

98TH EU COMMITTEE MEETING BRUSSELS, 20 NOVEMBER 2025

The **Chair, Mads Pedersen Storgaard** (DK) welcomes the participants (*enclosure 1*), thanks Gesamtmetall for their generous invitation of the EU Committee members to the German event on 19 November. The Members agree to start with Item 3a) before the first item on the agenda (*enclosure 2*). The slides presented at the meeting are attached for convenience (*enclosure 3*).

ITEM 3 A): MINIMUM WAGE DIRECTIVE (MWD)

On 11/11/2025, the European Court of Justice (EcJ) has published the Minimum Wage Directive Case C-19/23, in which it partially annuls the Minimum Wage Directive. The court case is presented by the **Chair**, outlining the result and reasoning of the EcJ and the impact for the legal base of a legislative initiative in the future (see slides). The Chair opens the floor for a discussion and asked the Members of the impact within their national system.

Lucile Uhring shared that in France, there will not be much impact. **Eva van der Boom** said that it is the same for the Netherlands. In Germany, **Stefan Solle** said, over 80% of workers are covered by collective agreements. German employers hope that national discussions are picked up again. **Joanna Ahokanto-Niemi** explains that for Finland, as 70% of workers are covered via Collective Bargaining, even if the MWD does not affect the national system, the outcome of the court case is still disappointing. **Andreas Edenman** confirms that Sweden as well would have preferred a different outcome, even though the MWD does not directly affect Sweden either. In Denmark, whose government initiated the Court case, **Mads Storgaard Pedersen** informed the Members that the outcome can be seen as small victory. Both for countries having a statutory minimum wage system and those without, as the Court has confirmed, that even if you go below the 80% collective bargaining threshold, it is still fine.

Marcel Marioni informs that Switzerland does not have to adopt EU directives so there is no impact of the EcJ case. The same holds for UK. **Rose Sargent** shares that on national minimum wage, the Labour government proposes 2 age groups (under / over 18 years old) instead of the current 3 age groups and apprentices.

Members shared the general concern regarding the legal base. The EcJ interpreted the Commission's competence in a broad manner. This interpretation of the legal base is problematic from a democratic perspective; the European legislators can pick as legal ground 'working conditions' and then strategically pass new legislation.

ITEM 1 - DRAFT PROPOSALS FOR LEGISLATIVE INITIATIVES CURRENTLY BEING DISCUSSED: UPDATE & NEXT STEPS

a. Regulation on eDeclaration

State of play: The draft regulation on eDeclaration is a voluntary initiative which was presented on 13/11/2024, as one of the last legal proposals of the previous **Commission**. The aim is to facilitate reporting for posted workers via a digitalised system (revision of the IMI system). In the **EP**, the joint draft report of the two co-rapporteurs of IMCO (MEP Andreas Schwab - Germany, EPP) and EMPL (MEP Johan Danielsson – Swedish, S&D) was adopted on 8/9/2025 with a decision to enter trilogue negotiations. The EP favours a closed (though long) list of datapoints that can be asked in the eDeclaration. In **Council**, a general agreement was reached on 22nd of May, made possible by a constructive abstention of some countries. **Trilogues are ongoing.** There is political willingness to reach an agreement this year.

Ceemet remains cautious that the final eDeclaration will not have too many datapoints.

In the following discussion, **Stefan Solle** shared that the last trilogue would be planned for 8/12/2025. **Lucile Uhring** informed that the EP and Council are on the same line to have a long list of datapoints, contrary to the position of the Commission. The IMI-system (in which the eDeclaration tool will run) is not user-friendly and does e.g. not detect a wrong registration number of a company. Also, there is no autocompletion of data, which runs counter the “only once” principle. There are lessons to be learned for the future.

