our experience has shown that a principle-based approach allows for more flexibility, more cost-efficiency, and a better fit with the specific nature of IORPs without jeopardising legislative goals.

By pursuing this approach, the Digital Omnibus can contribute to a coherent, proportionate, and future-proof digital framework that strengthens both the competitiveness and resilience of Europe's pension systems and contributes to a more efficient, balanced regulatory environment.

## **About PensionsEurope**

**PensionsEurope** represents national associations of pension funds and similar institutions for workplace and other funded pensions. Some members operate purely individual pension schemes.

PensionsEurope has **25 member associations** in 19 EU Member States and 3 other European countries<sup>2</sup>.

PensionsEurope member organisations cover different types of workplace pensions for approximately over **100 million people**. Through its Member Associations PensionsEurope represents over **€ 6 trillion of assets** managed for future pension payments. In addition, many members of PensionsEurope also cover personal pensions, which are connected with an employment relation.

PensionsEurope also has **14 Corporate and Supporter Members** which are various service providers and stakeholders that work with IORPs.

PensionsEurope has established a **Central & Eastern European Countries Forum (CEEC Forum)** to discuss issues common to pension systems in that region.

PensionsEurope has established a **Multinational Advisory Group (MAG)** which delivers advice on pension issues to PensionsEurope. It provides a collective voice and information sharing for the expertise and opinions of multinationals.

## **What PensionsEurope stands for**

- A regulatory environment encouraging workplace pension membership.
- Ensure that more and more Europeans can benefit from an adequate income in retirement.
- Policies which will enable sufficient contributions and good returns.

## **Our members offer**

- Economies of scale in governance, administration and asset management.
- Risk pooling and often intergenerational risk-sharing.
- Often “not-for-profit” and some/all of the costs are borne by the employer.
- Members of workplace pension schemes often benefit from a contribution paid by the employer.
- Wide-scale coverage due to mandatory participation, sector-wide participation based on collective agreements and soft-compulsion elements such as auto-enrolment.
- Good governance and alignment of interest due to participation of the main stakeholders.

*Contact :*

***PensionsEurope***

*Montoyerstraat 23 rue Montoyer – 1000 Brussels*

*Belgium*

*Tel: +32 495 21 62 61*

*info@pensionseurope.eu*

---

<sup>2</sup> EU Member States: Austria, Belgium, Bulgaria, Croatia, Denmark, Finland, France, Germany, Greece, Hungary, Ireland, Italy, Lithuania Luxembourg, Netherlands, Portugal, Romania, Spain, Sweden. Non-EU Member States: Iceland, Norway, Switzerland.