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	2025 Annual progress report on Simplification, Implementation and Enforcement
	- Information from the Commission

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2025 ANNUAL PROGRESS REPORT

Simplification, Implementation & Enforcement

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1. Introduction

This report summarises the key measures on simplification, implementation and enforcement, undertaken during the period 1st January – 31st July 2025 under my responsibilities in the fields of Social Rights and Skills, Quality Jobs and Preparedness. The report follows up on the Commission Communication of February 2025 on "A simpler and faster Europe", which sets out the European Commission's vision for an implementation and simplification agenda that delivers fast and visible improvements for people and business. These objectives, as well as the goal to contribute to reducing reporting obligations by at least 25% – and for SMEs at least 35% – and leveraging the power of digital tools to deliver better and faster solutions, are also among the core elements of my mission letter.

2. Executive Summary

During the reporting period, my services – DG Education, Youth, Sport and Culture (DG EAC) and DG Employment, Social affairs and Inclusion (DG EMPL) – delivered legislative proposals and IT solutions with significant simplification potential. These initiatives have a high potential to streamline processes and reduce administrative burden on implementing authorities and stakeholders alike.

DG EMPL has put in place a strategy to guide the stress-testing of the acquis under its remit by the end of the current Commission's mandate, prioritising in the first years the acquis on labour mobility, funding, skills and qualifications as well as occupational safety and health in view of their importance for competitiveness. This stress-testing will be further supported by the forthcoming ESF+ mid-term and ESF ex-post evaluations, which also fed into the preparation of the next Multiannual Financial Framework (MFF). DG EMPL has made better enforcement a priority and has actively supported national authorities in the effective transposition of the EU social acquis Moreover, DG EMPL focused on further simplifying the implementation of its funding instruments, providing support to Member States to foster the use of simplified cost options (SCOs) under the ESF+ and proposing an amendment to the European Globalisation Adjustment fund (EGF) *inter alia* to simplify procedures. To further enhance labour mobility and modernise, simplify and digitalise social security coordination, DG EMPL completed the preparation stage of an implementation dialogue which took place on 16 September 2025 where it invited a target group of stakeholders to discuss opportunities for simplification and reduction of administrative burden. The event is scheduled for September 2025 and will focus on free movement of workers, posting of workers and social security coordination.

DG EAC continued to drive simplification within the Erasmus+ programme through digitalised application procedures, reduced reporting requirements for National Agencies and lump sum funding, improving accessibility and efficiency. In 2025, DG EAC completed the Erasmus+ 2021-2027 interim evaluation, the Erasmus+ 2014-2020 final evaluation¹ and the interim evaluation of the 2021-2030 European Education Area (EEA) strategic framework². The latter assessed progress achieved in 2021-2025, confirmed the strong added value of the EEA and set the stage to

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¹ European Commission Directorate-General for Education, Youth, Sport and Culture, De Zan, T. and Chevallerau, F.-X., Support study for the Erasmus+ 2021-2027 interim evaluation and the Erasmus+ 2014-2020 final evaluation – Synopsis report, Publications Office of the European Union, 2025. https://data.europa.eu/doi/10.2766/5905094

² European Commission Directorate-General for Education, Youth, Sport and Culture, *Interim evaluation of the 2021-2030 European Education Area strategic framework – Report from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions, Publications Office of the European Union, 2025, https://data.europa.eu/doi/10.2766/2668196*

refine the EEA's strategic priorities, governance and working methods for its next cycle (2026-2030). An implementation dialogue on the European Education Area (3 June) complemented the aforementioned report, with stakeholders stressing the need for stronger links between education, youth and skills. Enforcement action addressed cross-border access to education.

Delivering Results: Key Measures

A. Simplification and stress tests

Simplification efforts are a top priority for me throughout my mandate. I aim to achieve this while safeguarding the values and objectives of the European social model, including through the support by the European Social Fund Plus (ESF+), Erasmus+ and other relevant funding programmes for employment, social inclusion and skills development.

In the field of labour mobility and social security coordination, a significant focus was placed on supporting the colegislators during the negotiations to amend **Regulations (EC) No 883/2004 and 987/2009**. The Commission will continue to encourage the co-legislators to seek agreement on this proposal which has significant potential to simplify procedures and facilitate labour mobility.

