

MEMO

To: EU Commission, DG EMPL

Date: 27 June 2025

Written contribution to the Quality Jobs Roadmap

This memo contains the Confederation of Swedish Enterprise's written contribution to the Quality Jobs Roadmap which the Commission has announced will be published in Q4 2025. It constitutes a summary of the views expressed during this spring's meetings and consultations regarding the roadmap. Furthermore, the Swedish Enterprise also supports the views presented by BusinessEurope. The original version of this Memo was written in Swedish.

The text is divided into three sections: **1. General comments on the roadmap**, **2. General comments on the background note**, and **3. Specific thematic comments** covering both the topics included in the mentioned note and the questions posed to the social partners.

1. General comments on the roadmap

1.1 Starting points

We are pleased that it is stated as a starting point that it is crucial to ensure conditions that enable companies to create quality jobs, including well-functioning labour markets, a competitive business climate that strengthens resilient companies, and attracts new businesses and investors.

It is also very good that the background note emphasises the importance of **incentives** to work and that a **dynamic labour market** requires varied forms of employment in order to facilitate entry and skills development and to provide greater flexibility and balance between work and private life. In this context, it is worth noting that the proportion of involuntary part-time contracts is very low in Sweden (SCB, AKU 2023: 19% women, 22% men).

As stated in the background note, the **low labour productivity growth** is deeply problematic, and for the entire European business community, **skills provision** is a key issue, i.e., the shortages of skills and labour, as well as the need for up-skilling/re-skilling, including basic skills to enable transitions (such as computer literacy).

The **EU's GDP has stagnated** at 70% of the US GDP per capita over the past 30 years, while other countries have significantly improved their relative positions (e.g., China increased from 3% of the US GDP per capita to 30% over the same period). These structural weaknesses must be addressed to ensure that companies continue to create quality jobs in Europe. If we want to tackle the very profound environmental, digital, security, and demographic transitions facing Europe, it is more important than ever to create conditions for **increasing productivity and employment at the same time**.

It is also commendable that both the (potential) **advantages and disadvantages of digitization** are recognized. As working life becomes increasingly digital and decentralized, it is important to harness the opportunities this transformation offers – for both employers and workers – while protecting rights and managing risks. It is also essential to realize that the flexibility provided in, for example, telework or hybrid work forms entails responsibilities for both employers and workers. Any disadvantages are aspects that need to be managed constructively – it is not possible to reap the benefits of these working methods if they

are not permitted to be used. The pandemic perspective on issues such as telework and the right to disconnect has had an understandable but overly dominant position that now needs to be recalibrated.

1.2 Relationship to the Social Pillar

Parallel to the development of the roadmap, work is ongoing to update the action plan for the implementation of the European pillar of social rights. Since everything in section I. Fair Working Conditions of the background note is already covered by the Social Pillar, we wonder what distinguishes these two instruments. Both also come with indicators (in the case of the Social Pillar, a scoreboard), and both are described as compasses. The question arises whether **the wheel is being reinvented**, albeit in a new administrative guise.

Section I. Fair Working Conditions, listed as the first pillar, moreover, **deals only with outcomes** and not with what is needed to generate these same objectives – innovation, growth, and productivity. To function as a **relevant compass** for the Commission's work over the next five years, the roadmap should contribute to creating conditions that **encourage companies to invest and create quality jobs in Europe**. It must not overlook the economic side of the equation and must include measures that contribute to encouraging productive investments in Europe.

1.3 On quality jobs as high-quality employment

We note that in 2024, the **Swedish translation** of the roadmap's title in Europe's Choice (political guidelines for the next European Commission 2024-2029) was given as 'high-quality employment' (p. 20, *sysselsättning av hög kvalitet*) and in the background note from April 2025 as 'high-quality job opportunities' (*arbetstillfällen av hög kvalitet*). We believe this better captures what the roadmap should be about – creating conditions for better job creation and being **forward-looking**.

In this context, we would like to emphasize the importance of avoiding attempts at defining job quality – as it is **context-dependent**. What constitutes a **quality job** largely depends on people's needs and varies depending on the different stages of working life. For example, students having their first work experiences are likely to have different expectations of quality jobs compared to young parents balancing professional and family life with more qualified jobs, while employees at the end of their careers are likely to have still different needs. Similarly, remote and part-time work can be an important opportunity for certain workers, such as young parents or students, while it may pose limitations for others who, depending on the phase of life, require other forms of work arrangements. Therefore, a balanced and needs-based approach is required, and it is not feasible to establish a legal definition of what constitutes quality jobs.

