

Question for written answer E-003955/2026
to the Commission
Rule 144
Pascal Arimont (PPE)

Subject: Cross-border workers and Luxembourg's pension system: how part-time work carried out in Belgium is counted

When it comes to calculating the pension rights of cross-border workers from Belgium, periods of part-time employment carried out in Belgium are converted into full-time equivalents (ETP) and submitted in this reduced form to the Luxembourg Pension Insurance Fund via the P 5000 form. This can have significant consequences, especially when it comes to accessing Luxembourg's early old-age pension, which requires 480 months of insurance contributions¹. For example, 12 months of continuous employment and contributions in Belgium may only be counted as 6 or 8 months of contributions in Luxembourg because of the ETP conversion. Meanwhile, you only have to complete 64 hours of paid employment for a full month to be counted in Luxembourg². Article 6 of Regulation (EC) No 883/2004 provides that periods of insurance and employment completed in another Member State are to be taken into account as though they were periods completed under the legislation of the competent institution. Article 12 of Regulation (EC) No 987/2009 gives specific effect to that principle.

1. Is this practice compatible with Article 6 of Regulation (EC) No 883/2004 and Article 12 of Regulation (EC) No 987/2009?
2. For the 480-month rule, must the actual duration of the period of employment/insurance completed in Belgium be taken into account or may it be reduced in proportion to the part-time nature of the work?
3. Does the Commission consider this to be a possible disadvantage for part-time cross-border workers compared with comparable part-time workers in Luxembourg?

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¹ <https://cnap.public.lu/en/pensions/pension-vieillesse-anticipee/pension-vieillesse-anticipee.html>.

² <https://cnap.public.lu/en/carriere-assurance/carriere-assurance-luxembourg/carriere-assurance.html>.