

# Position on the Communication on the Union of Skills



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Eurochambres welcomes the European Commission's Communication on the Union of Skills and appreciates the stronger emphasis placed on skills and vocational education and training (VET) at EU level. However, the focus on skills must not lead to a "skills only" approach as qualifications still play an important role, in particular, in VET. We also remain cautious regarding the feasibility of implementation and the potential administrative burden it may generate. Despite the extensive list of proposed actions, a clearer roadmap, with concrete milestones and coordinated governance, is still lacking.

Our comments are structured according to the chapters outlined in the Communication: the key strands of the Union of Skills, investing in education and skills, and governance.

### I. Key strands of the Union of Skills

#### a. Building skills for life through a solid educational foundation

##### Solid foundations in education and training

We welcome the attention given to basic skills, as this remains a major challenge across Europe. We are particularly interested in how the proposed toolkit for basic skills, including basic digital skills, within apprenticeships will provide practical guidance for VET providers and employers to effectively integrate these skills into their apprenticeship programmes.

In addition, there is a clear need to foster entrepreneurial skills and mindsets from an early stage of education. While not traditionally classified as basic skills, entrepreneurial competencies - such as creativity, initiative, decision-making, and problem-solving - are recognised as key transversal skills for lifelong learning (2018 Council Recommendation, EntreComp framework). These should be introduced progressively, in an age-appropriate manner, as already done in some Member States. This dimension should be further emphasised in the Action Plan, particularly in the section related to transversal skills.

The Communication lacks a concrete deliverable aimed at systematically enhancing entrepreneurship education across all levels of education and training. While collaboration with the innovative ecosystem is mentioned, it appears limited to the university level. Such cooperation should be expanded to encompass all educational tiers to ensure a comprehensive and inclusive approach to fostering entrepreneurial skills.

This reinforces the broader value of entrepreneurial education as a strategic investment for Europe's future. Entrepreneurial skills are essential for business creation, innovation, and adaptability. Introducing them early and fostering them throughout all levels of education helps build a resilient, future-oriented mindset. Eurochambres and its network of national chambers implement a wide range of initiatives in the field of entrepreneurship. We stand ready to contribute our expertise and share proven practices, particularly where our initiatives (complementary, pilot projects, work-based learning) may be scaled or adapted as curricular activities for implementation at national level. Furthermore, dedicated funding mechanisms should be foreseen to incentivise and support stakeholders in advancing

entrepreneurship education, especially when implemented in partnership with employers and chambers.

Recognition and collaboration mechanisms can further support the development of innovative and inclusive learning environments. It is a good idea to recognise schools that are innovative through a European Innovative School Award, but attention should also be given to VET schools to value excellence. We are keen to understand how cooperation with businesses and local authorities will be integrated. Chambers of commerce and industry could bring significant added value to this collaboration. Furthermore, the process for recognising schools should be transparent and based on clear criteria.

Yet, some of the proposed ambitions raise questions about feasibility and implementation. The newly proposed targets regarding basic skills and STEM are highly ambitious; however, their realism is uncertain, particularly if efforts are limited to EU-level initiatives. These targets appear to serve more as political objectives than operationally achievable benchmarks.

### STEM, AI and digital skills

Within the Science, Technology, Engineering, and Mathematics (STEM) Education Strategic Plan, we welcome the intention to involve local authorities and businesses in curriculum reform. Chambers can play a key role in shaping relevant, real-world content for learners.

Increasing enrolment in STEM, particularly among girls and women, is a shared priority. Embedding digital competence into STEM education is also a welcome and necessary step, given the critical role of technology across all sectors.

While the plan refers to cooperation with businesses, it lacks concrete deliverables for integrating work-based learning into STEM education – such as apprenticeships or mentoring schemes.

Moreover, the Communication does not establish a link between STEM and entrepreneurial education. Yet, the ability to innovate and problem-solve is essential in STEM-related sectors. Integrating entrepreneurial and STEM skills would better prepare learners for today's labour market. Fostering women's entrepreneurship could also help drive higher enrolment of girls and women in STEM fields.

We welcome the attention given to AI in education and skills. For instance, Eurochambres, through the EULEP project, contributes to making continuous VET more attractive by developing tailored training modules in areas such as artificial intelligence, virtual reality, and social innovation. We support the update of the Digital Competence Framework to reflect emerging technologies, including artificial intelligence. We suggest that the 2030 Roadmap on the future of digital education and skills should promote existing good practices, including successful projects and initiatives, should be promoted and taken into consideration. The roadmap should include chambers of commerce in its implementation.

Ensuring educators are equipped for this evolving landscape is equally vital. For the EU Teachers and Trainers Agenda and the European competence framework for academic staff, we suggest that teachers and academic staff in higher VET should be duly considered. Attention should also be given to trainers such as in-company trainers and tutors involved in VET, including those active in dual education systems.

