

25 March 2026

AEIP calls for an EU framework for IORPs that more accurately reflects the role and characteristics of paritarian occupational pension funds in the EU

The European Association of Paritarian Institutions (AEIP) has published its position paper on the European Commission's Supplementary Pensions Package, calling for an EU framework for Institutions for Occupational Retirement Provision (IORPs) that better reflects with the nature, role and governance model of paritarian occupational pension institutions in Europe.

Paritarian institutions are jointly managed by representatives of employers and employees on an equal basis. This governance model supports collective pension provision, long-term investment, economies of scale through the collective organisation of contributions and investments, and a strong fiduciary duty towards members and beneficiaries.

AEIP supports the objective of expanding occupational pensions across the European Union and improving the adequacy of retirement income for citizens. At the same time, the association underlines that the Commission's proposal should more clearly recognize the diversity of IORPs across Member States, and avoid extending to paritarian pension institutions rules and concepts that are primarily designed for retail financial products. In AEIP's view, the future framework should remain proportionate, preserve the role of social partners, and reflect the specific social and collective character of occupational pensions.

Werner Schneider, President of AEIP, stated:



A balanced framework must properly reflect the diversity of pension institutions across Europe. It is essential to support the development of occupational pensions across the EU and to help deliver adequate retirement income for European citizens. The proposed review of the IORP II Directive introduces a number of governance and communication requirements that do not appear appropriate for paritarian institutions, given their specific social role, long-term investment perspective, and joint governance model based on equal representation of employers and employees. Such requirements risk increasing administrative costs and burdens for IORPs without delivering clear added value for members and beneficiaries. In particular, the proposed introduction of an explicit duty of care for IORPs could create unnecessary duplications, as its core

elements are already embedded in the existing IORP II Directive and are effectively ensured through the internal checks and balances inherent in the paritarian model of governance.

AEIP also stresses the importance of maintaining the current minimum harmonisation approach of the IORP II Directive, which allows Member States to reflect the diversity of national pension systems and institutional arrangements.

In this context, the association expresses concerns about the introduction of delegated acts, which could lead to increased regulatory complexity and reduce the flexibility currently available to Member States and national competent authorities. Supervisory authorities at national level remain best placed to assess the risks and specific characteristics of pension institutions within their jurisdictions.

AEIP also reiterates that proportionality remains a key issue in the review. The association is concerned that the proposed changes do not sufficiently take into account the diversity of IORPs across Member States, many of which operate as small and medium-sized institutions with limited administrative capacities. In particular, removing the reference to “size” from the proportionality criteria and introducing additional obligations could place unnecessary pressure on such institutions without clear added value for members and beneficiaries.

The association also raises concerns about the extension of communication and disclosure requirements inspired by a retail market logic, as well as by the proposed standardisation of the Pension Benefit Statement (PBS). While AEIP supports clear and meaningful information for members and beneficiaries, communication rules for occupational pensions should remain tailored to the characteristics of collectively organised, employment-based pension arrangements and avoid unnecessary overlap with existing national tools and obligations.

Simone Miotto, Executive Director of AEIP, added:

Occupational pension funds are long-term institutional investors that can play an important role in supporting Europe’s growth and competitiveness. The regulatory framework should therefore encourage efficient pension provision and long-term investment while avoiding unnecessary complexity. Simpler rules for IORPs would be fully consistent with the objectives of the Savings and Investments Union and the Commission’s Better Regulation Agenda.



AEIP welcomes the proposed clarification of the prudent person principle, which could support a more diversified investment approach and contribute to stronger long-term returns for pension savers. At the same time, IORPs should retain sufficient flexibility to align investment decisions with their risk profile, benefit structure and long-term objectives.

Regarding the proposal to allow IORPs to offer the Pan-European Personal Pension Product (PEPP) Regulation within workplace arrangements, AEIP stresses that Member States should retain full discretion to permit such arrangements, while safeguarding the role and autonomy of social partners in designing pension schemes through collective bargaining.

AEIP also supports the development of Pension Tracking Systems (PTSs) and the future connection of national systems with the European Tracking Service on Pensions, which can improve transparency for citizens, including for workers with cross-border careers. However, the association cautions that mandatory EU reporting requirements linked to such systems could create significant operational costs for IORPs. Given the diversity of national pension systems, the design and format of PTSs should remain within the competence of Member States.

Through its position paper, AEIP will continue engaging with European policymakers to ensure that the future regulatory framework for occupational pensions supports sustainable pension provision, respects national diversity, preserves the role of social partners, and enables paritarian institutions to continue delivering adequate retirement income for European citizens.

For further information please contact: [Roberto Silvestri, Policy Advisor on Pension & Financial Affairs](#)



AEIP Disclaimer

The European Association of Paritarian Institutions (AEIP), founded in 1996, is a Brussels-based advocacy organisation representing social protection institutions, established and managed by employers and trade unions on a joint (or paritarian) basis within the framework of collective agreements. The Association has 33 members from 13 European countries, representing more than 460 social protection providers with €2.8 trillion in assets under management and delivering social protection benefits to over 118 million people.

All AEIP associate and affiliate members are not-for-profit paritarian institutions. Through dedicated working groups, AEIP deals, in particular, with EU-coordinated pension schemes, occupational pension funds, healthcare, unemployment, provident schemes, and paid holiday, health, and safety at-work schemes in the construction sector. Complementary to their role as not-for-profit social protection providers, AEIP members are also long-term institutional investors.

www.aeip.net