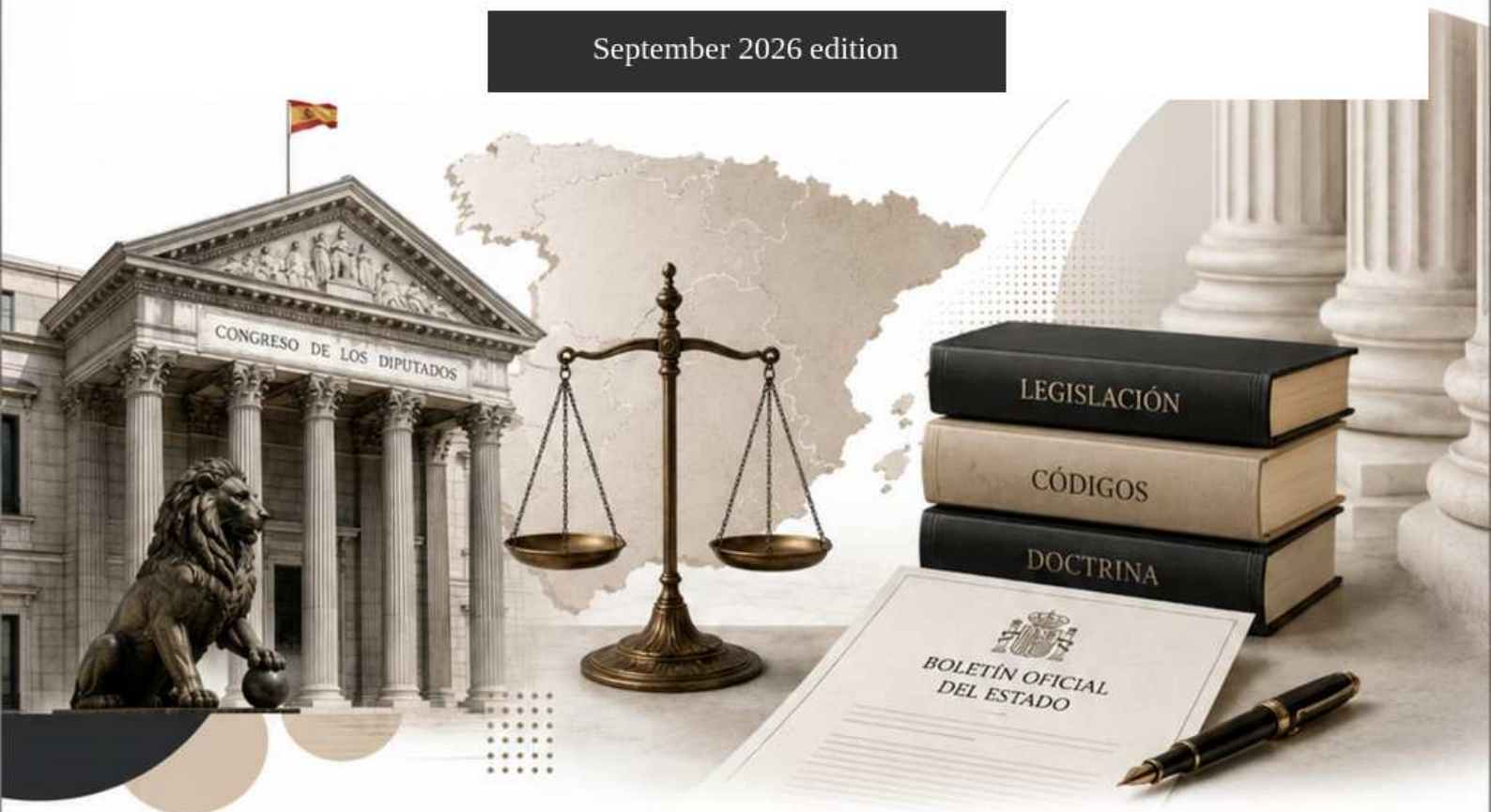


LEGAL BULLETIN

Regulatory developments in Spain

September 2026 edition



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Law 2/2026: changes to alternative mutual societies and Social Security

Law 3/2026: update to the neonatal screening programme

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RDL 17/2026 and 19/2026: dependency, partial retirement and insularity

EXECUTIVE SUMMARY

Recent regulatory overview in Spain

This section provides a concise overview of the main recent national legislative developments, with particular attention to those that may have a practical impact on companies, organisations and professionals.



RECENT TIMELINE

23 June 2026

RDL 17/2026

29 June 2026

RDL 19/2026

29 July 2026

Laws 2/2026 and 3/2026
+ RDL 20/2026

25 August 2026

RDL 21/2026

1		RDL 21/2026 In force since 27/08/2026: mandatory national register, rules of conduct, legislative footprint and sanctions regime.
2		Law 2/2026 In force since 01/08/2026. The voluntary transfer route to RETA depends on implementing regulations; the application period will be one year from their entry into force.
3		Law 3/2026 In force since 01/08/2026: strengthens evaluation and consistent application of the NHS neonatal screening programme.
4		RDL 20/2026 Urgent labour and social protection measures in response to wildfires; published on 30/07/2026.
5		RDL 17/2026 Validated on 14/07/2026. Strengthens the SAAD; minimum state-level amounts apply from 01/07/2026.
6		RDL 19/2026 In force since 01/07/2026 and validated on 23/07/2026: early partial retirement for public-sector employees and insularity measures in the Balearic Islands.

