



*Employers entrusted to deliver
Sustainability Growth Innovation*

Opinion

Response to the second stage consultation on possible EU action to improve working conditions,
health and safety at work and implementation of workers' rights

Quality Jobs Act

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28 September 2026

Introduction

SGI Europe takes note of the Commission's objective to ensure that Europe's framework for quality jobs remains fit for a rapidly changing economic and social environment.

This objective should be pursued consistently with the Commission's broader agenda to strengthen European competitiveness and better regulation to reduce unnecessary administrative and regulatory burdens while maintaining high standards of working conditions.

Digitalisation, AI, decarbonisation, demographic change, labour shortages and growing geopolitical uncertainty are reshaping labour markets across Europe. These structural developments require labour markets that are resilient, adaptable and capable of supporting sustainability, competitiveness and high-quality employment. For providers of services of general interest, these developments are particularly tangible. As enablers of job quality and key actors in Europe's economic and social resilience, they are expected to accelerate the green and digital transitions, respond to changing demographic needs and invest in new technologies. They also have a responsibility strengthen preparedness and organise their capacity to anticipate and respond to future disruptions. At the same time they must ensure the uninterrupted delivery of essential services that underpin Europe's social cohesion, territorial resilience and economic competitiveness, within constrained budgetary frameworks, requiring the efficient and responsible use of public resources.

Achieving these objectives requires providing clarity, supporting innovation and investment, and allowing employers and workers to adapt successfully to changing circumstances. Job quality is multidimensional and context dependent. Their promotion must therefore recognise different national, sectoral and local realities and the central role of social dialogue and collective bargaining in determining working conditions.

SGI Europe would like to emphasize that the social partners have for a long time, together through joint work, and through collective agreements, found adapted solutions, based on a constantly evolving labour market, in all five areas identified by the Commission in the consultation document (AI/AM, H&S, subcontracting, transition and enforcement). In many places, this work together constitutes entire "eco-systems" that clearly contribute to job quality, smooth operations and to our (welfare) societies.

This important role that the social partners have should be better recognized and made clearer in the European Commission's consultation document/analysis. The social partners can also have an important role in the implementation of EU regulation, but their responsibilities cannot be reduced only to the implementation part of legislation. Their work, responsibilities and contributions are much broader than that.

SGI Europe agrees and welcomes the fact that the Commission itself points out, in many places in the consultation documents, that the EU level has an important role in supporting Member States, in particular through information, awareness-raising and guidance on already existing legislation, by disseminating good practices and by providing funding for the work of the parties through various EU-funds.

SGI Europe in its first stage response highlighted that as employers, SGI Europe members share the objective of promoting good working conditions, safe and healthy workplaces and effective implementation of workers' rights. At the same time, any reflection on possible EU action must carefully balance social objectives with operational realities and the capacity of employers to deliver both quality jobs and high-quality services across diverse contexts.

Any future initiative should be firmly guided by the principles of subsidiarity, proportionality, simplification and demonstrate a clear EU added value, while respecting national competences, established industrial relations systems and the autonomy of the social partners.

The following sections set out SGI Europe's assessment of the different policy areas covered by the consultation and the type of EU action that may be most appropriate in each case.

Algorithmic management

SGI Europe agrees, as the Commission rightly points out in the consultation document, that existing legislation already provides substantial safeguards for algorithmic management and automated decision-making in many work place situations (p. 6, paragraph 4; p. 7, paragraph 2).

The European Union has already established a comprehensive legal framework governing many aspects of algorithmic management. The AI Act, the GDPR, occupational safety and health legislation, information and consultation rights and, where relevant, the Platform Work Directive already establish safeguards relating to transparency, human oversight, data protection, non-discrimination and workers' rights. Much of this legislation is only beginning to be implemented.

