



Input on the Quality Jobs Act

JOBS



Eurochambres' input on the Quality Jobs Act

Every job created in Europe by a competitive company that serves to increase productivity is a 'high-quality job'. In its communications on the 'Competitiveness Compass', the 'Union of Skills' and the 'Clean Industry Pact', the Commission states that high-quality jobs are a driver of EU competitive-ness, enabling employers, especially small and medium-sized enterprises (SMEs), to grow and contribute to a just transition in all regions.

It seems as if high-quality jobs are completely independent of those who create them, namely businesses. However, businesses do not operate in a vacuum but must be able to rely on European framework conditions that enable them to compete globally. Economic growth is the basic prerequisite for social progress. To achieve this, the economy must have access to workers with the right skills. In our view, initiatives to remedy or at least alleviate labour and skills shortages should be a priority.

The term 'high-quality job' is also misleading: employment relationships which comply with European legislation, including their national implementation and correct application, are always high-quality jobs. Furthermore, this term has a strong subjective element: employees will define "quality" differently at different stages of their working lives, whether as young professionals, young parents or older employees.

1. Are the identified issues and possible areas for action correct?

With a possible 'Quality Jobs Act', the Commission wants to review existing legislation, revise it in part and supplement it if necessary. We welcome and support the Commission outlining in the Quality Jobs Roadmap that any potential EU action in this field "would need to demonstrate clear added value, guaranteeing full consistency with the existing legal framework and avoiding duplications. A further consideration would be simplification, as regards administrative burdens on workers and companies, and clarification of the interaction with other EU rules, such as on data protection, AI systems, information and consultation, or trade secrets."

While the consultation identifies relevant themes linked to the evolving world of work, concerns remain regarding the framing and emphasis of certain issues, which risk increasing administrative burdens rather than reducing them, contrary to the Commission's simplification agenda. In particular, EU-level regulation is often presented as the primary response, rather than focusing on the effective enforcement of existing frameworks and capacity building at national level.

However, there is currently no need for additional regulation. Instead, attention should be focused on improving the enforcement of existing legislation and possible administrative simplifications in social policy directives. During the previous term of the European Commission social policy legislation has been characterised by a high level of detail (e.g. the Wage Transparency Directive, the Platform Directive). In an economically challenging time - when Europe is losing its international competitiveness - the application of this

legislation places a massive administrative burden on businesses, especially SMEs.

Moreover, insufficient account is taken of sectoral diversity, notably in labour-intensive sectors with high SME representation, seasonal demand and a strong need for flexibility, where one-size-fits-all solutions may prove ineffective. Many of the challenges identified in the consultation, including in the areas of occupational health and safety, subcontracting and working conditions, are already addressed by existing EU and national frameworks. The issue lies primarily in implementation and enforcement gaps rather than in the absence of legislation.

Finally, in the context of the digital transition, AI and new technologies are predominantly framed through a regulatory lens, whereas greater emphasis should be placed on skills development, training and digital adaptability to better prepare both workers and businesses for technological change.

2. Is there a need for EU measures? If so, in what direction and to what extent?

Algorithmic management: the repeatedly called-for legislation on algorithmic management for companies is unnecessary, as both the General Data Protection Regulation and the AI Act apply. The latter classifies the use of artificial intelligence in employment relationships as a high-risk application. This risk-based approach can best be ensured through guidelines to be developed by the European Artificial Intelligence Office (AI Office) in cooperation with the European social partners. Provisions on algorithmic management are already included in the Platform Directive, which is currently being implemented in the individual Member States. Their evaluation should be awaited before a separate directive for all employment relationships is presented. During the transposition process of the platform work directive the Commission stressed that the Platform work directive aims to fill the legal gaps left by the AI Act, as not all AI tools will be AM tools and not all AM tools will be AI-based. It is therefore key to distinguish AI tools and algorithmic management (AM) tools. When introducing AM, the Directive on informing and consulting employees also applies. In our view, the EC's intention to protect workers from potential risks in the area of AM will not lead to its parallel goal of encouraging employers, and SMEs in particular, to make greater use of AI driven AM, but will rather have the opposite effect.

In this context, EU action should focus on guidance, training and upskilling rather than prescriptive regulation, with enforcement and monitoring remaining primarily at national level, supported by EU coordination.

Occupational health and safety: the Advisory Committee has suggested a revision of the Workplace Directive, which would, among other things, extend the definition of workplace to include working from home or from another location. This has implications for risk assessment, as it requires greater involvement on the part of employees. In our view, such a revision could be considered. The Advisory Committee's opinion also suggests adding a provision to the annex to the Directive requiring workplaces to be designed in such a way as to pre-vent or reduce the risk of violence and harassment by third parties, taking into account measures for emergencies.

