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CEC European Managers

Reply to the Second-Phase Consultation under Article 154 TFEU on possible EU action to improve working conditions, health and safety at work and implementation of workers' rights – Quality Jobs Act

Introduction

CEC European Managers welcomes the opportunity to contribute to the second-phase consultation on the Quality Jobs Act.

As highlighted in our response to the first-phase consultation, CEC considers quality jobs, workers' well-being, sustainable work organisation and strong social dialogue to be essential elements of the European social model. Quality jobs and competitiveness should not be considered as conflicting objectives. Good working conditions, healthy workplaces, access to skills, effective worker participation and sustainable work organisation contribute to the ability of European companies to attract and retain workers and to remain productive, innovative and resilient.

Managers have a particular position in this debate. They are workers themselves and are exposed to technological, organisational and psychosocial risks. At the same time, they are responsible for organising work, leading teams, implementing technological and organisational change, ensuring health and safety, developing workers' skills and translating legislative and collectively agreed requirements into workplace practice. Any future European initiative should therefore recognise this dual role, which CEC already emphasised during the first phase of the consultation.

The working conditions of managers themselves deserve particular attention. In 2024, 21.1% of managers in the EU usually worked 49 hours or more per week, compared with 6.6% of employed people overall. Managers were among the occupational groups most exposed to long working hours. This reinforces the importance of considering managers not simply as actors responsible for implementing rules and protecting their teams, but also as workers whose own workload, autonomy, health and working conditions require protection.¹

CEC welcomes the Commission's intention to pursue a targeted approach aimed at modernising the EU framework, improving enforcement and promoting social dialogue while taking account of the diversity of national systems. The second-stage consultation examines algorithmic management and AI, occupational safety and health, subcontracting, just transitions, enforcement and social dialogue, while also emphasising simplification and proportionality.

Simplification should improve clarity, coherence and practical applicability. It should not result in a reduction of existing standards of worker protection.

1. Views on the objectives of possible EU action

CEC broadly supports the objectives identified by the Commission.

The Quality Jobs Act should respond to the transformation of European workplaces while maintaining a high level of worker protection and creating favourable conditions for sustainable competitiveness. Quality of employment should be understood in a multidimensional manner. It includes safe and healthy working conditions, sustainable workloads, professional autonomy, meaningful participation in decisions affecting work, opportunities for lifelong learning and career development, work-life balance, trust and transparency in the use of technology, and effective access to collective rights and social dialogue.

European action should aim in particular at ensuring that existing rights remain effective as workplaces undergo rapid digital, organisational, environmental and demographic transformation. **This requires both addressing and, where necessary, establishing common minimum protections where transformations of work create clearly demonstrated protection gaps, while ensuring the effective implementation and enforcement of the substantial body of EU legislation already in place.**

CEC considers that four principles should guide the initiative.

First, worker protection and competitiveness should be mutually reinforcing. The objective should be productive, innovative and resilient workplaces in which technological and organisational change can take place while maintaining sustainable working conditions.

Second, EU action should focus on identified problems and demonstrable European added value. New obligations are particularly relevant where existing rules leave protection gaps, where divergent approaches undermine effective protection or legal certainty, **where a common European floor is necessary to ensure effective protection across the Union**, or where cross-border problems cannot adequately be addressed through national action alone.

Third, subsidiarity, proportionality and the diversity of national industrial-relations systems must be respected. European action should provide sufficient space for implementation through national legislation, collective bargaining and sectoral solutions. **Where European measures are adopted, they should respect the autonomy of national social partners and leave appropriate scope, where the relevant EU framework**

permits and national social partners agree, for requirements to be implemented, adapted or complemented through collective agreements.

Fourth, social partners should be meaningfully involved not only in policy design but also in implementation, monitoring and adaptation. Their capacity to develop workable solutions adapted to sectors and workplaces is an important component of job quality in itself.

European action should also follow an inclusive and accessible approach. Workers with disabilities and other people facing barriers to employment must be effectively considered in the design and implementation of measures concerning digitalisation, artificial intelligence, training, labour-market transitions and work organisation. Formal coverage alone is insufficient where inaccessible technologies, training formats or organisational processes prevent equal participation in practice. Accessibility and universal-design principles should therefore be incorporated from the outset rather than addressed only after new systems or measures have been introduced.

This is consistent with CEC's first-phase position, which identified particular European added value where structural transformations are common across Member States, rights are unevenly implemented or enforced, cross-border situations weaken effective worker protection or technological developments challenge existing regulatory and collective-bargaining frameworks.