PRACTICAL KEYS

Review applicable regulatory compliance and update your obligations.

Assess the operational and financial impact of the new provisions.

Update protocols, internal policies and relevant documentation.

Maintain ongoing monitoring of regulatory developments and forthcoming rules.

HIGHLIGHTED DEVELOPMENTS I

Transparency, social protection and healthcare



Regulatory anticipation reduces risk and improves decision-making.

1

Royal Decree-Law 21/2026, of 25 August

INTEREST GROUPS

Creates a mandatory national Register of Interest Groups and establishes rules of conduct, a legislative-footprint report and a specific sanctions regime. It entered into force on 27 August 2026.

PRACTICAL IMPACT

- Mandatory national register.
- Legislative footprint and traceability of contacts.
- Specific infringements and sanctions.

2

Law 2/2026, of 29 July

ALTERNATIVE MUTUAL SOCIETIES AND SOCIAL SECURITY

Strengthens minimum protection and transparency for alternative mutual societies. The voluntary transfer of rights to RETA requires implementing regulations; the application period will be one year from the entry into force of those regulations. The minimum reference contribution reaches 86% in 2026, 93% in 2027 and 100% in 2028.

POINTS TO WATCH

- RETA transfer route pending regulations.
- Greater minimum protection and transparency.
- Pension and tax planning.

3

Law 3/2026, of 29 July

NEONATAL SCREENING

Strengthens evaluation of the neonatal screening programme, early detection and consistent application across the National Health System. It has been in force since 1 August 2026.

RELEVANCE

- Periodic programme evaluation.
- More consistent access.
- Health and technical monitoring.

HIGHLIGHTED DEVELOPMENTS II

Employment, dependency and public-sector employment

01



Royal Decree-Law 20/2026, of 29 July

WILDFIRES

Establishes urgent labour and social protection measures in response to wildfires. It was published on 30 July 2026 and entered into force the following day. Its application protects workers and organisations affected by the emergency situations covered by the rule.

PRACTICAL IMPACT

Work contingencies: protection and coverage adapted to the exceptional situation.

Support measures: facilities for economic and social recovery.

Operational continuity: flexibility and adaptation of labour and Social Security obligations.

02



Royal Decree-Law 17/2026, of 23 June

DEPENDENCY

Strengthens and consolidates the System for Autonomy and Care for Dependency. It was validated by Congress on 14 July 2026. The minimum state-level amounts provided for in the rule apply to benefits accrued from 1 July 2026.

KEY POINTS

Care reinforcement: increased resources and improved support.

Social approach: person-centred care and territorial equity.

Implementation monitoring: evaluation and control to ensure effectiveness.

03



Royal Decree-Law 19/2026, of 29 June

PARTIAL RETIREMENT AND INSULARITY

Regulates urgent measures on early partial retirement for public-sector employees and the insularity supplement in the Balearic Islands. It entered into force on 1 July 2026 and was validated by Congress on 23 July.

POINTS TO WATCH

Human resources: workforce planning and generational replacement.

Labour costs: budgetary impact and sustainability.

Administrative adaptation: procedural adjustments and compliance control.

RECOMMENDED REGULATORY FOLLOW-UP

Regulatory development

Monitor in particular the RETA transfer-route regulation provided for by Law 2/2026.

Internal analysis

Assess the impact on processes, policies and contracts to anticipate necessary adjustments.

Stakeholder communication

Inform teams and partners about the changes and their practical implications.

Criteria update

Review and update legal criteria, procedures and key documents.



PRACTICAL IMPLICATIONS AND NEXT STEPS

What companies, professionals and organisations should review



COMPANIES AND INTEREST GROUPS

- Strengthen transparency in information and communication.
- Review institutional relationships and strategic third parties.
- Ensure traceability and documentary records.
- Assess risks and reinforce organisational compliance.



PROFESSIONALS AND MUTUAL-SOCIETY MEMBERS

- Review your coverage and alternative options.
- Check your position in relation to Social Security.
- Seek preventive advice for significant decisions.
- Plan scenarios and adjustments in your professional activity.



PUBLIC, HEALTH AND SOCIAL SECTOR

- Strengthen inter-administrative coordination.
- Prioritise orderly implementation of the measures.
- Ensure appropriate dependency and care support.
- Carry out continuous organisational monitoring and evaluation.

RECOMMENDED ACTIONS

in the next 30 days

- Review the main applicable regulatory developments.
- Update internal protocols and key documentation.
- Identify impacts and critical compliance areas.
- Inform and train teams and responsible persons internally.
- Monitor legislative developments and official guidance.
- Seek specialist advice where appropriate.

LEGAL WATCH

- Follow-up of implementing regulations and technical guidance.
- Analysis of interpretative criteria and administrative doctrine.
- Evolution of sector-specific measures with cross-cutting impact.



EDITORIAL CLOSE

In a changing regulatory environment, timely information and rigorous analysis are essential for sound decision-making.

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