For providers of services of general interest, the responsible use of AI can also support more efficient service delivery and a better allocation of scarce resources. In sectors operating under significant budgetary constraints, productivity gains from AI can contribute to making better use of public finances while maintaining the quality and continuity of essential services.

Against this background, the focus should therefore be on raising awareness, information and support for actors on the ground. The immediate priority should therefore be to promote its coherent application before considering additional legislative initiatives.

The Commission nevertheless identifies a number of practical questions regarding the application of this legislation, notably concerning emerging forms of worker monitoring, meaningful human involvement in algorithmic decision-making and the interaction between different transparency obligations. SGI Europe considers these to be primarily implementation challenges and not, in themselves, to demonstrate significant regulatory gaps.

This is particularly relevant to worker monitoring. The Commission points, for example, to situations where algorithmic management may contribute to excessive pressure, stress or other psychosocial risks. Where the use of algorithmic management creates occupational risks, however, employers are already required to assess and prevent those risks under the existing EU occupational safety and health framework. The existence of problematic practices in particular sectors should therefore not in itself be considered evidence of a regulatory gap requiring additional horizontal legislation.

Practical guidance should help employers and workers understand how existing obligations apply and interact in practice, while recognising the respective scope of the AI Act, the GDPR and employment legislation and avoiding the creation of additional information or transparency requirements through such guidance.

In particular, transparency and information obligations should remain proportionate and practically achievable. Employers should not be required to provide technical information concerning algorithms or AI systems that is not available to them, including proprietary information held by technology providers.

With regard to emerging technologies such as predictive AI and neurotechnology, SGI Europe recognises that these applications raise legitimate questions where they affect employment relationships. However, as the Commission mention in the consultation document, they do not operate in a regulatory vacuum. Depending on their use, existing requirements under the GDPR, the AI Act, occupational safety and health legislation and workers' information and consultation rights already apply, including requirements relating to necessity, proportionality, data protection, human oversight, transparency and risk prevention.

SGI Europe recommends monitoring developments, assessing emerging practices and support the consistent application of existing obligations before considering sector-specific employment rules.

Similarly, ensuring meaningful human involvement where algorithmic systems support employment decisions is essential to maintaining trust and accountability in line with existing regulation.

The priority should therefore be to provide greater predictability regarding how these existing safeguards operate together in practice and to avoid unnecessary overlaps, rather than creating parallel or duplicative requirements. OECD research highlights governance arrangements, workforce participation, training and internal policies as the principal determinants of successful algorithmic management rather than the absence of additional legislation.¹ The European Committee of the Regions² and the European Economic and Social Committee³ likewise emphasise that the proper implementation of the AI Act will require continued support, particularly for regional and local authorities and providers of public services.

European social dialogue is particularly well placed to contribute to this process. The 2020 Autonomous Framework Agreement on Digitalisation already provides a flexible basis for addressing the impact of digital technologies on work organisation. Its 2025 implementation report demonstrates that such an approach has generated collective agreements, practical guidance, training initiatives and joint tools across Europe. This should be clearly recognised.

Building on this experience, European social dialogue can continue to support the coherent application of the evolving EU framework on AI in employment and, where there is mutual interest, contribute to the further development of practical solutions adapted to workplace realities. The ongoing TransFormWork II project illustrates the value of this collaborative approach.

Future EU action should focus on supporting the transposition and application of the EU acquis through an appropriate combination of awareness-raising, skills development, practical implementation support, the exchange of good practices and initiatives developed through European social dialogue.

This approach is also consistent with the objectives underpinning the Commission's Digital Omnibus initiative, which seeks to improve the coherence, clarity and practical application of the EU digital acquis before introducing additional regulatory requirements.

The Commission's approach in this area should fully respect the principles of subsidiarity and proportionality, as well as the division of competences established by the Treaties.

