

POSITION PAPER

DATE: 2-2-2026

SUBJECT: DORA IN THE DIGITAL OMNIBUS

Position of the Dutch pension sector on DORA in the Digital Omnibus

The Digital Operational Resilience Act (DORA) has raised standards for operational resilience in the financial sector. The Dutch pension fund sector manages €1.7 trillion on behalf of 10 million participants. The sector has proactively implemented DORA to improve ICT risk management. DORA has streamlined various frameworks for ICT risk management across EU Member States and different parts of the financial sector. By giving financial entities leverage over ICT-third party providers and their subcontractors, DORA has empowered us to enforce mature risk management practices across entire ICT outsourcing chains.

The Digital Omnibus aims to streamline European digital legislation and reduce regulatory burdens. While we support these overarching objectives, we are concerned about the potential adverse consequences of including DORA in this legislative package.

WE RECOMMEND NOT AMENDING DORA AT THIS MOMENT

We think it is too early to amend DORA and oppose any amendments to DORA at this moment. DORA has been implemented in 2025. Supervisory components are not yet operational, notably the Oversight on major cloud and technology providers. We recognize increasing cyber risks and geopolitical risks of dependence on some big tech companies. Still, DORA alone cannot fix them. A concerted effort would be needed to decrease tech dependence. Premature changes to DORA would undermine regulatory stability and increase compliance burdens without improving resilience.

In this phase, we encourage dialogue between the financial sector and supervisors as well as supervisory guidance to create shared understandings of DORA's application. We pay attention to the application of risk-based processes and proportionality, and their contribution to effective risks management practices and compliance costs. These points should be taken up with supervisors, and feed into DORA's evaluation in 2028.

WE ALSO OPPOSE A EUROPEAN SINGLE-ENTRY POINT FOR INCIDENT REPORTING

The European Commission aims to decrease reporting costs by proposing a European single-entry point for incident reporting. Firstly, we note many financial entities do not have these benefits, as they operate in a single EU country, notably pension funds. In our view, national notifications structures and entry points better correspond to existing cooperation and communication between financial entities and supervisors. Secondly, we see limited synergies from a single-entry point for multiple reporting laws, considering the differences in reporting requirements.

We care about a cost-efficient, user-friendly solution, with adequate availability, integrity and confidentiality, and the option to file notifications in Dutch and English. We also flag potential security risks of the centralization of sensitive incident reporting information in a European single-entry point.