### Vocational education and training (VET)

We encourage developing an attractive and innovative VET and we welcome the European Strategy for VET, but we are curious to see what it will entail. However, higher VET is not addressed in the Communication. We strongly recommend that it will be taken into consideration, as it contributes to the attractiveness, excellence, and inclusiveness of vocational education and training. Higher VET is key for businesses facing fast-changing skills needs. It offers a flexible way to deepen and update workers' skills after initial training, keeping pace with innovation and sectoral demands. Without it, companies struggle to find the advanced technical profiles they need. Several Member States already offer higher VET programmes, and this model could be further extended. As we work to widen access to higher education, Member States should also consider creating bridges between academic tracks under the Bologna Process and higher VET.

Finally, supporting learners in navigating their choices remains an essential, yet overlooked, component. Career and professional guidance play a crucial role in raising awareness and motivating learners and workers to engage in training. Its absence in the Communication is a missed opportunity, as strengthened guidance services would significantly enhance the attractiveness of VET.

### **b. Upskilling and reskilling to ensure future-oriented skills**

#### Upskilling and reskilling of adults

We appreciate the continued focus on Individual Learning Accounts (ILAs), though we call for more clarity on design, governance, and funding. The chamber network recognises that there are many ways to organise lifelong learning and considers that the European initiative on Individual Learning Accounts (ILA) should respect the variety of tools and systems existing in the Member States (that respond to the specific needs of different target groups). Therefore, the Commission should not develop a one-size-fits-all approach and respect the principle of subsidiarity.

Clarifying roles and responsibilities within the ILA framework is essential to ensure effective implementation. Some chambers provide training and could potentially provide training within the ILA scheme. It is important to clarify that businesses should not be subject to mandatory financial contributions for employee training. Moreover, employers should retain a degree of autonomy over the training undertaken by employees, particularly when it occurs during working hours.

In parallel, the role of flexible learning tools must be carefully considered. Micro-credentials can be a useful instrument in certain situations but expanding them should not be a goal in itself. Their use must be guided by the concrete needs of companies and supported by appropriate validation, recognition, and uptake by employers.

The Skills Guarantee pilot also presents an opportunity to align training systems with labour market realities. Eurochambres interprets the Skills Guarantee pilot as a potential tool to improve the provisions of skills for the benefit of both workers and employers. This pilot should not have the objective of testing an individual “right to training”. It could be done in collaboration with employers and chambers. Chambers could have a greater role as they represent businesses and could facilitate the “transfer” of workers.

Funding frameworks play an important role in enabling long-term upskilling strategies. Assessing if state aid rules applicable to training need to be updated to provide better

incentives for industry, including the social economy, is welcomed. The current framework lacks the flexibility and targeting needed to support strategic reskilling. It tends to favour short-term, technical upskilling rather than transformative learning aligned with long-term priorities such as the green and digital transitions. A revised framework should provide stronger incentives for training in future-critical areas like green technologies, AI, circular economy, etc. Peer learning activities for Member States on innovative community learning spaces should involve businesses and chambers that understand local labour market needs.

However, financial incentives for training still lack clarity and targeting, especially for SMEs. While the Communication aims to “incentivise” employer investment in training, it fails to outline how. In particular, the needs of SMEs must be addressed by ensuring that the financial burden of skills development is manageable. More targeted use of instruments such as financial tools, ESF+ allocations, and co-financing models could play a key role in supporting SME training investment.

### Public-private partnerships and promoting cooperation

Beyond funding, cooperation between education and business remains key to addressing skills gaps. Strengthening apprenticeship opportunities is key, ensuring they are accessible to people of all ages. They are essential to address companies' skills needs and facilitate labour market transitions. Eurochambres will increase its efforts to contribute to the European Alliance for Apprenticeships and the Pact for Skills and promote the networks to its members.

However, existing initiatives must first prove their value before new ones are introduced. So far, the existing EU Skills Academies have not delivered tangible results. Before creating new Academies, those who already exist should demonstrate their added value in the broader landscape of skills providers. Efforts must focus on avoiding duplication and fragmentation of existing initiatives through a coherent governance approach. Coordination cannot rely solely on participants; clear structures set by the Commission are needed to ensure efficient resource use, better visibility, and long-term impact.

Transnational collaboration can further strengthen the connection between education and innovation ecosystems. We welcome the idea of transnational university-business partnerships supporting dedicated joint programmes, the joint development of micro-credentials, and initiatives to foster entrepreneurship and mentorship for start-ups and scale-ups. However, we would advocate for such partnerships to extend beyond the university level to ensure inclusiveness across all levels of education.

## **c. Circulate and allocate skills to unlock the full potential of the single market**

### Portability of skills and qualifications

We support initiatives to facilitate mobility and transparency of qualifications. However, skills portability should go beyond formal qualifications and include soft skills, non-formal and informal learning, and validation practices. Chambers must be consulted in the development of frameworks for recognition and mobility, which must remain flexible and aligned with national systems. There is no clear delivery model for the portability initiative. Will it build on Europass, EURES, or be a new platform? How will employers use it?

Building on this, the design of new tools must ensure they complement rather than duplicate existing structures. Regarding the Pilot of a European VET diploma/label, we caution that

such a diploma should complement – not replace – national qualifications and avoid duplicating existing efforts. A European VET diploma could be attractive as a top-up / add-on programme after having acquired a national qualification but should not by any means endanger national qualifications. Pilot projects could be co-designed with VET providers and employers, and the initiative should remain voluntary.

