



Mr László Andor

Commissioner for Employment, Social Affairs
and Inclusion

200 Rue de la Loi
Brussels

22 November 2013

Dear Commissioner,

I am writing to you to convey BUSINESSEUROPE's views on the idea of a Framework on Traineeships, ahead of the publication of the proposed Council Recommendation at the beginning of next month.

Traineeships provide young people with a practical work experience that can greatly facilitate their integration on the labour market. While it is paramount to focus on the learning outcomes of a traineeship, policies devised to do so must also encourage employers to create such learning opportunities.

Concluding an agreement between the company and the trainee is helpful to ensure that the traineeship benefits both parties. Such agreements should outline the tasks description as well as the rights and duties of each actor throughout the duration of the traineeship.

However, the European level is not the appropriate level to set a framework for such agreements. Member States must be able to decide on how best to approach traineeships and how to prevent abuses. In view of the specificities of national regulations, industrial relations and educational practices, a different balance of rights and obligations will be required in each country. Far from increasing opportunities for youth, the introduction of a framework at EU level will discourage employers from offering traineeships.

Concerning the approach you envisage on the status of trainees, BUSINESSEUROPE recalls that traineeships must be seen first and foremost as part of the learning experience. Consequently, it is neither logical nor desirable to consider trainees as workers and the proposed recommendation should talk about "compensation" rather than "remuneration".

We kindly ask you to take these points into consideration and remain at the disposal of your services for any clarifications that you may seek.

We also recall the position stated by the European social partners in the Framework of Actions on Youth Employment that we will consider taking joint action towards the Council and Parliament based on the Commission's proposal for a traineeships framework.

Yours sincerely,

Markus J. Beyrer