Action: Ceemet will follow up the file in trilogues, and if needed will contact the relevant stakeholders.

b. Directive on improving and enforcing working conditions for trainees and combatting regular employment relationships disguised as traineeships

State of play: In March 2024 the Commission proposed the Traineeship Directive. In the EP the draft report of rapporteur MEP Homs (Spanish, S&D) was adopted on 23/9/2025 in EMPL with a decision to enter trilogue negotiations. This was confirmed by Plenary on 8/10/2025. At Council level, a general approach agreement was reached on 19/6/2025. Trilogues are ongoing but there are still contentious discussions.

Mads Storgaard Pedersen informed the Members that the Danish presidency expects to hand over this file to Cyprus, the following Presidency. There is a very narrow mandate in Council with little room for manoeuvre. **Lucile Uhring** shared that it is indeed a technical as well as a political discussion. The positions of the EP and Council are far away; it will take time to find a compromise. **Rose Sargent** mentions that for “mentorships” the UK government would like to introduce a national definition. Currently there are different names, e.g. internship, work shadowing.

Actions: Ceemet will follow up the dossier and inform the Members accordingly.

c. Omnibus initiative on the revision of CSRD and CS3D

State of play: Trilogues have started on 18 November, following a hectic period in the EP. In Plenary, the adopted JURI report was rejected on 20/10/2025. On 5/11/2025, EPP tabled amendments. On 13 November, the amended JURI report was adopted, including the mandate for JURI to enter interinstitutional negotiations (see slides).

The crucial point for trilogues is how to do due diligence.

Stefan Solle discusses that whereas the Commission and Council have a 2-step approach, similar to the current German system, the EP favours a risk-based approach that is not just fixed on the first-tier business partner, but also farther down the chain. This results in a spill-over effect for SMEs. It remains to be seen how the balance will be struck of large companies needing information, while small companies out of scope would not have to give information.

Henrique Laitenberger shares that the outcome of the EP is as good as we could hope for. Building on the minimum standards will be a tough point in trilogue negotiations. Companies need a predictable level playing field, to avoid forum shopping. The position of the EP is more in line with TIF's. **Alexandre Chevassut** informs Members that for France, regarding the risk-based approach of the EP position, the main issue is go back to the Council position.

Members then shared their views on how the vote was reached in Plenary (with help of PfE) and whether a return to the Von der Leyen majority could be reached for the (future) provisional agreement. As it will be the first vote on an Omnibus Package, MEPs may want to give a clear signal regarding simplification omnibus in general.

Action: Ceemet will closely follow the next steps in trilogues and will inform the Members accordingly. The Secretariat will liaise and align, if necessary, with other European federation if actions would be required before the vote in Plenary.

Simplification statement of the European social acquis

The Chair gives the floor to **Delphine Rudelli**, the Director General of Ceemet, regarding the simplification of the social acquis. Last week, the European sector federation of the chemical and pharma industry ECEG, published an overview of all their position papers of the last years, calling for a "Social Omnibus". The vitriolic reaction of the Trade Unions, especially on LinkedIn, was rather shocking. Ceemet would therefore like to discuss with the Members whether Ceemet could **publish a statement**, in which we call for the necessity of a simplification exercise of the social acquis. Simplification does not mean deregulation.

As the Commission is due to launch the "Quality Jobs Roadmap" on 3 December, there is also the question of **timing**, when to publish a statement. Lastly, we can liaise with other European Sector Federations to **co-sign** the statement.

A lively debate follows, where all Members give their opinion, resulting in the unanimous decision for Ceemet to come out with a statement on this topic.

Actions: The Secretariat will write a one-pager at once, including all the elements discussed. Members will receive the draft statement later today and are invited to check it with their CEO/DG in their organisations for feedback by tomorrow. Delphine Rudelli will contact other sector European sector federations to inform them and check if they are willing to co-sign the statement. Publication is foreseen for 1/12/2025.

d. Revision of the European Works Council Directive

State of play: A Provisional Agreement was reached in the trilogue negotiations on 21 May 2025. The text was voted in Plenary on 6/10/2025, after which Council adopted it on 27/10/2025.