2. Views on the possible avenues for EU action

Algorithmic management and artificial intelligence at work

CEC considers algorithmic management and AI at work to be one of the areas in which the Quality Jobs Act can provide particular added value.

AI is rapidly becoming part of organisational practice. In 2025, 20% of EU enterprises with at least 10 employees used AI technologies, compared with 13.5% in 2024. Among large enterprises, the share had already reached 55%. This rapid uptake demonstrates that workplace AI governance is not a hypothetical future issue, but an increasingly immediate question for companies, workers and managers.²

AI and algorithmic systems can support managers and organisations in areas including workforce planning, work allocation, skills management, scheduling, organisational development and decision-making. Their responsible use can contribute to better planning, prevention and decision support. At the same time, their use can affect professional autonomy, workload, performance assessment, access to employment and career opportunities, working time and fundamental rights.

Algorithmic forms of work organisation are already visible across the workforce. EU-OSHA's 2025 OSH Pulse found that 27% of EU workers reported digital technologies being used to automatically allocate tasks,

working time or shifts, 26% received automated instructions or directions, and 25% reported that such technologies were used to personally supervise or monitor their work and behaviour.³

The debate therefore cannot be confined to the technical regulation of AI systems. It also concerns the organisation, direction and evaluation of work.

CEC supports an approach based on the principle that technology should support rather than replace human leadership and professional judgement.

Workers and their representatives should receive clear and understandable information when algorithmic management systems materially affect work organisation or employment decisions, including information on their purpose, the relevant categories of data and their consequences for working conditions.

Where algorithmic management systems may significantly affect the organisation or conditions of work, worker representatives should be informed and consulted in a timely manner before their introduction, in accordance with applicable information and consultation frameworks, and should remain meaningfully involved in their monitoring and review.

Significant decisions concerning recruitment, evaluation, promotion, remuneration, disciplinary action, work allocation or termination should remain subject to meaningful human oversight. For decisions with particularly significant consequences, human involvement must entail genuine discretion over the final outcome rather than the formal validation of an algorithmic recommendation.

Workers should have an effective possibility to request human review and challenge significant decisions affecting them.

Relevant algorithmic systems should also be assessed for risks relating to discrimination, privacy, occupational health and safety and psychosocial working conditions.

Accessibility should form part of the assessment, procurement and deployment of workplace AI and digital tools. Such systems should not create new barriers for workers with disabilities or reproduce exclusion through inaccessible interfaces, inappropriate data, discriminatory assumptions or decision-making processes that fail to reflect the diversity of the workforce. Workers affected by accessibility barriers should be meaningfully involved in the design, testing and review of these systems.

This is particularly important because digital technologies can themselves affect the organisation and intensity of work. In EU-OSHA's 2025 survey, 48% of EU workers reported that digital technologies determine their speed or pace of work, 30% said they result in working in isolation and 28% reported an increase in workload. Sixteen per cent said that digital technologies reduced their ability to decide how to perform their work.⁴

These findings support an approach to algorithmic management that addresses autonomy, workload and work organisation alongside transparency and data protection.

Particular attention should be paid to managerial responsibility. Responsibility cannot simply be transferred from an identifiable decision-maker to an algorithmic output. Managers must retain sufficient information, discretion, resources and authority to exercise genuine human oversight.

At the same time, CEC recognises that AI at work is already governed by several interacting frameworks, including the AI Act, data-protection legislation, labour law and information and consultation rights. The Commission should ensure coherence between these frameworks and identify precisely where substantive protection gaps remain.

Where genuine gaps concern fundamental employment protections, human control over significant decisions or effective collective rights, targeted binding minimum **requirements** can be appropriate. Where the principal problem concerns interpretation, implementation or interaction between existing requirements, practical guidance and capacity-building may provide greater added value.

Training and AI literacy must form an integral part of this approach. Managers, workers and workers' representatives need the capacity to understand not only the technical functioning of AI systems but also their organisational, legal, ethical and social implications.

CEC also draws attention to its ongoing AI MANAGE project, which is examining how responsible AI and algorithmic management can be translated into practical managerial processes, cross-sectoral guidelines, tools and skills development. The project's research and practical outputs are currently under development and will provide further evidence and guidance as the work progresses.

Occupational safety and health

CEC supports the modernisation of the EU occupational safety and health framework to reflect contemporary forms of work.

In particular, the framework should better address remote and hybrid work, portable digital devices, psychosocial and organisational risks, ergonomic risks and risks associated with heat, extreme weather and changing climatic conditions.

CEC therefore supports targeted updating of the Workplace Directive and Display Screen Equipment Directive where existing provisions have become outdated or insufficiently adapted to modern ways of working. Any revision should improve protection and legal clarity while avoiding unnecessary complexity.

