



EU RegCORE Client Alert

Financial Services

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Ireland's 2026 EU Presidency: Focusing on the financial services files that matter

QuickTake

On 1 July 2026, Ireland assumed the rotating Presidency of the Council of the European Union for the period 1 July to 31 December 2026. The Irish Presidency's Policy Programme¹ confirms that financial services are no longer being treated merely as a regulated sector but as infrastructure for European competitiveness. The Programme is structured around three pillars – competitiveness, values and security – and states plainly that "Ireland's 2026 EU Presidency will be defined by action and by delivery."

The Presidency coincides with the political aftershock of the Draghi Report on competitiveness and the Letta Report on the future of the Single Market.² The Programme expressly carries forward the priorities identified in those reports, with the One Europe, One Market Roadmap – agreed by the Council, the European Commission and the European Parliament – providing the blueprint for decisive progress. The Roadmap provides a shared, time-bound delivery framework for competitiveness and Single Market reform, giving Ireland's



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¹ Available [here](#).

² See our coverage available [here](#).

Presidency more political leverage on economic files than it would otherwise possess.

The operational consequence for financial services firms is significant: the Presidency appears to be signalling it intends to use the six-month window for delivery, not deliberation. In the Programme's own words: "We will use all the tools available to the Presidency to facilitate agreement on the priority files in line with the agreed targets." For banks, insurers, asset managers, market infrastructure providers, payment firms and fintechs, the indication is that EU financial services regulation is being reframed through competitiveness, resilience and security rather than through post-crisis risk reduction alone.

The programme's organising architecture is structured around three pillars: competitiveness, values and security. This tripartite framing structures how the Council's working time will be allocated, which files are treated as priorities, and how the Presidency will broker trade-offs between competing legislative demands.

Key elements to consider include:

- **What.** The Irish Presidency's overarching priority for ECOFIN is competitiveness. Priority will be given to achieving the targets on the Savings and Investments Union (**SIU**) and the Digital Euro, with action focused on deepening European capital markets and strengthening the competitiveness of Europe's banking sector.
- **When.** 1 July to 31 December 2026. The One Europe, One Market Roadmap sets ambitious timelines, with multiple files targeted for trilogue conclusion or significant progress by year-end 2026.
- **Who.** All regulated financial services firms operating in the EU – including banks, insurers, asset managers, investment firms, market infrastructure providers, payment firms and fintechs – as well as national competent authorities and EU institutions. Ireland's position as host to the European headquarters of a disproportionate number of global financial institutions means this is a Presidency that understands the regulatory, supervisory and commercial environment in which cross-border financial services operate.
- **Where.** All 27 EU Member States. The Presidency chairs all Council working groups, COREPER and most ministerial Council configurations. In trilogue negotiations with the European Parliament, the Presidency speaks for the Council, tables compromise texts and determines the pace of inter-institutional negotiation.
- **Why.** The Presidency's measures are clear that "Europe must act urgently to enhance its competitiveness and productivity". The current global environment is described as "unstable and deeply challenging," with the Presidency responding to external factors through determined action on competitiveness, values and security. The 2028–2034 Multiannual Financial Framework negotiations will also be an overarching priority.
- **How.** Firms may wish to map exposure to the key files, prepare advocacy positions while the window remains open, reframe regulatory strategy around competitiveness, reassess product and infrastructure strategy and integrate regulatory, geopolitical and operational resilience planning.
- **What the Presidency cannot do.** The Presidency cannot legislate alone. It cannot override the European Commission's exclusive right of legislative initiative — if the Commission has not tabled a proposal, the Presidency cannot negotiate one into existence. It cannot bind the European Parliament, which is a co-legislator with its own timeline, priorities and political dynamics. It cannot force unanimity among Member States in the Council, and on sensitive files (particularly tax, foreign policy and treaty change) its ability to broker outcomes depends entirely on the willingness of capitals to compromise. Critically, the Presidency is constrained to six months. Files that require longer negotiation may see their momentum dissipate when the next Presidency recalibrates priorities.