In our view, these two points could be included in the Workplace Directive.

The Advisory Committee has also issued an opinion on the revision of the Display Screen Equipment Directive. This proposes that mobile display screen equipment be included in

the definition of display screen workstations. For the annex, the Advisory Committee proposes, among other things, that height-adjustable tables be purchased for workstations set up after the Directive comes into force. In our view, this represents a massive burden on employers and should therefore be rejected. There is also a risk that such tables would then have to be provided for home office workstations as well. Therefore, we say yes to a change in the definition, but no to changes in the annex that would entail considerable burdens. In any case, drawing up guidelines for employee participation in the risk assessment of home offices, would be appreciated, as the employer has no right to enter the employee's private premises and – in the case of mobile work – has no influence whatsoever on the design of the respective workplace. Any changes in this area should be implemented with appropriate transition periods and preserve sufficient flexibility to reflect sectoral and national specificities.

With regard to the risk assessment of psychological stress, we refer to Framework Directive 89/391, which also applies here due to its comprehensive scope. However, guidelines could also be helpful in this area.

Subcontractor chains: In the consultation document, the Commission aptly notes that there is already a broad *acquis* applicable to subcontractor chains and their liability and therefore proposes improved enforcement mechanisms, such as increasing transparency in national systems. We are expressly opposed to new liability regulations for certain sectors (construction, transport, agriculture, food industry) at European level.

EU action should therefore prioritise enhanced transparency and accountability through effective enforcement of existing rules rather than introducing new EU-wide liability schemes that could create additional complexity and administrative burdens.

Just transition: Here, too, a comprehensive *acquis* (Directive 2002/14; Directive 98/59; Directive 2001/23; Directive 2009/38 as amended by 2025/2450) is already in place, which applies in particular to corporate restructuring, but also generally to the introduction of new working methods. We do not consider additional regulations in this area to be necessary. Priority should instead be given to national frameworks and social dialogue, ensuring sufficient flexibility for companies to adapt to economic and structural change.

Enforcement and role of the social partners: The extent to which the social partners play a special role in ensuring compliance with national implementation of European directives depends on the respective national industrial relations system. The principle of subsidiarity and the autonomy of the social partners take precedence in this regard. Increased cooperation between labour inspectorates is already taking place through the European Labour Authority. Increased cooperation between other authorities (e.g. finance, labour inspectorate and equal treatment) could be promoted through the use of AI, provided that this means that the same data does not have to be reported multiple times.

More broadly, EU action should facilitate the exchange of best practices and coordination between Member States through funding, technical assistance, digital tools and guidance, while avoiding the creation of additional administrative burdens for SMEs or the undermining of national competences in enforcement and labour inspection systems.

3. Would you initiate a dialogue under Article 155 TFEU on the above-mentioned topics?

Cases from chambers:

The Austrian Federal Economic Chamber (WKÖ) sees no need for a Quality Jobs Act as described by the EC. However, WKÖ is open to a targeted social dialogue on the revision of the Workplace Directive and the Screen Directive.

The Malta Business Bureau sees that initiating dialogue is supported if there is a clear scope limited to areas where social partner agreement could genuinely add value over legislative or national approaches as well as respect for subsidiarity and recognition that certain issues are better addressed at national or sectoral level. Dialogue should not be used to introduce harmonised obligation by indirect means. Consequently, these are potential topics for Article 155 dialogue:

- Skills development and training frameworks for digital and green transitions: this could benefit from social partner collaboration on identifying needs and co-designing solutions
- Guidance on proportionate approaches to AI and algorithmic management in the workplace, focusing on transparency and worker involvement rather than prescriptive regulation
- Simplification and alignment of existing EU labour market instruments to reduce fragmentation and administrative burden.
- Better flexibility to respond to seasonal and customer-driven demand. Working time flexibility is crucial during peak demand periods, which require adaptable scheduling frameworks and best designed at national and sectoral level.

The Malta Business Bureau urges the Commission to ensure that any measures are proportionate, practical, and respectful of national diversity. For Malta's hospitality industry, characterised by high SME representation, seasonal demand patterns, and flexible workforce arrangements, additional regulatory complexity risks undermining the very objectives the Act seeks to achieve. Overly prescriptive EU-wide rules could reduce business flexibility, increase administrative costs, and ultimately limit job creation in a sector that is vital to Malta's economy. Future initiatives should assess impacts on tourism competitiveness, specifically for small island and tourism dependent economies.



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