

Reif – Contribution

Simplification or deregulation? Committed to administrative simplification, Reif stress the need for a proportionate approach

April 2025

The European Commission's 2025 work programme, embodying the political guidelines presented in July by President von der Leyen, announces ambitious targets for administrative simplification. The Commission's intention is to reduce the administrative burden for businesses in general by 25%, and that of SMEs in particular by 35%.

Reif's member social security institutions (European representation of French social security institutions) are committed to the development at national level of simplification tools that have long been promoted by the European Commission. They believe that **simple and rapid access to administrative procedures is essential to the proper exercise of rights by users**. Simplified procedures, reduced formalities and interoperable systems can also **generate efficiency gains** and **facilitate relationships between officials and users**. They are thus important elements of **performance** and **cost management** at a time of tight budgets. Ultimately, public trust in the State institutions is also at stake here.

Reif requests:

- ❖ **Take into account all the simplification needs of all users and organisations, depending on the resources of the institutions, but also the needs and constraints of social security organisations;**
- ❖ **Establish a precise timetable and deadlines for the regulatory provisions in the future Omnibus initiatives;**
- ❖ **Thanks to a successful conclusion of negotiations on the coordination regulations, take advantage of the adoption of a renewed legal framework for worker mobility to promote the simplification of management practices;**
- ❖ **Prioritize the various European simplification initiatives to make them more readable and integrated, for example by mapping the texts, tools, training and digital projects underway at European level;**
- ❖ **Promote the exchange of best practice and support, with adequate funding, the development of the necessary tools;**

Ongoing simplification for the social security organisations, for many years now

The French social security institutions have been engaged in a process of administrative simplification for many years, for the benefit of businesses and those insured with us. The **Répertoire national commun de la protection sociale** (Common national social protection registry), which contains data, based on a registration number, on the beneficiaries' identity, their affiliation and the risks covered, was set up nearly 20 years ago.

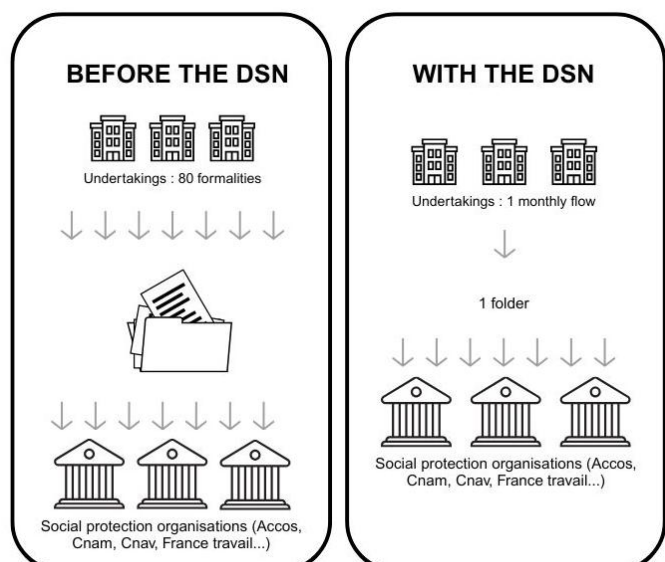
Simplification of administrative language used in forms and correspondence, as well as application of the 'Once-only' principle, are also important aspects of this policy. In addition, all the Objective and Management Agreements ('Cog') for the French social security institutions, setting out objectives and resources for the funds over a 5-year period, include goals for further development of these aspects.

These institutions are also fully committed to **continuing digitalisation of procedures, while making sure that support or physical access is still available for groups who are less willing or able to use digital tools**. The many recent or current initiatives include the following:

- The website 'Mes-aides.gouv.fr', which provides simulation tools to inform citizens more effectively of their social security entitlements;
- The 'Info-retraite.fr' website which provides information on pension entitlements for all schemes;
- The development of one-stop shops focusing on digital procedures in the 'France services' centres, which bring together several administrations, including social security, in one location;
- Expanded use of *chatbots* on the websites of the social security funds, to respond to requests for information from users.

In addition to digitalisation, this commitment to simplifying procedures is also reflected in a rationalisation of procedures. The introduction, for example, of the **Nominal Social Declaration (Déclaration sociale nominative – DSN)** meant that the declarations made by employers could be rationalised, combining 80 previously distinct formalities into one.

Taking account of the situation of small agricultural businesses without the software necessary for the DSN, a **Simplified agricultural employment certificate (Titre d'emploi simplifié agricole – Tesa+)** has been made available by the MSA (agricultural social security fund). This free declaration service helps these businesses make social security declarations, produce pay slips and join the DSN system, with the help of business advisors.



Another example: from 2026, digital platforms will be responsible for declaring the turnover of micro-entrepreneurs working with them. From 2027, they will also be responsible for paying auto-entrepreneurs' contributions directly to Urssaf on behalf of the micro-entrepreneur concerned.