CEC supports greater recognition of psychosocial and organisational risks within prevention systems.

The scale of the issue is significant. In 2025, 44% of EU workers reported exposure to severe time pressure or work overload. In the same EU-OSHA survey, 37% reported overall fatigue and 29% reported stress, depression or anxiety caused or made worse by work.⁵

These figures support an approach centred on primary prevention. **Psychosocial risks should be effectively integrated into occupational risk prevention, with priority given to addressing their organisational causes.** Workload, work intensity, staffing levels, organisational change, professional autonomy, permanent digital availability, poorly designed performance systems and management structures should **therefore** be considered as potential occupational risk factors. Mental health at work should not be treated primarily as an issue of individual resilience where the underlying causes lie in work organisation.

This is particularly relevant for managers. Managers are expected to identify and prevent stress, burnout and other organisational risks within their teams while frequently facing substantial workloads and organisational pressures themselves. The Eurostat evidence on managers' particularly high incidence of long working hours reinforces this concern.

Managers can only fulfil their prevention responsibilities when they have adequate authority, resources, information, competence and genuine capacity to influence work organisation. Future EU action should explicitly acknowledge this relationship between responsibility and managerial capacity.

CEC's first-phase response already underlined the need to integrate psychosocial-risk prevention into OSH obligations and to consider workload, work intensity and work organisation.

For work carried out outside the employer's premises, including telework, obligations should ensure an equivalent objective of protection while remaining proportionate to the employer's actual ability to assess and influence working conditions and while respecting workers' privacy.

Climate-related risks also require greater attention. EU-OSHA's 2025 survey found that one third of EU workers were exposed to at least one climate change-related occupational risk, including extreme heat, extreme weather events or poor air quality. Climate-related risks should therefore be systematically considered within risk prevention while leaving sufficient flexibility to adapt measures to actual exposure, sectors and workplaces.⁶

CEC also considers that sector-specific realities must be taken into account. Mobile and safety-critical workplaces, including transport, demonstrate that occupational risks do not always arise within conventional fixed workplaces. EU rules and guidance should therefore address the real conditions under which work is carried out.

Protection of workers in subcontracting chains

CEC supports the Commission's objective of preventing fragmentation in subcontracting chains from resulting in gaps in worker protection, enforcement or occupational safety and health.

Subcontracting is a legitimate feature of economic organisation and can support specialisation, flexibility and the participation of SMEs. However, increasingly complex and cross-border chains can make responsibility more difficult to identify and rights more difficult to enforce.

CEC therefore supports stronger transparency concerning subcontracting structures, improved cooperation between enforcement authorities, effective access to information and remedies and targeted inspection and enforcement in sectors or situations where evidence demonstrates an elevated risk of infringements.

European action should also ensure that increasingly fragmented contractual arrangements cannot be used to avoid appropriate responsibility for working conditions and respect for workers' rights. The allocation of responsibility should reflect the actual control and influence exercised by the different actors within the subcontracting chain.

Particular attention should be given to occupational safety and health in multi-employer workplaces. Responsibilities for coordination should be clear and operational and should reflect both actual risks and the capacity of the different actors to influence them.

CEC notes that national industrial-relations and liability systems currently address subcontracting in different ways. Different views consequently exist concerning the appropriateness of a uniform European liability mechanism.

CEC considers that any future provisions concerning liability should therefore be based on demonstrated enforcement gaps, be legally clear and proportionate, take account of the relationship between responsibility and actual control, and respect national systems and collective-bargaining arrangements.

European action should concentrate particularly on situations in which cross-border or complex contractual arrangements demonstrably prevent workers from enforcing their rights.

The objective should be to ensure that legitimate subcontracting cannot be used to dilute responsibility or circumvent labour standards, while avoiding disproportionate mechanisms insufficiently adapted to national systems.

Any European action in this area should preserve more protective national provisions and collectively agreed arrangements. European minimum requirements should operate as a floor and should not create incentives or justification for lowering existing standards in countries or sectors that already provide a higher level of protection.

At the same time, European measures should respect the autonomy of national social partners and the role of collective bargaining. Where the relevant EU framework permits and national social partners agree, collective agreements should remain able to adapt or complement the implementation of European requirements in accordance with national industrial-relations systems, while respecting the objectives and minimum level of protection established by the European measure.

Just transitions, restructuring and skills

CEC supports the Commission's objective of ensuring socially fair and inclusive management of the green and digital transitions.