We await its publication in the Official Journal of the EU (OJEU). Member States will have 2 years to transpose the Directive in their countries.

A roundtable was organised with the question if there are still companies in their country, with a so-called “Article 13 Agreement”, an EWC agreement concluded *before* 22/09/1996. These old EWC agreements could still be renegotiated applying the rules of the old EWC Directive 94/45/EC. This will change. EWC agreements concluded *after* 22 September 1996 are referred to as “Article 6 Agreements” and already had to be adapted following the new Directives.

In Germany, **Robert Plummer** mentions that the majority of companies have an Article 6 agreement. There may be 10 to 20 companies with an old agreement. A working group on EWC closely follows the revision. **Lucile Uhring** shares that In France, there were indeed companies with old Article 13 agreements. However, as headquarters had moved to other countries, they are no longer under French law. Within MEDEF there is a working group that will first await the publication in the OJEU of the EWC Directive. **Joanna Ahokanto-Niemi** informs that a survey showed there are no Article 13 agreements: the last company with an old agreement are renewing their EWC agreement. The Trade Unions had also asked their members to check their agreements. **Anton Wemander Graham** says that in Sweden there are no Article 13 Agreements either. **Mads Storgaard Pedersen** shares that in Denmark, the few companies with sufficiently old agreements have changed theirs in the meantime.

Action: Ceemet will inform the Members when the text is published in the OJEU.

e. Revision of the Regulation on Social Security Coordination

State of play: The Danish Presidency has not worked on this file after the Polish Presidency had decided to reopen the discussion at Member States level. The next Cypriot Presidency will pick up the file again. The hopes are high, and there seems to be political willingness to reach an agreement on the 883/2004 Regulation.

The file remains on the table; it was not on the list of the Commission Work Program for 2026 of files to be withdrawn.

For Ceemet, the exemption to have an A1 document for short postings and business trips is crucial. The Council wants the construction sector to have the same exemption (contrary to the will of both European social partners of the construction sectors) whereas the EP wants them out.

In Germany, **Stefan Solle/Robert Thurm** confirm that the position is to keep the file on the table. We need clarification with regard to the exemptions of PDA1 documents. **Lucile Uhring** gives an insight in the mobilisation of the French and German governments to keep the file on the table by sending a letter of 14 Member States to keep the file on the table. She informs the

Members there is Circular of the French social security administration, confirming that you do not need A1 document to attend a meeting (business trip).

Actions: Ceemet will continue to follow up the file in the trilogue negotiations led by the Cypriot Presidency and meet with the Presidency and other relevant players if needed.

f. Regulation establishing an EU Talent Pool

State of play: Trilogues are concluded on 18/11/2025. The provisional agreement now needs to be voted upon in the EP and in Council.

Members are informed that it will take 1 to 2 years to build the digital platform. **Lucile Uhring** is hesitant if the platform would be used. **Anton Wemander Graham** said that Swedish companies currently recruit often via LinkedIn. **Mads Storgaard Pedersen** reflects that as long as the Talent Pool remains voluntary for Member States, it is likely that it remains unused.

Actions: Ceemet will follow the next steps and inform the Members accordingly.

ITEM 2 – CURRENT AND POSSIBLE FUTURE INITIATIVES

a. Possible initiative on AI at the workplace

State of play: Members receive an overview of the activities following the own initiative legislative draft report (INL) of MEP Bula (Polish/EPP) of 20/6/2025 (see slides), which includes in the Annex a text of a Directive. The draft report was voted in EMPL on 11/11/2025, deleting the Annex but still recommending the Commission for a legislative initiative. An indicative vote in Plenary is scheduled for 15/12/2025.

The members of the Ceemet AI Working Group have finalised a Position Paper and Survey Report on 2/9/2025. The Bula report runs counter the position of Ceemet. In the Quality Jobs Roadmap and Quality Jobs Act there will be an initiative on AI@work.

