

Ceemet response to the second phase consultation of social partners under Article 154 (2) TFEU on possible direction of EU action to improve working conditions, health and safety at work and implementation of workers' rights – Quality Jobs Act

28 September 2026

On 20 July 2026, the Commission launched the **second stage consultation** of European social partners on the so-called Quality Jobs Act (QJA). Ceemet has carefully reviewed the consultation document and would like to provide the following contribution.

1. Introduction

Quality jobs can only be created and sustained by competitive companies operating in a business environment that enables growth, productivity and investment. That is why, Ceemet welcomes the Commission's stronger emphasis, found in the second stage consultation, on assessing the impact of each proposed measure in QJA through the lens of competitiveness. Indeed, this is essential for our members to ensure that any initiative effectively supports Europe's economic resilience, innovation capacity, and investment climate. In this context, every proposed measure should be subject to a thorough impact assessment evaluating its effects on companies' competitiveness, administrative burden and investment capacity, particularly for SMEs. Such an assessment should also examine whether the policy objective can be achieved through better implementation of the existing acquis, simplification of current rules, or non-legislative measures, rather than through additional legislation. In addition, in line with the European Commission's objective of simplification and reduction of administrative burdens by at least 25% for all companies and by 35% for SMEs,

the impact assessment accompanying the QJA initiative should demonstrate a net reduction of burden for companies, and not an increase.

Moreover, Ceemet highlights that given that the challenges, identified in the consultation document, are primarily linked to implementation and enforcement rather than regulatory gaps, the Commission should prioritise the effective application of the existing EU social acquis and avoid introducing new horizontal legislative obligations. In essence, a competitiveness-focused impact assessment should therefore become a key safeguard to ensure that future initiatives strengthen Europe's regulatory framework without adding unnecessary complexity or burdens that would ultimately weaken the ability of companies to create and sustain quality jobs.

On another note, Ceemet draws attention to the fact that self-employed persons are again mentioned in the second phase consultation document on the Quality Jobs Act (QJA). In this regard, Ceemet emphasises that, in accordance with Article 153 TFEU, EU labour law on working conditions does not regulate working conditions outside the employment relationship. Consequently, it supposes that genuine self-employed persons remain outside the scope of the QJA. Moreover, companies are legal entities in their own right, and the principle of strict interpretation of criminal law as it applies to them—as provided for by the European Convention on Human Rights and the case law of the Court of Justice—must be respected, including in the Commission's interpretation of legislative texts.

In addition, Art. 153 TFEU limits EU action to supporting and complementing national policies and allows only minimum standards. Any QJA-related initiative should strictly respect these limits. Minimum requirements of a possible EU legislative initiative will not – nor can they – bring a harmonisation or alignment of existing national practices. Member states indeed address issues in different ways, while respecting the minimum requirements, to cater for their national geographic situation, socio-economic context, industrial relation system and digital maturity. Ceemet is of the opinion that national rules and/or social partners agreements better accommodate and reflect local conditions and situations and are preferable to further EU legislation.

In the upcoming chapters, Ceemet will share its insights and positions on the various potential elements of the Quality Jobs Act – from algorithmic management (AM) and subcontracting to health and safety and skills.

Our key messages are:

- Algorithmic management and artificial intelligence at work: The Commission should prioritise consistent implementation of the existing risk-based EU framework, distinguish clearly between AI and algorithmic management, and avoid new horizontal rules.
- Occupational safety and health at work: Improve implementation of existing OSH rules and keep employer duties for remote work proportionate to their actual influence.
- Protection of workers' rights in subcontracting chains: Preserve legitimate subcontracting and tackle abuse through risk-based, data-driven enforcement, instead of new restriction or liability rules.
- Just transitions: Enable flexible, sector-specific transitions through social dialogue, collective bargaining and targeted public investment in relevant skills.
- Enforcement and the role of social partners: Strengthen risk-based enforcement and practical guidance while respecting national priorities and social dialogue.
- Simplification: The Commission should ensure that the QJA delivers a measurable net reduction in burdens through impact assessment, better regulation, simpler rules and digital once-only solutions.
- Relevant EU policy instruments: Prioritise non-legislative measures, effective national implementation and enforcement, and sector-specific social partner solutions in line with proportionality and subsidiarity.