Key takeaways

Savings and Investments Union: the centre of gravity

For capital markets, investment firms, banks, asset managers, trading venues, clearing and settlement infrastructure, the SIU is the main strategic file. The Programme confirms: “A key priority of the Irish Presidency is the Savings and Investments Union. A stronger, more liquid EU capital market will improve the functioning of the real economy by offering more attractive opportunities to both businesses and investors and boosting Europe’s capacity to finance innovation and support enterprises, both large and small.”

The Presidency frames this as a transformational moment: “It is time to take a decisive step forward on the Savings and Investments Union, and to help channel Europe’s substantial savings into more productive investments.” The Irish Presidency will respond to the commitment in the One Europe, One Market Roadmap and aim to conclude negotiations on the Market Integration and Supervision Package.³ Deeper capital markets require stronger participation by both EU savers as retail investors and pension funds as institutional investors – the Presidency will progress negotiations on the Supplementary Pensions Package with a view to conclusion in line with the Roadmap.

The following table summarises the key financial services files with delivery commitments under the Irish Presidency:

Legislative File	Status / Presidency Objective	Relevance to Financial Services
Market Integration and Supervision Package (MISP)	Conclude negotiations	Supervisory architecture, market access
Digital Euro enabling framework	Trilogue agreement	Payments, deposits, liquidity
Securitisation Framework	Political agreement in trilogue	Bank capital, investment opportunities
SFDR revision	Political conclusion in trilogue	ESG disclosures, product classification
Supplementary Pensions Package	Conclude negotiations	Pension funds, retirement products
EuVECA review / Investment Exits	Ready to commence	Venture capital, fund management
Cybersecurity Act (CSA) revision	Progress negotiations	ICT risk, incident reporting
DAC recast	Aim to conclude	Tax transparency, reporting
Tax Simplification Omnibus	Progress work	Corporate tax compliance

³ See extensive coverage on MISP from our EU RegCORE.

Legislative File	Status / Presidency Objective	Relevance to Financial Services
Digital Simplification Omnibus	Agreement by end 2026	Cyber reporting, regulatory coherence
Banking sector competitiveness report	Facilitate discussions	Prudential regulation, level playing field

Digital Euro: payments policy becomes resilience policy

The Digital Euro is framed not merely as a payments innovation but as a European resilience instrument. The Programme states: “The Irish Presidency will also work towards an agreement in trilogue negotiations on the enabling framework for a Digital Euro, promoting a European option for digital payments that will bring new benefits for citizens, strengthen the EU as a financial hub and bolster our economic resilience.”

For banks and payment firms, the Digital Euro is likely to require strategic choices around wallet distribution, customer interface, deposit substitution risk, holding limits, merchant acceptance, PSP obligations, AML/KYC interaction, privacy architecture, offline functionality, settlement, interoperability and commercial economics.

Banking: simplification, securitisation and competitiveness

For banks, the Programme is unusually significant because it places banking competitiveness firmly in the political mainstream. The Programme states: “Investing in our competitiveness requires a strong and stable EU banking sector, given the heavy reliance of EU businesses on bank-based financing.” The Presidency will facilitate discussions on the European Commission’s report on the competitiveness of the banking sector “with a view to promoting simplification and a level playing field in the internal market and globally.”

Securitisation: bridging bank lending and capital markets

Securitisation is the most concrete banking-capital markets bridge. The Programme states: “Securitisation provides a bridge between bank lending and capital markets. A revitalised EU securitisation market will free up bank lending capacity and add investment opportunities for capital market investors.” The Presidency makes a clear delivery commitment: it will take forward trilogue negotiations on the Securitisation Framework with a view to reaching a political agreement.

Asset management and sustainable finance: SFDR may finally move

The Programme identifies SFDR as a priority for trilogue negotiations: “To improve the rules for investment in the green transition, the Irish Presidency will engage in trilogue negotiations on the Sustainable Finance Disclosure Regulation (SFDR) to work towards a political conclusion.” For asset managers, insurers, banks with investment products and distributors, the SFDR review may become one of the key “simplification with substance” files of late 2026. Firms may anticipate political pressure to move away from the current unstable market practice around Article 8 and Article 9 categorisation.