There are also no general definitions or criteria to distinguish between "quality jobs" and "non-quality jobs." Flexible agreements made in **full compliance with applicable labour laws and collective agreements**, for example, are quality jobs. They meet both workers' and companies' needs and are crucial not only for certain sectors, such as the hospitality sector where work is carried out around the clock, but also for micro-enterprises and small and medium-sized companies.

For the Confederation of Swedish Enterprise, all productive jobs provided by competitive companies in full compliance with applicable labour laws and collective agreements, and which can be maintained through adaptation to changing economic and social needs, are quality jobs.

1.4 Existing framework and ongoing work

The existing framework and ongoing work are described as a solid foundation for the upcoming roadmap, but we argue that this foundation is rather **one-sided and unbalanced**, especially since nothing is written about the prerequisites for creating quality jobs, such as innovation, productivity, growth, business

conditions, and the investment climate. As a result, this section primarily resembles a review of the implementation of the Social Pillar.

2. General comments on the background note

2.1 The design of the background note

The text in the background note seems **back-to-front**. The approach is good, but the sections need to be better interconnected. This is especially true for the **necessary link** between competitiveness and employment. We perceive the document as **split**, as if it has two different authors, and we hope this does not reflect a struggle within the Commission.

To confirm that the roadmap, as stated in Europe's Choice, is to be developed together with the social partners, the background note should have **started** with what is now its **final paragraph**:

The roadmap will benefit from cross-sectoral and sectoral social partners' unrivalled expertise and knowledge of the employment and social conditions on the ground, reflecting views from both sides and allowing them to develop targeted and effective responses, either jointly or individually.

2.2 Designing the roadmap – A missing 'pillar'

The roadmap is described as a compass guiding the Commission's work and addressing workers across different sectors and self-employed individuals. However, **nothing is said about employers** or businesses. In fact, the word "employer" does not appear even once in the text (unlike "workers," which occurs over 20 times, and "companies," 7 times), despite the fact that the existence of employers is a prerequisite for there to be employees/workers.

The approach is as if working conditions are solely a matter for workers – and not for employers. Similarly, the three pillars have an overly narrow focus and, in large parts, provide **one-sided** perspectives – this applies in particular to what is referred to as the first pillar, which sets out what is to be achieved but says nothing about how this is to be achieved.

Nothing is mentioned about the **prerequisites for creating quality jobs**, such as business conditions and the environment for entrepreneurship. Nor is there any understanding shown for differences in conditions between **sectors**, particularly public and private. Tax-funded operations have different financial conditions compared to market-driven ones, and certain public services have specific requirements for availability and delivery (such as emergency healthcare and defence).

We therefore believe that the roadmap lacks an **entrepreneurship and employer pillar** that ties into the Competitiveness Compass, the Union of Skills, and the Green Industrial Deal. In its current form, the roadmap overlooks measures that contribute to fostering productive investments in Europe – which are essential if the roadmap is to succeed in promoting the creation of quality jobs in Europe. To echo our messages at the Social Summit in Gothenburg, when the Social Pillar was proclaimed: No social Europe without jobs, no social Europe without a competitive business sector.

In particular, the roadmap should be developed in collaboration with the Commission's follow-up on the recommendations within the Competitiveness Compass. One of the goals of this Competitiveness Compass is to promote innovation. This can only be achieved by creating a favourable climate for young companies to start and expand, helping large companies to adopt new technologies such as artificial intelligence (AI) and robotics, simplifying rules and regulations to enable businesses to operate across the EU, and supporting the development of new technologies.

2.3 Horizontal enablers

Regarding horizontal enablers, we would like to emphasize that **responsible and autonomous social partners** also constitute important infrastructure for achieving quality jobs.

Infrastructure for skills development is equally important, both before and during working life. It is also crucial that education and training are relevant to labour market and that support is provided where a lack of or outdated basic skills hinder transitions, as well as incentives to move from unemployment to employment.

3. Specific thematic comments

3.1 Social dialogue and collective bargaining

The Confederation of Swedish Enterprise agrees that **social dialogue** is an essential part of the European social model and the European market economy.