2. Algorithmic management and artificial intelligence at work

Ceemet considers that the use of AM and artificial intelligence (AI) in the workplace is already sufficiently regulated (AI Act, GDPR, and the technology-neutral labour law acquis) and that there are no regulatory gaps in context of employment. Particular caution should be exercised with regard to possible new requirements concerning the human review of decisions based on algorithmic outputs. Existing EU legislation, notably Article 22 GDPR and the AI Act, already provides more than sufficient safeguards where decisions are fully automated or where high-risk AI systems are deployed. Any new requirement extending mandatory human review to significant decisions - based fully or partially on automated outputs, such as recommendations, scoring or rankings - would create substantial legal uncertainty for employers since all AI systems making significant decisions related to employees are determined as high-risk AI systems (Annex III, Section 4 of the AI Act) that require human oversight as described in the AI Act. Moreover, AM itself doesn't make decisions since the parameters of such systems are always exhaustively decided and controlled by humans, i.e., AM that is not within the sphere of AI Act doesn't actually do thinking or decision-making on its own and, therefore, it is not necessary to further regulate the use of such

systems. Automation, including in workforce management, has been a key driver of business success for decades. Extending regulation to all forms of automated worker management would be overly broad, unnecessary, and potentially detrimental to business competitiveness.

At the same time, Ceemet welcomes the Commission's decision to simplify the EU framework for AI and digital regulation, to facilitate a better understanding and implementation of existing legislation, as well as to ensure that European companies remain competitive. AI and algorithmic tools offer significant opportunities to improve productivity, innovation, safety and the quality of work. Therefore, it is important to maintain clarity and not to introduce another law specifically targeting algorithmic management. In this respect, Ceemet does not support the idea raised in the consultation document of giving worker representatives a stronger role in the review of algorithmic management systems: neither new participation rights for worker representatives nor an extension of existing collective rights are required, as the existing legal framework already covers these situations. Moreover, Ceemet considers that regulation in this area should remain technology neutral.

The AI Office is currently developing several guidelines¹ including employment to facilitate the implementation of existing legislation and the protection of employees. Ceemet deems that non-legislative support in the form of guidance would be the most suitable way forward on AM and AI. However, guidelines on high-risk AI systems in the social sector should remain strictly limited to the technical and procedural requirements applicable to the placing on the market of such systems. Ceemet, alongside industry employers, is also involved in various European projects aimed at integrating AI and AM into the existing European social dialogue. Some of these projects have already resulted in the production of sector-specific guidelines and conclusions.

The Commission should also pay attention to the fact that the certain use of AM, for example for automated planning and scheduling systems, as well as automated versions, already exists for decades. Those AM do not include AI in it. This point is particularly important because the notion of algorithmic management is significantly broader than AI. This notion may encompass a wide range of long-established management and planning tools, including workforce scheduling, task allocation, production planning, performance monitoring, and other automated business processes that have been used for long without relying on artificial intelligence. Therefore, a clear distinction between AI and AM is needed, particularly if the Commission is considering whether additional obligations might be justified. It is even more important to note that all forms of AM, and their application, that are not within the sphere of application of the AI Act are still subject to the rights and obligations arising from the GDPR, the directives on information and consultation, and the rest

¹ European Commission. Employment. AI Act Service Desk. <https://ai-act-service-desk.ec.europa.eu/en/employment-0>

of the labour law acquis. Adding regulation to such AM could risk encompassing routine, low-risk operational processes for which no specific regulatory gaps have been identified. Taking this into account, we do not see any need for additional legislative measures on AM.

Finally, Ceemet calls on the Commission to respect the role of the social partners at national and European levels as well as to consider the economic realities of businesses. The Commission should neither impose new requirements on the social partners nor interfere with the solutions they have already reached at national, sectoral or company level. New technologies—and in particular the most advanced ones that handle large amounts of data—come at a considerable cost to businesses.

3. Occupational safety and health at work

Ceemet subscribes to the Commission statement² that there are indeed different occupational safety and health (OSH) rules in place at national level, reflecting sectoral risks and industrial relations systems. However, we do not share the Commission's conclusion that this leads to a lower level of protection of workers. In our view, the protection of workers in the MET sector is amongst the highest in the world. As a matter of fact, a review of studies evaluating existing European legislation or used to prepare new EU legislation reveals that existing national legislation on OSH is often extensive and much more technically detailed than shown by literature. Hence, examples of national best practices should be used more to show the reality on the ground.

