



Ceemet
European Tech &
Industry Employers

Lobbying Action Plan

Overview of lobbying
activities

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www.ceemet.org

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Introduction

A large part of Ceemet's strategy adopted in Berlin in October 2022 under the title "Reinforcing the MET employers' voice in Brussels" relates to how the organisation should develop its lobbying and communication strategies. This is done in order to show that the MET industries are part of the answer to the global challenges of the 21st century and to promote the competitiveness of industry and agility within labour markets. On the European scene, in Brussels, this presupposes to frame an effective and efficient lobbying strategy in order to shape an industry-friendly policy agenda by offering solid intelligence for the respective legislative processes. In order to be influential, Ceemet cannot act in isolation and has therefore developed strategic alliances to increase our capacity to influence policymakers.

The main purpose of this document is to give an overview to members on the day-to-day working of Ceemet, particularly how we influence EU legislation on your behalf. However, any version of this document is only ever a snapshot in time and is therefore a living document. Against this background, this document, which will be regularly updated for members, keeps track of the main dossiers on which Ceemet is active – weekly not to say daily for some of them – in order to influence their legislative processes. It is complemented by a Ceemet Communication strategy/action plan. The Ceemet micro plans, which detail the actions to be carried out by the Secretariat in order to advocate on behalf of members, also complement this document.

I. Current legislative files

1. Omnibus I: Corporate Sustainability Due Diligence Directive (CS3D) and Corporate Sustainability Reporting Directive (CSRD)

a) What is it about?

The CS3D aims to ensure that companies active in the internal market contribute to sustainable development and the sustainability transition of economies and societies through the identification, prevention and mitigation, bringing to an end and minimisation of potential or actual adverse human rights and environmental impacts connected with companies' own operations, subsidiaries and value chains.

The CSRD aims for companies above a certain size to report information on their Environmental and Social Governance (ESG) impacts. This should enhance transparency and accountability in corporate sustainability reporting. It empowers the Commission to adopt acts for compliance.

b) Where are we in the process?

Directive 2026/470 has been published in the Official Journal of the European Union.

The CS3D of 13/06/2024 gave Member States two years to incorporate the provisions of the Directive into their national legislation. The CSRD of 14/12/2022 foresaw complex implementation phases depending on the size of the company and the topic, with a first wave of reporting on financial year 2024 (so reporting in calendar year 2025).

However, on 26/02/2025, the Commission presented – in the frame of the so-called “Omnibus Package” – two proposals for Directive amending Directives 2006/43, 2013/34, 2022/2464 and 2024/1760 as regards certain corporate sustainability reporting and due diligence requirements. One initiative aims at postponing the two directives and the other one at simplifying the content of the CS3D and CSRD obligations.

The “stop the clock” Directive was adopted by the EP and Council very quickly (14/04/2025).

The work on the “content” directive followed the co-decision process for adoption. The Council adopted a general approach on 23/06/2025. In the European Parliament, JURI was the leading Committee, with 5 other Committees (EMPL, INTA, ENVI, ECON, AFET) delivering an opinion. In the EP, the Plenary adopted the JURI report on 13/11/2026.

Trilogue negotiations started on 18/11/2025, resulting in a Provisional Agreement on 9/12/2025. The agreement simplifies sustainability reporting and due diligence requirements in order to boost EU competitiveness, by reducing the reporting burden and limiting the trickle-down effect of obligations on smaller companies. It is important to note that these simplification measures uphold the original policy objectives of the directives to reduce adverse environmental and human rights impacts.

In Council, COREPER gave their green light on 10/12/2025. We now await Council's formal position, scheduled for the General Affairs Council of 24/02/2026.

In the European Parliament, the provisional agreement was approved in the JURI Committee on 11/12/2025, with 15 votes in favour, 8 against and one abstention. It was voted upon and adopted in Plenary on 16/12/2025 with 428 votes in favour, 218 against and 17 abstentions, thereby concluding a quite intense process.

The directive will enter into force twenty days after its publication in the Official Journal.

- The revised CS3D must be transposed by Member States by mid-2028 and will come into effect from mid-2029. The Commission must publish guidance on the due diligence duty by mid-2027.
- The revised CSRD will apply from January 2027. For 'wave one' companies in scope of the current CSRD that will fall out of scope with the Omnibus changes, Member States can exempt them from reporting obligations for financial years 2025 and 2026.

c) What are Ceemet's objectives and messages?

The CS3D presented a major risk of fragmentation of legislation within the EU as there is too much leeway for Member States to add on to or differently interpret the text of the Directive. Companies need common rules to preserve the competitiveness of European business and avoid the distortion of competing national rules. We therefore strongly advocated for a maximum level of harmonisation to ensure a level playing field throughout the European Union.

Initially foreseen for all companies above 250 employees, the new Directive foresees that companies with more than 1000 employees and a net turnover of more than €450 million must report on their sustainability. Listed SMEs are removed; financial holdings are exempted. There is a transition period for companies that had to start reporting from financial year 2024 ("wave one" companies); they are exempted to report for financial years 2025 and 2026. This is a major improvement. However, there is review clause concerning a possible extension of the scope for the CS3D.

On how to do due diligence, the initial Directive obliged to carry out due diligence in the total value chain. The texts now foresee a risk-based approach: companies can focus on the areas of their chains of activities where actual and potential adverse impacts are most likely to occur. Companies can thus prioritise assessing adverse impacts of direct business partners. No comprehensive mapping exercise is needed, but instead a more general scoping exercise is required, based on reasonably available information. This will reduce the trickle-down effect of information requests on SMEs. Lastly, the requirement for companies to adopt a transition plan for climate change mitigation has been removed.

The CSRD included reporting on certain Environmental, Social and Governance data. These datapoints were further developed in European Sustainability Reporting Standards (ESRS) by EFRAG (European Financial Reporting Advisory Group). The main problem with datapoints to be reported upon (in the social field ESRS S1 and S2) were the sheer number of datapoints, the required level of detail and the necessity for qualitative descriptions.

Initially CSRD was to be applicable to companies with more than 500 employees. Now, only large companies with more than 5000 employees and a €1.5 billion net turnover must carry out due diligence on their adverse impacts. The transposition deadline is extended to 26 July 2028. Companies will have to comply with the new measures by July 2029. This is a major improvement. However, there is review clause concerning a possible extension of the scope for the CSRD.

On civil liability and penalties, the new Directives do not longer require an EU harmonised civil liability regime. Instead, the national liability rules continue to apply. However, a review clause is inserted to evaluate the need for an EU harmonised liability scheme. As for penalties, there will be a maximum cap of 3% of the company's net worldwide turnover. The Commission will issue guidelines in this respect.

d) What has Ceemet done?

Ceemet had extensive advocacy activities before and throughout the legislative process.

- Meetings with DG GROW twice to discuss the red flags of and get more intel on the proposal.

- [Letter](#) to Commissioner Breton, outlining our main concerns on 23 November 2021.
- Ceemet and Orgalim [joint letter](#) to representatives from the European Commission, the EP and the Council on 31 May 2022. The Secretariat and members met with several key MEPs.
- [joint statement](#) on the due diligence proposal – call to make the EU due diligence framework more realistic, proportionate, and workable – 19 January 2023.
- A [letter to the MEPs](#) of the JURI Committee and the rapporteurs of the opinion giving committees, in order to outline our priorities on the CS3D on 27 March 2023.
- Ceemet sent a letter on 5 April 2023 to Executive Vice-President Dombrovskis, Commissioner McGuinness and Commissioner Schmit, on behalf of Ceemet's President Mr Rainer Ludwig, to voice our deep concerns on the European Sustainability Reporting Standards in the light of the recently adopted Corporate Sustainability Reporting Directive.
- A on the due diligence proposal: call on the EU institutions to make the EU due diligence framework more realistic, proportionate, and workable and listed some recommendations – 25 May 2023.
- Ceemet wrote a position paper on draft European Sustainability Reporting Standards S1 & S2 – 8 May 2023
- Ceemet input on ESRS S1 and S2 to EFRAG – 7 July 2023
- Ceemet and its members were in contact with several MEPs in order to table amendments to improve the text of the JURI Report.
- Letter to the MEPs of the ECR, Renew, EPP and S&D to point out the amendments that should be included in the final EP Report on 30 May 2023.
- Ahead of the COREPER meeting of 17 November 2023, a letter to Permanent Representatives advocating for a workable, reasonable and proportionate text of the Directive.
- A letter to COREPER requesting to improve upon provisional agreement sent on 2 February 2024.
- Ceemet, BusinessEurope and several other industry associations joint letter to President von der Leyen – November 2024.
- Ceemet participated in the Kick-off meeting on simplification on 5 & 6 February 2025 – to prepare the Omnibus package on CSRD, CS3D & taxonomy that the Commission launched on 26 February 2025
- Ahead of the vote in the plenary, on 3 April 2025, Ceemet wrote to all MEPS to call for their support on the “stop the clock” proposal.
- Ceemet adopted its position paper on the Omnibus I proposal on 17/09/2025.
- Ahead of the (first) vote in Plenary on 20/10/2025, Ceemet sent an email to 450 MEPs to vote in favour of the adopted report in the JURI Committee.
- As the adopted JURI report was voted down, Ceemet again sent an e-mail to 450 MEPs ahead of the 13/11/2025 vote in Plenary.
- Ceemet informed the members of the publication in the Official Journal of the EU on 26 February 2026 of Directive 2026/470 of the European Parliament and of the Council of 24 February 2026 amending Directives 2006/43/EC, 2013/34/EU, (EU) 2022/2464 and (EU) 2024/1760 as regards certain corporate sustainability reporting requirements and certain corporate sustainability due diligence requirements (Text with EEA relevance).

e) What is Ceemet going to do?

Ceemet will follow-up the transposition in the Member States.

2. E-Declaration

a) What is it about?

On 13/11/2024, the Commission has presented a draft Regulation on the eDeclaration, as one of the last legal proposals of the previous Commission, to simplify the national posting notification systems. It is voluntary for Member States.

When temporarily posting a worker to another Member State to work, the employer must notify the administration of the host Member State. Through this notification, the social inspectors of the host Member State have the possibility to check if the local remuneration and working conditions are respected. However, some Member States ask a disproportionate amount of information for every posted worker, e.g. to translate all social documents and upload them prior to the posting on the posting platform and to appoint a representative who is situated on the territory of the host Member State. These exaggerated requirements form a hurdle to the freedom to provide services in the internal market.

The aim of the eDeclaration is to have only one digital notification system, instead of the current 27 (very) different national systems. The digital system will run via (a revision of) the IMI system.

b) Where are we in the process?

In Council, it was discussed in the WG "Competitiveness & Growth". A general approach was reached on 22/05/2025, made possible by a constructive abstention of some countries. There are still a number of Member States opposing the eDeclaration for costs and administrative reasons or arguing that it will lead to less possibilities of controls as the number of data information requested are not sufficient.

At EP level, the file was led by two Committees, IMCO & EMPL. The joint report was adopted on 8/9/2025 with a mandate to start trilogues.

Trilogues are ongoing. Even though there was political willingness to reach an agreement in 2025, the positions on the datapoints are currently blocking progress. The Council and the EP would like a long list of information that the employer must give in the posting notification, whereas the Commission prefers that only necessary information should be asked.

c) What are Ceemet's objectives and messages?

Ceemet has welcomed the eDeclaration, as one digital system would significantly lessen the administrative burden for companies when posting their workers within the EU, with 27 different national systems. Since the eDeclaration is a voluntary tool, Ceemet encourages Member States to use the (future) system. For us, this can only be the first step in a longer process to improve labour mobility within the EU.

However, Ceemet remains cautious about the number of datapoints that are asked in the posting notification. The information required in the posting notification should be proportional to its aim, instead of being a hurdle to the free movement of services.

Lastly, a common digital eDeclaration should be seen in relation to other digital solutions that will benefit free movement. In this context, the link with digitalisation within each Member State of the request procedure to obtain the A1 certificate (for social security) and the ESSPASS project (digital wallet of a worker which will hold the A1 document) can further contribute to reducing burdens of labour mobility.

d) What has Ceemet done?