In Europe's Choice (the political guidelines), **collective bargaining** is given a special role as increased coverage is seen as particularly important for fulfilling the roadmap's objectives. We would like to point out that such objectives also require incentives for social partners to negotiate, and here we wish to highlight three points:

- You **cannot legislate** contractual relationships into existence.
- Every public regulation of conditions on the labour market **reduces** the social partners' incentive to negotiate their own solutions.
- Hence, it is also important to **decide** whether social dialogue should be something other than consultation, i.e., whether it should also include negotiations between social partners, especially since the latter requires both freedom of contract and autonomous parties (see also section 3.9 below).

It is true that in the **Pact for European social dialogue**, it is acknowledged that Europe's future long-term competitiveness must go hand in hand with quality jobs and a workforce that is equipped with the right skills. This is of central importance and precisely the link that needs clarification in order for the background note to become complete and balanced.

This link has been the Swedish approach and the starting point of Swedish social partners for decades. To quote from the common values in **The Agreement on Efficiency and Participation from 1982** (Utvecklingsavtalet, amended in 1985, see English translation as appendix):

"SAF, LO, and PTK agree that efficiency, profitability, and competitiveness require constant development in all aspects and at all levels of company activities... The process of improving efficiency calls for active participation by all those who work for the company, i.e., management, employees, and their union representatives. This has considerable importance for safeguarding employment."

Even wage formation in the Swedish labour market is based on the same perspective. [The Industrial Agreement from 1997](#) states that its purpose is:

"...to strengthen industrial development, profitability, and international competitiveness within each agreement area of the industrial sector and to provide preconditions for good wage development and other good terms for the employees."

3.2 Digitalization

Section II. Digitalization in the background note is a relatively balanced, covering both businesses and workers. Even so, it needs to be pointed out that there already exist regulatory frameworks to manage organizational development and work environment issues in the form of a framework directive (89/391/EEC) and the Advisory Committee on Safety and Health (ACSH). For instance, ACSH is currently working on an opinion on psychosocial risks and mental health at work.

When implemented correctly, AI and algorithmic management systems can support smarter task allocation and improve overall workplace efficiency. Wisely deployed, AI systems will help employers assess and develop workforce skills, provide career counselling, and support job matching. A uniform regulatory approach, however, would be counterproductive as algorithmic management systems vary greatly across sectors and companies, and their use is already covered by existing frameworks such as GDPR, workplace safety laws, and collective agreements in many member states. Social dialogue—not new legislation—is the key to effectively addressing these developments.

3.3 Transition

The section III. Fair transitions in the background note is unbalanced: Transitions are **a prerequisite for development** and for a competitive, profitable, and efficient industry. (See the previous quote from the Agreement on Efficiency and Participation: "...*efficiency, profitability, and competitiveness require constant development...*"). It is only at the end of the note that it is mentioned that it is important to create accessible pathways for workers to acquire new skills, when this should have been the starting point and framed as a key part of the necessary transitions. Thus, the last sentence of the section should be placed at the beginning:

Effective measures to foster the skills of the workforce are essential to support competitiveness and foster a more innovative and productive labour market.

Swedish trade unions' affirmation of new technologies is a hallmark of the Swedish labour market model, and this constructive approach deserves praise. As a result, the transition systems founded by the social partners as early as the 1970s do not protect jobs but rather individuals, thereby supporting transition processes (e.g., [recent private sector agreements](#)). Here we would like to refer again to the Swedish private sector social partners' common values in the **Agreement on Efficiency and Participation from 1982** (*Utvecklingsavtalet*, amended in 1985, see English translation as appendix):

Technological development and ongoing change may mean that the organization of work and work tasks at a workplace will also change so that certain work tasks will disappear, whereas new ones will be created. It is important that the employer be involved in training employees for new jobs that are created by the process of change at the work place.

When it is not possible to make adjustments within a job, support must be provided to enable a transition to another job or form of employment, based on the individual's circumstances and the conditions of the labour mark. This is the core idea of the Swedish social partners' transition systems (such collective agreements exists in all sectors of the Swedish labour market), which SN, PTK and LO presented to Director-General Mario Nava during his visit to Sweden in the spring of 2025 and will present to Commissioner Roxana Minzatu during her visit in the autumn of 2025.