In the consultation document, the Commission puts forward the idea of updating and possibly merging the Workplace and Display Screen Equipment Directives. The latter does not specifically refer to laptops, tablets, smartphones or other internet-connected devices, while the Workplace Directive sets out employees' rights and the employers' OSH obligations for work performed on the employer's premises.

With regard to **teleworking from home**, Ceemet endorses the Commission's statement in its consultation document that **employers' responsibilities should remain proportionate to their means of influence over the workplace**, without creating **undue obstacles for workers who wish to telework or work from home**. There is indeed a correlation between the two: if the costs, legal risks and liabilities of home-based telework becomes too high, employers will limit or stop offering it altogether, to the detriment of both sides. As the Commission³ rightly states, telework is generally in the interest of the worker. In order to allow flexible forms of work to spread wherever employer and worker agree on them, the existing legal framework should be made simpler rather

² Commission consultation document, p. 15.

³ SWD (2026) 239 final, p. 59-61.

than more burdensome. Restricting home and mobile work would be a setback for labour market flexibility and for employees' own interests, with no demonstrated OSH benefits.

In addition, following the case law of the CJEU, the right to privacy and to the protection of workers' private and family life takes precedence. It follows that a worker's **private home cannot be placed on an equal footing as the employer's premises**. For Ceemet, this means that the minimum requirements in the Annexes to the Workplace and Display Screen Equipment Directives cannot apply to telework. Moreover, a risk assessment of a worker's private home cannot be scrutinised in the same way as a risk assessment of the workplace on the employer's premises.

For off-premises **work carried out at the premises of another company**, Ceemet prefers the policy option of the Commission to better communicate and recalls the existing rules on cooperation, coordination, information and training when sharing a workplace.⁴

We would also like to reiterate two points raised in our reply of 6 October 2025 to the *2nd phase social partner consultation on a possible action in the area of workers' right to disconnect and telework*. First, **the notion of a "right to disconnect and telework", used repeatedly in the consultation document, is misleading and should be clarified**: there is neither a need nor a legal basis for a new "right to disconnect", and whether and to what extent work is performed remotely has to be agreed between the employer and the worker. Second, all 27 member states have **already rules in place covering telework** which take into account the closely interwoven national framework of labour law, social security and taxation, as well as the role, involvement and dialogue of social partners. Depending on the sector, the size of the company and the type of work, there are further specifications even within the same Member State. EU legislation is therefore superfluous.

For this reason, amending the definition of workplace in the Workplace Directive to include off-premises places of work, risks to **impact massively** the models of mobile and flexible working arrangements that are already well established in our companies. This could lead to a sharp increase in costs, while the benefits for workers' safety and health remain questionable. Thus, **Ceemet does not endorse the views expressed in the Staff Working Document** on this topic, as they do not reflect the reality in the MET sectors and companies. The concern is not merely financial, but also extends to the legal feasibility, proportionality and the preservation of flexible work arrangements that suit the employee. An employer cannot be made responsible to cover costs, risks

⁴ Articles 6(4), 10(2) and 12(2) of Council Directive 89/391/EEC; Article 3(1) of Council Directive 92/57/EEC; Article 3(3) of Council Directive 92/104/EEC; Article 3(3) of Council Directive 92/91/EEC.

and liabilities emanating from the Workplace Directive⁵, Display Screen Directive⁶ and other OSH Directives such as the Framework Directive⁷, for off-premises work and certainly not in respect of telework. It is essential to weigh up carefully which obligations should be mandatory for an employer, and which might instead be promoted by the employer (i.e. through non-binding initiatives). Lastly, Ceemet notes that merging the Workplace and Display Screen Equipment Directives will not, in itself, contribute to simplification.

Regarding **mental health** and referring to our position paper on this topic⁸, Ceemet emphasises the multifactorial nature of mental health which is influenced by both work and non-work-related factors. It is also important to recall that both employers and employees share a responsibility under the EU OSH Framework Directive. Mental health requires a holistic view and response, including the medical, psychological and health services of the Member States, with employers remaining responsible for managing work-related risks within their sphere of influence.

