

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

QUALITY JOBS ACT

CEI-Bois contribution

Brussels, 29 January 2026

1. Introduction

Quality jobs are provided by competitive companies that make it possible for individuals to thrive. Any EU initiative in the area of job quality must reinforce competitiveness rather than undermine it, and it must respect the diversity of national labour-market models where social partners hold primary responsibility for shaping working conditions.

European job quality is already high and has been steadily improving, supported by a comprehensive EU legislative framework covering working conditions, labour rights, occupational safety and health, and the use of digital technologies at work. Eurofound data from the European Working Conditions Survey indicate that a large majority of workers report satisfaction with their working conditions, reflecting the generally positive state of job quality in Europe. Indeed, in the 6th edition of this Survey of 2017, the great majority (86%) of respondents in the EU28 reported being either “satisfied” or “very satisfied” with their working conditions. This percentage has increased slightly since 2000, when 82% rated their working conditions as positive¹. Furthermore, the preliminary results of the latest, 7th edition of the Survey, carried out in 2024, show a continuation of this positive trend.

Instead of introducing a wide-ranging new legislative package, the Commission should concentrate on simplifying existing rules, reducing administrative burdens, ensuring effective enforcement, and facilitating reskilling and upskilling of the workforce. Simplification and reduction of regulatory burden are important to foster competitiveness, innovation, and investment, particularly for SMEs, and to ensure high-quality jobs. New obligations should only be introduced where there is a clear, demonstrable need for EU-level action and after thorough competitiveness assessments confirm they will not place additional strain on companies.

2. Algorithmic management and artificial intelligence at work

The Commission rightly underlines that with the AI Act, the GDPR, and existing labour and social legislation, the EU already has a comprehensive regulatory framework governing algorithmic management and the use of AI at work. Introducing new horizontal legislation would increase

¹ Eurofound (2017), <https://www.eurofound.europa.eu/en/publications/all/sixth-european-working-conditions-survey-overview-report>.



regulatory complexity, legal uncertainty, and compliance costs, potentially discouraging investment in technologies that can improve job quality, streamline administrative processes, and enhance occupational safety. Facilitating the development and deployment of AI in Europe is of crucial importance for future European growth, innovation, and productivity, and therefore for the creation of quality jobs. Introducing additional legislative requirements is not necessary.

Instead, the EU should focus on providing clear guidance to help employers navigate existing rules. Consolidated guidance, practical tools, and investment in digital skills for both workers and employers are more effective than new legislative obligations. Any future work should respect the autonomy of social partners, allowing sector-specific solutions to be developed through dialogue rather than through overly generalised legislation.

3. Occupational safety and health

The modern world of work has evolved significantly, and the OSH framework should reflect these changes. However, any revision of directives such as the Workplace Directive and the Display Screen Equipment Directive must remain proportionate. Employers cannot be held responsible for working environments to which they do not have access, such as private homes. Strict minimum requirements for telework or home offices, covering fire safety, ergonomics or other technical measures, would reduce flexibility and limit working arrangements that employees value. Psychosocial risks, similarly, often originate outside the employer's sphere of control, and overly prescriptive obligations would be disproportionate.

We therefore support a simplified and future-oriented approach, potentially involving the merging of the two above-mentioned directives into one. This merged directive should emphasise principles and clear responsibilities rather than detailed technical rules. Guidance, rather than legislation, should be used to address complex issues such as psychosocial risks, which require adaptable and context-sensitive solutions.

4. Subcontracting

Subcontracting is an essential and legitimate aspect of modern business organisation. It allows for companies to access specialised expertise, respond to market fluctuations, and innovate, while enabling smaller enterprises to participate in larger projects and value chains. The Commission rightly recognises subcontracting as a legitimate business model that allows companies to adapt their operations effectively to a changing business environment, which is a condition for their competitiveness.

