Ceemet
European Tech &
Industry Employers

Artificial Intelligence at the workplace

Position paper

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Contents

About Ceemet

Set up in 1962, Ceemet is the European employers' organisation representing the interests of the metal, engineering and technology-based (MET) industries with a particular focus on topics in the areas of employment, social affairs, industrial relations, health & safety and education & training.

Ceemet members are national employers' federations across Europe and beyond based in 20 countries. They represent more than 200,000 member companies, a vast majority of which are SMEs.

Ceemet members provide direct and indirect employment for 35 million people and cover all products within the MET industrial sectors, detailed below.

Together, these companies make up Europe's largest industrial sector, both in terms of employment levels and added value, and are therefore essential to ensuring Europe's economic prosperity.

Executive summary

On 4 June 2025, Ceemet adopted its position paper on Artificial Intelligence at the workplace, which aims at highlighting the main principles which should be followed by the stakeholders as regards the introduction of artificial intelligence at the workplace. They are summarised below:

- **Need to implement the official EU definition**

It is essential to adhere to the official definition, which includes three key elements: machine learning, autonomy and adaptability. These three functions distinguish AI from other technologies. This will allow for a common understanding and an effective implementation of regulations.

- **Respect a human-centric approach to Human Resources**

AI is a tool designed to assist human work. Existing regulations, such as the GDPR and the AI Act, already address concerns about AI misuse in Human Resources, making additional legislation unnecessary.

- **Avoid new legislation**

The deployment and use of AI systems at the workplace is already regulated by the AI Act, the GDPR and other relevant EU and national legislations. New regulatory proposals in this field are therefore unnecessary and would only serve to slow down the beneficial uptake of AI in companies and other organisations.

- **Use AI to improve health and safety at work**

AI contributes to a healthier working environment and plays an important role in preventing occupational risks by offering innovative solutions and reducing dangerous tasks.

- **Ensure that the workforce is well prepared to work with AI tools**

The EU and Member States should support initiatives and adapt the education system to equip workers with the skills they need to succeed with AI technologies, both to use them and to create new ones.

- **Stimulate investment in AI to boost growth and innovation**

It is essential to enable the private sector to invest by avoiding administrative burdens, ensuring affordable energy and creating a Single Market with a realistic legislative framework.

- **Promote social dialogue for the fair adoption of AI**

Social dialogue has already proven its importance in facilitating the integration of new technologies within companies. It should, therefore, be promoted in order to increase the use of AI in the MET industries and thus regain competitiveness.

Introduction

Artificial intelligence is changing our society just as profoundly as the advent of cars or the internet in the last century. It is appearing in our personal and professional lives as a new tool. Despite what one might expect, however, most Europeans use AI in their private lives (38%)[1] rather than their work (12% in 2024 and around 25 % in 2025[2]). However, the development of AI represents an important opportunity in the workplace: it can thus boost productivity, health, safety and job satisfaction at work. AI will also make possible to face certain challenges such as labour shortages by integrating AI for the accomplishment of certain tasks and optimising existing automation processes, thereby freeing workers from repetitive and tedious tasks with no added value.

Faced with this opportunity, the EU wants to take action. Europe wants to integrate and develop this new technology, as it is one of the key drivers for our companies to remain competitive in the world market by enabling an acceleration of productivity. Faithful to their values and the European social model, the European institutions have multiplied the announcements to stay in the race of artificial intelligence (AI) while at the same time ensuring that the risks associated with the use of this new tool are minimised.

Over the last twenty years, Europe has lost ground to other major economies due to a persistent lag in productivity growth. However, according to the OECD, the situation could evolve as "AI may have the potential to revive sluggish productivity growth and lead to gains in aggregate welfare, as suggested by initial positive evidence on innovation and workers' and firms' productivity"[3]. Generative AI could add $575.1billion (€525.08 billion)[4] to the European economy by 2030 and $151,3 billion (€137.82 billion)[5] to the Metal, Engineering, and Technology (MET) sector. AI is one of the key instruments enabling Europe to regain its competitiveness and continue to be an indispensable player in the global economy. The European Union must not become isolated and let its competitors forge ahead in the technological revolution. AI tools are an opportunity that European stakeholders must seize. It has the potential to contribute to the EU's key objectives: the regain of competitiveness by increasing productivity and accelerating further green transition, by supporting the development of innovative solutions. The MET industries are already using AI for this purpose by adopting it for more precise material cutting and raw material savings.