As mentioned above, even if certain risks are not specifically mentioned, all risks including psychosocial risks (PSR) fall within the current existing obligation to conduct a risk assessment and are covered in the existing OSH legislation. The implementation of the Framework Directive in member states is different. This reflects the different national situations and contexts and is proof that there is no unique model to address PSR at work. Member States, and (sectoral) social partners, still have flexibility to develop detailed national (sector) specifications which is crucial to adopt an approach that best suits the national / sectoral context. Therefore, the existing information and consultation structures are fit for purpose, also when it comes to OSH.

The same applies to the **ergonomic risks and to the heat- and weather-related risks addressed in the consultation document**. Both are already fully covered by the employer's general obligation under the Framework Directive to assess and prevent all risks and are further specified in a number of individual directives as well as in national legislation, sectoral collective agreements and company practice. Climate- and weather-related exposure in particular differs enormously between Member States, between seasons, and between indoor and outdoor activities. Rules in Southern Europe can and will therefore differ from rules in Northern Europe, which is precisely why national and, where appropriate, regional solutions are better suited than uniform EU requirements. Ceemet therefore sees no need for new EU legislation on ergonomics or on heat and weather;

⁵ The Workplace Directive: Council Directive 89/654/EEC of 30 November 1989 concerning the minimum safety and health requirements for the workplace (first individual directive within the meaning of Article 16 (1) of Directive 89/391/EEC).

⁶ The Display Screen Directive: Council Directive 90/270/EEC of 29 May 1990 on the minimum safety and health requirements for work with display screen equipment (fifth individual Directive within the meaning of Article 16 (1) of Directive 89/391/EEC)

⁷ The Framework Directive: 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.

⁸ Ceemet. (2024, April 15). Ceemet position paper on mental health at the workplace [Position paper]. <https://ceemet.org/position-papers/ceemet-position-paper-on-mental-health-at-the-workplace/>

practical guidance, EU-OSHA campaigns and the exchange of best practice are the appropriate instruments for addressing these issues at EU level

To conclude, extending the definition of the workplace is critically problematic, especially due to the lack of clarity regarding the employer's criminal and administrative liability. In addition, the existing OSH framework is deliberately principle-based and therefore capable of accommodating technological developments without constant legislative updates. The Framework Directive already requires employers to assess risks in a comprehensive manner, including emerging risks, such as psychosocial risks at work. Accordingly, additional detailed EU-level regulation of every new technology or term would risk making the framework less adaptable rather than more future-proof.

Ceemet therefore supports the Commission's preference for a **non-legislative approach** when it comes to certain OSH issues. Non-binding EU guidance can indeed help employers, workers and Member State institutions. Sharing best practices, developing joint guidance and toolkits on PSR, and coordinating thematic campaigns to raise awareness and improve compliance with existing legislation is the preferred option.

4. Protection of workers' rights in subcontracting chains

Ceemet fully subscribes to the Commission's statement⁹ that subcontracting is a legitimate business model which benefits the labour market by enhancing efficiency and innovation. Subcontracting allows for providing expertise, including by SMEs, and enables companies to focus on their core competencies, adapt quickly and remain competitive.

On this matter, we refer to the Ceemet position paper on subcontracting¹⁰ which outlines the vast social acquis of labour law and working conditions that protects workers throughout EU, including posted workers and third-country nationals. While national measures may vary, they cover a wide range of protective measures. There is no legislative gap, but there is a need to improve compliance with existing legislation. Hence, limiting the number of tiers in a subcontracting chain or introducing yet another level of liability mechanism on top of those that already exist, will not tackle abusive – even criminal – situations.

Furthermore, minimum requirements for workers' rights in subcontracting chains are generally overriding mandatory provisions¹¹ which are territorially applicable in the concerned Member

⁹ Commission consultation document, p. 18.

¹⁰ Ceemet. (2025, December 2). Industry needs subcontracting: Let's focus on implementation, not limitation [Policy paper]. <https://ceemet.org/position-papers/policy-paper-industry-needs-subcontracting-lets-focus-on-implementation-not-limitation/>

¹¹ Article 9 of Regulation 593/2008 of 17 June 2008 on the law applicable to contractual obligations (Rome I Regulation)

States and cannot be waived even in cross-border contracts. It follows that if deficits in workers' rights protection would exist, the problem resides in enforcement and not in regulation.