Venture capital, scale-ups and exits: more attention to capital formation

The Presidency states: “Capital markets are vital for start-ups and scale-ups with limited access to bank-based lending.” It makes a readiness commitment: “The Irish Presidency is ready to start negotiations when the European Commission brings forward a proposal on the review of the Regulation on European Venture Capital Funds (EuVECA), as well as a proposal aimed at improving options for growth companies to exit

the venture capital stage (Investment Exits).⁴ The policy direction appears to favour more patient capital, better exit channels, deeper venture markets and a stronger connection between private capital and public markets.

Digital infrastructure, AI and cloud: financial services technology meets strategic autonomy

The Programme’s digital agenda goes beyond the financial sector but will have direct consequences for it. Ireland will advance work on digital connectivity, digital networks, cybersecurity, cyber resilience, subsea telecoms connectivity, submarine cable security, cloud computing, AI and digital simplification. On cloud and AI, the programme describes the Cloud and AI Development Act as “a central element of the EU’s ambition to strengthen European capacity in cloud computing and AI infrastructure... a key pillar of the EU’s approach to digital sovereignty, supporting Europe’s ability to develop and deploy AI at scale while reducing dependencies in critical areas.” For financial institutions, this matters because outsourcing, cloud concentration, AI deployment, ICT third-party risk and operational resilience are already supervisory priorities. The Presidency’s programme indicates that these issues will increasingly be treated as matters of EU industrial policy and economic security, not merely firm-level risk management.

Policy area	Presidency priority files
Digital infrastructure / AI / Cloud	Digital Networks Act (progress report); Cloud and AI Development Act (progress report); European Business Wallet (trilogue towards agreement); Cybersecurity Act revision; Digital Simplification Omnibus (agreement by year-end).
Tax and reporting	Tax Simplification Omnibus; DAC recast (aim to conclude); monitoring of OECD Pillar Two implementation.
Climate and sustainability	ETS1 Directive review; CBAM revision; strengthened ETS1/ETS2 safeguards; 2040 emissions reduction target implementation package.

Firms may therefore need to navigate multiple interconnected files simultaneously, requiring cross-disciplinary expertise across capital markets, payments, prudential regulation, sustainable finance, tax, cyber resilience and digital infrastructure.

Cyber resilience: more harmonisation, more reporting architecture

The cyber section is highly relevant to banks, insurers, payment firms, investment firms, FMIs and critical ICT providers. The Programme states: “The revision of the Cybersecurity Act (CSA) will be pivotal to ensuring that the mandate of the European Union Agency for Cybersecurity (ENISA) accurately reflects the tasks assigned to it through the cyber security legislative framework.” The harmonisation objective is explicit: “This will also have a positive impact on the Single Market by providing for more harmonisation and will contribute to higher levels of cyber security and cyber resilience.” The Digital Simplification Omnibus aims to “simplify and harmonise incident reporting via a single entry point.”

⁴ See our coverage on this development [here](#).

Tax and reporting: simplification does not mean less change

The ECOFIN tax section is important for financial groups with complex cross-border structures. The Programme states: “The Irish Presidency will prioritise work on the tax simplification agenda and will significantly progress and aim to conclude the recast of the Directive on Administrative Cooperation (DAC). The recast will streamline the nine iterations of this important tax transparency and cooperation mechanism.” The framing is explicitly competitiveness-driven: “The Tax Simplification Omnibus, together with the recast of the DAC, will aim to reduce complexity caused by existing tax rules, and reduce the reporting, administrative and compliance burdens for taxpayers and Member States’ tax administrations, thereby contributing to efforts to enhance European competitiveness.” For financial institutions, this is not simply a tax department issue. It affects reporting architecture, legal entity rationalisation, fund structures, intra-group financing, deferred tax planning, Pillar Two data collection, and the interaction between prudential capital, transfer pricing and tax transparency.