In revising Directive 2009/38/EC on **European Works Councils**,³ the Commission included important elements to improve legal certainty, and to reduce the scope for disputes involving company management and workers, notably with a clarification of the notion of "transnational matters" which triggers the obligations set out in the Directive. While the revised Directive will establish new obligations (eg. management must respond in writing to a timely opinion expressed by the company's European Works Council), it will also lead to a clearer and simpler EU legal framework as one set of rules will apply to all Union-scale undertakings. With my support on behalf of the Commission, the co-legislators reached a balanced agreement on the file in May 2025.

Following the Commission's action plans on the automotive sector and on European steels and metals, the proposed amendment to the **European Globalisation Adjustment Fund (EGF)** aims to enable the fund to intervene earlier — before job losses occur — and mobilise support more quickly through a simplified disbursement procedure at EU level allowing for faster access to funding for the companies and workers concerned. The Commission looks forward to a swift completion of the negotiations on the file in 2025, for these simplification elements to come into force

Furthermore, several mid-term and ex-post evaluations of **funding instruments**⁴ are looking closely at how existing simplification measures have worked and aim at identifying potential for further simplification. The results also contributed to the preparation of the successor programmes under the next MFF 2028-2034. The next two years will be devoted to the implementation of the lessons learnt from the evaluations and prepare for the ex-post evaluations 2021-2027.

Executive agencies delivered their programmes efficiently, pursuing simplification and leveraging digital tools Efficiency gains were achieved through internal measures (reorganisations, simplification of processes and procedures) and corporate and cross-cutting actions. Local and corporate IT tools also improved the agencies' efficiency, contributing to cost saving, for instance through the development of digital content and the digitalisation of the agencies' documents and processes. Concrete progress included the modernisation of internal control systems, reinforced IT support and helpdesk functions, and cost savings of EUR 87.7 million over 2018-2020. These

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³ The Commission adopted its proposal on 31 January 2024 in response to the legislative resolution of the European Parliament of 2 February 2023.

⁴ Mid-term evaluations of the <u>ESF+</u>, <u>EGF</u>, <u>Erasmus+</u> and <u>Creative Europe</u> and ex post evaluations of the <u>ESF</u> and <u>Fund for European Aid to the most Deprived (FEAD)</u>.

measures reduced administrative burden, improved use satisfaction and made access to funding simpler and more reliable for beneficiaries.

Furthermore, the first half of 2025 witnessed technological enhancements to support these simplification efforts. The Commission proposal for a public interface connected to the Internal Market Information System for the **declaration of posting of workers** ('e-Declaration'), on which the Council reached a General Approach in May 2025, aims to simplify the posting declaration procedure, thus reducing administrative burden for companies, as well as their compliance costs. The single digital declaration portal will allow service providers to use a single form instead of using 27 different national forms in case all Member States participate. On average, this will decrease by 73% the time spent on the declarations. It will thus facilitate compliance while supporting the enforcement activities by Member States.

The Commission also facilitated the integration of standalone IT platforms. On 1 April 2025, the **EURES-Europass synergy project** became operational opening up Europass functionalities to EURES users. EURES job seekers were invited to transfer their CVs to Europass or to renew their profiles directly in Europass and seamlessly share them with EURES. This initiative is part of our ongoing commitment to improving the user experience and offering more integrated and effective support tools to jobseekers and employers.

For the submission of the national **Social Climate Plans**, the existing IT solution was reused, which significantly streamlines the submission process for Member States. As for Erasmus+, a key focus was placed on National Agencies (NAs), which are responsible for implementing over 80% of the Erasmus+ budgets under indirect management. Reporting requirements for their annual reports were significantly reduced. All implemented simplification measures were developed in close consultation with the NAs. The initial feedback from the Agencies has been positive, and the full impact of the new simplification measures will be assessed over the medium to long term, in accordance with the regular project lifecycle.

The simplification potential of digitalisation to streamline procedures, reduce administrative burden, and ease cross-border access to social security rights will be further developed with the **European Social Security Pass (ESSPASS)** initiative, which will be launched as part of the Fair labour Mobility Package, announced in the Single Market Strategy⁵. The initiative will build upon the pilot activities conducted from 2023 to 2025 by two consortia of Member State institutions to test the digitalisation of procedures related to the portable document A1 and the European Health Insurance Card. These efforts were supported financially by the Digital Europe Programme⁵.