What will improve compliance with EU and national law is decisive enforcement through inspections, based on data-driven risk assessments and supported by the European Labour Authority where Member States request it. Ceemet firmly opposes any new legal provision limiting subcontracting and resolutely favours a non-legislative approach. Restrictions to subcontracting on EU level would also come with legal complexities and would conflict with the right to conduct a business under Article 16 of the EU Charter. A non-legislative approach could take the form of specific guidance for high-risk situations and of recalling existing rules on cooperation, coordination, information and training when two or more companies share the same workplace or construction site.

Finally, as regards the proposal to extend the principles of the Mobile Construction Sites Directive to the MET sector¹², Ceemet is firmly opposed to any attempt to extend the rules applicable to mobile construction sites that would require contractors to fund an external coordinator. In accordance with Article 6(4) of the Framework Directive, Ceemet's industrial member companies have developed best practices that ensure effective dialogue between external contractors working on a site and the company managing it. These practices, often governed by national legislation, consist of formal procedures that may extend to the certification of companies or even individuals. A European legislative initiative would undermine practices that have been functioning effectively for several decades.

5. Just transitions

As regards just transitions¹³, a one-size-fits-all approach is clearly not the answer, since the transformation varies greatly from company to company, from sector to sector, from region to region, and from Member State to Member State. In fact, industries need flexibility, not rigid and detailed legislation, in order to adapt quickly to rapid changes.

On this matter, we agree with the Commission's analysis¹⁴ that the current EU legal framework is fit for purpose and that the current directives connected to workplace transformations¹⁵ remain relevant, effective and consistently mutually reinforcing and do not need to be revised, and that further legislative action would risk creating overlaps.

¹² Commission consultation document, p. 23.

¹³ Ceemet. (2025, December 2). Ensuring a just transition through national & sectoral initiatives [Policy paper]. <https://ceemet.org/position-papers/policy-paper-ensuring-a-just-transition-through-national-sectoral-initiatives/>

¹⁴ On page 25 of the consultation document.

¹⁵ Including information and consultation; on collective redundancies; on transfer of undertakings; on European Works Council Directive.

In fact, in line with the existing European legislative framework, companies comply with Directive 2002/14/EC, which establishes a general framework for informing and consulting employees in EU companies, and the recently amended European Works Councils Directive 2009/38/EC, which provides for information and consultation on transnational issues. These instruments ensure that employees are informed of foreseeable developments in the company's activities and consulted on decisions that may have a significant impact on the workplace.

On top of all this, national legislation and policies aimed at ensuring a fair transition already exist and are being implemented on the ground.

As a recognised EU social partner, Ceemet highlights that **social dialogue and collective bargaining play a critical role in the MET industries in shaping fair transition policies and establishing mechanisms to anticipate and manage change.** In the MET sector, employers and trade unions work as partners on labour relations, labour market challenges and industrial transformation. In this regard, collective agreements are a key tool for addressing the rapid changes reshaping the world of work. These agreements help adapt employment conditions to the evolving needs of the world of work, supporting both good work and a competitive, resilient industrial base, particularly in the context of the twin transition,

In this respect, Ceemet would like to underline once more that collective bargaining's flexibility - compared to legislation - leaves a larger room for manoeuvre for social partners at the appropriate level to negotiate customised agreements to a rapidly changing world of work. Hence, collective bargaining remains today an indispensable tool for anticipating and managing change in a timely manner, with the close involvement of workers and companies. Any EU initiative should therefore preserve the autonomy of social partners to determine the appropriate solutions at the relevant level.

When it comes to skills development, Ceemet can only agree with the Commission when it highlights that investment in upskilling and reskilling is essential for just transitions, just as the transition itself demands new skills and competences.

In this regard, we highlight that for MET employers, upskilling and reskilling policies must be at the forefront of the transformation in order to boost competitiveness, increase continuous employability of the industry's workforce and strengthen the European industrial base.

In our view, training must fulfil the dual objective of enhancing workers' competences while supporting the company's operational and strategic goals, thereby ensuring both individual employability and overall business competitiveness.