- Ceemet sent a letter, co-signed by employer organisations ECEG and Pearle, to express our support for the set-up of the eDeclaration to the EP IMCO and EMPL Committee, several Commission representatives in DG EMPL and DG GROW, the PermReps and representatives of the European Labour Authority.
- Ceemet is giving input on the common eDeclaration for notifying posted workers on several occasions.
- Ceemet gave an interview regarding a study on problematic situations involving posted workers and other temporary cross-border workers support the monitoring of Directive (EU) 2018/957 on the posting of workers in the EU and its Enforcement Directive.
- Ceemet sent a letter to some representatives in the European Commission expressing concerns in relation to upcoming preparation of the report on the implementation of the Posting of Workers Directive.
- On 29/04/2024, Ceemet participated in social partner hearing on e-declaration.
- October 2024: Ceemet co-signed a letter with other sectors asking for better implementation of the posting Directive vs. new legislation
- Ceemet started advocacy asking for a swift adoption of the eDeclaration proposal – joint statement with ECEG & EuroCommerce on 7/02/2025
- In the EP, Ceemet had meetings with the co-rapporteurs MEPs Schwab (German, EPP) on 27/03/2025 and Johansson (Swedish, S&D) on 16/04/2025 as well as EMPL shadow rapporteur Arimont (Belgian, EPP) on 4/06/2025.
- Ceemet sent a letter to all PermReps (Ambassadors) ahead of the Competitiveness Council of 22/05/2025, to reiterate our support for the eDeclaration.
- Ceemet discussed eDeclaration with the Irish Presidency on 11/02/2026.

e) What is Ceemet going to do?

Ceemet is monitoring the file in the European Parliament and Council. Further actions will be taken, when necessary, in order to lobby the institutions towards our position.

3. Social Security Coordination Regulation

a) What is it about?

On 13 December 2016, the European Commission proposed the revision of the Regulations which aim at modernising the current rules. The proposal is very broad and touches on several parts of social security coordination (i.e., unemployment benefits, long-term care benefits, social security coordination for posted workers etc.). Ceemet is active on the prior notification for posted workers.

b) Where are we in the process?

Council

- The Member States rejected the provisional agreement in the COREPER I meeting on 22/12/2021.
- No meetings took place under the French Presidency (Jan–July 2022).
- The Swedish Presidency submitted a new proposal in the Social Question Working Party on 29/03/2023 and the Coreper on 26/04/2023.
- Discussions relaunched under the Polish Presidency – 1st semester 2025. 19th trilogue of 3/6/2025 did not come to a conclusion.
- No meetings took place under the Danish Presidency (2nd semester 2025).
- The Cypriot Presidency (1st semester 2026) is picking up the file, with 2 technical meetings in Q1-2026 and the next trilogue meeting is scheduled for 22 April 2026.

European Parliament

- Rapporteurs: Gaby Bischoff (S&D; DE) Shadow rapporteurs: Jeroen Lenders (EPP), Gordan Bosanac (Greens), Jana Toom (Renew), Marie Dauchy (Pfe), Francesco Torselli (ECR)
- On 11/12/2018 the Plenary gave mandate to enter trilogue negotiations.

Interinstitutional negotiations

- The EU institutions reached a provisional agreement on 16 December 2021, but it was rejected by the Council afterwards.
- In September 2023 the European Commission issued its Communication on digitalisation in social security coordination where it urges the Council and Parliament to swiftly reach an agreement on the revision of the EU social security coordination rules.
- On 8/11/2023, Council presented draft conclusions on digitalisation in social security coordination, which are to be approved on 28/11/2023.
- After several attempts, the file was not finalized neither under the Spanish nor under the Belgian or Hungarian Presidencies.
- The Polish Presidency reinvigorated the discussion, hoping to find an agreement with the European Parliament. A revised mandate was voted in Council on 11/04/2025 and was discussed with the European Parliament in May 2025, but the positions remain quite diverging (on the prior notification and the unemployment benefit for cross border workers).
- The last attempt for a trilogue meeting (17/06/2025) failed. Hope to see an agreement has reduced considerably.
- The European Commission however waited for Cyprus to take over the Presidency (1st semester 2026).
- A new political meeting is scheduled for 22 April 2026.

c) What are Ceemet's objectives and messages?

Ceemet is advocating for the exemption of the prior notification requirement for trips which do not exceed a limited number of days abroad. This would cover both business trips and the provision of services when they do not exceed a limited number of days. Indeed, the requirement to notify every trip abroad creates an excessive amount of additional administrative burden on companies. Ceemet would like to see an agreement reached soon as the file has been on the table for nearly 10 years now and the issue of prior notification is key for the MET companies.

d) What has Ceemet done?

Prior to the shadow rapporteurs meeting, on 20/05/2021, Ceemet wrote a letter to urge them to be open to a pragmatic and in practice workable solution and exempt both business trips as well as activities which do not exceed a limited number of days. Ceemet sent a letter to the PermReps to outline our concerns on the notification requirement in the provisional agreement before the vote in COREPER I in December 2021.

Ceemet published a press release before the vote in COREPER I to highlight the main concerns.

Ceemet teamed up with the Labour Mobility Initiative to organise the “Social Security Coordination: The A-Z of AI forms webinar” technical seminar in October 2020. Gathering all relevant players, the event had the look of a mini-trilogue.

Several meetings were organised with MEPs and Presidencies until June 2025.

A letter was sent to the Cyprus Presidency on 03/02/2026.

On 17 March the Secretariat met with the head of the German social security administration to discuss the exemption for business trips and short postings.

On 9 April 2026, Ceemet has sent a letter to the Council Presidency and social attachés, as well as to the EP (shadow) rapporteurs reiterating our call to conclude the negotiations.

e) What is Ceemet going to do?

Ceemet is closely monitoring any movement on the file in the European Parliament and Council. Further actions will be taken, when necessary, in order to lobby the institutions towards our position.

4. Quality job Roadmap and Quality Jobs Act (QJA)

a) What is it about?

Following the announcement made by President von der Leyen in her 2025 State of the Union address and the Commission's 2026 work programme, the European Commission launched, on 4 December 2025 the Quality Jobs Roadmap which should strengthen job quality in the EU.

b) Where are we in the process?

The first-stage consultation of social partners on the future Quality Jobs Act expired on 29 January 2026. A second stage of consultation is expecting in 2026.

c) What are Ceemet's objectives and messages?

Ceemet considers that the issue of quality jobs identified by the Commission is largely implementation and enforcement challenges and not evidence of regulatory gaps that would justify a new horizontal legislative instrument such as a QJA.

Ceemet stresses that in the modern economy, emphasising that quality jobs and competitiveness go hand in hand, prerequisites to keep our companies afloat. Only competitive companies can offer quality jobs.

Ceemet defends the crucial role of the social partners in this field.

The main objective is avoiding any new legislative EU initiatives.

d) What has Ceemet done?

On 29th January 2026, Ceemet answered to the first phase consultation of social partners under article 154 (2) TFUE on possible direction of EU action to improve working conditions, health and safety at work and implementation of workers' rights – quality jobs act.

e) What is Ceemet going to do?

Ceemet will further monitor the developments after the consultation.

Ceemet will identify and participate in events to share its views on this file.

5. EU Talent Pool

a) What is it about?

On 15 November 2023, the European Commission introduced a proposal for a regulation on establishing an EU talent pool, a creation of an EU-wide platform, a voluntary tool for interested Member States. The aim of the tool is to facilitate international recruitment and offer opportunities to TCNs to work in EU- wide shortage occupations.

b) Where are we in the process?

The European Commission introduced a proposal for a regulation on 15 November 2023. On 13 June 2024, the Council agreed its position on the proposed regulation. The Council position aims to reconcile the principles of fair recruitment with a secure and comprehensive migration system while also reinforcing the position of the European Union in the global race for talent. Moreover, the Council has agreed that when Member States decide to join the scheme, they should indicate which entities are allowed to take part in the Talent Pool – employers, temporary work agencies, private employment agencies or labour market intermediaries. The Council has also put in place a withdrawal procedure, with clear rules and a number of safeguards to ensure stability in the system.

As regards the European Parliament, the proposed regulation is currently being discussed under the ordinary legislative procedure. The Committee responsible for this dossier is LIBE (Civil Liberties, Justice and Home Affairs) and the rapporteur for the file is MEP Abir Al-Sahlani (Renew Group, Sweden). The EMPL, DEVE (Development) and CULT Committees have developed opinion reports on the file.

The EMPL Committee voted its opinion report on 19 February 2025. Amongst others, this Committee has approved the deletion of the list of shortage occupations that was part of the initial proposal of the Commission. Furthermore, the EMPL text also highlights that employers participating in the EU Talent Pool shall comply with the relevant Union and national law and practice, including applicable collective agreements, as well as the ILO General Principles and Operational Guidelines on Fair Recruitment, to ensure selected third-country nationals' protection against unfair recruitment, inadequate working conditions and discrimination.

The vote in the LIBE Committee took place on 19 March 2025, followed by the vote in plenary on 3 April 2025. Trilogue negotiations started between Council and European Parliament, on 7 June 2025 after several technical meetings in April and May. On 18 November 2025, trilogue negotiations were concluded with provisional agreement reached. On 3 December the LIBE Committee voted in favour of the provisional agreement. On 10th March 2026 the European Parliament Plenary session voted in favour of the provisional agreement on the pool.

On 30th March 2030 the Council formally approved the regulation to establish the EU Talent Pool. The Commission will now develop the platform, which is expected to be fully operational by 2027.

c) What are Ceemet's objectives and messages?

In its position paper presented on 28 February 2024, Ceemet welcomed the fact that the proposal recognises labour and skills shortages faced by the employers in many sectors as well as difficulties experienced by the employers and third - country nationals in relation to international recruitment.

Ceemet favours the idea of establishing the EU talent pool, an online platform that will help matching the job vacancies posted by the employers in the EU with the profiles of jobseekers who reside outside the EU. Ceemet endorses the fact that the proposed regulation includes an Annex with the list of shortage occupations, which includes many occupations that our industries require. Ceemet highlighted the importance of the active involvement of sectoral social partners, and in particular employers' federations, especially when it comes to the development and update of the shortage occupation lists.

d) What has Ceemet done?

- On 28 February 2024 Ceemet finalised its position paper regarding EU talent pool.
- On 20 January 2025, Ceemet participated in the BusinessEurope WG Mobility and Migration that discussed in-depth the employers' strategy. It was agreed that a joint employer's statement on the Talent Pool should be developed.
- On 3 February 2025 Ceemet met the office of MEP Moreno Sanchez (S&D Shadow Rapporteur in the LIBE Committee) to discuss the upcoming LIBE proposal and convey Ceemet messages on this dossier.
- On 17 February 2025, Ceemet met the office of MEP Assita Kanko (ECR Shadow Rapporteur - LIBE) to discuss the upcoming LIBE proposal and convey Ceemet messages.
- On 24 February 2025, Ceemet, BusinessEurope and other employer organisations released a joint Employer's statement on the EU talent tool. The employers, among other issues, call on the co-legislators for the swift approval of the regulation.
- On 5 March 2025, Ceemet met MEP Andrzej BUŁA (EPP shadow rapporteur) and MEP Hristov Petrov (Renew Shadow rapporteur) in the EMPL Committee.
- On 16 April 2025, Ceemet co-signed a joint sectoral employer's position on the topic together with Hotrec, ECEG, WEC-Europe and FIEC calling for a swift adoption in trilogue.

e) What is Ceemet going to do?

Ceemet will inform members as regards the development of the platform and the technicalities for companies to access the talent pool.

6. CMRD 6 (Directive 2004/37/EC)

a) What is it about?

In the [EU Strategic Framework on OSH 2021–2027](#), the European Commission committed to addressing the following substances through a sixth revision of the Carcinogens, Mutagens or Reprotoxic Substances at Work Directive (CMRD): welding fumes, polycyclic aromatic hydrocarbons, isoprene, 1,4dioxane and cobalt and inorganic cobalt compounds. These five substances were also identified as priority substances by the tripartite Advisory Committee on Safety and Health at Work (ACSH), and in the Commission Staff Working Document setting out the list of substances to be scientifically assessed for the purposes of the CMRD.

b) Where are we in the process?

