

SECOND-PHASE CONSULTATION ON POSSIBLE EU ACTION TO IMPROVE WORKING CONDITIONS, HEALTH AND SAFETY AT WORK AND IMPLEMENTATION OF WORKERS' RIGHTS

QUALITY JOBS ACT

CEI-Bois contribution

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1. Introduction

CEI-Bois supports the objective of ensuring high-quality, safe and future-proof jobs in Europe. Quality jobs are provided by competitive, productive and profitable companies that are able to invest, innovate, employ and offer good working conditions. Any EU initiative in the area of job quality must therefore reinforce competitiveness rather than undermine it and must respect the diversity of national labour-market models, where social partners hold primary responsibility for shaping working conditions.

Support for the objectives of the Quality Jobs Act should not, however, be equated with support for new horizontal EU legislation. Before introducing new requirements, it should be clearly demonstrated that there is a genuine regulatory gap, that existing legislation and enforcement mechanisms are insufficient and that EU-level action provides clear added value. Any proposed measures should also be thoroughly assessed in terms of their impact on competitiveness, SMEs, investment, productivity, innovation and employment.

This is particularly important for the woodworking industries, which are characterised by considerable diversity in terms of company size, business models, capital intensity, digital maturity, workforce composition and working environments. These range from industrial production and office-based activities to mobile work and telework. A uniform and prescriptive approach would therefore be inappropriate.

For many companies, particularly SMEs, the operational consequences of new requirements are significant. Regulatory changes require adjustments to workflows and internal procedures, integration with existing occupational safety and health and working-time systems, training, documentation and compliance processes. These requirements tie up resources that would otherwise be available for productive activities and investment.

CEI-Bois therefore considers that the priority should be to consolidate and simplify the existing framework, reduce administrative burdens and duplication, ensure effective implementation and enforcement, and provide practical support where necessary. Any EU action should be outcome-based, risk-based and proportionate, leaving sufficient flexibility to reflect sectoral and company-specific circumstances.



2. Algorithmic management and artificial intelligence at work

CEI-Bois recognises that the increasing use of artificial intelligence and algorithmic management at work raises questions concerning transparency, the use of data, human oversight and working conditions.

At the same time, the EU already has an extensive regulatory framework applicable to these issues. The AI Act, the GDPR and existing labour and social legislation provide rules relevant to the use of AI and algorithmic management in the workplace. Information and consultation obligations and occupational safety and health requirements also continue to apply when new technologies are introduced.

Against this background, CEI-Bois does not see a need for an additional horizontal legislative layer on algorithmic management and AI at work. Additional legislation risks increasing regulatory complexity, legal uncertainty and compliance costs, while creating overlaps with recently adopted rules that companies are still implementing. It could also discourage investment in technologies that can improve productivity, streamline administrative processes, enhance occupational safety and contribute to job quality.

The priority should instead be legal clarity and practical support for the implementation of the existing framework. Consolidated and interpretative guidance can help employers understand how the different existing requirements interact in practice. Practical tools, particularly for SMEs, the exchange of good practices and investment in AI literacy and digital skills for workers and employers can further support responsible deployment.

Any approach should remain principles-based and technology-neutral and should clearly distinguish between different technologies and applications rather than treating all forms of AI, algorithmic management and automated decision-making in the same way. Sector-specific issues should be addressed through social dialogue and collective bargaining where appropriate, respecting the autonomy of social partners.

3. Occupational safety and health

The world of work continues to evolve and the EU occupational safety and health framework needs to remain fit for purpose. Any modernisation should, however, be proportionate, risk-based and aimed at genuine simplification and greater legal clarity rather than creating additional layers of detailed technical requirements.

A fundamental principle should be that employer responsibility reflects the employer's actual sphere of control. Employers cannot reasonably be held responsible for working environments to which they do not have access or over which they have no effective influence, such as employees' private homes or certain third-party premises.

This is particularly relevant in relation to telework. Extending structural workplace requirements concerning matters such as electrical safety, emergency exits, fire safety, ventilation or temperature to private homes would be difficult to implement in practice and could generate significant costs and legal uncertainty. Such an approach poses a significant risk of reducing companies' willingness to offer flexible and remote working arrangements.

Psychosocial risks should continue to be addressed through the existing occupational safety and health framework. Psychosocial risks are complex and multifactorial. They can be influenced by working conditions and work organisation, but also by individual circumstances, factors outside work and differences in how people respond to similar situations. Employer responsibility must therefore reflect the employer's actual sphere of control. A one-size-fits-all approach would not adequately reflect this complexity.



The priority should be effective implementation of the existing OSH framework, supported by practical guidance and tools, exchange of good practices and social dialogue. Prevention is most effective when requirements are clear, proportionate, adaptable to the actual circumstances, risks, sector and size of each workplace, and integrated into existing occupational safety and health systems.

Similarly, ergonomic risks and risks associated with working temperatures should be addressed in a proportionate manner that takes account of existing occupational safety and health requirements and national approaches. Additional EU requirements should only be considered where a genuine protection gap has been demonstrated.

More generally, any revision of existing occupational safety and health legislation should focus on removing outdated provisions, improving coherence and ensuring that requirements remain adaptable to different workplaces. Guidance can play an important role where it provides practical support while preserving the flexibility needed to respond to different working environments and sectoral circumstances.

4. Subcontracting

Subcontracting is a legitimate and necessary part of modern business organisation. It enables companies to access specialised expertise, respond to fluctuations in demand, organise complex value chains and innovate. It is also particularly important for SMEs, allowing smaller companies to participate in larger projects and value chains.