In the context of the Council's review of the EEA strategic framework, and in line with efforts to build a Union of Skills, the governance of the **European Education Area** is being streamlined to enhance efficiency. Simplification efforts aim to break down silos between the education, training, employment, economic and financial sectors, aligning governance structures and reporting mechanisms and more firmly link the EEA within the European Semester to ensure synergies with the Union of Skills and trigger reforms and investments. Adjustments aim to reinforce the EEA's role as a shared framework for lifelong learning and skills development, contributing more directly to the Union's economic and social resilience.

Regarding **stress tests**, by the end of the mandate, DG EMPL will screen all its policy areas, including occupational health and safety, labour law, skills and qualifications, social protection as well as social inclusion to ensure, that legislation remains relevant, proportionate and fit for purpose. The screening performed in 2025, including legal and economic analysis, covers the acquis in the area of funding instruments (several mid-term and ex post evaluations

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⁵ COM(2025)500 - Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions - The Single Market: our European home market in an uncertain world

⁶ Member State institutions in the consortium under the European Digital Identity framework tested the use of EU digital Identity wallets for the portable document A1 and the EHIC (among other use cases). Member State institutions in the consortium under the European Blockchain Services Infrastructure explored the use of some components of this infrastructure and blockchain to exchange these attestations.

of funding instruments, for details see footnote 3) and labour mobility (evaluation of Regulation on European Labour Authority, preparatory work on ESSPASS, starting evaluation of European Network of Public Employment Services (PES) and building on the results of the work done in the previous year, such as Europass evaluation and Report on the application and implementation of the Directive concerning the posting of workers in the framework of the provision of services.

After screening the legislative acts under its remit during the reporting period, DG EMPL identified four **delegated acts and an implementing act** to be proposed in 2026, all of them in the area of recognition of professional qualifications. All of them are priority acts that are legally required without a given timeframe and are essential for the achievement of the relevant EU policy objectives.

During the reporting period I also had the opportunity, in the context of **reality checks** organised by my services, to meet and discuss with stakeholders regarding the practical implementation of EU legislation on the ground. In February 2025, I visited a construction site with EU and national social partners and local authorities in Antwerp to discuss about ELA role, ESSPASS need, third country nationals and sub-contracting. In March, I took part in a joint inspection with the Dutch minister and inspectorate to discuss about third country nationals, ELA's key role in subcontracting and digitalisation. In April, I visited the national labour inspectorate in Italy with the minister in Rome to discuss about digitalisation in preventing fraud and abuses in cross-border situation, ELA's role, ESSPASS, aspects related to third country nationals and sub-contracting. Also in April, I visited a construction site together with EU and national social partners, and the Danish minister in Copenhagen to discuss about ESSPASS need, social cards, third country nationals and sub-contracting. In September, I visited several parking sites in Belgium with EU and national social partners and local authorities to discuss the well-being of truck drivers, the implementation of EU legislation, the importance of investment, and the role of ELA All these discussions have provided first-hand insights to me and my services regarding the challenges that stakeholders are facing as well as their expectations.

B. Implementation

My services regularly **engage with national authorities, social partners and various stakeholders** to identify potential for further simplification and discuss other challenges in implementing the EU social acquis. An example is the Legal Seminar on the EU Social Acquis Enforcement and Implementation, which took place on 5 March back-to-back with the European Employment and Social Rights Forum. The seminar pointed to the need to combine robust enforcement with simplification, with increased involvement of social partners and local practitioners in both policy design and enforcement being critical. In addition, during the social partner hearing of 10 July on the new Action Plan to implement the European Pillar of Social Rights, the topic of implementation and simplification were further discussed. While employers welcome the simplification agenda as a way to support better implementation, trade unions are more cautious about the risk to simplify at the expense of a potential negative impact on workers' rights

Strengthening the **cooperation with Member States** and supporting them in their implementation efforts is key in ensuring effective implementation and preventing breaches from ever occurring. In the reference period, DG EMPL used numerous tools to support correct implementation, such as legal networks, informal transposition groups, bilateral and package meetings, discussing infringement related questions with individual and multiple Member States, guidance documents and a dedicated annual seminar on implementation and enforcement. Through this continuous dialogue, DG EMPL managed to resolve several issues before initiating formal infringement procedures or finding solutions to identified compliance issues. Dialogue and enforcement actions have contributed to tangible progress in delivering benefits for both workers and businesses, by ensuring alignment with the rights granted under the EU social acquis and promoting greater clarity and consistency in the application of the relevant rules

In this context, on 3 June 2025, during the **implementation dialogue** on the European Education Area (EEA), participants called for stronger links between education, training and skills policies, and better use of the European Semester to support reforms in Member States. They flagged fragmented governance, insufficient investment, the

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need for a stronger stakeholder involvement and gaps in monitoring as key barriers. Good practices shared included peer learning and the strategic use of EU instruments to support inclusive and future-ready education.