Additional information rights concerning how algorithms operate, the data processed and the basis for decisions affecting working conditions, as well as requirements for human oversight of decisions such as termination of employment or disciplinary measures, concern primarily the employment relationship rather than data protection. This distinction should be reflected in the Commission's approach, with Article 153 TFEU

¹ Algorithmic management in the workplace new evidence from an employer survey" OECD ARTIFICIAL INTELLIGENCE PAPERS February 2025 No. 31 February 2025 No. 31

² European Committee of the Regions (2024), *Challenges and Opportunities of Artificial Intelligence in the Public Sector: Defining the Role of Regional and Local Authorities*, Opinion, ECON-VII/038, adopted at the 163rd plenary session, 20–21 November 2024.

³ European Economic and Social Committee (2025), *AI for Public Services, Organisation of Work, More Equal and Inclusive Societies: Fostering Opportunities and Managing Risks from New Technologies for Public Services, the Organisation of Work and More Equal and Inclusive Societies*, Exploratory Opinion SOC/790.

remaining the relevant Treaty basis for measures concerning the employment relationship, preserving the role of national industrial relations systems and collective bargaining in its implementation.

Recommended EU action

- Focus on awareness, information, increased understanding , guidance and support.
- Complete the implementation of the AI Act, the GDPR and get an overview over the existing employment acquis before considering additional workplace-specific legislation.
- Prioritise support for the responsible adoption of algorithmic management tools and practices, including through the exchange of good practices, mutual learning and capacity building, as proposed by the Commission.
- Assess the practical use of predictive AI and emerging new technologies in the workplace before considering sector-specific employment rules.
- Clarify how transparency, human oversight and information obligations interact across the existing legal framework to facilitate consistent application.

Occupational safety and health

SGI Europe broadly shares the Commission's assessment that the Workplace Directive (89/654/EEC) and the Display Screen Equipment Directive (90/270/EEC) no longer fully reflect developments in the world of work. In this respect, SGI Europe takes note of the conclusion of the Advisory Committee on Safety and Health at Work that these Directives should be reviewed in light of evolving workplaces, digital technologies and forms of work organisation.

A review is an opportunity to consider whether the existing two directives could be further simplified by bringing together these closely related instruments. Its main objective should be to modernise outdated technical provisions, simplify the legislative framework and improve implementation.

However, this should not call into question the overall adequacy of the occupational safety and health framework (89/391/EEC). As the Commission rightly points out in the analytical document (SWD(2026)239), the OSH Framework Directive provides a comprehensive, risk-based system requiring employers to take measures to ensure the safety and health of workers in every aspect related to work, including assessing occupational risks and implementing the resulting preventive and protective measures.

The Commission's assessment draws in particular on survey evidence showing an increase in the share of workers reporting stress, depression or anxiety caused or worsened by work, as well as exposure to psychosocial risk factors linked to work organisation, digitalisation and violence or harassment in certain sectors. It does not, however, indicate that additional legislation alone would deliver better prevention. In practice, successful prevention depends as much on workplace organisation, management practices, worker participation and practical implementation as on legal obligations.

Therefore, primary prevention efforts must take place at enterprise and workplace level, where the concrete organisation of work and the risks arising from it can be identified and where appropriate solutions can be developed in cooperation with workers and their representatives.

Healthy and safe workplaces are essential, and employers and workers share a strong interest in ensuring a good physical and psychosocial working environment. At the same time, legal certainty requires maintaining a

clear distinction between occupational psychosocial risk factors and circumstances outside the employer's sphere of responsibility. Employers are responsible for identifying and managing occupational risks arising from work that they can reasonably assess, prevent or mitigate.

Stress is often the result of an interplay between factors in both private and working life. The Commission's Staff Working Document refers in this context to the 2025 EU-OSHA Pulse Survey, in which 29% of respondents reported experiencing stress, depression or anxiety caused or made worse by their work. However, this indicator does not distinguish between cases primarily caused by work and those where work may aggravate difficulties arising from other circumstances.