3.4 Enforcement

Non-compliance with **existing regulations** is a significant problem. Phrased differently, it must be easy for serious businesses to follow the rules, while simultaneously ensuring that it is not possible for rogue actors to have the disregard of applicable regulations as part of their business models.

Compliance is not achieved through additional layers of regulations, which **rogue actors** will also ignore or attempt to circumvent, but through better, smarter rules and robust enforcement. Ensuring that enforcement is consistent and fair is what constitutes a "level playing field". By contrast, the background note signals yet further measures (e.g., the Labor Mobility Package) aimed at tackling compliance issues with more rules that will affect serious businesses and entrepreneurs.

With regard to the labour market, it must be understood that **ELA and labour inspectors are not the only way** to achieve better compliance. Tax authorities, company registration authorities, patent and registration authorities, other licensing and supervisory agencies, the police and the judiciary, migration and customs authorities are at least as important actors in facilitating the running of legitimate businesses by ensuring existing legislation apply equally to all.

3.5 Future-oriented and future-proof quality jobs

The future quality jobs roadmap should not aim to predefine at the EU level which types of jobs should be created. Rather, it should aim to facilitate the emergence of productive value chains in Europe, rather than unnecessarily intervening in various business models, such as those using subcontractors, as this will ultimately dissuade investors and weaken the EU economy, as well as discourage specialisation and innovation.

When difficult or less desirable tasks are part of a job, the methods to minimize these negative aspects vary depending on the needs of the company and the worker involved. When working conditions are challenging, the social partners should be given the space to collaborate at an appropriate level to improve the balance between work demands (such as exposure to physical risks or challenging social situations, work intensity, degree of autonomy, perceived job insecurity, etc.) and work resources (protective equipment, social support, training, career development opportunities, etc.).

3.6 Proposed key areas

As previously noted, the employer perspective is literally absent from the background note. Like BusinessEurope, the Confederation of Swedish Enterprise urges the Commission to include in its analysis reflections on the generally accepted conditions necessary for creating quality employment, as well as potential support for companies in this endeavour. Additionally, the Commission should consider the political measures needed at the EU and national levels to increase labour productivity. This discussion must be better anchored in the broader economic conditions required for companies to create quality employment. Currently, this perspective is barely represented in the Commission's strategy.

3.7 Prioritized areas – Skills development as paramount

The recruitment difficulties experienced by the majority of companies in the EU are often linked to a mismatch between the demand for and supply of skills and labour shortages in an aging society. Addressing the imbalance between skills and the workforce is therefore a crucial part of the solution to improve the quality of job opportunities.

Regarding the Union of Skills, we note that there are actions the Commission can take to facilitate for the involved parties, namely by creating incentives for employers and employees to find their own solutions.

This could include removing restrictions in state aid rules regarding the funding of training as well as promoting the introduction of tax deductions for skills development — providing support both during existing employment and between employments.

3.8 Initiatives and commitments by the social partners

The Commission, in its continued work on drafting the roadmap, needs to consider that the EU's social partners, both at cross-sectoral and sector levels, require space to develop their own initiatives and, hence, the Commission also needs to ensure that partners' initiatives are taken into account when the future roadmap is implemented.

The Commission must respect the autonomy of social partners and collective bargaining in accordance with national labour market relations systems. The same applies to sector-specific social partners and their sector-specific negotiations.

The Commission must also respect ongoing social partner consultation processes and refrain from interfering or prejudging their findings. A recent disappointing example concerns psycho social risks and mental health at work, where the Commission should await the completion of the ongoing work within the ACSH working group that has just begun its deliberations before deciding whether and/or how to appropriately address this complex issue.

3.9 Increased collective bargaining coverage

Collective agreements can contribute to job quality but are not a necessary prerequisite for this. There are many quality jobs that are not covered by collective agreements. Thus, the idea of including collective agreements as an aspect of job quality is misleading.

In Europe, employers have a significantly higher level of organization than employee organizations. To meet up and increase collective bargaining, and thereby collective agreement coverage, **European trade unions must find their own strategies** to boost their level of organization and thus their bargaining power. The EU cannot assist in this matter since the right of association, which also encompass the right to bargaining, fall outside the EU's competence according to Article 153(5) TFEU. Because social partner autonomy is a central component, all measures resulting in GONGO constructions (Government-operated non-governmental organizations) must also be avoided, especially as this, in the labour market context, would lead to so-called yellow unions.