Support to implementation of EU law:

During the reference period, significant efforts were devoted to supporting Member States in the implementation of EU law. This included targeted technical assistance, guidance, and dialogue to facilitate national legislative processes and ensure alignment with EU directives.

On platform work, the Commission has set up an informal Expert Group on the transposition of Directive (EU) 2024/2831 on improving working conditions in platform work. It establishes cooperation between the Commission, the Member States and EU social partners for the correct implementation of the Directive and advises the Commission in monitoring the correct and timely transposition by the Member States. It also serves as a forum to bring about an exchange of experience and good practices on implementation with particular attention to the rules likely to present challenges when being transposed into national law.

In the area of <u>Occupational Safety and Health (OSH)</u>, a detailed explanatory document was prepared to assist Member States with the transposition of Directive (EU) 2024/869, amending the Directive on Carcinogens, Mutagens and Reprotoxic Substances and the Directive on Chemical Agents at Work.

As concerns Directive (EU) 2022/2041 on <u>adequate minimum wages</u> in the EU, the Commission has prepared a template to support Member States in the reporting of data and information required under Article 10(2) of the Directive. While this template is non-binding, it will facilitate their data reporting processes and will also allow the Commission services to process and analyse the reported information more efficiently.

Needs identified in Member States for the capacity-building of public administrations:

During the 13th mutual learning event on *distributional impact assessments (DIA)*, held on 12-13 May 2025, Member States reported encountering difficulties in implementing DIA, often due to a shortage of technical expertise or fragmented responsibilities. In particular, the lack of trained personnel in ministries hinders the effective application of DIA. To institutionalise effective DIA practices, it is crucial to enhance collaboration among various ministries (such as finance, social, and employment), statistical offices, and research institutes.

• Tools and programmes to support implementation, including technical support:

<u>Social Climate Fund</u>: During the reporting period, my services provided support to Member States in the preparation of their Social Climate Plans through different instruments and platforms, in particular the Climate Change Expert Group, which provides a platform for exchange of best practices, as well as the Technical Support Instrument which helps public administrations develop their Social Climate Plans⁷. In March 2025, the Commission adopted two Guidance documents – on the Social Climate Plans and the application of the 'Do no significant harm principle'

<u>EU Labour Law.</u> The Commission provides financial support in the form of grants towards actions supporting the implementation of Union rules on information, consultation and participation of employees' representatives in companies. The supported actions promote awareness and implementation of the relevant Directives⁸.

<u>OSH</u>. The Senior Labour Inspectors Committee (SLIC) and its various working groups meet regularly, to help promote effective and consistent enforcement of EU OSH legislation, including through exchange of good enforcement practices. In the reporting period, SLIC held one plenary meeting and more than 40 working groups meetings.

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^{7 10} Member States (Belgium, Czechia, Denmark, Greece, Finland, Croatia, Lthuania, Latvia, Romania, and Slovakia) are making use of the Technical Support Instrument for this activity over the 2024-2025 period.

⁸ <u>Directive 2002/14/EC on information and consultation</u>, <u>Directive 98/59/EC on collective redundancies</u>, <u>Directive 2001/23/EC on transfers of undertakings</u>, and <u>Directive 2009/38/EC on European Works Councils</u>, along with <u>Directives 2001/86/EC</u> and <u>2003/72/EC</u> on employee involvement in the European Company and Cooperative Society.

<u>Social protection</u>. To support implementation of the Council Recommendation on access to social protection for workers and for self-employed, two mutual learning events brought together Member States' experts, social partners, social security institutions and international organisations (ILO, OECD and ISSA) to exchange and reflect in-depth on reforms to improve social protection access and adequacy for vulnerable groups of workers and for professionals in cultural and creative sectors.