Investing in this tool at the workplace is likewise crucial to increasing the growth of the MET industries.

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[1] EY European AI Barometer, 15 July 2024
[2] Eurostat, Usage of AI technologies increasing in EU enterprises, 23 January 2025
[3] OECD, The impact of artificial intelligence on productivity, distribution and growth key mechanisms, initial evidence and policy challenges, OECD artificial intelligence papers, April 2024
[4] McKinsey Global Institute, Time to place our bets: Europe's AI opportunity, October 1, 2024
[5] McKinsey Global Institute, Time to place our bets: Europe's AI opportunity, October 1, 2024

In 2024, 13.5%[1] of enterprises in the EU with 10 or more employees used artificial intelligence (AI) technologies to conduct their business, indicating a 5.5 percentage points (pp) growth from 8.0%[2] in 2023. One in four workers[3] develop or use an AI tool or system at their job. It is essential that AI remains an opportunity in the European Union, that it continues to develop and be integrated into the workplace.

As with any new technology, AI can raise concerns. The EU needs to adopt a principle of technological neutrality with regard to AI, as industry does with other traditional technologies (e.g. electrical, mechanical, computer and robotic engineering). The real risks must be seriously evaluated, and the possible intrinsic dangers and the probability of a negative event occurring should be assessed.

The European Union has already regulated AI tools through various legislative measures, the most recent one being the AI Act, which entered into force in EU Member States in February 2025. This law aims to guarantee the security of goods and persons, the protection of fundamental rights such as the protection of privacy and personal data, non-discrimination, transparency, accountability, and respect for European democratic values. There are several additional pieces of EU legislation (please see Annex 1 for list of examples) that also regulate AI and the use of AI at the workplace in terms of data protection, values, cooperation, equality, and health and safety.

There are several additional pieces of EU legislation that also regulate AI and the use of AI at the workplace.

In addition to the legal framework, the social partners are also playing a key role in the integration and evolution of AI tools in companies. On 22 February 2023, Ceemet and industriAll-Europe published joint conclusions on artificial intelligence to reiterate the importance of the EU legislative framework, to confirm their commitment to the human-centric approach as regards human resources matters, and to reaffirm the need for social dialogue in this field.

Since the development of and approach to artificial intelligence is becoming an ever more pressing issue, Ceemet aims to provide further views on the topic by answering the current challenges that European citizens and MET industries are facing. These includes, among others, how to pursue the integration of AI in the workplace while ensuring the competitiveness of companies and the job satisfaction of employees.

[1] Eurostat, Usage of AI technologies increasing in EU enterprises, 23 January 2025
[2] Eurostat, Usage of AI technologies increasing in EU enterprises, 23 January 2025
[3] Cedefop, What is needed for a successful transition to artificial intelligence (AI)?, 21 January 2025

In order to achieve those goals, Ceemet proposes to respect the following principles:

1 Implement the definition of AI consistency

In the MET industries, robots have been present for many years and by 2030, 75%[1] of EU companies should use cloud computing services, big data, or artificial intelligence. It is essential to ensure a common understanding of what artificial intelligence is for the effective integration and implementation of the regulations that govern it. EU law already defines what artificial intelligence is. Article 3 of the AI Act provides a clear definition, as follows: "AI system means a machine-based system that is designed to operate with varying levels of autonomy and that may exhibit adaptiveness after deployment, and that, for explicit or implicit objectives, infers, from the input it receives, how to generate outputs such as predictions, content, recommendations, or decisions that can influence physical or virtual environments". According to this definition, and the communication of the EU Commission regarding AI system definition to facilitate the first AI Act's rules application of 6th February 2025, it is clear that AI systems do not cover all digitalisation tools; they are not simple machines or programming tools but operate independently. In line with this definition, AI should not be grouped in the same categories as robots or software. Other EU directives also contain relevant definitions of digital tools. "Platform work" and "digital labour platform" are thus defined in the EU Directive 2024/2831.[2]