The European Commission tasked a consortium comprising RPA Risk & Policy Analysts, COWI and others to carry out a study which assesses the impact of introducing new limit values for the five above substances in the CMRD, and more particularly from a MET industries perspective, an amendment to include welding fumes in Annex I of the CMRD. The European Commission organised two dedicated social partner hearings on this topic on 16 March and 7 November 2023. On 20 November 2023, Ceemet sent its written input to the Commission on this topic following both social partner consultations.

A proposal for a Directive was presented by the Commission on 18 July 2025 on welding fumes, PAHs 1,4 dioxane as well as cobalt and inorganic cobalt compounds.

In Council, a general approach was reached on 20/11/2025, including Isoprene as a new substance.

In the Parliament, EMPL rapporteur Sommen (Belgian, EPP) presented her draft report on 11/12/2025. The vote in EMPL is scheduled for 15 April 2026, with indicative vote in Plenary on 15/06/2026.

c) What are Ceemet's objectives and messages?

- First and foremost, the health, safety and wellbeing of our workers are top priorities for the companies of the MET sectors.
- Due to the current geopolitical situation, we cannot afford to be dependent on third countries. The importance of Cobalt in e.g. defence industry, forces us to take a pragmatic view. The current limit values for Cobalt are already the lowest in the world. Given the important role of recycling and upcycling for the EU industry, and that the EU does not have unlimited access within the EU of raw materials, we should strategically not limit values even further. Otherwise, there is a real risk that the industry in Europe will be forced to relocate.
- When limiting values on CMR, the size of the company and the investment and cost should be taken into account. Whereas in chemical and pharma sector, there might be huge companies, that is not necessarily always the case for MET companies.
- Longer transitional periods should be looked at as a possibility for companies, especially for micro and SME companies.
- If the costs are too high, EU companies might have to close down. This means loss of jobs. In addition, workers abroad certainly face higher limit values than in Europe.
- In addition, Private Protecting Equipment (PPE) should be taken into account when measuring limit values.
- Isoprene was not taken on board by COM for a reason: because there is no added value for the health of workers, while on the contrary there is a very significant cost for the employer.

- While some of the four substances within the sixth revision of the CMRD are not of interest to Ceemet members, there is an overarching interest in welding fumes.
- Welding fumes consist of many different substances, often with individual OELs (Occupational Exposure Limits). Therefore, it is extremely difficult to set an OEL for it.
- The sharing of best practices and tools are the most efficient way of dealing with welding fumes.

d) What has Ceemet done?

- On the sixth revision of the CMRD, Ceemet circulated the information received from the Commission on a study on the inclusion of welding fumes in the CMRD on 24 January 2023.
- The Secretariat participated in both dedicated social partner hearings on this topic on 16 March and 7 November 2023 and was part of the employer delegation in the meeting with the Commission.
- The Secretariat also provided written input to the Commission on this topic on 20 November 2023.
- Ceemet had a meeting with the EMPL rapporteur Sommen on 20/11/2025, while she was still drafting her report. Some of the points that we raised were taken on board of the EMPL draft report.
- Ceemet had meetings with the EMPL shadow rapporteurs of ECR, Renew and S&D, as well as with EPP MEPs.
- Ceemet has written amendments to the Sommen Report, based on input from the H&S Committee experts, which were shared with MEPs we have met of ECR.

e) What is Ceemet going to do?

Further meetings are foreseen with relevant stakeholders (MEPs for example)

7. Occupational Safety and Health (OSH) Review

a) What is it about?

In its EU Strategic Framework on health and safety at work 2021 – 2027, the Commission addresses occupational safety and health (OSH) in a changing world of work.

The Commission intends to modernise the OSH legislation framework by reviewing the Workplaces Directive (from 1989) and Display Screen Equipment Directive (from 1990).

These Directives establish minimum standards for workplaces and address hazards related to screen work, requiring employers to assess risks and, where necessary, take measures to mitigate the risks to improve workers' health and safety. An update is needed in the context of the post-pandemic world, marked with green and digital transitions, economic and demographic challenges and the changing notion of a traditional workplace environment.

b) Where are we in the process?

We currently wait for the impact assessment studies which will accompany the future proposal of the Commission. Even though the Commission has not yet officially launched the revision of both directives, the members of the H&S Committee have received draft documents of the impact assessment studies.

c) What are Ceemet's objectives and messages?

Ceemet acknowledges that an update could be useful, to reflect the changes at the workplace since the 1990s. We are however very cautious with regard to expanding the definition of "workplace", the rules of coordination and the hierarchy of responsibilities.

The employer is responsible for the workplace: conduct a risk assessment and mitigate H&S problems. The responsibilities of the employer should be proportionate to their means of interference. Ceemet is thus cautious about the broadening of the definition of workplace to include mobile construction sites, the premises of other companies or third parties who are not employers (such as the private house of a worker when teleworking). Legal security is necessary for employers.

There is a clear link with the general topic of telework. It is important to recognize that in case of telework, any employers' responsibility must be proportionate to their means of influence over the workplace or work environment,

In addition the Commission should take full note of the exact and all wording of the opinions of the Advisory Committee on Occupational Safety and Health (ACSH), adopted by the employers, the workers and the Government, and to avoid changing and adapting the wording of the proposition of a new article on the obligations of the employers and the workers with its footnotes, especially with regard to risk assessments.

The main issue indeed remains that the responsibility of the employer goes too far. The principle of the WPD is to have a "culture of compliance". We should be aware that a more formal approach of essential requirements takes a different angle (we protect ourselves via lawyers).

Since the Display Screen Equipment Directive of 1990, the "screen time" of individuals goes far beyond the world of work. Ceemet calls for a holistic approach for responsible use of screens, which goes beyond the sole responsibility of the employer.

d) What has Ceemet done?

- Through its members, Ceemet closely follows the discussions in the Advisory Committee on Safety and Health (ACSH) as well as in other Agencies and European bodies.
- Ceemet has circulated draft documents and discussed them in the respective Committees.

e) What is Ceemet going to do?

Ceemet will draft a position paper following the publication of the OSH proposals.

The Secretariat will continue their engagement with BusinessEurope to strengthen employer messages in this area.

8. Quality Framework for Traineeships (QFT)

a) What is it about?

The [2014 Council Recommendation on Quality Framework for Traineeships](#) (QFT) aims to help young people transition from education and unemployment into employment through quality traineeships that enhance their skills, allow them to gain work experience and thereby increase their employability. The Framework sets out 21 quality principles for traineeships that Member States are recommended to put into practice to ensure high-quality learning and adequate working conditions.

In March 2024, the European Commission presented two initiatives to improve the working conditions for trainees – a proposal for a Directive on improving and enforcing working conditions for trainees and combatting regular employment relationships disguised as traineeships and a proposal for a revised 2014 Council Recommendation on a Quality Framework for Traineeships.

b) Where are we in the process?

On 14 June 2023, the European Parliament adopted its resolution with recommendations to the Commission on quality traineeships in the EU. In its resolution the European Parliament requests the Commission:

- To submit a proposal for a directive on quality traineeships, setting out minimum requirements for quality standards including adequate remuneration for open labour market traineeships, traineeships in the context of ALMPs (active labour market policies) and traineeships that are a mandatory part of professional training.
- To submit a proposal for a decision on a quality framework for traineeships undertaken with the aim of obtaining educational qualifications, and that adequate compensation would be provided to the trainee by the traineeship provider in this case.

Following up on the Parliament's resolution, on 11 July 2023, the European Commission launched the first phase consultation of social partners under article 154 TFEU on a possible action further improving the quality of traineeships.

On 28 September 2023, the European Commission launched the second-stage consultation of social partners, which stayed open until 9 November 2023.

On 20 March 2024, the European Commission issued two initiatives on traineeships: a proposal for a Directive on improving and enforcing working conditions for trainees and combatting regular employment relationships disguised as traineeships and a proposal for a revised 2014 Council Recommendation on a Quality Framework for Traineeships.

The proposed directive is currently being discussed under ordinary legislative procedure in the European Parliament. The leading Committee for this dossier is EMPL and the rapporteur for the file is Alicia Homs Ginel (S&D, Spain). The CULT and JURI Committees developed opinion reports on the dossier.

The EMPL draft report was released on 26 February 2025. In it, the rapporteur replaces the notion of regular employment relationships disguised as traineeships by the notion of abusive practices arising from the use of traineeships. She further introduces a large list of criteria to assess whether an abusive practice exists, including the absence of remuneration, excessive duration of a traineeship as well as the absence of a training component, which shall be indicated by the absence of a large list of elements such as a clear training program, a designated supervisor and/or mentor etc. The Rapporteur also reinforces the principle of non-discrimination by explicitly applying existing EU anti-discrimination laws to trainees. The draft report was discussed on 17th March in the EMPL Committee, and 654 amendments were tabled. The meetings with the shadow-rapporteurs started on 9 April 2025. As the negotiations among the different political groups are

taking some time, the vote in the Plenary has been postponed to October 2025.

On its side, the Council approved its “general approach” position on 19 June 2025. The text clarifies that the proposed directive has a dual scope to reflect its two objectives. It applies to trainees in an employment relationship for the purpose of improving their working conditions, and it also applies to any person engaged in a ‘false’ traineeship for the purpose of fighting abusive practices. Due to their specific regulatory frameworks, traineeships within education or active labour market policies are not covered by the scope of the directive. The Council’s position ensures greater consistency and clarity of terms and definitions, including by replacing ‘regular employee’ with ‘comparable employee’ and by introducing a new definition of ‘false’ traineeships. Also, the position of the Member States respects the diversity of national systems by clarifying that the directive does not impose any obligation on member states to introduce a specific employment relationship for trainees into their national law.

On 23 September 2025 the EMPL Committee voted on the report. The EMPL report highlights that traineeships should be of limited duration (no more than 6 months unless duly justified) and involve entry-level work. Moreover, MEPs call for prospective trainees to have a written traineeship agreement describing pay, tasks, learning objectives, and the duration of the traineeship, and they should have access to social protection, such as health insurance. These new rules should apply to all types of traineeships, except for mandatory traineeships as part of education undertaken to obtain academic credits, and apprenticeships.

The report specifies that a traineeship that is not paid in accordance with national law, lacks a training component, or has no mentorship or evaluation, should be considered an abusive practices. It also wants organisations to designate a person to whom trainees would be able to turn for advice and support in cases of suspected malpractice.

Trilogue negotiations have started in October 2025 but they are moving at slow pace. On 25 February 2026 the EMPL Committee reported back to Parliament as regards the trilogue negotiations. A new trilogue meeting scheduled for 24 March is postponed to 5 May 2026.

c) What are Ceemet’s objectives and messages?

Generally, Ceemet is of the opinion that the proposed Directive is not a suitable and necessary instrument to address the issue of trainees. Due to the limited scope of Article 153 TFEU, the issue of traineeships cannot be addressed properly by a directive.

Hence Ceemet calls, amongst other issues, for the limitation of the scope of the directive. Indeed, for us traineeships that are part of formal education and training programs as well as traineeships that are a mandatory part of professional training to access certain professions should be excluded from the Directive.

Further, Ceemet believes that it must be clearly stated that practices within the framework of labour market policy measures and training within the regular education system, which include mandatory workplace-based training for an approved degree, should not be covered by the Directive. Without such a limitation and clarity, Ceemet fears that there will not be enough internship positions available

Likewise, we call for the limitation of the scope of the proposed Recommendation. In our opinion, only traineeships that are part of active labour market (ALM) policies and open labour market traineeships should be covered by the Recommendation.

d) What has Ceemet done?

- Between February 2023 and June 2023, Ceemet actively participated in BusinessEurope’s advocacy

group meetings on traineeships. The focus of these discussions was to explore and discuss the employers' approach to the upcoming update of the Quality Framework for Traineeships (QFT).