Simplification agenda: better regulation, not deregulation

The Programme is explicit: “Simplification is about better regulation, not deregulation. We need to prioritise smarter, simpler and more streamlined regulations.” The Presidency will embed “the ‘simplicity by design’ concept in our legislative approach” and take forward “regulatory deep cleaning” of the EU acquis.

The following table summarises the key differences between the policy priorities across the three pillars:

Pillar	Core focus	Financial services relevance
Competitiveness	Single Market integration; simplification; Savings and Investments Union; Digital Euro; banking competitiveness; securitisation; venture capital	SIU, Digital Euro, securitisation, SFDR, pensions, EuVECA are primary delivery files
Values	Ukraine support; rule of law; democratic resilience; enlargement; fundamental rights	Sanctions compliance; Ukraine financial support; ESG and sustainable finance alignment with EU values
Security	Defence; cyber resilience; hybrid threats; preparedness; organised crime; critical infrastructure	DORA; CSA revision; ICT supply chain security; incident reporting; financial crime cooperation

Practical considerations

The following areas may warrant attention for financial services firms.

1. Map exposure to the key files. Firms may wish to systematically map their exposure to the key files that have the Presidency’s expressed commitment to progress or conclude:
 - a. **Capital markets files:** SIU, Market Integration and Supervision Package, Supplementary Pensions Package, EuVECA, Investment Exits, Securitisation Framework.

- b. Payments and digital files:** Digital Euro, Digital Networks Act, Cloud and AI Development Act, European Business Wallet.
- c. Sustainable finance and climate files:** SFDR, ETS1 review, CBAM revision, ETS safeguards.
- d. Tax, cyber and governance files:** Tax Simplification Omnibus, DAC recast, Cybersecurity Act revision, cyber incident reporting harmonisation.

2. Prepare advocacy positions now

The Presidency is explicitly in delivery mode. Once trilogues and Council compromises mature, there may be less scope to influence the architecture. The Programme states that “we will use all the tools available to the Presidency to facilitate agreement” – meaning informal trilogues, Presidency compromise texts, COREPER marathons and political-level deals. Firms that have not yet engaged may find the window for input narrowing.

3. Reframe regulatory strategy around competitiveness

Firms may wish to consider reframing regulatory concerns beyond “burden reduction” and instead evidence how targeted simplification supports EU financing capacity, resilience, innovation and market depth. The Presidency’s own framing supports this: “A more proportional and efficient framework of financial regulation will be a key factor in delivering our objectives.” And: “We need to reduce the regulatory burden, in particular for Small and Medium-sized Enterprises (SMEs), while continuing to protect and uphold fundamental and social rights.”

4. Reassess product and infrastructure strategy

The most material commercial opportunities are likely to sit around securitisation, pension investment, retail participation, digital payments, cloud/AI infrastructure, transition finance and venture/growth-company financing. Each of these is a named Presidency priority. Firms that align their commercial strategy with the policy direction will be better positioned than those that treat regulation as an exogenous constraint.

5. Integrate regulatory, geopolitical and operational resilience planning

The Programme treats security, cyber resilience, economic security, sanctions, critical infrastructure and financial stability as connected issues. Firms may benefit from taking a similar approach. The indication is that competitiveness, prudence and resilience are not competing objectives – they are the same objective viewed from different angles. Firms may wish to avoid treating DORA implementation as a closed project; the wider EU cyber ecosystem appears to be moving towards convergence between financial-sector operational resilience, critical-entity resilience, cyber certification, supply-chain risk, crisis exercises and public-private incident coordination.

6. Monitor EU-UK and international relations

The Programme makes clear Ireland’s ambition on EU-UK relations: “The United Kingdom remains a key partner for the EU.” The Irish Presidency “will be ambitious in promoting positive EU-UK relations, while seeking new opportunities to advance the renewed agenda of cooperation.” Ireland’s unique position – sharing a land border with the UK, deeply integrated with the UK economy, and hosting many firms that serve both the EU and UK markets – gives this Presidency particular credibility on EU-UK matters. Firms with London, Dublin, Frankfurt, Paris, Luxembourg, Amsterdam or Milan footprints may wish to monitor whether the renewed EU-UK agenda creates soft-law, supervisory-dialogue or market-access opportunities in payments, clearing, sustainable finance, data, digital assets, cyber and wholesale markets.