In the discussion that follows, **Henrique Laitenberger** shares that in Plenary there is likely to be a binary vote: yes or no. The report also calls for an Impact Assessment. The nature of the INL report has changed, since the Annex has been deleted, which can be read as a strong signal that this is not the way to tackle AI@work. He refers to TIF contacts with the Cabinet of President Von der Leyen, sharing that on AI social partners could be asked to negotiate on this issue. As for the next steps, **Delphine Rudelli** suggests that we wait for a BusinessEurope statement on AI that we can endorse. It will be difficult for BusinessEurope to obtain a mandate to negotiate. **Lucile Uhring** confirms that MEDEF is not in favour of negotiations. MEDEF proposes to gather all relevant provisions in 1 document. **Stefan Solle** debates whether the current Bula report can still be called an INL or rather INI report. There is no majority in EMPL for a Directive; in addition, there is currently also the Digital Omnibus. **Anton Wemander Graham** informs the members that BusinessEurope is currently reforming, and they want to test the political investment. It would be good to enter negotiations, but this should be balanced with simplification topics on other directives.

Actions: As AI@work is very likely to be part of the Quality Job Roadmap, due to be launched by the Commission on 3/12/2025, Ceemet will follow up initiatives in the AI Working Group. Legislative initiatives will be dealt with in the EU Committee.

b. Subcontracting

State of play: MEP Johan Danielsson (Swedish, S&D) published a draft report on subcontracting on 17/7/2025, to be voted on in December in EMPL and in Plenary in January 2026. Ceemet circulated a draft position paper, which was forwarded for comments to the Members. The commented position paper was sent to Members on 17/11/2025. The main changes to the position paper are presented, discussed and approved by the Members. Members are invited to send national examples relating to subcontracting to the Secretariat.

The European Employers Institute published a legal study on subcontracting. The study, the first publication of the EEI, proves to be a success.

Actions: Members are invited to share national examples to the Secretariat which will be included in the position paper. The Secretariat will then circulate the position paper to the GA for adoption.

c. Telework and the right to disconnect

The 2nd stage consultation was launched by the Commission on 25/7/2025. The Secretariat prepared a response, that was circulated to the Members on 4/9/2025 and (final draft) on 23/9/2025. Based on the input of Members, Ceemet has replied to the 2nd stage social partner consultation on 6 October 2025.

Actions: Ceemet will follow up the results of the 2nd stage social partner consultation and inform the Members of new initiatives in this area.

d. Just transition

The Members are informed about an initiative of MEP Toom (Estonia, Renew) to call for a new Directive on Just Transition.

Actions: This topic is on the agenda of the IER Committee. If and when it would come to a legislative initiative, the EU Committee will be involved.

e. Quality Jobs Roadmap (QJR)

The Commission published a background paper on 30th of April 2025 on the QJR, which will serve as a compass for the next 5 years. Various initiatives will fall under the umbrella of QJR. The position paper of Ceemet on QJR was adopted and contributed to the consultation on 1st of July.

In addition, there will also be a Quality Jobs Act (QJA), foreseen for 2026. In that case, the Commission must organise social partner consultations.

Actions: Ceemet will closely follow up the launch of the QJ Roadmap and Act and inform the Members. In the following weeks and months, and depending on the content of the QJR/QJA, Ceemet will prepare draft statements and positions for the Members to comment upon.

f. Fair Labour Mobility Package

In Q2 2026, the Commission is planning to launch initiatives to facilitate labour mobility, strengthening the ELA mandate and to modernise and digitalise social security coordination.

A proposal on ESSPASS is expected as well.

Actions: Ceemet will inform the Members when the Fair Labour Mobility Package is launched. The Secretariat will then prepare draft statements and positions.

g. 28th regime

The Commission is currently working on the 28th regime, which is an optional EU wide legal framework of company law. It would be voluntary opt-in system, meant as extra possibility for start-ups and scale-ups.