Managers have a central role in identifying future skills requirements, anticipating changes in work organisation, supporting employees through change and implementing restructuring decisions. Successful transitions therefore require managers themselves to have the competences, information and organisational capacity necessary to lead change responsibly.

CEC supports early information and meaningful consultation, strong social dialogue and collective bargaining, access to inclusive and accessible upskilling and reskilling, and measures supporting employability and professional transitions before workers lose their jobs.

Particular attention should be paid to workers with disabilities and other groups facing barriers, who must be able to participate effectively in training and transition programmes. This requires accessible formats, appropriate support and reasonable accommodation where necessary.

Skills policy should nevertheless be about more than simply increasing the volume of training. Eurofound's 2024 European Working Conditions Survey found that 13% of EU workers considered that they required additional training to perform their job well, while 30% reported being overskilled for the work they currently performed. This illustrates the importance of better anticipation of skills requirements, effective use of existing competences and closer involvement of workers and managers in technological and organisational change.⁷

The Commission's analysis concludes that the existing framework governing information and consultation during restructuring is broadly fit for purpose and identifies implementation, skills, social dialogue and transition support as important areas for further action.

CEC therefore considers that EU action in this area should concentrate on anticipation, implementation, skills development, transition support and effective social dialogue rather than creating unnecessary overlapping procedural requirements.

European funding instruments should support these objectives and be accessible to SMEs as well as larger organisations. Capacity-building and the exchange of good practices between social partners can also play an important role.

Enforcement and the role of social partners

The effectiveness of the Quality Jobs Act will ultimately depend on implementation.

CEC supports stronger cooperation between competent authorities, adequately resourced and skilled labour inspectorates, improved access to information and remedies and effective enforcement of existing and any new rights.

Where sanctions are necessary, they should be effective, proportionate and dissuasive. Enforcement systems should at the same time support prevention and compliance and provide practical guidance to organisations seeking to meet their obligations.

CEC welcomes the Commission's recognition of the role of social partners in implementing EU social legislation. Collective bargaining should be actively supported, including through appropriate capacity-building.

There is also evidence of the continuing need to strengthen workplace participation. Eurofound's 2024 European Working Conditions Survey found that 21% of EU employees had neither formal employee representation nor workplace meetings through which they could express their views. In a context of accelerating technological and organisational change, effective channels for worker involvement, information, consultation and social dialogue remain essential.⁸

Technology can also contribute to more effective enforcement. Where AI or data analytics are used to target inspections, appropriate transparency, human oversight and safeguards should apply.

Simplification

CEC supports simplification where it improves clarity, coherence, accessibility and practical implementation.

Complex or overlapping regulatory frameworks can make compliance more difficult for managers, workers and companies alike. Particular attention should therefore be given to clarifying the interaction between different regulatory regimes and competent authorities.

The interaction between AI legislation, data protection, labour law and occupational safety and health is a clear example where greater coherence can simultaneously improve worker protection and reduce unnecessary complexity.

However, simplification should not become synonymous with deregulation. Existing substantive rights and standards should not be reduced in the name of administrative simplification.

The appropriate guiding principle should therefore be simplification without lowering protection: reduce unnecessary duplication and improve usability, while maintaining or increasing the effectiveness of workers' rights.

3. Views on the possible instruments

CEC considers that the breadth and diversity of the issues covered by the Quality Jobs Act make a differentiated package of instruments more appropriate than a uniform approach.

The Commission envisages the possibility of combining legislative and non-legislative instruments, including directives establishing minimum requirements, recommendations, interpretative guidance and capacity-building.

CEC considers that the choice of instrument should follow the nature of the problem identified.

Binding European minimum requirements are appropriate where there is a clearly demonstrated protection gap, where fundamental worker protections require legal certainty, where a common European floor is necessary to ensure an effective level of protection across the Union, or where significant cross-border problems cannot adequately be addressed through national measures.

Any European minimum requirements should operate as a floor and not as a ceiling. They should not be used to reduce more protective national legislation, collective agreements or established industrial-relations arrangements.

At the same time, European measures should fully respect the autonomy of national social partners and national collective-bargaining systems. Where the relevant EU instrument provides for flexibility and national social partners agree, collective agreements should be able to adapt or complement the implementation of European requirements, and to make use of any negotiated possibilities expressly provided for by the instrument, while respecting its objectives and minimum level of protection.

Targeted amendment of existing legislation should be preferred where a clearly identifiable gap can be addressed within an established framework, rather than creating unnecessary parallel regimes.

Guidance and recommendations can provide important added value where the principal problem lies in interpretation, coherence or practical implementation of existing requirements. This may be particularly relevant to the interaction between the AI Act, GDPR and labour law, certain aspects of occupational safety and health implementation and the governance of subcontracting chains.

