



Mr Aurel Ciobanu-Dordea
Director for Equality
Directorate General for Justice
European Commission
1049 Brussels
Belgium

25 February 2013

Re: Consultation on the European Commission's draft Guidance on the gender neutral job evaluation and classification systems

Dear Mr Ciobanu-Dordea,

In response to your letter sent on 24 January 2013 regarding the Consultation on the above-mentioned draft Guidance, BUSINESSEUROPE, CEEP and UEAPME are pleased to send you this joint response. Notwithstanding the fact that our members are involved in a broad range of activities promoting gender equality at all levels, we would like to express serious reservations about the interest, usefulness and intention of the European Commission's paper.

Firstly, wage bargaining is the competence of the social partners at national, sectoral and/or enterprise level. Therefore tools aiming to supporting collective bargaining and wage formation mechanisms must be identified by the social partners themselves in line with the diversity of national industrial relations systems. In that respect, the European Commission should not aim to provide a pay system guidebook.

Secondly, the draft Guidance takes the wrong starting point by inferring that discrimination is widespread in job evaluation and classification systems. According to us, there is no single, quick fix solution available to address the true causes of the pay gap between men and women. There is a need to take into account multiple grounds, including the horizontal and vertical segregation on the labour market, the different educational and professional choices between men and women, the fact that most part-time jobs are occupied by women, as well as cultural and behavioral factors and career breaks.

Thirdly, the draft Guidance aims to give suggestions and recommendations on the implementation of a range of quantitative and qualitative analytical tools, including mental and psycho-social sub-factors. This will not only create more administrative burden for enterprises, but also contribute to complex internal evaluation and classification processes that have not proven efficient to address the gender pay gap. Moreover, trying to standardize existing pay structures, pay arrangements and practices would not reflect the specific needs of many sectors and small and medium size enterprises.

We look forward to providing you with more detailed comments during the workshop of 27 February.

Yours sincerely,

For BUSINESSEUROPE



Maxime CERUTTI

For UEAPME



Liliane VOLOZINSKIS

For CEEP



Valeria RONZITTI