For Ceemet members, it is important to stick to existing definitions as currently enshrined in EU law. Otherwise, employers and employees would be confused as to which rules apply to these tools. Article 3 of the AI Act is fundamental: the notions of machine learning, autonomy, and adaptability are key to understanding the terms of discussion and the applicable law.
It is also important to maintain a strict definition of high-risk AI systems, as this definition entails numerous obligations for user companies as deployers and employers (see Article 26 of the AI Act[3]). The application of existing technical legislation to this type of AI is positive. Regulation 2023/1230 (known as the "New Machinery Regulation") limits the definition of high-risk machines to those in which the AI controls safety functions. It is, therefore, very important that the definitions and their limits are precise so that companies understand their legal, administrative, and technical obligations.

There will also be trivial uses of AI that should not be considered under the AI Act's framework. The aforementioned Commission communication is already endorsing an approach along these lines.

[1] Eurostat, Towards Digital Decade targets for Europe, August 2025
[2] Directive (EU) 2024/2831 of the European Parliament and of the Council of 23 October 2024 on improving working conditions in the platform
[3] AI Act Article 26: " Obligations of Deployers of High-Risk AI Systems"

Contrary to the rules of the New Legislative Framework (NLF) and Regulation 2019/1020 (known as the "EU Market Surveillance Regulation"), the AI Act never considers a company as a simple end user. However, the NLF and the Market Surveillance Regulation had explicitly provided that the end user could not be systematically regulated (see, among others, Blue Guide point 3.8). The systematic assimilation of a user company to a "deployer" associated with the desire to assimilate any "deployer" to a "supplier" is excessive for ordinary uses or even insignificant for an AI that is not under the direct control of a company (see Commission guidelines on prohibited practices, definition point 14).

2 Ensure a human-centric approach to Human Resources

In order to facilitate its integration into the world of work, particularly in the field of human resources, the EU must strictly apply the definition of artificial intelligence set out in the AI Act. The social partners of the European MET industries, Ceemet and IndustriAll-Europe, in their joint conclusions of 22 February 2023, agreed in their chapter on human resources that "AI applications should not simply replace human work and industrial know-how or increase the intensity of work". In this spirit, Ceemet reaffirms the principle of maintaining a human-centred approach in the programming and final decision-making on the use of AI in human resources management. Human intelligence must have the final say in decisions proposed by an algorithm when it comes to Human Resources.

Several stakeholders raise concerns about the use of AI in the workplace – which are closely linked to its use in HR management (e.g., biased and discriminatory decision-making in the selection of candidates for a position, monitoring of worker activity, etc.). On this point, it is important to remember that European legislation, national laws and collective agreements already today provide a number of guarantees against misuse to the detriment of employees which make more legislation unnecessary and would seriously increase the risk of double regulation. The following list includes only some examples, and it is not exhaustive:

- Personal data collected for input into an AI system is subject to the General Data Protection Regulation (GDPR), which establishes a number of protective principles (e.g., the need for a legal basis for data processing, the principle of data minimisation, transparency, the right of access to data);

- The AI Act classifies AI systems related to employment and workforce management as high-risk (Annex III). They are, therefore, subject to a strengthened legal framework aimed at guaranteeing respect for the fundamental rights of employees. It thus foresees, for instance, an examination of the data to identify any biases that are likely to affect people's health and safety or that are deemed to have a negative impact on fundamental rights or that are likely to result in prohibited discrimination (see Art. 10). Employee representatives and employees themselves are entitled to be provided with information before a high-risk AI system is used (see Art. 26).
- EU law (e.g., Directive 2002/14/EC[1]; Directive 89/391/EEC[2]), as well as national law and practice already provide for an obligation for employers to inform or to inform and consult workers or their representatives on decisions to put into service or use new technologies when it can be deemed necessary;
- Directive 90/270/EEC on the minimum safety and health requirements for work with display screen equipment clearly states that "no quantitative or qualitative checking facility may be used without the knowledge of the workers".

60% of employees who work with robotics and AI expect positive impacts on their productivity, job satisfaction, and safety.

