

Presentation by Brendan Kennedy to the National Pensions Summit 28 January 2026

Introduction

Thanks for the opportunity to address this conference. Events such as these allow the Pensions Authority to communicate with our most important stakeholders.

This morning I will cover

- the current situation pensions situation in Ireland in early 2026
- the outlook and issues for pensions
- the Pensions Authority's priorities and plans for the coming year.

Current situation

As we have heard, auto enrolment was launched at the beginning of this year, and the numbers of employers and employees enrolled are very promising. At the same time, in the recent years, the Authority has seen an increase in the number of members of occupational schemes and of contributors to PRSAs. Taken together, the result is a very significant and welcome increase in pensions coverage.

The process of bedding in the requirements of the IORP II Directive is continuing, as is the consolidation process. An important milestone will be reached in a few months' time when the five year derogation for single member schemes expires in April.

We now have two categories of occupational pension scheme:

- The first category comprises master trusts and those single employer schemes that have taken the decision to continue as standalone schemes, and to be compliant with IORP II
- The second category comprises the remaining schemes, in the process of winding up and transferring to master trusts and PRSAs. This set includes those single member schemes about to see their derogation expire.

That first category – defined benefit, master trusts and standalone defined contribution schemes – includes approximately 650 schemes. In other words, we expect the final number of pension schemes in Ireland will be no more than 650, and will probably be fewer. This is in contrast to the position four or five years ago when there were about 1,000 new pension schemes created every month.

Although there is still work to be done on consolidation, these schemes already comprise 89% of all occupational pension scheme assets. At the end of October 2025, defined contribution master trusts held just over €40bn of assets and had about 725,000 members.

For the schemes in the second category, it is a developing situation:

For those schemes without an employer, up to now there has been a requirement for a participation agreement to be signed by a sponsoring employer, when their pension scheme is being transferred to a master trust, in fulfilment of the obligation for employer recognition of the scheme.

Where the trustees of a scheme have determined that transfer to master trust is in the best interest of the members, but the transfer cannot be progressed solely because the employer is now dissolved, a number of details will be required relating to the scheme and the date the employer was dissolved. Once this detail is shared with the Authority and with Revenue, a transfer can be made without an employer participation agreement. In some cases this may require the Pensions Authority to use its powers to appoint trustees to make that transfer.

There are some schemes where neither the trustees nor the sponsoring employer have responded to repeated communications from their administrator about compliance with IORP II. We have begun a pilot project involving direct contact from the Pensions Authority, and we intend to expand this project further. Our preference is a process of encouragement, but we are already considering taking enforcement action.

At the same time as the increase in occupational pension scheme membership, there has also been considerable growth of PRSAs. At the end of October 2025, total PRSA assets were €21.5bn, and we expect to see further strong growth in the last three months of 2025. This is a continuation of the significant growth in PRSA assets over the last number of years.

Outlook and issues

- The Pensions Authority conducted a number of in-depth supervisory reviews during 2025, focussed mostly on master trusts. As in previous years, we will publish a summary of the issues we have come across. This will be done before the end of February.

There was wide range of outcomes – some well-run schemes, some, not so good. There was a range of issues, which we will set out in our report, but I'd like to highlight a few:

- Some trustees seem to lack awareness of conflicts of interest and failed to identify actual or potential conflicts in their schemes. In one example, the trustees commissioned their critical review of their administration from their current administrator.

- There were also examples of trustees not giving enough consideration to operational resilience, apparently assuming that this is a matter for their administrator.
- Not all trustees recognise the importance of the own risk assessment. The central role of this work must be recognised, and trustees must understand that it is a task for which they bear responsibility, including decisions about how to respond to the risks identified: it must not be treated as a document to be prepared by a third party.
- We welcome the authorisation legislation promised by the Minister for Social Protection, Dara Calleary, and we are supporting his Department in this work. At the same time, we are working on implementation plans, so that authorisation can be put into effect as soon as possible after enactment.
- Our application of forward-looking risk-based supervision continues to develop: we are refining our oversight of standalone schemes; and increasing our expectations of all trustees.
- The Pensions Authority's new I.T. system will be going live in mid-2026. Our priority immediately thereafter is to improve and expand the Authority's data collection – both for supervisory purposes and to meet our EU reporting obligations. This will require that pensions administration systems need to be capable of providing accurate and timely data in the formats we will require, and this is a trustee responsibility.
- In response to the increase in PRSA contributors and assets, we are increasing the oversight of PRSAs. This will include gathering more data, to underpin better risk assessment, and identifying areas of concern for further examination.
- Under the Auto Enrolment Act, the Pensions Authority has the responsibility of providing the Minister with an annual report on NAERSA, and the first of these will be undertaken in respect of calendar year 2026.
- The Authority will also be monitoring and responding as needed to EU developments, especially SFDR, further DORA developments, and the EU Commission's proposals for IORP changes.

2026 priorities

Our priorities for the coming year are

- Ongoing supervision of continuing schemes and raising trustee standards where necessary.
- Completing the transition of other schemes to master trusts or PRSAs as soon as possible.



- Using more data to support supervision.
- Implementing scheme authorisation as soon as possible.
- Staying ahead of national and European developments.

Thank you for your attention.

Brendan Kennedy
Pensions Regulator

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