<u>Long-term care</u>. The Commission provides support to the implementation and monitoring of the European Care Strategy and the Council Recommendation on access to high quality affordable long-term care, mobilising funding, analytical and technical support as well as opportunities for mutual learning and exchanges. It also helps mobilise stakeholders to actively engage in implementation.

<u>Social security coordination</u>: The deployment of the Electronic Exchange of Social Security Information (EESSI) has highlighted the need for comprehensive support in the digitalisation efforts of Member States. It has brought to light issues such as the varying levels of digital maturity among different countries and sectors, differing national priorities, and difficulties of adaptation in some administrations. Dedicated teams are actively supporting the implementation of the system. These teams provide resources and expertise to ensure that Member States can effectively integrate and utilise the system.

• EU funding programmes providing assistance to implement EU policies and legislation:

ESF+ – use of simplified cost options (SCO) and financing not linked to costs (FNLC): In the current programming period, the ESF+ leads among cohesion policy funds regarding the uptake of SCOs and FNLC. According to a recently published study, almost 50% of the ESF+ budget is to be implemented through SCOs and FNLC. During the reporting period, several national workshops on SCOs and FNLC for programme authorities took place in Germany (March 12), in the Netherlands (April 8), in Estonia (June 4) and in Italy (June 24). In January – July 2025, the ESF Transnational Network for Simplification convened twice, in the Netherlands (April 10–11), and in Italy (June 26–27).

Erasmus+ During the reporting period, DG EAC completed the Erasmus+ interim evaluation for the 2021-2027 programme and final evaluation of the 2014-2020 programme. The evaluation reports on the introduction of digitalised application procedures and simplified lump sum funding, which increased efficiency in project management, especially for small-scale partnerships. The programme benefited from a simplified architecture and improved IT tools, facilitating access for newcomers. There was strong uptake of the new initiatives supporting inclusion and green/digital priorities in schools, VET and adult learning. Capacity-building and technical support to national agencies helped improve coherence across countries, especially in managing mobility and partnerships.

• Initiatives to enhance digitalisation and data access:

The Commission and Member States are closely cooperating on the <u>ESSPASS initiative</u> to explore a digital solution to issue and verify digitally citizens' social security entitlements across borders (i.e. portable documents, including the European Health Insurance Card). The aim is to facilitate the exercise of social security rights and reduce administrative hurdles for citizens, businesses and national authorities. With the support of the Commission, pilot activities were conducted to assess the feasibility of this solution, including exploring the potential reuse of the European Digital Identity wallets for sharing and verifying these social security attestations.

In addition, the <u>European Fair Transition Observatory</u> and an <u>inter-agency data-sharing platform</u>⁹ which are under development will improve data collection and access on just transition aspects and include various focuses and levels of granularity.

The role of EU regulatory agencies in ensuring the consistent application of EU law:

The first evaluation of the European Labour Authority (ELA) confirms ELA's role in supporting free and fair labour mobility, facilitating consistent application of EU law across the Member States in this field. For example, between

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⁹ In cooperation with Cedefop, ELA, Eurofound, ETF and EU-OSHA

17–23 February 2025, the ELA supported a cross-border enforcement operation involving 7 Member States ¹⁰, in partnership with the European Roads Policing Network. A total of 420 trucks and buses were inspected, resulting in 208 identified incompliances. The operation involved 320 national inspectors, 51 visiting officers from 12 additional Member States, and 14 ELA staff members, demonstrating strong cross-border cooperation and joint capacity. ELA has continued to contribute to better implementation of EU labour mobility acquis in Member States also through its Posting 360 Forum.

The European Agency for Safety and Health at Work (EU-OSHA) has also developed guides and tools ¹¹ to support the application on the ground of OSH measures. In particular, the EU-OSHA OiRA project actively supports Micro and Small Enterprises (MSEs) in meeting their OSH regulatory obligations by providing free, user-friendly online risk assessment tools. These tools are developed through a collaborative process involving national and EU social partners, ensuring they are specifically tailored to the unique challenges of different sectors and the particularities of national contexts thereby simplifying the practical application of EU OSH requirements. As of December 2024, the platform boasts over 285,000 registered users and a substantial 482,964 risk assessments, demonstrating its widespread adoption and practical application within MSEs. Furthermore, the large-scale EU-OSHA Healthy Workplaces Campaigns raises awareness and disseminates good practices on central themes of occupational safety and health, contributing to promote effective application of OSH measures.