AI in Human resources management can be a helpful tool, as it could substitute repetitive and time-consuming tasks. Moreover, employees recognise the improvement of their health and safety at work since the introduction of new technologies, robots, and now AI. 60%[3] of employees who work with robotics and AI expect positive impacts on their productivity, job satisfaction, and safety.

[1] Directive 2002/14/EC of the European Parliament and of the Council of 11 March 2002 establishing a general framework for informing and consulting employees in the European Community.
[2] Council Directive 89/391/EEC of 12 June 1989 on the introduction of measures to encourage improvements in the safety and health of workers at work.
[3] IPC, IPSOS, Ben Armstrong, Valerie K. Chen, Alex Cuellar, Alex Forsey-Smerek, Julie Shah, Automation from the Worker's Perspective, 30 September 2024

3 Guarantee safety and security at the workplace

The social partners of the MET industries highlighted in their joint conclusions in 2023 that, as part of the general process of digitalisation, AI can help to replace repetitive and monotonous tasks with more challenging or interesting tasks for humans. Dangerous tasks and tasks in dangerous environments can also potentially be substituted and allocated to a machine, thereby contributing to a healthier work environment for employees. Already, some manufacturing industries have thus, for instance, adopted exoskeletons to preserve the health of their employees and are moving towards integrating AI to reinforce the prevention of some risks and facilitate human movement.

AI is playing an increasing role in the prevention of occupational risks, offering innovative solutions to improve the safety and health of workers. AI thus makes it possible to analyse large amounts of data in real time in order to identify early warning signs of potential risks. For example, it detects anomalies, trends, and high-risk areas, thereby enabling companies to anticipate dangers before they occur. By using historical and environmental data, AI helps to predict incidents and plan appropriate preventive measures. Connected devices monitor working conditions (air quality, temperature, etc.) in real time and transmit this information to AI systems for analysis and rapid intervention.

The EU's framework directive on occupational health and safety emphasises the importance of managing all risks effectively. When managed properly, AI can enhance the working environment by reducing hazards and improving overall safety. This is why risks and opportunities of AI can be handled within the framework directive on OSH that ensures robust safeguards to protect workers and businesses. The focus should be on proactive risk management to create a safer and more productive workplace.

In addition to social dialogue and transparent communication, AI will be an opportunity for workers, employers, and the global economy. To fully harness this opportunity, investing in skills development is essential.

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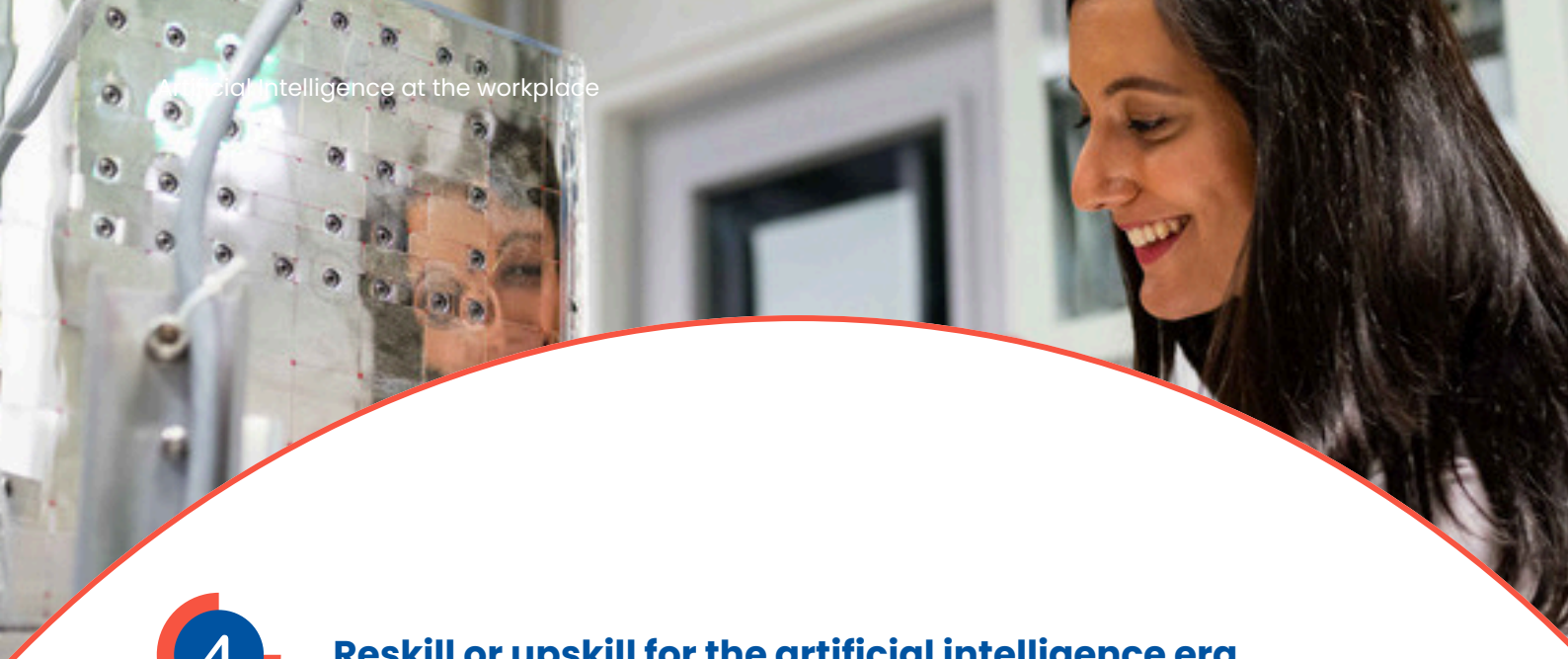