It is unclear whether social law aspects would be involved. In that case, this topic will return on the agenda of the EU Committee.

Actions: Ceemet will monitor the 28th regime to decide whether further action on social aspects require input and action.

ITEM 3 – IMPLEMENTATION AND FOLLOW-UP OF ADOPTED DIRECTIVES

a. Adequate Minimum Wages Directive

(This topic was moved as the first point on the agenda, given the recent EcJ Case C-19/23 of 11/11/2025.)

b. EU Pay Transparency Directive – round table on national implementation

The members are invited to give an update on the transposition into national law of the Pay Transparency Directive.

Note: *Following Circular 304/25 of 4/12/2025, the Secretariat will circulate this information, including what the main hurdles for transposition are. This can be helpful for your input in the debate within your country.*

c. Platform Work Directive

The directive has been published in the OJEU on 11 November 2024 and the Member States have until 2 December 2026 to transpose the provisions in their national legislation.

In most countries, the full attention is currently on the transposition of the Pay Transparency Directive. In Finland, **Joanna Ahokanto-Niemi** shares that the directive will be implemented later in 2026. She mentions the High Court Bolt-case of 22/5/2025, where the Court held that Bolt workers are employees. It is to be noted that drivers cannot obtain work permits. **Eva van der Boom** informs about the situation in the Netherlands, where in general these issues are dealt with in company agreements; Work Councils are strong and do have a say in work processes. Parts of the Platform Directive have been implemented in existing legislation. **Robert Thurm** mentions that there is no draft text yet for the Platform Directive in Germany. **Andreas Edenman** informs that for the Swedish government has not finished its report on the transposition, as indeed it is very detailed. **Mads Storgaard Pedersen** shares that the Platform Directive does not leave much room for national interpretation when implementing. **Marcel Marioni** shares that Switzerland does not have any rules on platform work. **Rose Sargent** says that, as for Switzerland, the UK does not have to transpose the EU Platform Work Directive.

ITEM 4 – FOR UPDATE

a. Update on EU-UK relations

Rose Sargent (Make UK) provides an update on EU – UK relations:

The May summit, that Richard Rumblelow referred to in the previous EU Committee meeting, contained a technical review of the trade agreement. The autumn meeting deepened the common understanding between the UK and EU. Topics that are on the table are – among others – Erasmus and offering youth exchange experiences in general; how to align missions on trade; and migration. A new summit is to take place in 2026, the dates are not yet set.

The Labour government is due to publish its budget next week. It is likely that taxes will have to be raised. Given that great growth is lacking, and the current volatility, the opposition of Reform is growing. This must be taken seriously, as it will affect the future relationship with the EU. The positive news is that car manufacturing is increasing, there is launch of industrial strategy in June.

b. Update on EU-CH relations

Marcel Marioni (Swissmem) confirmed that the new bilateral agreement between Switzerland and the EU provides for better access to the market. As 57% of Swiss exports are to the EU, this is very important for businesses. In addition, there is an electricity agreement, and Switzerland is back again in the Horizon Europe project. In 2026, both Chambers in Parliament will vote. The popular vote can be held in 2027. However, this has proven in the past to be a difficult topic. With Swiss nationalist conservative party, it remains unclear what will happen. In addition, the Trump administration has set a 39% tax on Swiss products. The geopolitical situation has increased the understanding that we cannot stand alone, Switzerland needs a partnership. The popular vote can be postponed until 2030; there is still a long way to go.

ITEM 5 – AOB

a. Public procurement

The Commission will launch the revision of Public Procurement Directives. Even though this is not a topic that falls within the remit of Ceemet, the Secretariat will monitor if social conditionalities will appear in the proposals. In that case, Ceemet would give input on the social aspects in the social partner consultation in January 2026.

