



[PensionsEurope Newsletter 2025/03](#)

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1. SIU

Background

On 19 March 2025, the European Commission published its [Communication on the Savings and Investments Union \(SIU\)](#), which aims to improve how the EU financial system channels savings into productive investments. In response, **PensionsEurope has issued a press release** available [here](#).

Content and key measures for PensionsEurope

Citizens and Savings (Q3 2025)

- The EC will propose a European blueprint for savings and investment accounts/products, based on best practices in MSs, together with a recommendation on the tax treatment of such savings and investment products.
- It will adopt a financial literacy strategy.

Developing Supplementary Pensions (Q4 2025)

- **The EC will review the IORP II Directive and PEPP Regulation to improve participation in supplementary pensions, boost adequacy levels, and channel savings into more productive investments.**
- **It will publish recommendations on the use of and analyse best practices for auto-enrolment, pension tracking systems, and dashboards.**

Investments and Financing (Q4 2025)

- The EC will clarify how, for pension funds, equity investments are aligned with the prudent person principle.
- Address other barriers to equity investments for institutional investors.

- It will work with the EIB Group on measures to incentivise private investments into venture capital and private equity.
- It will take action to remove national taxation procedures that lead to administrative burden and impede cross-border investment.

Efficient Supervision (Q4 2025)

- The EC will propose measures to strengthen supervisory convergence tools.
- It will focus on more harmonised supervision of capital markets.

Next steps

We will discuss the SIU communication and PensionsEurope's upcoming work and priorities on these initiatives during the April GAM.

The Commission will conduct a mid-term review by Q2 2027 to assess progress.

2. Other relevant SIU workstreams

A. EP, ECON Committee

Background

On 17 March 2025, the draft report of the European Parliament [Facilitating the financing of investments and reforms to boost European competitiveness and creating a Capital Markets Union \(Draghi Report\)](#) was released. This own-initiative report is prepared in the ECON Committee, with Aurore Lalucq (S&D, FR), Chair of the ECON Committee, serving as rapporteur.

Content

- Granting **ESMA direct supervisory powers** over pan-European market infrastructures.
- Requests the EC to develop proposals to repatriate clearing activities to the EU.
- **Reaffirms support for the sustainable finance objectives** and the mobilisation of investments in the clean transition. (The S&D group has expressed skepticism regarding the Omnibus proposal, with some MEPs viewing it as deregulation rather than simplification).
- **Urges the EC to create an EU investment savings account or label for simple retail investment products**, based on common criteria including asset allocation.
- Recommends issuing a **common EU safe asset** to match the investment needs of the EU.
- Encourages **the EIB Group to adapt its lending capacity to support high-risk investments** in innovative companies and green transition projects.

Next steps

- End of April: deadline for amendments to the report.
- 24 June 2025: vote in the Committee.
- 8 September 2025: Plenary sitting date.

B. Petra Hielkema's op-ed on the SIU

Background

On 27 March 2025, Petra Hielkema, Chair of EIOPA, published [an op-ed in response to the European Commission’s communication on the Savings and Investments Union](#).

Content of the letter

Improving the Existing Framework

- Advancing the EC agenda, particularly through the review of the IORP II Directive and the PEPP Regulation.
- Increasing pension coverage with auto-enrolment.

Expanding Savings Products

- There is a need for more savings products, including third-pillar pensions and insurance products.
- Promoting long-termism, tax incentives, flexibility, and portability for these products.
- Expanding pension tracking systems and dashboards to solve the pension gap.

The Importance of Trust

- There is a need to improve financial literacy and promote a savings culture to boost confidence in investment decisions.
- EIOPA also stresses the importance to improve the value for money of PPPs to make them more attractive to people.

Supervision

- Supporting more harmonised supervision of capital markets to enhance the Single Market and investor confidence for insurance products.

Limited Focus on Occupational Pensions

- The op-ed puts limited emphasis on occupational pensions, acknowledging that this remains largely a national matter.

3. **Omnibus Simplification Package**

On 26 February 2025, the EC published the first Omnibus package on sustainability.

State of play

On 26 March, Member states’ representatives (Coreper) approved the Council’s position (‘negotiating mandate’) on one of the Commission’s proposals to simplify EU rules and thus boost EU competitiveness. This proposal (the so-called ‘Stop-the-clock’ directive) postpones the dates of application of certain corporate sustainability reporting and due diligence requirements, as well as the transposition deadline of the due diligence provisions.

The proposal forms part of the ‘Omnibus I’ package adopted by the Commission at the end of February 2025 to simplify EU legislation in the field of sustainability. Given significant implications for the business community, the Polish presidency has treated this proposal with utmost priority to provide EU companies with the necessary legal certainty as regards their reporting and due diligence obligations. Member states have broadly shared the presidency’s sense of urgency and, in that view, supported the Commission’s proposal to postpone:

- by two years, the entry into application of the Corporate Sustainability Reporting Directive (CSRD) requirements for large companies that have not yet started reporting, as well as listed SMEs, and
- by one year of the transposition deadline and the first phase of the application (covering the largest companies) of the Corporate Sustainability Due Diligence Directive (CSDDD).

A possible swift agreement between the co-legislators will provide them with time to agree on substantive changes to the CSRD and CSDDD, also proposed by the Commission as part of the 'Omnibus I' package on sustainability.

PensionsEurope position

PensionsEurope believes that this proposal to postpone the implementation is necessary to secure sufficient time to reform properly the directives based on the Omnibus recommendations. Our LTSI WG already met and discussed the Omnibus proposal. The first draft of our position paper will be sent in due time to the LTSI WG members for comments.