4 Reskill or upskill for the artificial intelligence era

A well-prepared workforce is key to ensuring that AI enhances rather than disrupts the labour market. This is why Ceemet members strongly support the Union of Skills, recognising it as a vital initiative to equip workers with the competencies needed for the future. The workers need to be reskilled or upskilled to develop and use artificial intelligence tools.

Indeed, 61%[1] of workers will need new knowledge and skills in the next five years to deal with the impact of AI on their work. Even if AI tools are usually understandable and intuitive, 42%[2] agree that they need to further develop their knowledge and skills in using AI tools and systems for their job. Certain groups of employees' risk being left behind: this is particularly the case for older employees or those already experiencing difficulties in the digital transition.

The EU and Members States must support efforts to equip employees with the skills they need to thrive with AI tools, both to use them and to develop new ones. Skills are needed to use and develop AI in the workplace. To develop AI, Ceemet calls for the backing of public authorities and the education systems to work closely with social partners to determine the skills needed and adapt the educational system to the new technology. Public authorities should support MET industries to attract young people to this sector as well as increasing the importance of STEM in the basic educational system.

Concerning the need to develop the skills of the workers, Ceemet supports the VET system and lifelong training. It is one of the biggest challenges in the coming years to reskill or upskill the workforce in addition to adapting them to a technology that evolves constantly. The MET social partners recognised that continuous reskilling or upskilling is a prerequisite for a successful introduction of AI in the workplace. The EU needs to invest in the educational systems to adapt them to the new technologies.

The EU is lagging far behind its competitors in the field of AI and is tentatively trying to catch up.

[1] Cedefop, What is needed for a successful transition to artificial intelligence (AI)?, 21 January 2025
[2] Cedefop, Skills empower workers in the AI revolution, January 2025

5 Increase investment in Artificial Intelligence to drive innovation and growth

The EU urgently needs to regain its competitiveness, support European industries in the information and communication technologies sector, and be attractive to talent and innovation. At this stage, there is a lack of investment in AI on the part of MET industries, not because they lack the will to do so, but because they are heavily burdened, weighed down by excessive red tape, and have suffered as a result of various health, energy, economic and geopolitical crises. What's more, the EU is forcing these companies to invest in areas other than AI, such as the ecological transition, by imposing drastic deadlines that force them to invest in products that cannot be marketed, leading to a rapid decline in their competitiveness. It is essential to allow companies to invest in different areas. AI solutions can also accelerate the ecological transition.