- In February 2023, Ceemet ETE experts discussed at different online meetings what could be the MET industries' position on the matter.
- In March 2023, Ceemet met different EMPL MEPs to pass its messages on this key dossier. Ceemet also put forward amendments to the Semedo draft report (EMPL Committee).
- On 18 April 2023, ETE experts discussed in-depth Ceemet formal positioning on the matter. It was agreed that lobby activities should be deployed at national and EU level. The main focus of Ceemet lobbying at Brussels level should be the Commission.
- On 15 September 2023, Ceemet submitted its official response to the first phase consultation of social partners under article 154 TFEU on a possible action further improving the quality of traineeships.
- On 8 November 2023, Ceemet submitted its response to the second-stage consultation of social partners.
- On 11 April 2024, Ceemet ETE experts discussed in depth the Commission's initiatives on traineeships in particular the enhanced recommendation.
- On 17 April and 14 May 2024, Ceemet legal experts discussed in depth the Commission's initiatives on traineeships, in particular the proposal for a Directive.
- On 23 April 2024 Ceemet actively participated in BusinessEurope advocacy group on traineeships. The focus of this working group was to discuss the employer's approach and position as regards the Commission package (directive and recommendation) to improve the quality of traineeships in the EU. The package was released on 20 March 2024.
- On 11 July 2024, Ceemet issued its position paper on the Commission's initiatives to improve the quality of traineeships in the EU.
- In September 2024, Ceemet developed a draft letter to be addressed to the President of the Commission, requesting that the proposal for a directive be withdrawn in connection to the principle of political discontinuity.
- On 23 September 2024 Ceemet met the Hungarian Perm Rep to discuss the dossier on traineeships.
- On 8 October 2024 Ceemet presented the above-mentioned letter at the BE advocacy group on traineeships in order to explore if other sectors and BusinessEurope could support this proposal.
- On 20 November 2024, Ceemet, BusinessEurope and other employer organisations released a joint statement requesting the European Commission to withdraw the proposed directive on quality traineeships.
- On 19 February 2025 Ceemet actively participated in the BusinessEurope Advocacy Group on Traineeships to discuss the employers' positioning on this dossier.
- On 25 February 2025 Ceemet met the office of MEP Homs Ginel to discuss the upcoming EMPL draft report and convey its messages on the matter. A second meeting took place on 8 April 2025.
- In May 2025, Ceemet met with the Polish presidency.
- On 7 November 2025 Ceemet actively participated in the Advocacy Group on Traineeships focused on discussing advocacy lines ahead of the trilogue negotiations

e) What is Ceemet going to do?

Ceemet will continue to convey its messages on this key dossier to the European Commission and the European Parliament.

II. Potential legislative files

1. Just Transition

a) What is it about?

On 8 July 2025, MEP Jana Toom (Renew, Estonia) was appointed as the European Parliament rapporteur regarding the legislative own initiative (INI) report with recommendations to the Commission on a just transition directive in the world of work: ensuring the creation of jobs and revitalising local economies. With this report, the Parliament intends to address the challenges and opportunities of a just transition in the workplace, through a possible legislative framework.

b) Where are we in the process?

On 3 September 2025 MEP Toom presented her draft report in the EMPL Committee. Amongst others, MEP Toom called for:

- The introduction of a directive to address the challenges and opportunities of a just transition in the workplace
- The mandatory and timely information and consultation of workers and their representatives to prepare for restructuring and avoid redundancies (..)
- The introduction of an individual right to training during the working hours.

On 3rd December 2025 the EMPL Committee voted the Toom report and in line with the Rapporteur called on the Commission, by a large majority, to present all the legislative proposals of the draft report including: the just transition directive, the introduction of mandatory and timely information and consultation of workers and their representatives (..), and the introduction of an individual right to training during working hours.

In addition, the EMPL Committee also voted to demand stronger protection against unfair dismissal as well as to ensure that workers affected by restructuring have access to adequate compensation, retraining opportunities and support in securing new employment.

On 19 January 2026 the European Parliament Plenary meeting adopted its resolution on the EMPL Report. Despite the fact that the EMPL Committee had voted by a large majority to call on the Commission to present a proposal for a directive on the just transition in the world of work, the Plenary meeting did not endorse this proposal and rejected the call for a directive. Instead, the annex to the resolution regarding recommendations as to the content of the proposal calls on the Commission for establishing a dedicated framework to anticipate and manage change. However, article 1 of the resolution highlights the following "Believes that a legislative framework to address the challenges and opportunities of a just transition in the workplace is essential to ensure adequate minimum standards (...)"

The European Parliament however, backed however the EMPL Committee's call to introduce an individual right to training at EU level.

Within three months, the Commission should respond to the Parliament's demands.

c) What are Ceemet's objectives and messages?

In Ceemet's views introducing a directive for a just transition in the world of work could undermine the autonomy of social partners, who are the relevant actors when addressing employment-related changes. Furthermore, this call for a directive goes against the principle of better regulation which is one of the new imperatives of the European Commission

Likewise, additional EU-level legislation on information and consultation of workers and their representatives would impose unnecessary administrative burdens, particularly on SMEs, and would run counter to the objectives of simplification, subsidiarity and strengthening the competitiveness of EU businesses.

As regards skills, we believe that paid training leave can be an effective tool to boost training, quality employment and higher rates of job-to-job transition when negotiated by social partners and aligned with the organisational needs of companies.

For us, a universal right to training will not guarantee the quality and relevance of training, nor would it increase the participation rates of workers in training, in particular of low-skilled workers.

Last but not least, Ceemet highlights once more the role that social dialogue continues to play in the MET industries in dealing with fair transition policies and in putting in place adequate mechanisms to anticipate and manage change. Moreover, collective agreements continue to be a key tool for addressing the rapid changes reshaping the world of work.

d) What has Ceemet done?

- On 7 October 2025, Ceemet met MEP Jana Toom
- On 14 October, Ceemet met MEP Georgiana TEODORESCU (ECR, Romania)
- On 2 December 2025, Ceemet issued its position paper on ensuring a just transition through national & sectoral initiatives
- In December 2025 ahead of the plenary vote, Ceemet position paper was shared with different MEPs
- On 15 January 2026, Ceemet together with BusinessEurope, Cepi, EuroCommerce, European Shipowners, HOTREC and WEC Europe issued a joint statement calling on the European Parliament to reject the most problematic provisions (especially the call for a directive) of the own INI report
- The joint statement was shared with key MEPs ahead of the plenary vote.

e) What is Ceemet going to do?

Ceemet will monitor future developments and will continue to develop advocacy activities in this field.

2. Subcontracting

a) What is it about?

On 17 July 2025, a draft report on addressing subcontracting chains and the role of intermediaries in order to protect workers' rights 2025/2133(INI) by MEP Johan Danielsson was introduced addressing subcontracting chains and the role of mala fide intermediaries, in order to protect workers' rights. The draft report suggests three domains to work on: 1) preventing labour exploitation, 2) better enforcement and control, and 3) sanctioning labour exploitation. The report calls for limiting subcontracting as well as joint and several liability throughout the whole subcontracting chain. It suggests a maximum of 2 levels of subcontractors for risk sectors, as well as calling for a comprehensive European approach to address labour exploitation in general and abusive forms of subcontracting and labour intermediaries in particular. The report also mentions that increasing use of subcontracting for core business activities can lead to longer working hours, lower wages and job insecurity: it calls to ensure equal treatment for equal work and promote direct employment in sectors where such risks occur.

Subcontracting is one of the topics of the Quality Jobs Map and Roadmap.

b) Where are we in the process?

At Commission level, Ceemet responded to the first stage social partners consultation on QJA on 19 January 2026. We now await the second stage of social partners consultation.

In the European Parliament, the EMPL rapporteur MEP Danielsson (S&D) published his own initiative draft report on 17 July 2025. IMCO appointed MEP CEPEDA (S&D) as a rapporteur on the opinion. The vote in the EMPL committee took place on 3 December 2025, with the vote in the EP plenary being on 12 February 2026. The final text that was adopted in plenary, *the motion for a European Parliament resolution on addressing subcontracting chains and the role of intermediaries in order to protect workers' rights* was adopted by 322 against 209 and 33 abstentions.

Ceemet welcomes the final text. Most of the problematic issues have been voted down.

There is no call for legislative action. Subcontracting is recognised as a vital economic practice that supports competitiveness, innovation and job creation across Europe. The resolution does not include the limitation of the number of tiers in the subcontracting chain, therefore ensuring that well-run companies can continue to operate and grow. Respecting the freedom to conduct business is essential for a strong single market. In addition, there is a clear call for better implementation and enforcement of the existing social acquis. Effective enforcement is key to addressing abuses and criminal situations while protecting workers. Finally, the role of social partners is recognised together with the call to respect social partner agreements. Social dialogue remains central to delivering safe and competitive employment practices.

c) What are Ceemet's objectives and messages?

- Remove the call for a legislative initiative.
- Avoid any limitation to the number of subcontracting chains.
- Put emphasis on better transposition and robust enforcement of illegal – even criminal – situations.
- Underline that subcontracting is a legitimate business practice. The MET sector will not survive if subcontracting is limited, as it is the backbone of the economy. Limiting the number of subcontractors in a chain denies the fact of complex and hyper-specialised procedures and products.
- Recognise the negative impacts any limitation of subcontracting can have on SME and on regional economic ecosystems.

- Acknowledge that chain liability is already foreseen in the European acquis relating to posted workers. There are provisions about the protection of workers and joint and several liability for direct contractors, under certain conditions even for indirect contractors. To introduce a complete chain liability legislation for all sectors and all activities is not proportionate, nor is it necessary.
- Call for a more significant focus on implementation of existing legislation, inspection instead of adding a new layer of legislation. There is already European legislation since 1996, instigated by problems in the construction sector. The Posting of Workers Directive 96/71/EC tackled these problems. It was followed by other pieces of legislation relating to the protection of illegal third country nationals, Sanctions Directive 2009/52/EC. The Temporary Agency Work Directive 2008/104/EC.

d) What has Ceemet done?

- On 3 September 2025, through EEI, Ceemet published a study on the legal implications of limiting subcontracting, following it with a press release, mailings to MEPs, social attaches, media and the European Commission officials.
- Ceemet sent requests for a meeting to 20+ MEPs from EMPL and IMCO committees and followed up with calls.
- On 15 May 2025, Ceemet met APA Kalle Dramstad, assistant to MEP Johan Danielsson (S&D, Sweden).
- On 5 September 2025, Ceemet met APA Borja Martin Simón, assistant to MEP Maravillas Abadía Jover (EPP, Spain).
- On 9 September 2025, Ceemet met with two APAs of MEP José Cepeda (S&D, Spain), IMCO Opinion rapporteur.
- On 9 September 2025, Ceemet met APA Kim Victor S. Van Aken, assistant to MEP Liesbet Sommen (EPP, Belgium).
- On 9 September 2025, Ceemet met APA Sabin Ciornea and MEP Georgiana Teodorescu (ECR, Romania). Ceemet has forwarded amendments to several MEPs.
- On 15 October 2025, Ceemet met with MEP Jana Toom (Renew, Estonia) and APA Cristian Voicu.
- On 24 October 2025, Ceemet met with APA Andrea Molaro of MEP Elena Monazzan (ECR, Italian)
- A position paper on subcontracting was adopted on 28/11/2025.
- Ceemet co-signed a joint statement on subcontracting to oppose any legal initiative on the file, driven by BusinessEurope. FIEC, HOTREC and WEC also co-signed.
- In the week before the vote in EP Plenary, Ceemet sent its position paper to the MEPs, together with the call to delete the most worrying parts of the report.
- Ahead of the vote in EP Plenary, Ceemet sent an email to MEPs of EPP, ECR and Renew to vote against amendments that were tabled two days before plenary vote, which re-introduced the limitation of subcontracting chain to two tiers.

e) What is Ceemet going to do?

Ceemet will continue to follow up potential initiatives relating to subcontracting, and contact relevant players if and when necessary.

It is likely to be a topic in the Quality Jobs Act.

3. Mental Health at the Workplace

a) What is it about?