The EU already provides a substantial regulatory framework covering subcontracting, including the Posting of Workers Enforcement Directive and relevant provisions in the Public Procurement Directive. Imposing new restrictions, such as limits on subcontracting chain length or expanded joint liability regimes, would threaten competitiveness, create legal uncertainty, and interfere with the freedom to conduct business as protected by the EU Charter.

Instead, enforcement efforts should concentrate on addressing abuses in specific high risk sectors and on strengthening labour inspectorates, including through the development of interoperable digital tools such as ESSPASS. Transparency and cooperation between authorities within and across Member States are important to combat workplace crime and ensure effective enforcement. Penalties for breaches must target the party committing the violation. Efforts should therefore prioritise enforcement, transparency and cooperation rather than the limitation of subcontracting chains or the expansion of joint liabilities. Imposing joint or chain liability would unfairly burden compliant companies and increase costs without addressing root causes. Effective enforcement, not new legislation, is key to addressing the challenges that do exist.



5. Just transition

The green and digital transitions indeed present significant challenges and opportunities. Employers manage such transitions continuously, whether driven by technology, climate policy or market conditions. The existing EU framework already provides robust tools, including the 2013 Restructuring Framework, the 2022 Council Recommendation, and substantial financial instruments such as the Just Transition Fund and the Social Climate Fund. There is also already extensive EU legislation on employee information and consultation, including the revised European Works Councils framework and the directives on information and consultation and on collective redundancies. If consultation obligations are not respected, this points to enforcement challenges rather than regulatory gaps.

A new horizontal legislative approach would risk slowing down necessary restructuring and raising costs at a time when European companies need flexibility to remain competitive. It is not possible to force viable economic change through legislation. EU action should prioritise effective application of existing rules, comprehensive guidance, and targeted support for workforce reskilling and upskilling to enable adaptation to changing labour market demands. In this context, strengthening enforcement is more effective than creating new legislative layers. Moreover, any approach must respect national labour market models and recognise that the needs of companies vary by sector, size, and regional context. The existence of competitive companies able to invest in people, technologies and skills is a prerequisite for making the transition a just one.

6. Enforcement and the role of social partners

The EU already maintains a strong body of labour law providing extensive protections for workers. The priority should be effective implementation of this framework. Labour inspectorates play a central role in combining enforcement with guidance, training, and awareness-raising. Social partners support compliance by informing workers of their rights and helping companies understand obligations, but they cannot replace inspectorates and should not be expected to enforce EU law. Clarity and simplicity of regulation are key components to facilitate compliance. Duplication, ambiguity, and confusion around the scope of legal obligations undermine compliance, particularly for smaller companies.

Future EU measures should focus on actual challenges rather than isolated cases, avoiding overreaction that would create additional burdens for compliant companies. Any future strengthening of the European Labour Authority's mandate should respect national prerogatives and maintain the voluntary nature of its involvement in inspections.

It is equally important to preserve the autonomy of social partners and respect the different national labour markets that exist within the EU, one-size does not fit all. Collective agreements that derogate, deviate, adapt or complement EU legislation should be enabled, provided that the general level of protection of workers is ensured. This is true promotion of social dialogue. The right of association is guaranteed. How individuals and companies exercise that right should remain voluntary. Mandatory or forced approaches to collective bargaining risk undermining social partners' autonomy and contractual freedom and increasing administrative complexity.

7. Conclusions

A potential Quality Jobs Act can contribute constructively to EU labour policy only if it focuses on:

- Simplifying existing rules and reducing administrative burdens.
- Ensuring effective implementation and enforcement of current legislation.
- Prioritising guidance, practical support, and workforce reskilling and upskilling.
- Preserving social partner autonomy and respecting national labour market models.
- Introducing new legislative obligations only when clearly necessary and thoroughly assessed for their impact on competitiveness.

By following these principles, the EU can strengthen job quality while supporting the competitiveness, resilience, and growth of European companies.