C. Enforcement

In line with the 2016 Communication "Better results through better application", my services give priority to cases where the infringement of EU law has particularly serious implications, such as the non-transposition or incorrect transposition of EU directives or non-compliance with judgments of the Court of Justice of the European Union (CJEU). The Europa webpage on infringements, pre-infringement dialogues and transposition provides up-to-date statistical information on the Commission's enforcement activities and Member States' compliance with EU law, including trends per policy area, topic and Member State.

· Safequarding the rights of EU citizens through constructive dialogue with Member States

Whenever possible, dialogue with Member States was used to safeguard the rights of EU citizens, as a first tool to drive compliance. A pre-infringement dialogue with Ireland was concluded following clarifications on rules for allocating medical intem posts. At the same time, the Commission opened a pre-infringement dialogue with Belgium regarding access restrictions for non-residents to medicine and dentistry studies. Further pre-infringement dialogues were launched in response to citizen complaints on potentially discriminatory practices: application fees at several Dutch universities; admission conditions for Master of Advocacy studies in Malta, refusal of reduced public transport fares for Polish pupils studying across borders, and limited access to the Navarrese eBiblio platform, which excludes non-residents. These dialogues reflect the Commission's commitment to safeguarding the rights of EU citizens and ensuring fair access to education and services across Member States.

In addition, during the reference period, petitions and complaints concerning health and safety at work were examined in relation to the Commission's competence under Directive 89/391/EEC; no infringement cases were opened, as the issues raised either fell outside the Commission's remit or concerned national provisions exceeding the scope of the Directive, which was correctly transposed

Professional Qualifications

The Commission pursued a targeted enforcement approach to uphold the free movement of professionals and ensure legal certainty across the Single Market. In April 2025, infringement procedures were launched against 14 Member States for failure to notify transposition measures for Directive (EU) 2024/505, which amends Directive

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¹⁰ Belgium, Denmark, Croatia, Italy, Cyprus, Lithuania and Romania.

¹¹ See for example "Heat at work — Guidance for workplaces" and OIRA (on-line interactive risk assessment): free and simple tools for a straightforward risk assessment process.

2005/36/EC, to ensure that Romanian nurses trained prior to accession and who completed a specific upgrading programme may benefit from automatic recognition. Additionally, the Commission is currently examining replies of Member States provided following the launch of 22 infringement proceedings in December 2024 for applying unjustified prior checks on professional qualifications under Article 7(4) of Directive 2005/36/EC. These enforcement actions are central to removing disproportionate administrative barriers and directly support the Commission's broader objective of enhancing professional mobility and ensuring coherent implementation of EU law across Member States.

<u>Labour Law</u>

The Commission continued to address systemic shortcomings in the application of EU directives governing working conditions. While 18 non-communication cases on the Directive (EU) 2019/1152 on transparent and predictable working conditions were closed, Spain was referred to the CJEU for failure to fully transpose this Directive with a request for financial sanctions. Italy was similarly to the Court of Justice of the EU for failure to prevent the abusive use of fixed-term contracts for ATA (administrative, technical and auxiliary staff) school staff, in breach of Directive 1999/70/EC In addition, France and Austria received Letters of Formal notice for non-compliance with Directive 2003/88/EC on working time, while another Letter of Formal Notice was addressed to Czechia for discrimination against part-time workers under Directive 97/81/EC An intense dialogue with Member States continued throughout the period to resolve long-standing cases, including those concerning the use of fixed-term employment contracts in Spain and discriminatory working conditions affecting fixed-term employees in the public sector.

Occupational Safety and Health (OSH)

The Commission closed four infringement cases (Greece, Poland, Italy, Spain), related to the non-communication of transposition measures of Directive (EU) 2022/431 on the protection of workers from the risks related to exposure to carcinogens or mutagens at work, and one (Germany) for incorrect transposition of Directive (EU) 2017/164, establishing a fourth list of indicative occupational exposure limit values. Moreover, ongoing pre-infringement dialogues led to legislative amendments or clarifications in eight cases, enhancing alignment with Directives 92/57/EEC, 2017/2398, 2019/130 and 2019/1833, on protection of workers from the risks related to exposure to carcinogens or mutagens at work. The pre-infringement dialogues in the area of OSH allowed for national legislative changes ensuring better and of an equal minimum level protection for workers, safeguarding workers and contributing to a level playing field across the EU. In Case C-219/24, the Court clarified that EU OSH legislation does not preclude national rules requiring vaccination of workers exposed to biological risks, thereby confirming Member States' possibility to require vaccinations under the Biological Agents Directive and OSH Framework Directive. In parallel, the Commission — working jointly with the SLIC and EU-OSHA — provided practical guidance and training, supporting effective enforcement and contributing to better protection of workers across the Union.