### Transnational cooperation and boosting mobility

We support strengthening Erasmus+ to make it more inclusive and accessible for all (including in VET). Attention should be offered to VET learners but also companies, especially SMEs, which lack sufficient resources. We support strengthening transnational cooperation under Centres of Vocational Excellence after 2027.

Clarification is also needed on how new initiatives align with existing programmes and their target groups. Regarding piloting European School Alliances, how is this different from existing Erasmus+ calls directed to schools? Does it cover VET schools?

### **d. Attract and retain skills from third countries to address skills shortages and develop top talent in Europe**

The focus is too narrow, concentrating only on highly skilled talent. The EU also needs intermediate and vocational talent - especially in healthcare, construction, hospitality – which the Communication does not address.

Beyond the narrow focus, the lack of concrete implementation tools also raises concerns. There is no operational strategy for skills partnerships with third countries, nor mechanisms to ensure ethical recruitment and circular migration. Integration measures remain vague. Skilled migrants face significant barriers in practice, including recognition delays, language gaps, and discrimination, none of which are substantively tackled.

Equally important is ensuring that untapped potential within the EU itself is fully mobilised. The activation of the EU workforce should not be overlooked – particularly with regard to vulnerable and underrepresented groups such as women (beyond the STEM context), young people (especially those not in employment, education, or training), seniors, individuals with migrant backgrounds, and refugees. This important aspect was not addressed in the Communication.

Eurochambres [welcomes the EU Talent Pool](#) and its emphasis on facilitating international recruitment, particularly in light of significant and enduring ills and labour shortages across Europe. Recognising the importance of legal migration as a solution to workforce deficits, it is imperative to address key shortcomings that hinder the European Union's attractiveness.

To ensure the EU Talent Pool's efficacy, it must be user-friendly and easily accessible for companies. Seamless interoperability with existing national systems is crucial. Additionally, there should be no list of shortage occupations because companies themselves should be able to determine their specific recruitment needs from third countries. Eurochambres stresses the importance of a coordinated and comprehensive approach. Cooperation and effective dialogue between local, national, and European levels will be key, while also acknowledging the realities of labour markets and soliciting input from relevant stakeholders.

Complementary measures such as one-stop services can further ease the migration

process. We support the launch of Multipurpose Legal Gateway Offices and are interested in how the implementation will take place.

In parallel, targeted actions to attract high-end talent are also important for Europe's innovation potential. Attracting talent from third countries, e.g. by a MSCA Action, is key to securing the long-term competitiveness of the European economy. The framework of research careers has the potential to improve the mobility between the academic sector and R&I intensive industry. Closer cooperation between academia and industry is key to fostering innovation.

### **II. Investing in education and skills**

We support the message that education and skills are investments, not costs. We welcome the launch of the "EU Invest in Talent" platform and encourage blending public-private investments, including support for regional and sectoral initiatives. However, Member States must be incentivised to use the EU funds available effectively, especially in support of SMEs to stimulate employer investment in skills development. Evaluation of funding effectiveness should be transparent and participatory.

### **III. Governance**

The governance structure must avoid becoming another bureaucratic layer and ensure that its work does not overlap with existing bodies (e.g., the High-Level Board – how is it different from Working Groups, Advisory Groups, ACVT, or DGVT? Similarly, for the Observatory – how does its role differ from that of Cedefop, Eurostat, etc.?).

The added value of both the Board and the Observatory must be clearly communicated. If their responsibilities differ from those of the existing bodies mentioned above, they should include strong representation from employers, including SMEs and intermediaries such as chambers.

The European Skills Observatory can become a useful tool, but only if it includes local and sectoral data collected in cooperation with employers and chambers. Transparency on how each country engages with the Observatory would also support mutual learning.

The planned EU-27 Recommendation on human capital should reflect diverse national contexts and avoid a one-size-fits-all approach. It should also explain how it will be integrated into the European Semester and the added value it will bring to monitoring and reform guidance. Furthermore, the agenda-setting process for issues related to human capital should include the contribution of chambers.

### **IV. Conclusion**

To deliver on the Union of Skills, the European Commission must move from strategy to implementation with a focus on impact. This means ensuring that initiatives are co-created with businesses and chambers, that understand real labour market needs; designed to be practical and adaptable to national and regional contexts; driven by demand, particularly the needs of SMEs; grounded in partnerships that reflect all education and training actors; evaluated transparently, with clear benchmarks for success. Eurochambres, with its experience and expertise, remains fully committed to working with the European Commission to shape and implement the Union of Skills.



Eurochambres – the association of European chambers of commerce and industry – represents more than 20 million businesses through its members and a network of 1700 regional and local chambers across Europe. Eurochambres is the leading voice for the broad business community at EU level, building on chambers' strong connections with the grass roots economy and their hands-on support to entrepreneurs. Chambers' member businesses – over 93% of which are SMEs – employ over 120 million people.

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