On 7 June 2023, the European Commission published its communication on a comprehensive approach to mental health. As part of this initiative, the Commission conducted a peer-review on the legislative and enforcement approaches to address mental health at work in the Member States. This is being done with a view, and subject to its outcomes and the input of social partners, to present an EU-level initiative on mental health at work in the medium term.

On 20 March 2026, MEP Ceulemans (S&D, Belgian) published a draft report on psychosocial risk, stress and mental health at work, including in the Annex the text for a Directive. It was presented in the EMPL Committee on 15 April 2026, with deadline for amendments the next day on 16 April 2026. The main points in the draft report are:

- Mandatory annual psychosocial risk assessment including action plan
- Restructuring, reorganisation of work or introduction of surveillance or digital management technologies must be subject to a prior psychosocial risk assessment
- Right to disconnect
- Right to report and protection against retaliation
- Shift of the burden of proof to the employer
- Extensive participation and co-decision right for workers
- The right to expertise' is introduced, suggesting that workers' representatives could invite an expert to guide to advise them on PSR
- A call for legislative action by the Commission.

b) What are Ceemet's objectives and messages?

- MET employers recognise mental health at work as a multifaceted issue, requiring a public health response focused on prevention.
- Ceemet highlights the limitations of employer responsibility and stresses that blaming private sector work for mental health issues is inaccurate and overlooks root causes.
- Mental health challenges involve both work and non-work factors; employers and employees share responsibility under the OSH Framework Directive.
- Hence, there cannot be a shift of the burden of proof to the employer once a worker establishes facts suggesting exposure and compatible health impairment due to work. An employer does not have access to all sorts data personal data on the employee (previous occupations, life events, medical records) – and rightly so – in full respect of the privacy of workers.
- Mental health challenges impact productivity and company attractiveness; addressing these is economically beneficial for employers.
- Work benefits mental health by providing stability, purpose, and a support network.
- The EU OSH Framework is effective and fit for purpose in this context, addressing all risks, including psychosocial risks, even if they are not explicitly mentioned. EU legislation may hinder rather than help, guidelines & best practices are more effective.
- Risk assessments for mental health are challenging, often complicated by distinguishing work-related from personal factors.
- Tackling mental health issues can be different in member states. This reflects the different national situations and contexts and is living proof that there is no unique model to address mental health 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.

- There cannot be a European level co-decision right for workers (representatives), nor a European level obligation for public services to include social partners. This goes against the well-established social partner dialogue structures that are working well and exist in the Member States.

c) What has Ceemet done?

Communication of the Commission

- The Secretariat has drafted a position paper on this topic.
- Along with the chair of the Ceemet H&S committee, the Secretariat met with Charlotte Grevfors Ernoult, Head of Unit, DG EMPL, OSH Unit to bring forward the Ceemet position on this topic and influence, before its publication, any proposal from the Commission.
- The Secretariat met with relevant Policy Advisors in the Green Group in the European Parliament to feed into their policy thinking for the next EU mandate.

EP draft Ceulemans report

- The Secretariat prepared amendments on the draft report, urging to delete the call for legislative action, mainly based on the Ceemet position paper on Mental Health at Work of 15 April 2024, ahead of the presentation in the EMPL Committee by the rapporteur. The amendments were based on the position paper of 15/04/2024 and sent to the H&S Committee experts with a call to contact their national MEPs, given the fact that the draft report does not give a balanced view of both social partners.
- The Secretariat organised meetings with the assistant of the shadow rapporteur of ECR on 6/04/2026 to discuss our amendments and contacted MEPs of EPP and Renew.

d) What is Ceemet going to do?

Once a proposal from the European Commission is launched, the Secretariat will devise a strategy based on its content and scope.

Regarding the EP draft Ceulemans report, the Secretariat is organising meetings with the rapporteur and other shadow rapporteurs.

4. Artificial Intelligence at work

a) What is it about?

Over the last months, several initiatives related to AI at work have raised Ceemet's interests.

These include:

- The EP own-initiative legislative (INL) report of MEP Bula on digitalisation, artificial intelligence and algorithmic management in the workplace – shaping the future of work,
- The revision of the AI Act in the frame of the Digital Omnibus,
- The inclusion of AI and algorithmic management in the social partners' consultation on the Quality Jobs Act.

b) Where are we in the process?

EP Report on AI at Work by MEP Bula

On 26 June 2025, in the EMPL Committee, MEP Bula (EPP) published a draft report on AI at Work, calling for the adoption of a directive. The report was adopted on 11 November 2025 in EMPL. The vote in Plenary took place on 17 December 2025. The final report calls for a proposal/initiative on algorithmic management in the workplace, to be presented by the Commission. This initiative should integrate provisions on corporate human oversight and control; transparency on the introduction and use of AI; the right to information and consultation; prohibited practices; and OSH safeguards. However, following the vote in Plenary, the notion of "legislative" was rejected.

Digital Omnibus

At the end of 2025, the Commission presented the Digital Omnibus Package which included the simplification of GDPR as well as the simplification and the postponement of the application date of the AI Act to 2028. On 26th March 2026, the European Parliament adopted its position on the proposal. On 28th April 2028, the trilogue discussions will begin among the three institutions with a view to the final adoption of the text.

Quality Job Act

The Quality Jobs Act was announced in 2025 by President Von der Leyen. The first phase of consultation with European social partners, which took place from 4th December to 29th January 2026, identified potential initiatives, such as one aimed at regulating the use of algorithms in the workplace.

c) What are Ceemet's objectives and messages?

Ceemet wants to exclude the possibility of a new directive and considers that if algorithmic management is not yet covered sufficiently by EU law, the AI Office should provide for guidance, included in the AI Act transposition. What has Ceemet done?

- At the Social Dialogue Competitiveness & Employment (SD C&E) meeting of 8 March 2021 the social partners discussed the issue of artificial intelligence and its impact on the MET industries. At this meeting it was decided to continue discussions on this topic and possibly create an ad hoc working group on AI.
- Following up on the discussions of the SD C&E working group of March 2021, Ceemet organised a first AI Working Group on 22 September 2021.
- A new joint expert working group on AI, gathering industriAll Europe and Ceemet members, was held

on 16 June 2022.

- As a result, Ceemet and industriAll Europe adopted joint conclusions on “Artificial intelligence in the MET industries” at the Social Dialogue Working Group on Competitiveness and Employment of 15 March 2023. Those conclusions were presented during the AI informal Workshop organised by Business Europe on 28th of January 2025.
- Ceemet participated in the AI Summit in Paris on 10 February 2025.
- Ceemet published its position paper on the AI at Workplace on 4 June 2025, as well as the results of its survey.
- On 2nd September, Ceemet organised a breakfast event at the European Parliament to present its survey report, its position paper and express opposition to any new legislation.
- On 1 October 2025 Ceemet met with the cabinet of EVP Mînzatu to discuss AI@work.
- In February and March 2026, with AI@Work project from the EEI, Ceemet published two business cases on AI at work in Airbus, Heuville & Fils and Miele.
- On 19th March 2026, Ceemet participated in BusinessEurope event on “Hope4AI project: AI in Practice: Transforming Work and Skills” co-organised by Confederatia Concordia and MGYOSZ.

EP Report on AI at Work by MEP Bula

- On 27 May 2025, Ceemet met the office of MEP Bula, before the drafting of the report.
- In August 2025, Ceemet wrote amendments to MEP Bula draft report to be used by members in contacts with their national MEPs. Ceemet sent an email to the MEPs of the EMPL Committee with the view of deleting the Annex of the draft report, thereby deleting the proposal for a directive.
- On 11 December 2025, Ceemet, together with BusinessEurope and other sectoral employers' associations, published a joint statement on the Bula report calling to reject any call for a directive.

Digital Omnibus

- On 18th March 2026, the Committee LIBE and IMCO held a vote on the Digital Omnibus on AI. Ceemet carefully reviewed the amendments with its members and concluded that no further action was required at this time. The simplification and modifications align with Ceemet's positions.

Quality Job Act

- On 29th January 2026, Ceemet answered to the first phase consultation of social partners on Quality Job Roadmap, which contains some suggestions on AI.

d) What is Ceemet going to do?

Ceemet will follow up on the activities in the Parliament and the Commission with the aim to prevent legislative initiatives. Ceemet will continue to monitor all policy initiatives related to AI that might have an impact on the world of work. Ceemet will contribute to the European Employers' Institute project on AI at Work.

EP Report on AI at Work by MEP Bula

- The Commission has three months to reply to the EP call for an initiative on AI. When available, Ceemet will adjust its advocacy strategy to ensure that no further legislative obligations are imposed on companies.

Digital Omnibus

- Regarding the digital omnibus on the AI Act, Ceemet is liaising with Orgalim, who are conducting the lobbying on technical issues, including those related to the products directive and the NLF.

- With regard to the digital omnibus on GDPR, Ceemet will continue to assess whether members are interested in exploring this topic in greater detail.

Quality Job Act

- Ceemet will follow up on the activities in the Parliament and the Commission with the aim to prevent legislative initiatives.
- Ceemet will continue to monitor all policy initiatives related to AI that might have an impact on the world of work.

5. European Social Security Pass (ESSPASS)

a) What is it about?

In its pilot version, ESSPASS originates from digitising European social security rights. The Commission intends the use of ESSPASS for additional aims, other than related to social security, in particular issues related to the posting notification (labour law) in cross-border situations.

Originally, the European Social Security Pass (ESSPASS) is a project designed to make it easier for individuals to exercise their social security rights when they are in another European country. This initiative is part of the European Pillar of Social Rights Action Plan.

ESSPASS focuses on digitalising the process of requesting and receiving entitlement documents, such as the European Health Insurance Card (EHIC) as well as real-time verification. ESSPASS would introduce real-time systems to swiftly verify across borders whether these digital documents are valid, or changes have occurred. ESSPASS will be part of the Fair Labour Mobility Package, that the Commission is due to launch in Q3 2026. ESSPASS will be a digital wallet, where a person can keep documents proving rights and entitlements. ESSPASS will hold the result (e-form, document, certificate) following a specific procedure to obtain a document which proves that the individual has a certain right or entitlement.

b) Where are we in the process?

On 14 January 2026, the Commission has put out a Call for evidence for an impact assessment with regard to a European Social Security Pass (ESSPASS). This will feed into a possible initiative in the frame of the “Fair Labour Mobility Package”. Ceemet responded to the call on 12 February 2026.

We are waiting for the launch of the Fair Labour Mobility Package that is due to be launched in Q3 2026.

c) What are Ceemet’s objectives and messages?

- Ceemet welcomes ESSPASS as a step towards digitalisation and simplification in cross border situations. Recognising the need of removing practical barriers to mobility, including in border regions, is essential. Labour mobility, and especially the posting of workers, is crucial for MET companies. In a globalised world, cross-border supply and value chains have become the standard. The burdensome procedures for temporary posting of workers are rightfully described as one of the “terrible ten” barriers of the Single Market that the Commission vows to tackle with priority. At the same time, it is essential that digitalisation indeed simplifies existing procedural matters and does not create inadvertently additional bureaucratic tasks.
- ESSPASS should be future proof. In the architecture of the ESSPASS, there should be room for further steps, in a modular, purpose-bound and voluntary way. Other documents, such as diplomas and certificates, immigration documents (work permit; single permit) of third country nationals, could be kept.
- A copy of the PDA1 document, a statement delivered by the national social security administration of a Member State, at the request of an employer when posting a worker, to proof that this worker is subject to that country’s social security system, will also be kept in ESSPASS.
- The possibility to add a QR-code¹ on the A1 document, or, alternatively to send only a QR code to the employee’s ESSPASS, could allow a secured, verifiable, structured and user-friendly way to prevent misuses or abuses.
- Ceemet is of the opinion that the information contained in the A1, and that is already forwarded to the social security administration of the host Member State, should be used or re-used within that

¹ Inspiration can be found in the Corona-safe app, which allowed cross-border travel during the Covid 19 pandemic.

Member State for the posting notification.