Guidance, recommendations, capacity-building and exchange of good practices can usefully complement binding minimum requirements. They should not substitute for enforceable protection where a clearly demonstrated gap requires common minimum rights.

Social-partner agreements, collective bargaining and sectoral solutions should play a substantial role in adapting common European principles to national, sectoral and workplace realities. European measures should therefore retain sufficient flexibility to allow implementation through collective agreements where appropriate.

Capacity-building, training, exchange of good practices and access to expertise should accompany legislative as well as non-legislative measures.

CEC recognises that the appropriate balance between additional binding European requirements and implementation through existing national and European frameworks will vary according to the issue concerned. The central test should be whether a demonstrated protection gap requires a common European floor and whether European action provides clear added value while respecting national industrial-relations and collective-bargaining systems.

Substantial common ground exists around high worker protection, responsible use of AI, effective human oversight, modernised occupational safety and health, stronger enforcement, skills development and a central role for social dialogue.

CEC therefore considers that a workable European approach is to establish binding minimum **requirements** where demonstrated gaps require a common floor, while prioritising enforcement, coherence, guidance and social-partner implementation where the existing framework already provides the necessary substantive protection.

4. Possible negotiations under Article 155 TFEU

CEC reaffirms its strong commitment to European social dialogue and considers Article 155 TFEU a fundamental instrument of the European social model.

CEC is open to entering into negotiations on selected elements of the Quality Jobs Act, provided that the scope, objectives and potential added value of such negotiations are sufficiently clear and that there is genuine space for social partners to negotiate meaningful outcomes.

Areas that could lend themselves to further discussion between the European social partners include principles for responsible algorithmic management and meaningful human oversight; prevention of psychosocial and organisational risks in increasingly digital workplaces; anticipation and management of technological and environmental transitions; and the role of social partners in implementation, monitoring and enforcement.

Any decision to launch negotiations should nevertheless take account of the breadth and complexity of the Quality Jobs Act. Negotiations are likely to be more effective when focused on clearly defined areas rather than attempting to reproduce the entire scope of the Commission initiative within one social-partner agreement.

CEC considers that Article 155 negotiations should complement other forms of EU action. The appropriate approach should be assessed according to the issue concerned, the potential added value of social-partner negotiations and their capacity to deliver timely and effective outcomes, while fully respecting the autonomy of the social partners.

CEC's position therefore builds on its first-phase response, in which it expressed openness in principle to Article 155 dialogue provided that social-partner autonomy is fully respected, that there is genuine negotiating space, that the diversity of national systems is taken into account and that negotiations offer the prospect of concrete improvements in job quality and workers' rights.

Conclusion

CEC supports the ambition to ensure that European employment policy keeps pace with profound technological, organisational, environmental and demographic transformations.

The Quality Jobs Act should provide a framework in which competitiveness, innovation and strong worker protection reinforce one another. Its effectiveness should be assessed not by the number of new obligations introduced, but by whether it results in safer and healthier workplaces, more sustainable work organisation, responsible use of technology, meaningful worker participation, stronger skills and employability, effective enforcement and stronger social dialogue.

From the perspective of managers, implementation is particularly important. Managers are among those expected to translate European rights and principles into everyday organisational practice. At the same time, they are workers facing substantial changes in workload, technology and organisational responsibility. They therefore need clear rules, sufficient authority and resources, appropriate training, professional autonomy and practical tools, alongside meaningful social dialogue.

CEC consequently supports a targeted and proportionate European approach combining, according to the issue concerned, **binding minimum requirements where demonstrated protection gaps require a common European floor**, effective enforcement, guidance, capacity-building and social-partner solutions.

Such an approach should provide effective protection while respecting the diversity of European labour-market and industrial-relations systems, preserving more protective national and collectively agreed arrangements and safeguarding the autonomy of national social partners. Where appropriate and permitted by the relevant European framework, collective bargaining should remain able to adapt the implementation of European requirements to national, sectoral and workplace realities.

Footnotes / references

1. Eurostat, "6.6% of employed people worked 49 hours or more weekly", 21 August 2025, based on 2024 EU Labour Force Survey data, dataset. Long working hours are defined as usually working 49 hours or more per week in the main job.

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3. European Agency for Safety and Health at Work (EU-OSHA), *OSH Pulse 2025: Occupational safety and health in the era of climate and digital change – Summary*, EU-27 survey of 25,688 workers.
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7. Eurofound, *European Working Conditions Survey 2024: Overview report (2025)*, findings on skills matching and training needs.
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