7. Sanctions, Ukraine and economic security

Ukraine remains a defining priority. The Programme states: “Responding to Russia’s aggression towards Ukraine will remain the major foreign policy priority for the EU.” It adds: “We will continue to pressure Russia

to end its illegal and unjustified war of aggression, including via robust sanctions in close coordination with likeminded partners.” For financial services firms, sanctions controls, client screening, beneficial ownership analysis, trade finance controls, correspondent banking, payments monitoring, securities custody and exposure to Russian-linked assets are likely to remain high priority. Treating sanctions as a static list-screening function may prove increasingly inadequate in the environment this Presidency describes.

Outlook

The Irish Presidency's programme presents a dense and ambitious legislative agenda with direct implications for regulated financial services firms. The twin emphasis on competitiveness and simplification signals a potential inflection point — moving from intensive rule-making towards consolidation and streamlining. This is a pro-competitiveness programme, but not a deregulatory one: it is about mobilising capital, strengthening banks, deepening markets, digitising payments, simplifying where possible and hardening Europe's resilience. As the Programme states: “Enhancing European competitiveness and economic resilience remains a core priority for the European Union, carrying forward the priorities identified in the Draghi and Letta reports.” Firms would be well advised to engage proactively during this Presidency, as files under negotiation — particularly the SIU package, SFDR revision, Securitisation Framework and Digital Euro — have the potential to reshape the competitive landscape across the Union.

For firms, the opportunity is that the EU may finally move from diagnosing fragmented capital markets to negotiating concrete legal changes. The risk is that firms that wait for final texts may find themselves late to the process. The second half of 2026 is likely to be a period in which the EU's financial services architecture is reshaped less by one grand reform and more by a sequence of politically connected files that all point in the same direction: a more integrated, more digital, more resilient and more strategically European financial system.

The Irish Presidency holds this mandate at a moment when Europe's political institutions have, for the first time (arguably in a long time), aligned around a shared delivery framework with binding timelines. The Programme closes with a formulation that captures both the aspiration and the constraint: “Success will require all Member States and each institution to work purposefully together in a spirit of cooperation and compromise, in the interests of every citizen and business right across our Union.” For regulated financial services firms, the indication is significant: early engagement may be more effective than waiting for final texts to emerge.

About us

PwC Legal is assisting a number of financial services firms and market participants in forward planning for changes stemming from relevant related developments. We have assembled a multi-disciplinary and multijurisdictional team of sector experts to support clients navigate challenges and seize opportunities as well as to proactively engage with their market stakeholders and regulators.

Moreover, we have developed a number of RegTech and SupTech tools for supervised firms, including PwC Legal's Rule Scanner tool, backed by a trusted set of managed solutions from PwC Legal Business Solutions, allowing for horizon scanning and risk mapping of all legislative and regulatory developments as well as sanctions and fines from more than 2,500 legislative and regulatory policymakers and other industry voices in over 170 jurisdictions impacting financial services firms and their business.

Equally, in leveraging our Rule Scanner technology, we offer a further solution for clients to digitise financial services firms' relevant internal policies and procedures, create a comprehensive documentation inventory with an established documentation hierarchy and embedded glossary that has version control over a defined backward plus forward looking timeline to be able to ensure changes in one policy are carried through over to other policy and procedure documents, critical path dependencies are mapped and legislative and regulatory developments are flagged where these may require actions to be taken in such policies and procedures.

The PwC Legal Team behind Rule Scanner are proud recipients of ALM Law.com's coveted "2024 Disruptive Technology of the Year Award" and the "2025 Regulatory, Governance and Compliance Technology Award in 2025".

If you would like to discuss any of the developments mentioned above, or how they may affect your business more generally, please contact any of our key contacts or PwC Legal's RegCORE Team via de_regcore@pwc.com or our [website](#).



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