- If a QR code could be put on the AI, it would be interesting to include in the architecture of the code the technical possibility to decompose the individual data points that were originally used for the AI request. These datapoints can then be re-used towards the posting declaration in the host MS. This would in fact give the required information for a simple notification prior to the posting.
- The Once-Only Technical System approach should be implemented in every Member State. This would drastically reduce the administrative burden of companies.

d) What has Ceemet done?

- On 13 March 2025, Ceemet co-signed a statement with the European Banking Federation, ECEG, EuroCommerce, FIEC, and PEARLE to welcome ESSPASS.
- Ceemet responded to the call for evidence that feeds into the impact assessment on 12 February 2026.
- On 16 February 2026 Ceemet met with the cabinet of EVP Minzatu, where ESSPASS was one of the topics discussed.
- On 17 March the Secretariat met with the head of the German social security administration.

e) What is Ceemet going to do?

Ceemet will follow closely the launch of the Fair Labour Mobility Package. Once a proposal from the European Commission is launched, the Secretariat will devise a strategy based on its content and scope.

6. Skills Portability

a) What is it about?

The Commission will develop a Skills Portability Initiative, aimed at enhancing the recognition and portability of skills and qualifications across the EU, independently of where they were acquired. This initiative will be released as part of the Fair Mobility Package to be launched in October 2026.

b) Where are we in the process?

The Commission is in the phase of organising targeted consultations of the social partners as regards the future skills portability initiative. As part of this consultation process a social partner hearing was held on 23 January 2026.

c) What are Ceemet's objectives and messages?

Ceemet supports the overall objectives of the initiative to facilitate smoother intra-EU mobility of talent and to enhance the EU's attractiveness for skilled workers from third countries. In this regard, in Ceemet views it is crucial to:

- Ensure that any EU initiative on skills recognition and portability remains simple, non-bureaucratic, and user-friendly, particularly for SMEs, so as to guarantee effective uptake by both companies and workers.
- Promote a trust-based approach for non-regulated professions, allowing employers to assess the relevance of skills and qualifications in line with labour market needs, without imposing additional administrative burdens.
- Improve coordination and interoperability between EU-level tools (such as the EU Identity Wallet, Talent Pool, and portability schemes) and existing national, regional, and sectoral systems, including by integrating proven good practices.
- Ensure the early and systematic involvement of social partners and industry stakeholders in the design and implementation of these tools, drawing on their practical experience to ensure relevance and effectiveness.

However, in Ceemet views the recognition of skills and qualifications is neither the main obstacle to intra-EU mobility nor to the recruitment of foreign workers. In this regard it calls on Member States to prioritize the simplification and acceleration of immigration procedures for third-country nationals, as these remain the primary obstacle to labour mobility and recruitment, rather than focusing solely on skills and qualifications recognition.

d) What has Ceemet done?

- On 23 January 2026, Ceemet participated in the social partner's hearing as regards the skills portability initiative.
- On 6 February 2026, Ceemet submitted its official response to the European Commission.

e) What is Ceemet going to do?

Ceemet has discussed this initiative in the ETE Committee meeting of 15 April 2026. Ceemet will continue to convey its messages regarding this dossier.

7. Remote work

a) What is it about?

The shift towards remote work (telework, mobile work, home office etc.) has since the outbreak of the COVID- 19 pandemic suddenly and significantly increased.

Due to the rapid and sudden extension of remote work, a topic that remained practically unnoticed at EU level, is now high on the EU agenda. Indeed, today the topic of telework and the related right to disconnect, are topics currently frequently discussed at EU level.

b) Where are we in the process?

On 21 January 2021, the European Parliament adopted a Resolution on the right to disconnect. The resolution calls on the Commission to propose a Directive that ensures the right to disconnect for all workers. This Directive could only enter into force after the three-year deadline for implementing the framework agreement on Digitalisation, signed on 20 June 2020, has passed.

On 9 March 2021, the Portuguese Presidency organised a 'High-Level Conference on the future of work: Remote Work: Challenges, Risks and Opportunities, aiming at gathering input from different stakeholders on remote work.

On 15 June 2021, the Council adopted its conclusions on telework where it highlights that the recent increase in telework makes it necessary to consider the potential, limits and risks of teleworking. It calls on Members States to develop national plans to address the challenges and opportunities of remote work.

On 15 March 2022, the European Parliament and the Commission jointly organised a high-level Conference on the right to disconnect and telework.

In mid-March 2022, the European cross-sector Social Partners adopted their 2022-2024 Work-Program. The social partners agreed to launch negotiations on the issue of telework and the right to disconnect. They intended to revise and update the 2002 Autonomous Agreement on Telework. The revised agreement, if successful, were to be put forward for adoption in the form of a legally binding agreement implemented via a Directive.

On 22 September 2022, the social partners organised a fact-finding seminar on the matter. The negotiations on remote work officially started on 4 October 2022. The negotiations were ongoing for several months until they failed in November 2023.

On 30 April 2024, the European Commission launched the first-stage social partner consultation under article 154 TFEU on possible EU action in the area of telework and workers' right to disconnect.

On 25 July 2025, the second-stage consultation was launched. Ceemet gave input to the second-stage social partner consultation on 6 October 2025.

c) What are Ceemet's objectives and messages?

Ceemet opposes to any initiative from the Commission in this area, especially in case of an initiative with a binding nature.

Against this background, Ceemet appreciates the cross-sector social partners' decision to discuss tele-work and

to revise the 2002 agreement. Ceemet is of the opinion that it is better to have an agreement negotiated by the social partners than a legally binding initiative by the Commission. However, Ceemet will remain vigilant on the social partners' discussions.

Ceemet acknowledges the importance of the topic of telework and the right to disconnect considering the changes in telework prevalence. Currently in all 27 Member States there are specific rules in place about telework and/or the right to disconnect, via national legislation, collective agreements at national cross-sectoral or national sectoral level, company social partners agreements or company policies. Social partners indeed play an important role.

We therefore strongly oppose to an EU initiative on telework or a possible right to disconnect.

Generally, we agree with the European Commission that telework may bring about both opportunities and challenges. However, if the obligations and/or costs for employers will not be proportionate and balanced, telework will be made less attractive for employers.

There is a link with the upcoming review of the OSH legislation, in particular the Workplace Directive (of 1989). If the definition of "workplace" is extended to the private home of the worker when teleworking, it is important:

- to recognize the employer's authority to direct and lead the workforce, as well as the right of companies to make decisions about their own business operations,
- to avoid additional bureaucracy associated with managing working hours regulations and the introduction of telework,
- to recognize that in case of telework, any employers' responsibility must be proportionate to their means of influence over the workplace or work environment,
- to take full note of the exact and all wording of the opinions of the Advisory Committee on Occupational Safety and Health (ACSH), adopted by the employers, the workers and the Government, and to avoid changing and adapting the wording of the proposition of a new article on the obligations of the employers and the workers with its footnotes, especially with regard to risk assessments.

d) What has Ceemet done?

- Ceemet President Rainer Ludwig participated in the High-Level Conference of 9 March 2021 and delivered a MET vision on remote work.
- Ceemet has participated in BusinessEurope's Employment Working Groups with the aim of gathering intelligence on remote work and in order to share, as well, MET views on the matter.
- Ceemet participated in BusinessEurope's working group on telework of 28 February 2023. This ad hoc working group that gathers the EU sector employer organisations has been set up in order to keep the sectors informed of the "negotiations on telework and the right to disconnect" and in order to gather input from the sectors on the matter
- Ceemet replied on 24 June 2024 to the 1st stage consultation.
- EU-OSHA agency organises every year in October, the European Week for Safety and Health at Work. Ceemet participated this year to the campaign from 21st to 25th October 2024 ; it was dedicated to "ensuring safety and health in the era of remote and hybrid work"
- Ceemet has replied to the second stage social partner consultation on 6 October 2025.

e) What is Ceemet going to do?

Since remote work is a very important issue for the MET industries, Ceemet will continue to monitor all possible EU initiatives and participate at events on this topic in order to put forward the MET industry messages.

III. Other topics of relevance

1. Transition Pathway for the Mobility Ecosystem

a) What is it about?

The transition pathway for the mobility ecosystem is an initiative launched by DG Grow (Internal market, Industry, Entrepreneurship and SMEs) on 24 January 2022 with a Staff Working Document (SWD) on “Scenarios for a transition pathway for a resilient, innovative, sustainable and digital mobility ecosystem”.

The consultation document outlined the main priorities, actions and scenarios to support the green and digital transition of the mobility ecosystem, which the Commission has identified as covering the entire value chain of the automotive, waterborne, rail and bike industries.

The SWD also kicked off the so-called co-creation process, in partnership with Member States, social partners and stakeholders, of the transition pathway for this ecosystem.

b) Where are we in the process?

Since early 2023, Member States, industry associations, social partners and other “mobility stakeholders” have been meeting in the co-creation roundtables in order to identify the challenges and opportunities of the twin transition for this ecosystem.

In total, seven co-creation roundtables compose this Transition Pathway. Ceemet has been responsible for co-chairing, together with industriAll Europe, the roundtable on the Social Dimension of this ecosystem.

The outcomes of the co-creation process have resulted in the publication of the final report on the transition Pathway for the EU Mobility Industrial Ecosystem that was released on 30 January 2024. As a follow-up to the release of the report, the so-called co-implementation process was launched. This new phase aims to foster the transition of the mobility ecosystem with concrete actions in the fields identified during the co-creation process.

c) What are Ceemet’s objectives and messages?

As active member of the co-creation process of this pathway, the tech and industry employers have constantly insisted on the need to put skills at the heart of this ecosystem, as a cross-cutting issue impacting all “mobility sectors “. Indeed, it is well identified that skills shortages are the major obstacle to the competitiveness of companies belonging to this ecosystem and that this hampers continuously the creation of quality jobs.

Ceemet is convinced that in order to support the mobility ecosystem in its digital and green transformation, we need to invest massively in the up-skilling and re-skilling of the workforce. In our opinion, a critical step to close the skills gap, is to invest in anticipating the skills needs of the future including emerging skills to design education and training programs that are adapted to labour market and employability opportunities.

d) What has Ceemet done?

- On 31 March 2022, Ceemet submitted its response to the open consultation on the Transition Pathway of the Mobility Ecosystem.

- On 8 March 2023, Ceemet co-chaired with industriAll Europe the first meeting of the roundtable on the Social Dimension of the Transition Pathway of the Mobility Ecosystem.
- On 3 November 2023 Ceemet sent its input to the draft report on the transition pathway for the mobility ecosystem, namely in the skills and social dimension area.
- On 29 February 2024 Ceemet participated in the roundtable event on the Mobility Transition Pathway. This was the occasion for Ceemet to present the outcomes of the social dimension roundtable.
- On 10 April 2024, Ceemet addressed the High-Level Conference on "Skills (R)evolution in the Automotive Mobility Ecosystem". On this occasion Ceemet gave its messages as regards the crucial role that social partners play in delivering the twin transition in the automotive sector.
- On 11 April 2024, Ceemet addressed the TRIREME kick-off meeting. The project TRIREME (Digital and Green Skills: Towards the Future of the Mobility Ecosystem) is the follow-up to the Automotive Skills Alliance.
- On 1 September 2024, Ceemet submitted together with its trade union counterpart, industriAll Europe, its joint pledge as part of the "co-implementation phase" of the mobility transition pathway intended to foster the green and digital transformation of this ecosystem.
- On 3 and 4 October 2024, Ceemet participated at the 2nd TRIREME partnership meeting held in Milan.
- On 4 December 2024, Ceemet and industriAll Europe organised a social partner's workshop in Brussels focused on discussing the social dimension of the transformation of the automotive industry.
- On 8-10 April 2025, Ceemet actively participated in the 3rd TRIREME partnership meeting held in Ostrava (Czech Republic). In the framework of the partnership meeting, Ceemet and industriAll Europe organised with work package 5 (regional roll-out) a joint workshop on the Social and Regional implications of the transformation in the automotive industry.
- On 24-25 September, Ceemet actively participated in the TRIREME Workshop meeting held in Turin, where social partners of the Southern region (France, Italy, Spain & Türkiye) discussed the transformation of the automotive sector.
- In October 2025, Ceemet actively participated in the 4th TRIREME partnership meeting held in Madrid.
- On 14 January 2026, Ceemet actively participated in the Automotive Skills Alliance Annual Conference.
- On 21 April 2026, Ceemet intervened as speaker at the ASA High Level Conference: Skills (re) evolution in the automotive mobility ecosystem. The Conference was held in Cluj -Napoca (Romania)
- On 22-23 April 2026, Ceemet actively participated in the 5th TRIREME partnership meeting held in Cluj -Napoca (Romania)

e) What is Ceemet going to do?

