



REPUBLIC OF ESTONIA
MINISTRY OF SOCIAL AFFAIRS

European Central Bank
pension.administration@ecb.europa.eu

Your ref. 03.11.2025 No 11-4.1/4748-1/

Our ref. 27.11.2025 No 1.4-2/2872-2

Dear Ms Eva Murciano and Ms Natália Trindade

We would like to thank you for your letter of 31.10.2025 regarding the proposal to conclude an agreement on the transfer of pension rights between the Estonian national pension scheme and the European Central Bank (ECB) pension arrangements. We appreciate your proactive approach in ensuring the portability of pension rights for your staff members.

We have carefully reviewed your proposal and the legal context. In our assessment, Estonia has already fully implemented a comprehensive legal framework that facilitates these transfers, making a separate bilateral agreement unnecessary. The transfer of pension rights to and from European Union institutions is governed in Estonian State Pension Insurance Act ([State Pension Insurance Act–Riigi Teataja](#)) and by our national regulation, "Procedure for the Accounting of Pension Rights of European Union Officials," ([Euroopa Liidu ametnike pensioniõiguste üle arvestuse pidamise kord–Riigi Teataja](#)) which directly implements the provisions of the EU Staff Regulations (Council Regulation No 259/68). This framework has been successfully in use since 2008 for transfers with numerous EU institutions, including the European Parliament, the European Commission, and the Court of Justice of the European Union, without the need for additional agreements.

We have consulted with our competent institution, the Estonian Social Insurance Board, which is responsible for the practical execution of these transfers. They have confirmed that there are no legal or practical obstacles to processing pension transfers with the European Central Bank under the existing legislation. The current framework already provides a clear and sufficient basis for both "transfer-in" and "transfer-out" procedures, ensuring that all legal requirements, including those outlined in Annex VIII of the Staff Regulations, are met.

We can assure you that the existing Estonian system is fully operational and capable of handling pension right transfers for ECB staff members.

However, should your experts have any practical or technical questions regarding the existing process, our colleagues at the Estonian Social Insurance Board would be pleased to provide the necessary clarifications. For any specific transfer cases, the process can be initiated directly by a personal application from the staff member, accompanied by confirmation from the ECB.

We trust that this clarifies Estonia's position and confirms our commitment to ensuring the seamless portability of pension rights for all EU officials. We remain at your disposal should you have any further questions.

Yours sincerely,

Kristiina Selgis
Head of Department of Benefits and Pension
Policy

Merle Sumil-Laanemaa
Merle.Sumil-Laanemaa@sm.ee