Illegal practices and abuses linked to subcontracting should be addressed firmly. However, they should not be addressed by imposing additional burdens on legitimate subcontracting arrangements or by restricting subcontracting as a business model.

The EU already has a substantial regulatory framework applicable to subcontracting. Before considering new legislation, priority should therefore be given to assessing whether existing rules are being effectively implemented and enforced and whether cooperation between competent authorities can be improved.

CEI-Bois does not support broad chain-liability regimes or limits on the length of subcontracting chains. Liability for infringements should remain with the party responsible for the violation. Extending responsibility to compliant companies that have not committed the infringement would increase costs and legal uncertainty without addressing the underlying causes of abuse.

The focus should instead be on targeted and effective enforcement, adequately resourced labour inspectorates and improved cross-border cooperation and information exchange between competent authorities. Interoperable digital tools can contribute to more effective enforcement, provided that they follow a once-only approach and do not create duplicative reporting requirements.

Where transparency or registration requirements are considered necessary, they should be proportionate, risk-based and designed with the administrative capacity of SMEs in mind.

5. Just transition

The green and digital transitions are an ongoing reality for the woodworking industries. Companies continuously adapt to technological change, restructuring, evolving skills needs, energy and climate policies, global competition and changing market conditions.

Competitive and economically sustainable companies are a prerequisite for a successful and just transition. Companies need the capacity to invest in people, skills, technologies and new production processes. Measures that increase costs or reduce companies' ability to adapt can ultimately undermine rather than support this process.



The existing EU and national frameworks already contain extensive provisions concerning employee information and consultation and the management of restructuring. CEI-Bois therefore does not see a need for a new binding horizontal EU framework governing the management of transitions.

Priority should instead be given to supporting skills development, upskilling and reskilling so that workers and companies can adapt to changing labour-market and technological needs. Measures supporting recruitment, mobility and access to relevant skills can also facilitate transitions.

Existing financial support should be accessible and proportionate and should enable companies and workers to respond effectively to change without generating unnecessary administrative requirements or additional costs for businesses. Approaches must remain sufficiently flexible to reflect differences between sectors, companies and national labour-market systems.

6. Enforcement and the role of social partners

Effective implementation and enforcement of the existing framework should be a central element of EU action on job quality. Adding new legislation does not in itself improve compliance and can make the regulatory framework more difficult to understand and apply, particularly for SMEs.

Labour inspectorates play a central role in enforcement and should have the necessary resources, competence and digital tools to carry out their tasks effectively. Enforcement should be targeted and risk-based and should remain primarily the responsibility of the Member States.

Cross-border cooperation between competent authorities can be strengthened where necessary. The European Labour Authority can play an important role in facilitating cooperation and information exchange, while respecting national competences and the voluntary nature of Member States' participation in inspections.

Social partners also play an important role in supporting compliance, providing information and developing practical solutions adapted to national and sectoral circumstances. They should not, however, replace public enforcement authorities or be expected to enforce EU law.

It is equally important to preserve the autonomy of social partners and the diversity of national labour-market models. EU legislation should leave sufficient room for collective agreements to derogate from, deviate from, adapt or complement EU provisions, provided that the general level of worker protection is maintained. Social dialogue and collective bargaining must remain voluntary and based on the autonomy of the social partners.

Simplification should be a central objective across the Quality Jobs Act. Rules should be clearer, more coherent, easier and more cost-effective to apply. Administrative burdens and duplication should be reduced, parallel reporting structures should be avoided and information already provided to public authorities should, wherever possible, follow a once-only approach.

7. Conclusions

CEI-Bois supports the objective of quality, safe and future-proof jobs. Quality jobs are provided by competitive companies that are able to invest, innovate, adapt and create employment, while ensuring effective worker protection.

In the areas covered by the second-phase consultation, CEI-Bois considers that the priority should be to:

- avoid an additional horizontal legislative layer on algorithmic management and AI at work and instead provide legal clarity, consolidated guidance, practical tools and support for AI and digital skills;



- ensure effective implementation and enforcement of the existing occupational safety and health framework, together with simplification, practical guidance and greater legal clarity, rather than creating additional legislative layers through the Quality Jobs Act;
- preserve subcontracting as a legitimate business model while addressing abuses through targeted enforcement, stronger cooperation between competent authorities and effective digital tools. Broad chain liability or restrictions on subcontracting chains should be avoided;
- support companies and workers through the green and digital transitions by prioritising skills, reskilling and upskilling and accessible support. A new binding horizontal framework should not be introduced;
- strengthen effective implementation and enforcement of existing rules while respecting Member State competences and the appropriate role of labour inspectorates;
- preserve social partner autonomy, national labour-market models and sufficient scope for collective agreements to adapt EU requirements to national and sectoral circumstances; and
- make simplification, proportionality and the reduction of administrative burdens central principles of any initiative, with particular attention to the impact on SMEs.

New legislative obligations should only be considered where a clear and demonstrable regulatory gap exists, where EU-level action provides genuine added value, and where the impact on competitiveness, investment, productivity, innovation and employment has been thoroughly assessed. The Quality Jobs Act should focus on reskilling and upskilling the workforce, simplifying and streamlining existing employment-related legislation, and supporting the effective implementation of the existing framework.

A Quality Jobs Act based on these principles can support high standards of job quality and job creation while preserving the competitiveness, resilience and capacity to invest of Europe's woodworking industries.