Ceemet will continue to contribute to the implementation of this pathway and will thus remain actively involved in the "co-implementation process".

Within TRIREME, Ceemet is co-leading with industriAll the work package on the social impact of the continuous transformation in the automotive-mobility ecosystem with a focus on the role of social dialogue to mitigate the effect of the green transition on employment and skills in the sector. The work carried out will serve to feed also the « co implementation process » of the transition pathway for the mobility ecosystem.

TRIREME - "Digital and Green Skills: Towards the Future of the Mobility Ecosystem" is a blueprint for sectoral skills collaboration in the Mobility-Transport-Automotive ecosystem and it is financed by Erasmus +. The actors cover a wide range of stakeholders from industry associations (such as ACEA, Clepa, ETRMA), social partners (Ceemet & industriAll Europe), regions, universities, companies, researchers etc.

Running over four years, the project is composed of seven work packages with a main focus on the skills issue, the idea being to ensure the upskilling and reskilling of the workforce of the automotive industry facing the challenge of the green transition.

2. Vocational Education & Training (VET) Strategy

a) What is it about?

In its Communication on the Union of Skills, the Commission announced the launch of a European Strategy for Vocational Education and Training as one of its key deliverables in this field. The strategy to be released in mid 2026 aims at strengthening Europe's human capital base and ensuring that every learner and enterprise benefits from the full potential of VET with future-ready, high-quality and relevant vocational pathways offering a high level of permeability – from initial vocational education and training, including at tertiary level, to continuous VET supporting the upskilling and reskilling of adults.

b) Where are we in the process?

The Commission is in the phase of organising targeted consultations of the social partners as regards the future VET Strategy. As part of this consultation process a social partner hearing was held on 6 February 2026.

c) What are Ceemet's objectives and messages?

In Ceemet views, Europe needs excellence in vocational education and training to sustain competitive industries, strengthen quality industrial employment and ultimately preserve and reinforce its industrial foundation. We therefore believe that Member States must continue to invest in ambitious and high-quality VET policies that are essential for MET companies as well as for workers to keep up with the skills development that is required for the MET sector to remain strong, innovative, competitive and sustainable. In this regard Ceemet continues to insist that it is crucial to enhance both the visibility and attractiveness of VET as a first-class educational pathway that leads to quality employment in the technology industries. This requires permeability between the different (general and VET) pathways and improved career guidance and counselling that guides youngsters towards VET and in the end guide them to work in the industries. Moreover, for Ceemet it is also important to reinforce cooperation between industry, social partners and VET providers as a way to ensure that VET Curricula and training modules are adapted to labour market changing needs. Besides, Ceemet is of the opinion that enhancing VET mobility could contribute to improving its attractiveness, but on this point warns of the difficulties that SMEs can face when it comes to receiving and following-up on a mobile apprentices as legal frameworks vary from country to country. Last but not least, for Ceemet it is essential that the Commission fully respects national competences in the development of this strategy as Member States remain responsible for the organisation, structure and content of their vocational education and training systems.

d) What has Ceemet done?

- On 3 February 2026, Ceemet participated in the webinar the international dimension of VET – A structured consultation webinar for VET strategy
- On 6 February 2026, Ceemet participated in the social partner hearing as regards the future VET strategy
- On 23 February 2026 Ceemet submitted its position papers regarding the EU future VET strategy to the European Commission.

e) What is Ceemet going to do?

Ceemet ETE Committee has discussed the VET strategy at the ETE Committee meeting of 15th April 2026. Ceemet will continue to convey its messages regarding this important dossier for the MET industries.

3. Simplification / Better regulation

a) What is it about?

On 21 October 2025, the European Commission under Ursula von der Leyen's second mandate adopted its work programme for 2026, where the President of the EU Commission increasingly emphasised regulatory simplification as a central policy objective.

b) Where are we in the process?

Several Omnibus packages emerged during the past year:

- Omnibus I on CSRD and CS3D: see above (under legislative files, point 1)
- Digital Omnibus

c) What are Ceemet's objectives and messages?

Ceemet wants to make sure that the EU Commission continues to simplify the EU framework and avoids the reopening of legislative texts for purposes other than simplification. Ceemet considers that the simplification of the EU framework will allow to regain competitiveness and achieve the Single Market. Within those considerations, Ceemet calls, among others, for the respect the principle of subsidiarity and proportionality; better impact assessments; digitalisation (ESSPASS, e-Declaration) and legal clarity.

d) What has Ceemet done?

- On 3 December 2025, Ceemet co-signed a statement with EBF, HOTREC and WEC Europe to urge the Brussels Institutions to simplify the social acquis.
- On 4 February 2026, Ceemet has responded to a call for evidence from the Commission on *"better regulation" and how to make EU regulation more effective, proportionate and efficient, particularly for SMEs*.
- In February 2026, Ceemet published its position paper entitled *"Better regulation as a driver of EU competitiveness"*.
- On 10 February 2026, Ceemet published an open letter addressed to the heads of state, ahead of their informal retreat at Alden Biesen.
- On 12 February 2026, Ceemet responded to the call for evidence that feeds into the impact assessment on ESSPASS.
- On 18th February 2026, Ceemet intervened at Business Europe event with EVP Commissioner Mînzatu on *"simplification"*.
- On 26/02/2026, Ceemet initiated and sent a letter asking for a postponement of the transposition date of the Pay Transparency Directive by a two year *"stop-the-clock"* process to EVP Commissioners Mînzatu, Séjourné, Ribera and Commissioner Lahbib, Coreper and social attachés of the PermReps. The letter was co-signed by other European employer federations ECEG, EuroCommerce, EBF and Hotrec.
- On 7/04/2026, Ceemet sent a joint letter to the Commission with a request for a Reality Check on Directive (EU) 2023/970 on Pay Transparency
- Ceemet met with the Cypriot Presidency on 18 March and 14 April to discuss simplification and better regulation.

e) What is Ceemet going to do?

Ceemet will continue to follow the simplification initiatives and support the *"in one, in out"* principle.

IV. Following up transposition and implementation

1. Directive on Pay Transparency

a) What is it about?

On 4 March 2021, the Commission presented a proposal for a Directive on pay transparency and enforcement mechanisms which, according to the European Commission aims at tackling the persisting inadequate enforcement of the fundamental right to equal pay and ensuring that this right is upheld across the EU. The proposal focuses on two elements:

- 1) Pay transparency measures: providing for measures related to pay transparency for job seekers, right to information for employees, reporting on gender pay gap and joint pay assessment.
- 2) Access to justice: laying down provisions on compensation for workers, shift the burden of proof to the employer, sanctions and collective claims.

b) Where are we in the process?

The Pay Transparency Directive was published in the Official Journal of the EU on 17 May 2023. Member States must transpose the Directive into their national legal systems by 7 June 2026.

Member States currently face difficulties. Only one EU country indicated that the transposition into national legislation would meet the deadline of 7 June 2026.

c) What are Ceemet's objectives and messages?

Ceemet supports the aim of the proposal but feared from the start that this Directive does not address the root causes of the gender pay gap (such as labour market segregation and employment rates for women). Therefore, the effect of any such measures will be minor for employees while it would inevitably create additional costs and administrative burden on companies.

Ceemet saw three major risks for employers:

- It undermines social partners' autonomy and their freedom to negotiate wages.
- It imposes heavy administrative burden on companies, mainly SMEs.
- It promotes litigation and increase court cases.

d) What has Ceemet done?

- Ceemet has responded to the social partner consultation on gender pay gap – transparency on pay for men and women on 25 May 2020 and provided input to the Commission on the forthcoming proposal.
- Ceemet has responded to the BusinessEurope's survey on binding pay transparency measures.
- Members developed a plan A and plan B position paper. Plan A requests the withdrawal of the proposal and highlights the problems which it risks creating for companies, social partners and Member States. Plan B goes more into the details of the articles.
- Ceemet has drafted a proposal for amendments to the Commission proposal to be used as a lobbying tool with the European Parliament (EP) and Council.
- Ceemet spoke at the occasion of an EP hearing organised by the EPP shadow rapporteurs to highlight the practical difficulties of this proposal for companies.
- Ceemet and ECEG, the European Chemical Employers Group, developed a position paper in order to

agree on main problematic issues for both organisations.

- Ceemet sent a letter to the MEPs from EPP, Renew Europe and ECR Political Groups to urge them to reject the committee mandate on pay transparency in plenary. The letter was co-signed by the European employers' organisations Geopa, ECEG and EFCI.
- Ceemet sent a letter following the adoption of the draft report in the FEMM and EMPL Committee. (co-signed by the European employers' organisations, Geopa, Hotrec, ECEG, EFCI and EuroCommerce.
- Prior to the vote in Coreper, Ceemet sent a letter to the Member States to outline our main concerns on the agreement, which in our opinion does not provide for a pragmatic approach and will create a significant amount of financial and administrative burden on companies and urged the Member States to reject the agreement.

On 26/02/2026, Ceemet initiated and sent a letter asking for a postponement of the transposition date of the PTD by a two year "stop-the-clock" process to EVP Commissioners Mînzatu, Séjourné, Ribera and Commissioner Lahbib, Coreper and social attachés of the PermReps. The letter was co-signed by other European employer federations ECEG, EuroCommerce, EBF and Hotrec. We address in particular that our sectors since long respect the principle of equal pay for equal work regardless of gender, commitment that is reflected in the Collective Agreements which have been negotiated through social dialogue with our respective trade unions counterparts. Therefore, the presumption of compliance of Collective Agreements should be recognised.

- On 7/04/2026, Ceemet sent a joint letter to the Commission with a request for a Reality Check on Directive (EU) 2023/970 on Pay Transparency.

Meetings

- Ceemet met with nine Perm Reps of the following Member States: Croatia, Czech Republic, Denmark, Estonia, France, Ireland, Italy, Luxembourg, Slovenia and Poland.
- Ceemet met with the office of the EMPL rapporteur Ms Peter-Hansen (Greens; DK), to discuss the EMPL report ahead of the drafting. We also met with MEPs Walsh, Pietikäinen, Al-Sahlani, de la Pisa Carrion & Brunet and sent written input to MEP Rafaela.
- Ceemet met with the French Presidency on 6 May 2022 to urge the Presidency to stick to the general approach.
- Ceemet organised a technical seminar with social attachés to explain the practical impact of the legislative proposal on companies on 30 June.
- Ceemet has followed the transposition in the Member States and organised round tables in the EU Committee, to share the problems and best practices of members regarding this Directive.
- Ceemet has attended meetings with BusinessEurope regarding the transposition.

e) What is Ceemet going to do?

Ceemet will closely follow up this file and take the necessary action.

2. European Works Council Directive (EWC)

a) What is it about?

The European Parliament adopted a report requesting a revision of the European Works Councils (EWC) Directive. The report stresses that there should be timely and meaningful consultation between company management and employee representatives on transnational issues that impact the jobs and working conditions of the European workforce, such as restructuring plans.

The report also called for effective, dissuasive and proportionate sanctions for non-compliance with the Directive, clarification of the scope of confidential information and access to justice for EWCs.

b) Where are we in the process?