The general obligation to assess occupational risks already encompasses psychosocial and ergonomic risks arising from work. Priority should be given to supporting the effective application of the integrated methodology of the OSH framework instead of creating, at EU level, new categories of risk assessments, separate obligations for specific psychosocial risks, or prescribing a uniform assessment methodology.

Practical support, including guidance and solutions developed through social dialogue, remains an essential complement to legislation. Among many others, the European autonomous Framework Agreements on Work-related Stress (2004) and Harassment and Violence at Work (2007), together with the updated multi-sectoral Guidelines to prevent and tackle Third-Party Violence and Harassment related to work⁴, already provide a valuable basis for developing practical and sector-specific solutions.⁵

This is particularly relevant to sectors exposed to third-party violence and harassment, where preventive measures should reflect the nature of the occupational risk and what employers can reasonably identify, influence and prevent.

Occupational risks associated with changing environmental and climatic conditions should likewise be addressed within the existing risk-based OSH framework. Any consideration of outdated technical requirements should avoid creating separate climate-specific risk assessment obligations and preserve sufficient flexibility to reflect different sectors, workplaces and climatic conditions in different countries or even within the same country.

Any future EU action should remain focused on simplification, legal certainty and proportionate adaptation to evolving working environments, ensuring that rules are clear, readable and easy to understand and implement in practice, complemented where appropriate by practical guidance and solutions developed through social dialogue.

⁴ European Multi-sectoral Social Partners (2025), *Guidelines to prevent and tackle third-party violence and harassment related to work*, updated 2025.

⁵ For example, in connection with the renewal of the collective agreement on 1 April 2026, the social partners in the Danish municipal sector agreed to revise and modernise their Agreement on Well-being and Health in the Workplace. The revised agreement reflects applicable legislation and strengthens cooperation on workplace well-being and the prevention of work-related physical and psychological violence, threats and harassment. [See Chapter 6 of the agreement.](#)

Recommended EU action

- Review the Workplace and Display Screen Equipment Directives with a view to modernising and simplifying the existing legislation.
- Support the effective application of the existing general risk-based OSH framework, including to psychosocial and ergonomic occupational risks, through practical guidance and social dialogue, without introducing separate assessment duties, new categories of risk assessment or prescriptive methodologies.
- Ensure that any initiative concerning telework and other off-premises work respects the distinction between workplaces under the employer's control and locations that employers neither own, access nor control.
- In parallel with the assessment of the practical application of the EU OSH acquis, undertake a review of the broader EU labour law acquis to identify opportunities for further simplification.

Protection of workers' rights in subcontracting chains

SGI Europe agrees with the Commission that subcontracting is a legitimate and important feature of modern economic activity. It enables enterprises to access specialised expertise, respond flexibly to operational needs and contribute to the resilience of supply and service chains.

For providers of services of general interest, subcontracting is often indispensable for activities such as maintenance, engineering, construction and digital services that ensure the continuity of essential services.

Labour rights and occupational safety and health requirements should be respected throughout subcontracting arrangements and the EU acquis already provides substantial protection for workers throughout subcontracting chains. Labour law and occupational safety and health obligations apply to every employer for their workers. Additional safeguards also exist through sectoral legislation, including the Posting Enforcement Directive and other labour mobility instruments.

The principal challenge is as a consequence not the absence of legal obligations, but ensuring their consistent enforcement, particularly in complex cross-border situations. SGI Europe's first-stage response opposed blanket structural restrictions on subcontracting and emphasised enforcement, guidance and targeted action. These challenges are best addressed through greater transparency, oversight and cooperation between the relevant actors.

The forthcoming Labour Mobility Package provides the appropriate framework to strengthen cross-border enforcement. The announced review of the European Labour Authority's work within its existing mandate, together with initiatives such as ESSPASS, could, if grounded in operational realities, contribute to improving cooperation between national authorities, facilitating information exchange and strengthening the practical enforcement of existing rules. Priority should be given to these instruments before introducing additional labour law obligations under the Quality Jobs Act.