Despite various European support plans for digitalisation, the EU is lagging far behind its competitors in the field of AI and is tentatively trying to catch up. In January 2025, the USA announced that it would allocate €500 billion to AI technologies, while the EU committed to €200 billion in investment. Additionally, between 2018 and the third quarter of 2023, investments in EU AI companies amounted to approximately €32.5[1] billion, compared to over €120 billion invested in US AI companies. For Ceemet, it is crucial to grant the private sector the possibility to invest by avoiding administrative burdens, guaranteeing affordable energy and building a single market with a realistic legislative framework. Only under these conditions will industries be able to regain competitiveness, productivity and investments in Artificial Intelligence tools.

While a favourable investment climate remains the cornerstone of Europe's industrial competitiveness, it is not sufficient on its own to close the gap in AI innovation. Public-sector support may, therefore, be needed. However, it should be stressed that this should not take the form of direct funding of private companies, but the creation of robust and predictable framework conditions that enable private investment to thrive.

Initiatives should thus include targeted public investment in fundamental enablers such as research and development, high-performing universities, modern infrastructure, and skills development tailored to the needs of the future labour market. It also means streamlining permitting processes, reducing regulatory uncertainty, and using tax incentives to encourage private-sector innovation and risk-taking. The energy dimension is equally crucial: reliable access to affordable, low-carbon energy must be ensured through coherent policy frameworks and long-term infrastructure planning.

[1] European Parliament, AI investment: EU and global indicators, March 2024

In summary, the role of public support should focus on policy, permitting, and fiscal tools that lower barriers and accelerate private investment without distorting competition or creating dependency. This approach strengthens Europe's strategic autonomy while remaining grounded in open markets and private initiative. All these measures will enable companies to innovate and access AI tools, which will guarantee and increase their productivity and thus facilitate the achievement of the economic forecasts of 151,3 billion[1] for Metal, Engineering, and Technology (MET) in 2030.

€200 billion investment in AI

€500 billion investment in AI

6 Engage social partners in shaping Artificial Intelligence policies

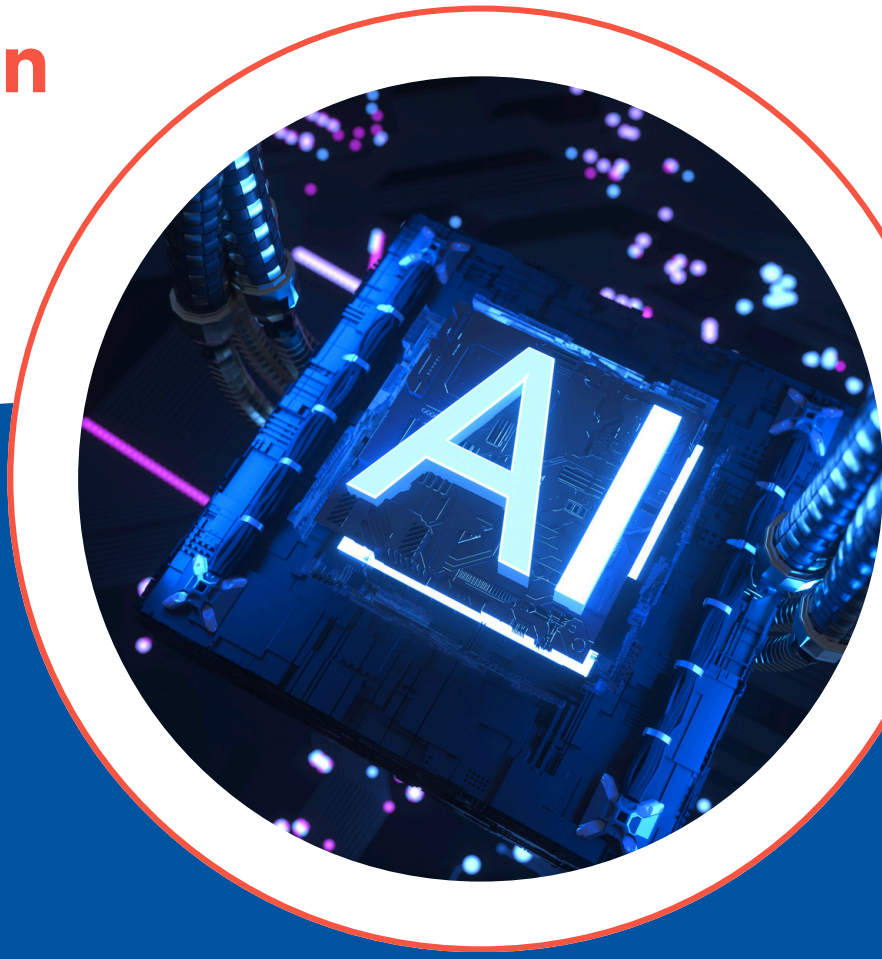
Beyond the collaboration between the public and private sector, fostering dialogue with employers, workers, and stakeholders for fair AI adoption is vital to ensure EU competitiveness and the successful integration of technology in companies. Social dialogue has proved its importance in implementing digital tools, new policies, and new skills in a company. It is also instrumental in the context of AI adoption and development. Social dialogue is best placed to deal with all employment-related aspects of technology, including inequality, skills, the nature of work, work organisation, and the prevention of discrimination.