Actions: the Secretariat will monitor if social conditionalities are taken on board in the Public Procurement Directives. If this is the case, Ceemet will contribute to (only) those aspects in the social partner consultation.

b. Entry-exit system

Ceemet reminds Members that the roll-out of the Entry-Exit System was launched on 12/10/2025. All points of entry within the EU from outside will have the EES at the latest by 10/4/2026. This will impact the (knowledge about) their duration of stay for third country nationals. More information can be found on [FAQs about EES - EES](#).

c. ELA: project on manufacturing in 2026-2027

Robert Thurm, who is a member of the Stakeholder Group for Ceemet, informs the Members that the European Labour Authority will launch a project on manufacturing in 2027. The preparations will start in 2026. Members are encouraged to take part in the preparations, via interviews and written input.

Actions: The Secretariat will monitor the manufacturing project, and inform the Members of possible opportunities to be interviewed or give input.

d. Gender equality strategy

Point for information. The Commission has launched a gender equality strategy. If there are topics that are of interest for the Members, these will be discussed in the respective Ceemet Committees.

e. Supplementary pension package

Stefan Solle informs the Members that the Commission will launch today a new pension package. This will include the IORP III revision, including an auto enrolment system. He warns that this is the first step to have a mandatory system in 7 years.

f. Dates of next EU committee meeting

The next EU Committee will take place on **24 March 2026** in **Brussels**, from 8h30 to 15h30.

The 99th meeting will be held **in the new offices of Ceemet as of 1 January 2026:**

New offices as of 1 January 2026:

CEEMET

Square de Meeus 40
1000 Bruxelles

Enclosures:

1. List of participants
2. Final agenda
3. Slides showed during the meeting (*attached separately*)
4. Written input from members on the transposition of the Pay Transparency Directive (*attached separately*)

EU Committee

Final List of Participants

Meeting of 20 November 2025

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Lucile Uhring	UIMM	France
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Victoria Krah	Gesamtmetall	Germany
Stefan Solle	Gesamtmetall	Germany
Fabian Schlüter	Gesamtmetall	Germany
Robert Thurm	Gesamtmetall	Germany
Melanie Grafmueler	Gesamtmetall	Germany
Eva Van Der Boom	FME	Netherlands
Andreas Edenman	Teknikforetagen	Sweden
Anton Wemander Grahm	Teknikforetagen	Sweden
Marcel Marioni	Swissmem	Switzerland
Rose Sargent	MakeUK	UK
Delphine Rudelli (online)	Ceemet	Secretariat
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98th EU Committee

Meeting of 20 November 2025

Final Agenda

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Item 1 Draft proposals for legislative initiatives currently being discussed: update & next steps

- a. Regulation on eDeclaration
- b. Directive on improving and enforcing working conditions for trainees and combatting regular employment relationships disguised as traineeships
- c. Omnibus I – Revision CSRD & CS3D
- d. Revision of the European Works Council Directive
- e. Revision of the Regulation on Social Security Coordination
- f. Regulation establishing an EU Talent Pool

Item 2 Current and possible future initiatives

- a. AI & Algorithmic Management in the Workplace
- b. Subcontracting
- c. Telework and the right to disconnect
- d. Quality Jobs Roadmap
- e. Just transition
- f. Gender equality
- g. 28th regime

Item 3 Implementation and follow-up of adopted directives

- a. Adequate Minimum Wages Directive
- b. EU Pay Transparency Directive
- c. Platform Work Directive

Item 4 For update

- a. Update on the EU-UK relationship
- b. Update on the EU-CH relationship

Item 5 A.O.B.

- a. Public Procurement: social conditionalities – social partner consultation January 2026
- b. Entry-Exit-System launched on 12 Oct. 2025 in force as of 10 April 2026
- c. ELA: project on manufacturing in 2026 – 2027
- d. Gender Equality
- e. Supplementary Pension Package
- f. Date and place of the next EU Committee meeting