Finally, SGI Europe is strongly opposed to the introduction of general liability throughout subcontracting chains. Labour law is based on clearly defined rights and obligations within the employment relationship. These responsibilities should not be blurred by extending liability horizontally to third parties in the subcontracting chain.

Each employer and enterprise in the chain remains responsible for complying with the applicable labour law, occupational safety and health, tax and other relevant obligations. Depending on the nature of the infringement, enforcement may also involve other applicable legal frameworks, including social security law and, where relevant, criminal law, in accordance with national systems.

The priority should therefore be to ensure effective supervision and enforcement of existing rules against those that fail to comply, using the appropriate legal and enforcement mechanisms, rather than creating new general liability regimes.

Should the Commission consider further action in this area, it should first demonstrate a clear regulatory gap and EU added value and carefully assess proportionality, the interaction with national industrial relations systems and the potential impact on SMEs, specialised contractors and the delivery of essential services.

The appropriate priority is therefore to strengthen implementation and enforcement, improve cross-border cooperation, enhance transparency where necessary, and target clearly identified risks where they arise.

Recommended EU action

- Build on the Labour Mobility Package to strengthen cross-border enforcement of existing regulation before introducing additional obligations under labour law.
- Direct enforcement efforts towards abusive labour intermediation and other demonstrated risks instead of imposing horizontal obligations on subcontracting.

Fair transition and preparedness

The green, digital and demographic transitions are contributing to and reshaping Europe's labour markets and skills needs. Recognising the need to prepare for the transformation at all levels and across sectors, SGI Europe supports the Commission's emphasis on anticipation, skills development and investment as the foundations of a successful transition towards climate-neutrality in 2050.

For providers of services of general interest, fair labour market transitions and preparedness are inherently linked. Energy, transport, waste management, digital telecommunication, water, health and social care, education and public administrations are not only adapting to the green, digital and demographic transitions; they are also key actors in organising and enabling them. Through investment, infrastructure, workforce planning and the transformation of essential services, they help turn European transition objectives into practical change on the ground, while maintaining continuity of service. Their capacity to recruit, retain and develop a skilled workforce is a prerequisite for Europe's resilience and territorial cohesion.

The legislation on information and consultation of workers, together with the 2013 EU Quality Framework for anticipation of change and restructuring, supports employers and workers in managing organisational change and preparing for labour market transitions. As the Commission itself recognises, this framework remains fit for purpose. Further action should therefore focus on improving implementation of the 2013 Quality Framework, including through early intervention, social dialogue, training and support for job transitions.

Skills development and access to training are essential to successful labour market transitions and should continue to be strongly supported at European, national and sectoral level. However, as the Commission explicitly acknowledges, a general European right to training cannot be introduced under the Treaty framework, since Article 166 TFEU excludes EU measures harmonising Member States' laws and regulations in this field.

EU action should therefore focus on supporting training through existing legal provisions, funding, social dialogue and collective bargaining, rather than seeking to establish a new general EU-level right.

This also requires using the right governance tools. The European Semester already provides the appropriate framework to identify labour market and skills challenges, support structural reforms and coordinate investment in human capital. The semester has also been reinforced by the Council Recommendation on Human Capital, which explicitly links skills, labour market reforms and investment through the Semester.

Investment is equally important. EU funding instruments play a crucial role in supporting just transition objectives. The European Social Fund Plus, the Just Transition Fund and the Social Climate Fund provide essential support for upskilling, reskilling and workforce adaptation, particularly in vulnerable regions.

These instruments should remain accessible to local and regional service providers, be well coordinated with employment and skills policies, and respond to genuine workforce and service delivery needs.

