

Future-proof skills promotion: Thinking sustainability more comprehensively

Position on the European Commission's proposal for a regulation on establishing a framework of measures for strengthening Europe's net-zero technology products manufacturing ecosystem of 16 March 2023 (COM (2023) 161) – education and training policy aspects

May 2023

Introduction

With its proposal for a Net Zero Industry Act, the European Commission is stepping outside the European treaties. In addition, it is leading to a mistaken prioritisation of politically determined skills and professional occupations instead of following the differentiated needs of the labour market. The proposal for a regulation envisages, among other things, measures to improve professional skills and to facilitate the recognition of professional qualifications for regulated professions – only in net-zero industries. That the draft regulation does not reflect the reality in companies and in the EU member states is also demonstrated by the fact that no continuous involvement of the social partners is envisaged.

There is no legal basis to introduce (professional) training policy provisions of this kind via a regulation. Whilst strictly respecting the responsibility of the member states for the training content, the European Union can merely play a supporting and complementary role in this area (Article 165 and 166 of the TFEU). The education and training aspects of the proposal for a regulation should therefore rather be dealt with in the framework of a recommendation, as is also standard practice in the area of education and training.

Climate change is accompanied by significant changes for the economy, the labour market as well as education and training systems. It is the joint responsibility of all players in the labour market to successfully counteract climate change. Acting sustainably – and thus in a future-proof way – is a fundamental interest of companies. The vocational qualifications of skilled workers must thereby be directed by the specific needs of companies and customers, not by purely political determinations.

The proposal for a regulation falls short in terms of meeting the correct aim of promoting skills. The regulation goes hand in hand with a prioritisation of politically determined skills and thus occupational fields. On the one side, this risks creating qualifications that go beyond labour market needs and creating parallel structures to the education and training systems of the member states. On the other side, the proposal pursues an approach, which, with its narrow focus on eight technologies, overlooks the fact that a change to greater sustainability and climate neutrality is taking place throughout the entire economy.



The principle of technological neutrality, including in education and training policy, is a basic precondition for innovation. In general, any profession and any activity can make a contribution to more sustainability. This is a realisation that the German vocational training system has long since implemented by introducing a standard 'Environment and Sustainability' occupational profile. Since 2021, this has been a mandatory component of every enacted vocational training regulation in Germany based on the vocational training law and the skilled crafts and trades regulation, irrespective of sectors, region or specific vocational training company.

Climate-related structural transformation requires major efforts from the economy and society as a whole. In order to shape it wisely, we must not distinguish between 'green' occupations that are to be privileged and 'the rest'. Instead, we must understand sustainability as an optimisation process, which takes equal account of the three dimensions ecological, social and economic.

In detail

A comprehensive approach is necessary for facilitating the recognition of qualifications

In general, steps towards simplifying the recognition of professional qualifications – including in regulated areas – make sense (Article 24). With regard to the significant shortage of skilled labour, efforts should be undertaken, to enable greater labour migration within the single market. Provided that qualifications are proven to be equivalent, automatic recognition within the EU – instead of recognition on a case-by-case basis – for many professions in the EU member states (as in article 49 of Regulation 2005/36/EC) could be considered. Assessment here varies in the different sectors (such as in trade and crafts with regard to their regulated professions). However, via the regulation, access is to be regulated only for professions with "particular interest for the net-zero industry'. It is not comprehensible to create bases for simplified and accelerated recognition only for occupational profiles of the net-zero industry, which would be based solely on the learning programmes of the Net-Zero Industry Academies. Instead, there is a need for a comprehensive approach, which facilitates the greater mobility of skilled labour from all sectors within the EU and at the same time takes into account national realities and the different education systems.

Net-Zero Europe Platform would create superfluous parallel structures

The proposal for a regulation envisages the establishment of Net-Zero Industry Academies, which are to develop the learning programmes, content and learning and training materials for the production of net-zero technologies (Article 23). They would be strategically directed and supervised by a Net-Zero Europe Platform (Article 25), to which each Member State is to send a high-ranking representative. The Platform shall, among others, also develop European occupation profiles.

The regulation would go hand in hand with a prioritisation of politically determined skills based on eight technologies. Thus, qualification would be based on European specifications and not on actual national labour market needs. With the creation of a Net-Zero Europe Platform – as a supervising body with regulatory competences – a parallel structure to the education and training systems of the member states would be implemented, which are currently facing the challenges of climate change and transformation on their own responsibility and in line with their needs. It is incomprehensible to provide seed funding only for skills development via the academies in net-zero industries, while existing educational institutions and new ones in other industries receive no targeted support.



It would make more sense to support existing structures or innovation processes in the member states in a targeted way and to promote the mutual exchange of good practices. The establishment of Net-Zero Industry Academies must not be about creating independent European education and training institutions. Rather, the concept of the academies should be designed in such a way that it promotes the creation of EU-wide networks in which relevant stakeholders from the member states can exchange and discuss approaches and progress in skills development and qualification of skilled workers. Where appropriate, this could lead to nationally adapted qualification concepts, which could then be incorporated into national structures.

Ensuring the involvement of the social partners and company practitioners

If, at whichever level, academies, in which learning content is developed, are to be set up, it must be ensured that this is done via practitioners from companies and not politically directed from a desk without referring to professional practice. No ongoing involvement of the (sectoral) social partners is foreseen in the regulation. The success of the professional training depends to a great extent on the active involvement of the social partners in designing the system and on close cooperation between the companies and the vocational training schools.

The social partners and companies that are concerned must play a central role both in the determination of labour market intelligence and in the development of learning programmes and content. The companies know best which skills they need in order to deal with ongoing transitions. Their involvement should result from nationally tested procedures, not by establishing a European Platform as an additional supervisory body in the area of national education.

Contact:

BDA | DIE ARBEITGEBER

Bundesvereinigung der Deutschen Arbeitgeberverbände

European Affairs

T +49 30 2033-1050

europa@arbeitgeber.de

BDA is the central business association organising the social and economic policy interests of the entire German economy. We pool the interests of one million businesses with around 30,5 million employees. These businesses are associated with BDA through voluntary membership of employer associations.

Transparency Register: 7749519702-29