



The voice of crafts and
SMEs in Europe



European Centre of
Employers and Enterprises
providing Public services

Mrs Catherine Day
Secretary General
European Commission
B - 1049 Brussels

12 October 2012

Dear Mrs Day,

We are writing to you concerning the draft Communication “Re-thinking education: Investing in skills for better economic and social outcomes”, which is currently going through the process of inter-service consultation.

We broadly welcome the objectives and approach of this communication. Education and training systems all over Europe need to better match labour market needs. Moreover, in times of budgetary constraints, spending on education and training should not only be prioritised but also optimised as this is a key element of our future productive and innovation capacity, and therefore of our future prosperity.

According to the European Centre for the Development of Vocational Training - CEDEFOP, 60% of enterprises in Europe provide training for their employees. This shows that employers already make a significant contribution to improve the skills base. We invest in our workforce to improve our enterprises’ productivity and workers’ employability.

In the context of training provision there is, however, a point in the draft Communication on re-thinking skills that greatly concerns us and on which we would have liked to be consulted on prior to the draft communication entering inter-service consultation. This is the reference to an EU Pact on Education for Growth, which includes “*exploring with the European Partners the opportunity of starting negotiations for a Social Partner Agreement (Art155 TFEU) on minimum training provision for all employees, with a view to delivering excellence in initial training, as well as re-skilling and up skilling the workforce*”.

Experience shows that the institution of a right to training is not efficient to improve skills in a way that gives a satisfactory answer to labour market needs. The reason is that a one-size-fits-all approach to training provision is not the best way for taking into account the different needs of companies and workers, making allowance for their size as well as regional and local context.

Furthermore, the European level is not adequate to discuss an entitlement to training. We have doubts as to whether the EU has the legal capacity to intervene in this area based on the Treaty. Moreover, the invitation to negotiate an agreement, if included in the Commission’s initiative, would tilt the balance of negotiations between social partners and interfere with the autonomy of the European social dialogue.

The approach chosen by European social partners is to deal with the issue of education and training in the context of a framework of actions. In 2002-2006, we have signed and implemented the framework of actions for the lifelong development of competencies and qualifications.

In this context, we recognised that mobilising resources is a shared responsibility of social partners. This is and should remain an issue for discussion between social partners at national level, in line with the diversity of their national economic circumstances and industrial relations systems.

More recently, in our work programme for 2012-2014, we jointly recognised that the 2002 Framework of Actions remains valid. Building on it, we have agreed to address two issues which have emerged since 2002: 1) Skills needs in greening economies; and 2) update and upgrade of the skills of older workers in the context of longer working life.

A Commission's invitation to negotiate on minimum training provision for all employees would be counter-productive as it would undermine the constructive dialogue we are having with the ETUC in the area of skills development.

We invite you to take these points into consideration before the adoption of the Communication and, on this basis, to remove the reference from the final text to:

- The objective to achieve minimum training provision for all employees;
- The proposed social dialogue instrument, i.e. an agreement.

A copy of this letter is also sent to the Directors General of DG EAC, EMPL, BUDG, SJ, ENTR, ECFIN, CNECT, MARKT, TRADE, CLIMA, and ENV.

Yours sincerely,



UEAPME
Andrea Benassi
Secretary General



BUSINESSEUROPE
Philippe de Buck
Director General



CEEP
Valeria Ronzitti
General Secretary