Drawing on the 2025 Progress Review of the Council Recommendation on ensuring a fair transition towards climate neutrality, SGI Europe underlines the importance of systematically involving social partners in key areas of the climate transition, including energy, transport, telecommunications, housing and the circular economy. This should be supported through relevant ESF+ initiatives and continued EU social dialogue, including in the preparation of forthcoming initiatives such as the EU Climate Resilience Strategy and Circular Economy Act.

The European Fair Transition Observatory can further support the involvement of employers and workers in managing the transition. Competitiveness and climate objectives should be mutually reinforcing, with restructuring and workforce adaptation anticipated through long-term planning rather than reactive policy responses.

No single regulatory model can prepare every labour market for transition. European action should focus on strengthening skills anticipation, workforce planning, social dialogue and the exchange of good practices and preserve the flexibility needed to reflect sectoral, regional and national realities.

Recommended EU action

- Make full use of the existing framework for anticipation of change and restructuring, including the 2013 Quality Framework, before considering new legislative instruments.
- Use the European Semester and existing EU funding programmes to strengthen workforce planning, skills anticipation and investment.
- Keep EU funding focused on workforce adaptation and continuity of essential services rather than attaching new horizontal regulatory conditions.

Enforcement and the role of social partners

Social partners have long contributed, through joint work and collective bargaining, to developing solutions adapted to evolving labour markets across all the areas covered by this consultation. Their role goes beyond supporting the implementation of EU legislation and should be fully recognised when considering future EU action.

SGI Europe therefore supports the Commission's emphasis on information, awareness-raising, practical guidance, exchange of good practices, capacity building and EU funding as means to support Member States and social partners in the effective application of the existing framework. EU initiatives should also preserve sufficient flexibility for collective agreements and solutions developed by social partners in accordance with national law and practice.

SGI Europe supports the Commission's recognition that strong social dialogue and enforcement and strong social dialogue are mutually reinforcing and essential to improving job quality.

Social partners have a unique role under Articles 153 and 155 TFEU in shaping, implementing and supporting the application of EU labour legislation. Collective bargaining, joint guidance, awareness-raising activities and capacity-building initiatives can and already contribute to better implementation of existing rights and obligations.

Future EU action should continue to strengthen the capacity of social partners at European, national and sectoral level, and should ensure the respect of their autonomy and the diversity of national industrial relations systems.

The ongoing assessment of the 2023 Council Recommendation on strengthening social dialogue provides an important opportunity to identify practical challenges, exchange good practices and evaluate the effectiveness of existing measures in cooperation with Member States and social partners. The findings of this process should be taken into account when considering any further EU initiatives in this area, ensuring coherence with the broader EU framework for promoting social dialogue and avoiding unnecessary duplication.

SGI Europe also supports initiatives that improve awareness of existing rights and obligations and that facilitate access to clear, practical and accessible information for employers and workers. Capacity building, peer learning and the exchange of good practices are likely to deliver more sustainable improvements than additional procedural requirements, particularly where national systems already provide well-established "ecosystems" to handle the different topics addressed in the consultation and mechanisms for implementing and enforcing labour legislation.

Enforcement should remain linked to the rights and obligations established in the relevant EU instruments. A new transversal enforcement mechanism should therefore be avoided where existing legislation already provides appropriate enforcement provisions, in line with the objective of simplicity by design.

The Quality Jobs Act should not interfere with established national systems governing workers' representation and social dialogue. Measures affecting the organisation of social dialogue, workers' representation or contacts between employers, workers and their representatives should continue to respect national law and practice, as well as the autonomy of the social partners.

Any future EU action should focus on supporting practical implementation and never aim at harmonising national industrial relations systems.

Recommended EU action

- Recognise and give greater visibility at EU level to the existing work and contribution of social partners across the areas covered by the consultation.
- Reinforce implementation of the existing *acquis* through practical guidance, capacity building and the exchange of good practices.
- Use the evaluation of the 2023 Council Recommendation on strengthening social dialogue to promote social dialogue and identify gaps before considering additional EU initiatives.
- Preserve the autonomy of the social partners and avoid measures that would harmonise national industrial relations systems.