- On 2 February 2023, the European Parliament adopted a report by MEP Radtke to improve the functioning of European Works Councils (EWCs) and strengthen their role by 385 votes to 118, with 99 abstentions. The resolution also calls on the European Commission to propose a revision of the 2009 EWC Directive by 31 January 2024.
- The Commission launched an assessment of the EP's request, which includes data and evidence collection and a comprehensive evaluation of problems and drivers in relation to existing EWCs, the undertakings falling under the scope of the recast Directive, and on the issues highlighted in the Parliament's resolution.
- As a follow up to the EP report, the European Commission published their first stage social partner consultation in April.
- The second stage consultation was launched by the European Commission at the end of July and ended on 4 October 2023. The social partners were consulted on their views regarding the possible avenues for EU action.
- BusinessEurope offered negotiations which ETUC rejected.
- On 24 January 2024, the European Commission issued a legislative proposal for a Directive.
- On 14 February 2024, the European Parliament issued a draft report on a proposal for EWC Directive.
- On 3rd April during the vote in the EMPL committee, 99% of Radtke's compromise amendments were adopted. The final report adopted by the European Parliament is not employer friendly.
- The Council completed its final text on EWC dated 31 May. The general approach was endorsed by the EPSCO Council on 20 June 2024.
- MEP Radtke (EPP, DE) has been confirmed as rapporteur & the mandate of the EP has been confirmed in Plenary on 18 December (by a short majority).
- Trilogue negotiations started on 6 February 2025 – 2nd meeting took place on 19 March and the last one under the Polish Presidency took place on 21 May 2025, when a provisional agreement was reached.
- The EP Employment Committee adopted the outcome of the trilogue on 5 June 2025 and the vote in plenary is likely to take place during the October session (6 to 10 October).
- The directive has been published in the OJEU on 11 December 2026: Directive 2054/2450 of the European Parliament and of the Council of 26 November 2025 amending Directive 2009/38/EC as regards the establishment and operation of European Works Councils and the effective enforcement of transnational information and consultation rights.
- Member States have to transpose the Directive in their national legal system by 1 January 2028. The application date is 2 January 2029, except for Article 1, points (12) and (13) insofar as they relate to article 14 and Article 14 (1), (2), and (3) as from 2 January 2028.

c) What are Ceemet's objectives and messages?

Ceemet opposed the call of the EP for an EU initiative aimed at revising the EWC Directive as there is no evidence that the proposed changes were necessary to improve the functioning of the EWCs in practice. On the contrary, it may work counterproductive in some ways. Ceemet feared that the strict and far-going provisions as proposed by the Report would ultimately discourage companies to establish branches within the EU. This would lead to a redirection of investments, with medium-term effects such as a shortfall in investments in future technology, reduced research activity in Europe as a development hub, declining market shares and increasing dependencies on countries outside the EU.

In particular the narrowing down of the definition of transnational topics, will be adding an unnecessary layer of complexity for European Works Councils vis-à-vis national Works Councils.

d) What has Ceemet done?

- Ceemet adopted its position paper to respond to a possible proposal for revision from the European Commission on 23 May 2023.
- Ceemet responded to the first stage social partner consultation on 17 May 2023.
- Ceemet had an interview with RPA, a research organisation conducting research services for the European Commission on 9 June 2023.
- Ceemet had a meeting with BusinessEurope at the beginning of September 2023 to discuss their position regarding the planned revision of the EWC Directive.
- On 3 October 2023 Ceemet provided a reply to second-stage social partner consultation.
- In October 2023, Ceemet initiated meetings with European Commission to discuss the future proposal.
- On 15 February 2024, Ceemet presented its position paper on the proposal for a Directive and prepared amendments to the draft report of the EP. Ceemet met representatives of the European Parliament.
- On 22 March and 31 May Ceemet co-signed joint employers' statements expressing our views and concerns on EWC.
- On 26 August 2024, Ceemet & ECEG wrote to the Presidents of the political groups in the European Parliament asking them to apply the discontinuity principle and restart the work on the EWC file. No replies were received to our letters.
- Prior to vote in plenary on the report, Ceemet sent a voting recommendation to the MEPs in this respect.
- Strong advocacy (with BusinessEurope) to block the vote in Plenary – close to success.

e) What is Ceemet going to do?

- Ceemet is part of an EU funded project on EWC Mentors' Effective Networking and Training on Restructuring. Ceemet participated in an EWC conference organised on 21-22 May 2025.
- Ceemet is represented in the Working Group on the Transposition of the Directive.

3. Adequate Minimum Wages Directive

a) What is it about?

In October 2020, the Commission presented a Directive which, according to the Commission, aims to:

- Ensure that workers across the EU are protected by adequate minimum wages.
- Strengthen collective bargaining as the main instrument to ensure fair wages and working conditions.

b) Where are we in the process?

The Directive has been published in the Official Journal of the EU on 19 October 2022. Member States shall adopt the measures necessary to comply with this Directive by 15 November 2024. The Danish government issued a legal challenge regarding the annulment of the Directive with the support of Sweden. On 14 January 2025, the General Advocate gave an opinion calling for the withdrawal of the directive. On 11 November 2025, the ruling of the ECJ was published: most of the articles of the directive were endorsed by the judges who recognised the existence of a legal basis to adopt the Directive. However, part of article 5 on the criteria was recognised as not valid. The Commission has set up an expert group on the transposition of the Directive.

c) What are Ceemet's objectives and messages?

Throughout the legislative process, Ceemet has continuously stated that the EU has no competence to introduce any EU action on pay and collective bargaining as there is no legal basis. Indeed, 'pay' is explicitly excluded from the EU level in art. 153(5) TFEU and the proposal interfere in a purely national competence. It has an effect on the level of pay as it imposes the use of indicative reference values and pre-defined criteria on Member States in order to determine the adequacy of minimum wages.

Furthermore, it is not for the EU to propose one threshold of collective bargaining coverage that applies to all Member States. Different Member States have different traditions as regards their industrial relations models and therefore it should be left to the national level and the social partners to take a decision in this respect. In several Member States, the only way to reach this target may be by making collective agreements universally applicable which will weaken social partners as it implies that the rules apply to all, even to those that are not member of an employers' organisation or a trade union who signed the collective agreement.

d) What has Ceemet done?

During the legislative process, Ceemet has strongly been lobbying on our main points of interest by:

- Meeting with six³ MEPs and/or their office and sent written input to two⁴ other MEPs.
- Meeting in 3 rounds with 19 Permanent Representatives and sent written input to two other PermReps.
- Publishing several press releases and (joint) statements. Sending several letters throughout the process to all institutions (MEPs in EMPL and Plenary, Council and negotiators during the trilogue).
- Organising a technical seminar together with six⁵ other European employers organisations to emphasize the lack of legal basis and main problematic articles (i.e. article 4 and 5).
- Ceemet was part of the Commission expert group on the transposition of the Directive on Adequate Minimum Wages and was giving input on the interpretation of the Directive.

e) What is Ceemet going to do?

Ceemet will continue to take part in the activities organised by the European Commission such as the workshops on the transposition of the Directive.

³ Monica Semedo (Renew; LU), Sylvie Brunet (Renew; FR), Radan Kanev (EPP; BG), Ann Sander (EPP; FR), Maria Walsh (EPP; IE), Jeroen Lenaers (EPP; NL) and Agnes Jongerius (S&D, NL)

⁴ Dragos Pîslaru (Renew; RO) and Tomas Zdechovsky (EPP; CZ)

⁵ ECEG, EFCI, EuroCommerce, GEOPA-COPA, HOTREC, WEC-Europe.

4. Platform Work Directive

a) What is it about?

On 9 December 2021 the Commission proposed a set of measures to improve the working conditions in platform work and to support the sustainable growth of digital labour platforms. The package includes:

- A Communication setting out the EU approach & measures on platform work and aiming at laying the foundations for work on future global standards for high-quality platform work.
- A Proposal for a Directive on improving working conditions in platform work. This includes measures which aim to correctly determine the employment status of people working through digital labour platforms and new rights for both workers and self-employed people regarding algorithmic management.
- Draft Guidelines clarifying the application of EU competition law to collective agreements of solo self-employed people seeking to improve their working conditions. This includes those working through digital labour platforms.

b) Where are we in the process?

The official adoption in Council took place on 14 October 2024 and the Directive was published in the Official Journal of the EU on 11 November 2024. Member States have two years, until 2 December 2026, to incorporate the provisions of the Directive into their national legislation.

c) What are Ceemet's objectives and messages?

The definition of a 'digital labour platform' is vague, too broad and may have extensive, unintended consequences such as the reclassification of genuine self-employed people as employees. The EU is not the best level to establish criteria to determine whether a person performing platform work is legally presumed to be in an employment relationship. The Member States are better placed to take measures in this respect, fully in line with their national legislation and practices. When a person performing platform work is correctly classified as an employee according to national law and practices, applicable EU and national labour and social law will automatically apply. Therefore, there is no need to add the rights deriving from chapter 3 and 4 to persons that are considered employees.

The Commission goes far beyond its competences as matters regarding national legal proceedings fall under the prerogative of the Member States. This should be left to the national level to be regulated in line with their national legislation and practices. Regarding the draft guidelines on the application of EU competition law to collective agreements regarding the work environment for self-employed persons Ceemet agrees with the general objective of improving of the work environment for self-employed persons as long as it is done in line with national regulations and industrial relations systems.

Ceemet considers, however, that the Commission, should have aimed at clarifying the application of EU competition law on this matter in line with national regulations and not by introducing criteria at EU level that determine in which situations a solo self-employed person can be considered as a worker for the purposes of collective bargaining/agreements even if the person in question has not been reclassified as a worker by national authorities/courts. By proposing these criteria at EU level, the Commission does not respect national competence when it comes to defining the term worker or self-employed.

By proposing these guidelines, the Commission is interfering with a core competence of Member States and

of representative social partners when it comes to determining the organising, parties and functioning of collective bargaining systems at national level.

d) What has Ceemet done?

- Ceemet has replied to the two consultations of social partners on addressing the challenges related to working conditions in platform work.
- Ceemet has also liaised with BusinessEurope and other sectors in order to coordinate the employers' position on this topic and gather information on the other sectors' views.
- Ceemet has been involved in the discussions within the Consultative Commission on Industrial Change (CCMI) on platform work.
- Ceemet has replied to the first public consultation regarding the application of EU competition law on collective bargaining agreements by self-employed.
- Ceemet submitted its response on draft guidelines on the application of EU competition law to collective agreements regarding the work environment for solo self-employed.
- Ceemet has adopted its position paper on the Directive.
- Ceemet issued a joint position with IRU, Hotrec, EBF-BCSE, ECEG titled "We are not platforms! Industries deeply concerned by EU proposal" on 3 November 2022.
- Ceemet issued a joint statement with Hotrec titled "Let's preserve the status of the real self-employed" on 6 December 2022.
- Prior to the vote on platform work, Ceemet sent an email to the MEPS to urge them to vote against the mandate presented by the EMPL Committee in order to allow for amendments to be put forward in plenary on 18 January 2023.
- Ceemet sent a letter to the PermReps to highlight some main points of concern, notably regarding article 2 on the definition of digital labour platform and article 4 on legal presumption on 21 April 2023.
- On 30 August 2023 ahead of the trilogue, together with HOTREC and IRU, Ceemet sent a joint letter to the members of the EP on platform work. The letter suggests to a great extent to follow the Council's General Approach.
- On 7 November 2023, a Ceemet letter was sent to the negotiators to support the inclusion of the definition of digital labour platforms as per the initial text of EC proposal and when it comes to the legal presumption, to follow the General Approach of the Council.

Meetings

- Ceemet has participated in different BusinessEurope Working Groups focused, among others, on discussing these draft guidelines in order to gather know-how, both from the employment and competition perspective, of other employer federations and BusinessEurope experts on the matter.
- Ceemet was present at the roundtable organised by rapporteur MEP Gualmini to communicate Ceemet's position on the topic on 12 April 2022.
- Ceemet met with the French Presidency to discuss the file.
- Ceemet met with Shadow rapporteur Dennis Radtke (EPP; DE) on 9 June 2022.
- Ceemet met with Renew policy adviser on 28 September and MEP Walsh on 12 October 2022.
- Ceemet organised an online technical seminar with Dennis Radtke MEP and European MET companies as guest speakers on 13 October 2022.
- Ceemet met with the French and the Irish PermRep to discuss the file.

e) What is Ceemet going to do?

Ceemet will further monitor the transposition of the Directive on the national level.

Get in touch



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