Moreover, a system known as **'Solidarity at source' ('Solidarité à la source')** was made generally available on 1 March 2025, following the success of an experimental phase. It aims to ensure automatic payment of certain benefits (the active solidarity income [RSA], activity bonus), on the basis of shared information (pre-filled declarations of resources).

Cross-border procedures are also constantly evolving, to facilitate administrative formalities for individuals and businesses in the single market. One example is the establishment of the Single digital gateway, which extends the 'Once-only principle to the European level. The procedures covered are: the application procedure for the Portable Document A1 (posting of workers); application for a European Health Insurance Card (EHIC); and information on the pension systems of the various European Member States. The public interest group Pension Union which includes some Reif members (Cnav, CCMSA and CRPNPAC) is also fully involved in the European *European Tracking Service* project, which, in the long term, should enable those covered by the social security system to obtain, simply and immediately, their statements of employment for the various countries in which they have worked.

The specific information needs by social security bodies to be taken into account to ensure process compliance

Reif is therefore always careful to ensure that the procedures and formalities required by or resulting from European legislative proposals are justified and proportionate to the aim of the measure concerned. It also recognizes that **there may be scope for targeted simplification of some of the provisions in the current legislation, or of the many projects underway, particularly regarding the digitalisation of social security.**

It is nevertheless necessary to provide a secure legal framework for most of these procedures, so that the social security institutions concerned can develop or finalise the tools needed to manage the situations covered. Reif recalls that **it is therefore essential that the negotiations on revision of the coordination regulations for the social security systems should be concluded speedily.**

While the French social security institutions are fully engaged in simplifying their procedures, for the reasons given above, we should nevertheless recall that **secure collection of useful and high-quality data is vital to the design and steering of public policies, access to the correct entitlements, monitoring, combatting fraud and errors.** Any rationalisation of procedures must be done in the light of this need.

Certain procedures are – and will need to remain – complex, as they apply to particular situations which are themselves complex. This may in particular be true for cross-border situations, where the coexistence of many European mobility regimes, and of several national legislations, means that sufficient data must be collected to determine correctly which legislation applies, to calculate the entitlements accurately, and also to meet the needs of the administrations (particularly for oversight and monitoring).

The simplification of the **procedure for prior notification of the sending of a posted worker, through the draft e-declaration regulation and the creation of a single, common form, is a perfect illustration of this problem.** While the aim of the text – to reduce the administrative burden and simplify the

process – is entirely justifiable, particularly from the viewpoint of companies, it is far less so for the bodies responsible for monitoring and inspecting these workers. The – fairly restrictive – list of data covered, according to the proposal, by the common form for the proposed declaration does not allow Member States to add requests for specific data necessary to monitor workers effectively; this has been done with a view to simplification. Information on working hours, social security affiliation and other data needed by the inspection bodies and workers themselves would all be scrapped.

This aim to simplify would even end up, in certain cases, having the opposite effect: the draft regulation would only cover employees who are posted, which means that several countries would need to keep different prior declarations for other categories of workers (the self-employed), **increasing the administrative burden on the inspection services.**

Reif therefore calls on the European Commission to commit to:

- ❖ **Take account of all the needs for administrative simplification, those of businesses, citizens and administrations.** Social security bodies are in the best position to determine the data they need to enable **correct enforcement of rights, oversight, combatting fraud and errors.** **For this reason, a qualitative assessment of the impact of the proposals is essential;**
- ❖ Establish a **precise timetable and deadlines for the regulatory provisions** which the European Commission wishes to modify **in its Omnibus initiatives**, and perform a meticulous evaluation for each of these;
- ❖ **Thanks to a successful conclusion of negotiations on coordination regulations**, take advantage of the adoption of a **renewed legal framework for worker mobility**, enabling organisations to finalise, in a secure and clear regulatory environment, **the introduction of appropriate tools for companies**, to promote **the simplification of management practices;**
- ❖ Prioritise the various European simplification initiatives to make them clear and integrated, **for example by mapping of the texts, instruments, training and digital projects underway at European level**, to rationalise these policies;
- ❖ **Promote the exchange of best practice** and support, with **adequate funding**, the development of the necessary tools;

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The European Representation of French Social Security Institutions (Reif) was set up in May 2003 to represent the main French social security funds to the European Union. Today, it brings together all the branches of the general scheme, professional schemes and specialised structures: health insurance, accidents at work and occupational diseases (Cnam), pensions (Cnav), family benefits (Cnaf), autonomy (CNSA), recovery (Urssaf Caisse nationale, formerly Acoass), the National Professional Union for Employment in Industry and Trade (Unédic), the Central Agricultural Social Mutual Fund (CCMSA), the National School of Social Security (EN3S), the Union of National Social Security Funds (Ucanss), the Centre for European and International Liaisons for Social Security (Cleiss) and the Retirement Pension Fund for Professional Air Crew Members in Civil Aviation (CRPNPAC). Reif has a permanent office in Brussels.

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