Simplification

SGI Europe supports the Commission's objective of ensuring that future initiatives follow the principle of "*simplicity by design*". Legislation should be clear, coherent, proportionate and straightforward to implement.

One of the strengths of European labour law has traditionally been the use of framework directives establishing common objectives and minimum requirements, leaving sufficient flexibility in accordance with national law and practice. It has enabled common European objectives to coexist with diverse labour markets, industrial relations systems and collective bargaining traditions.

Recent legislative experience nevertheless points to a growing tendency towards increasingly detailed and prescriptive rules. Aiming at legitimate policy objectives, some initiatives have reduced the flexibility traditionally offered by directives and narrowed the scope for further implementation through collective bargaining and national industrial relations systems.

In some cases, the interaction between different Treaty legal bases and policy objectives has also created uncertainty about the respective roles of the Union, Member States and the social partners. The result can be legislation that is more complex to transpose, implement and apply in practice, as illustrated by some of the implementation challenges arising in relation to the Pay Transparency and Platform Work Directives.

Better Regulation principles should always be at the heart of future initiatives. Evidence-based policymaking, subsidiarity and proportionality should guide both the design of new legislation and the review of the existing ones. Simplification should focus on reducing unnecessary complexity, improving coherence between related instruments and avoiding cumulative administrative burdens.

The Commission should ensure that "*simplicity by design*" is reflected in the substance of the initiative. Several options under consideration risk creating new layers of reporting, assessment and compliance obligations, undermining the very simplification objective the Quality Jobs Act is meant to pursue.

SGI Europe therefore welcomes the Commission's intention to review existing legislation before considering further action. These evaluations should reflect practical realities on the ground distinguish carefully between shortcomings in the legislation itself and problems arising from implementation, enforcement or national transposition. This evidence-based approach will help to identify where simplification is genuinely needed and keep preserving legal certainty.

Ultimately, the strength of the EU labour social legislation is not measured by its level of detail but by its ability to achieve its objectives efficiently. It should establish a clear framework of common minimum standards and leave sufficient room for Member States and the social partners to adapt national laws, and collective agreements respectively. This balance is essential to preserving the autonomy of the social partners recognised by the Treaties.

Common minimum standards should not require uniform solutions. Respect for the autonomy of the social partners requires sufficient flexibility to determine how these standards are implemented at national, sectoral and local level. Without such flexibility, the role of social partners risks being reduced to implementing detailed requirements determined at EU level rather than shaping appropriate solutions through social dialogue and collective bargaining.

Recommended EU action

- Apply Better Regulation principles systematically when reviewing or proposing EU labour legislation.
- Distinguish shortcomings in EU legislation from problems arising during national transposition, implementation or enforcement.
- Limit new legislative initiatives to demonstrated regulatory gaps identified in practice and where EU-level action provides clear added value, while preserving flexibility for national implementation and collective bargaining.

European social dialogue and possible negotiations under Article 155 TFEU

SGI Europe remains open to the use of European social dialogue under Article 155 TFEU where it can provide clear added value and where the subject matter is sufficiently defined and mature for negotiation.

At this stage, SGI Europe does not see a case for opening negotiations across the issues covered by the consultation as a whole. The priority should remain the effective implementation, clarification, modernisation and simplification of the existing framework.

If a focused negotiation were to be considered, it should have a clearly defined objective and scope and complement, rather than duplicate, existing EU and national frameworks. In this respect, the possible modernisation and merger of the Workplace and Display Screen Equipment Directives appears to offer the clearest potential, as it could combine stronger clarity with simplification and adaptation to evolving workplaces. On AI and algorithmic management, SGI Europe sees more immediate value in practical joint work by the social partners, including guidance, exchange of good practices and support for the application of the existing framework. This could be further explored through European social dialogue.