Ceemet members stand ready to work closely with the EU institutions to provide real-world examples on using AI in the MET industries and explain the potential challenges that they are facing.

Fair AI adoption is vital to ensure EU competitiveness and the successful integration of technology in companies.

[1] McKinsey Global Institute, Time to place our bets: Europe's AI opportunity, October 1, 2024

Conclusion



AI is increasingly present in the workplace, while at the same time being increasingly regulated at the European level. We are convinced that the EU must not overregulate AI if we want to remain a technological and industrial leader. At the company level, when implementing AI systems, it is important, to train employees, as well as to inform and consult workers or their representatives in accordance with national and European regulations. Similarly, it is the responsibility of employers to take the necessary measures to protect workers.

These conditions of transparency and information enable a better understanding of AI tools and a focus on the opportunities they represent for companies and their workers. It is indeed necessary to take advantage of AI in a responsible manner to boost productivity and competitiveness. With an environment conducive to the implementation of AI, as well as a boost in terms of investment and from the social partners, these tools will make it possible to obtain a better quality of jobs, better productivity of MET companies and a greater economic attractiveness of the European Union.

Annex 1

AI at work is supervised by several EU regulations in addition to the AI Act. Below is the table for the most important ones:

Workplace topic	EU legislative texts	Implementation on AI
Private life Monitoring	Regulation (EU) 2016/679 General Data Protection Regulation (GDPR)	This regulation effectively narrows down collecting, processing, and storing of personal data related to the employees to only what is absolutely necessary and simultaneously prevents both disproportionate and undue surveillance at work and other violations of the employees' privacy whether an AI system is deployed in a workplace.
Co-operation Consultation	• Directive 2002/14 EC establishing a general framework for informing and consulting employees in the European Community • Directive 98/59/EC on the approximation of the laws of the Member States relating to collective redundancies for the co-operation. • Directive 2009/38/EC on the establishment of a European Works Council or a procedure in Community-scale undertakings and Community-scale groups of undertakings for the purposes of informing and consulting employees	Those directives are technology-neutral and already adequately address the need for employee involvement in issues and consequences related to the use of AI systems in the workplace at the EU level.
Equality Discrimination	• Directive 2000/43/EC implementing the principle of equal treatment between persons irrespective of racial or ethnic origin • Directive 2000/78/EC establishing a general framework for equal treatment in employment and occupation the Directive 2006/54/EC on the implementation of the principle of equal opportunities and equal treatment of men and women in matters of employment and occupation	Those directives are technology-neutral and together with the AI Act they effectively protect employees against the risks of discrimination associated with the use of AI systems in the workplace at EU level.
Occupational health and safety	• Directive 2003/88/EC on The Working Time • Directive 89/391 EEC on The European Framework Directive on Safety and Health at Work	Those directives sufficiently prevent OSH risks, at EU level in connection with the usage of AI systems in workplaces. The EU has provided a massive amount of directives related to H&S in addition to these two that further enhance the protection of employees in matters related to OSH. It should also be remembered that the AI Act especially pays attention to health and safety.

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