Turning more specifically to the right to training¹⁶, Ceemet considers that training arrangements agreed by the social partners and aligned with the organisational needs of companies can be an effective tool to boost training, quality employment and job-to-job transitions. As the Commission rightly states, a general right to training would fall within the scope of Article 166 TFEU, which explicitly excludes any harmonisation of the laws and regulations of the Member States. Vocational training is and remains a national competence, which in itself rules out a universal right to training at EU level. Such a right would in any event fail to achieve its purpose: it would neither guarantee the quality and relevance of training nor increase participation rates, in particular of low-skilled workers¹⁷. Training arrangements agreed by the social partners and aligned with the organisational needs of companies are the more effective tool.

In light of the above, we welcome the Commission's statement that the European Competitiveness Fund should play an important role in supporting skills development in future, including through horizontal measures and project-specific upskilling and reskilling activities. We highlight the active role of Ceemet in EU-funded projects such as TRIREME (supporting upskilling and reskilling in the automotive industry) and SKILLS4ASD+ (supporting skills development in aerospace and defence sectors).

We likewise welcome the revised European Globalisation Fund, which is intended to finance training for workers at risk of redundancy. This is a positive development as this measure will help ensure that workers remain employable before losing their job.

Finally, as regards the skills guarantee, we have concerns about who will be responsible for determining what jobs are at risk and for assessing the skills in which a person at risk of unemployment should be trained. We believe that the funding of this guarantee is the responsibility of the public authorities, not of companies.

6. Enforcement and the role of social partners

Overall, Ceemet supports the Commission's analysis that more effective implementation and enforcement of EU and national legislation could support the transitions described above. In this regard, we believe that the Commission can add value by helping Member States to strengthen risk-based enforcement, improve cooperation between competent authorities and exchange information and good practice. Such support would be particularly useful for those Member States with limited enforcement capacity or technical expertise.

¹⁶ Ceemet. (2026, January 14). The right to training, an issue for the national level. <https://ceemet.org/position-papers/position-paper-the-right-to-training-an-issue-for-the-national-level/>

¹⁷ OECD outcomes point out that individual learning schemes have a poor track record as far as participation of the low-skilled workers is concerned.

As regards the options proposed by the Commission, including the possibility of releasing an EU initiative that includes appropriate enforcement mechanisms, Ceemet welcomes this proposal's focus on better implementation and enforcement of existing legislation. Clear, simple and practical guidelines and recommendations would in themselves contribute considerably to a better implementation of the existing rules. MET employers would therefore welcome Commission guidance and/or recommendations on how best to establish and deploy implementation and support mechanisms at national level, while always bearing in mind that it is for Member States and national social partners to set their priorities in accordance with their national circumstances.

When it comes to the possibility of entrusting social partners with implementation of measures to improve their own capacity building, Ceemet welcomes this option. As regards encouraging social partners to use collective bargaining in the field of transition measures and quality jobs, we highlight that social partners must always retain their capacity to decide, discuss and reach agreements on the matters they autonomously choose to negotiate, and must retain flexibility over how such measures are implemented. Policymakers cannot and should not prescribe the terms, content or outcomes of collective agreements.

Ceemet supports capacity building, guidance and exchange of good practices in this field, but continues to insist on the importance of respecting social partner autonomy. This is what ensures that the measures are sector-specific and that the solutions are tailored to the challenges faced by workers and employers in the rapidly transforming world of work.

In this same chapter the Commission states that *Member States could be required to ensure that employers, including undertakings in subcontracting chains, provide workers, for whom traditional face-to-face communication is limited, with the possibility to contact or be contacted by trade unions or employee representatives*. While we support the overall objective of improving the information and communication to workers, we highlight that it is not the responsibility of companies to facilitate trade union access to their premises for workers employed by independent contractors, since they are not those workers' employer. We also consider that this would breach social partner autonomy, as it is up to the social partners to discuss, determine and agree how workers are made aware of significant transformation measures. Along the same lines, we oppose the possibility that the future Quality Jobs Act establishes proportionate, effective and dissuasive sanctions in relation to any new rights enshrined under the act. In our view, the Quality Jobs Act should not introduce new legislation or create new rights; therefore, no sanctions should be attached to this Act.

Last but not least, we agree with the Commission's statement that the QJA could promote the responsible use of AI for targeting inspections, thereby improving their effectiveness, provided that appropriate human oversight and adequate staff training are ensured.

7. Simplification

Ceemet very much welcomes the fact that the Commission has made simplification a top priority. It is surprising, however, to note once again that no reference is made to the importance of impact assessments, ex post evaluations, or compliance with the principle of better regulation. No specific tools are mentioned, not even the "one in, one out" principle.