Next steps

On 1st April, there will be a vote at the plenary on that same proposal, on the request for urgent procedure under Rule 170.

4. EC's White Paper on European Defence

Background

On 19 March 2025, the European Commission published its [White Paper on European Defence – Readiness 2030](#), outlining the EU's plan to enhance European defence capacities and increase investments in the sector.

Content

For our sector, some relevant points in the White Paper include:

- **Granting the EIB group a central role in mobilising private capital**, with some operational changes to increase their investments in projects related to military capacity.
- Given the concerns raised about the **compatibility of defence with responsible investments**, the EC reaffirms **that the SFDR does not prevent investments in the defence sector**. Further clarification on the relationship between defence and investments under the sustainability framework will be provided.

5. Digital issues

A. FIDA

Background

Both the [Council](#) and the [Parliament](#) validated in December 2024 their positioning on FIDA, but the new [priorities](#) of the current EC as regards simplification and political pressure from Member States, delayed the start of the trilogues.

Recent developments

On 24 March 2025, the Council had its preparatory meeting ahead of the first trilogue meeting. MSs discussed three main issues: (1) the scope, (2) the treatment of gatekeepers & (3) the treatment of third-country FISPs.

On the scope, we understand that a group of MSs (RO, FR, FI, ES, DK, DE, PT, BG) supported the exclusion of the customer data category “*pension rights in official recognised occupational pension schemes*” as outlined in the [Council's general approach](#).

The presidency indicated that trilogue negotiation would take time. Simplification was highlighted as a key priority for many MSs, with the EC being tasked to write non-papers on that issue, as the EC and MSs already had several bilateral meetings.

PensionsEurope's position and next steps

The 1st trilogue meeting will take place on 2nd April 2025. Most likely, a second trilogue meeting won't take place before June/July 2025.

On 7 March 2025, PensionsEurope published its latest [position paper](#) ahead of the trilogue meetings. to indicate our satisfaction that co-legislators broadly acknowledged the specificities of occupational pension schemes that are often managed by social partners and depend on the employer's affiliation. However, we also expressed our concerns regarding the Council's position that includes IORPs in FIDA's scope if they manage personal pension products, as it would generate disproportionate costs for IORPs who are affected. We are conveying those messages to the co-legislators and the EC.

B. DORA

Background

[DORA](#) has been published in the OJEU on 27 December 2022 and has been applicable from 17 January 2025. IORPs are in the scope of DORA in Level 1.

IORPs are working on the reporting under the [register of information](#) (RoI). The ESAs have highlighted their [timeline](#) for new reporting obligations, asking NCAs to submit the received RoI by 30 April 2025. In consequence, NCAs have asked financial entities under their supervisory remit to send them the necessary information before that date, with different deadlines across the EU.

IORPs are also facing new reporting requirements for major ICT-related incidents, with a set of RTS and ITS for the [classification of ICT incidents](#), the [information to be provided](#) for the different reports, and [which templates to be used](#).

In January 2025, the EC [rejected](#) the draft RTS on subcontracting that was sent by the ESAs in July 2024, given that level 2 exceeded the mandate in level 1, in particular, the Article 5 (and related recital 5) of the [draft RTS](#) regarding the monitoring of the subcontracting chain.

Recent developments

On 24 March 2025, the EC adopted the [RTS](#) on subcontracting of critical or important functions. The text was published on the Commission register last Thursday. As expected, the text was considerably rewritten, both in form and in substance, as article 5 (and related recital 5) of the draft RTS on “*Conditions for subcontracting relating to the chain of ICT subcontractors providing a service supporting a critical or important function by the financial entity*” was removed.

On 28 March 2025, the ESAs published their latest version of the [FAQ](#) for reporting under the RoI, to help financial entities comply with the reporting requirements. There are 125 Q&A covering different aspects of the reporting including for instance the scope of the register, the level of consolidation, or the use of identifiers.

PensionsEurope's position and next steps

During the ESAs’ consultation process held in March 2025, we highlighted in our [answer](#) how burdensome Article 5 was and indicated our concerns about overregulation. We met with EIOPA and the EC to express our concerns.

As regards the reporting under the RoI, we have been [arguing](#) in our response published in September 2023 to the EIOPA consultation that “*IORPs are likely to face an over-proportional burden when implementing the register of information for the first time as IORPs usually have small structures with few human resources and are closely associated with sponsoring employers having their own IT infrastructure.*”

We will continue monitoring the DORA implementation process and act if necessary.

6. IORP 2025 Stress test exercise

Background

EIOPA BOS adopted by consensus during its 26-27 June 2024 meeting, the proposal for “*the launch of the 2025 Institutions for Occupational Retirement Provision (IORP) stress test exercise*” with a “*proposed exercise*” aiming “*at testing the liquidity position of IORPs against a scenario characterised by the prolongation/exacerbation of geopolitical tensions.*”

The exercise is an asset-only exercise, without a capital component (i.e., no funding ratio tested).

Recent developments

On 6 March 2025, PensionsEurope met with EIOPA to discuss the draft technical specifications of this stress testing exercise. On 17 March 2025, we delivered an answer to EIOPA on their informal consultation on those specifications after consulting our joint Stress test working group membership. We provided different comments to improve and simplify the exercise.

Next steps:

The stress test exercise will start on 7 April 2025, with the calculation phase until July 2025, and the final report will be published in December 2025.