We reiterate that, for Ceemet, simplification must be effective and sustainable, regardless of the area concerned. In particular, the Quality Jobs Act itself must contribute to the target of reducing administrative burdens by at least 25% for all companies and by 35% for SMEs: its impact assessment has to demonstrate a reduction of burden, not an increase as mentioned in the introduction.

Ceemet is of the opinion that simplification is best served by focusing on implementation and enforcement of the existing directives, as well as clear and simple guidelines to facilitate compliance. We would like also to reiterate that it is important to respect the work and the role of social partners at the national level.

In addition, Ceemet fully supports the principle of "simplicity by design" and the "once-only technical solution" (OOTS). Member States should, in our view, be encouraged to embrace OOTS to ensure cooperation and reduce administrative burden arising from overlapping or unclear rules. Similarly, Ceemet supports the use of digital tools to reduce administrative burdens.

However, reducing the administrative burden *for member states* by extending the reporting period is not the simplification exercise the European companies are looking for. In this respect, we reiterate that merging the Workplace and the Display Screen Equipment Directive will not in itself contribute to simplification either.

Ceemet does, on the other hand, support better interaction between REACH and OSH, by removing the requirements on OSH from the REACH regulation.

8. Relevant EU policy instruments

With regard to the relevant tools that the EU should use to implement the Quality Jobs Act, Ceemet firmly believes that non-legislative measures are the most appropriate. It is imperative that the

Commission maintains its focus on the objectives of simplification and enhancing the competitiveness of companies. Indeed, as confirmed during the first phase consultation, the Quality Jobs Act topics could be addressed more efficiently through improved implementation at a national level of the existing EU acquis combined with better enforcement and non-legislative means.

We highlight also that evidence shows that countries with strong social partner relations and a high prevalence of collective bargaining tend to have more resilient labour markets, characterised by lower unemployment and fewer low-paid workers. More broadly, a well-functioning system of social dialogue contributes to both economic competitiveness and the creation of high-quality jobs, thereby promoting sustainable growth while improving working conditions. Hence, it is essential that policy makers respect social partner autonomy, as their ability to develop sector-specific solutions through social dialogue helps to ensure that labour market policies remain relevant and responsive.

Finally, we would like to reiterate the importance of abiding by the two fundamental principles of proportionality and subsidiarity, which ensure that decisions are taken closer to the ground, in this context, at the level where workplace transformation actually takes place.

Conclusion: No need for more legislation in the social field

The topics raised in the QJA are already largely tackled by existing EU legislation and national legislation. We therefore **call for the further legislative EU initiatives to be avoided**. This applies, for example, to artificial intelligence and algorithmic management¹⁸, which are covered by a range of EU legislation, including the recently adopted AI Act.

Rather than introducing new rules, the Commission should focus on the effective application of existing legislation, as well as the social acquis in this field, and support its implementation through appropriate guidance for algorithmic management in the workplace, peer reviews of member states initiatives and sharing of best practices regarding mental health in general and at work. This non-legislative approach is essential to enable businesses to adopt new technologies, foster innovation, and remain competitive.

Ceemet stresses that **European companies in our sector want to and do follow the rules**. Reducing administrative procedures for companies and simplifying the complex cluster of rules and legislations to make it clearer and more predictable are not merely desirable but a prerequisite for our European companies to operate in a rapidly changing global environment. It also constitutes a

¹⁸ Ceemet (2025, September 2). Artificial intelligence at the workplace. <https://ceemet.org/position-papers/position-paper-on-artificial-intelligence-at-the-workplace/>

big step to better regulation, offering a clear understanding of the rights and obligations to employers and workers. Clear rules enable enforcement authorities to act more effectively in combating fraud and abuse.

To conclude, in order to provide quality jobs, companies in the MET sector do not need new rules: they need more, **better, and prompt guidance, implementation and, where necessary, better enforcement.**¹⁹

In light of the above and given that that none of the raised issues touch the MET industries alone, Ceemet does not consider entering into a formal dialogue in accordance with Art. 154 TFEU with its trade union counterpart on any of the aforementioned issues.

¹⁹ Ceemet. Position papers. <https://ceemet.org/position-papers/>