Labour Mobility

Through continuous dialogue with Member States, the Commission pursued resolution of long-standing infringement procedures linked to the Posting of Workers Enforcement Directive (2014/67/EU), focusing on finding solutions in relation to open grievances. Two cases were closed following constructive bilateral exchanges and the adoption of corrective measures by the Member States concerned. Two additional Letters of Formal Notice were sent in 2025 to address additional grievances. The adoption of national measures to address the grievances raised by the Commission has reduced non-compliance with the Posting of Workers Enforcement Directive. It has contributed to decrease administrative burden for posting of workers and has also improved worker protection and administrative cooperation between Member States in relation to cross-border enforcement of administrative penalties and fines

• Social Security Coordination

The Commission launched a pre-infringement dialogue with Italy following complaints concerning the transfer of pension rights for European Central Bank (ECB) staff. The reply of the Italian authorities is currently assessed by the Commission services. In parallel, systemic barriers persist in Greece, where over 400 unresolved SOLVIT cases concerned excessive delays in pension processing and data transmission, particularly affecting mobile workers. This

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issue was raised at the June 2025 meeting of the Administrative Commission on Social Security Coordination. Thanks to a close cooperation with the Greek authorities, 251 of these 400 cases were resolved recently, with a commitment from Greek authorities to resolve the remaining cases as swiftly as possible.

4. Way forward

For the remainder of 2025 and in 2026, my services will continue the implementation of stress-testing Among others, in the area of occupational health and safety (OSH) we are assessing the practical implementation of 24 OSH directives (plus 6 Commission Directives establishing indicative exposure limit values pursuant to the Chemical Agents Directive, plus the Council Directive implementing the social partners agreement on sharp injuries). In this context we will be also looking for possibilities of simplification, potential inconsistencies internally within our acquis and externally with other EU legislation and policies. The screening of acquis in the area of skills and qualifications will support the Skills Portability Initiative which will include actions aiming at digitalisation and simplification of the recognition and reporting processes. We are also assessing the implementation of the Council Recommendation on ensuring a fair transition towards climate neutrality. The results should foster the exchange of best practices and to identify policy gaps and areas in need of further analysis, guidance and support. The assessment includes the Artificial Intelligence-based tool conducting automated data collection to monitor the implementation of the Recommendation, currently piloted in 10 Member States.

Further simplification initiatives are also planned, as part of the Fair Labour Mobility Package, which was announced in the Single Market Strategy¹² and which is under preparation in view of adoption in 2026. The Package will contain and announce measures modemising, simplifying and digitalising labour mobility and social security coordination rules and practices as well as addressing barriers to free movement of workers related to portability of skills. Building on the interim evaluation of the 2021-2030 European Education Area (EEA) and my first implementation dialogue, the Commission has put forward a proposal on a renewed EEA governance structure which will be assessed by the Council. Further improvements in ESF+ implementation will focus on increasing the uptake of simplified cost options and financing not linked to cost measures by national, regional and local authorities. To that end, the Commission will continue supporting the work of the ESF Transnational Network on Simplification, including in the elaboration of guiding material and dedicated workshops. As regards the implementation of the Social Climate Fund, the Commission will soon issue a second Guidance on the implementation of the SCF to further support Member States and facilitate the implementation of the Fund. The SCF Guidance provides for an implementation model which takes the lessons learnt of the RRF to simplify the implementation process for Member States.

Drawing on the results of the Erasmus+ evaluation, further improvements in the programme implementation, will focus on expanding access to smaller and remote communities and leveraging digital innovation to simplify programme delivery. The simplification agenda will advance through the deployment of advanced data analytics and AI tools, without compromising policy objectives or compliance with the Financial Regulation. National Agencies (NAs) will continue to play a central role in this process. To support them, a "multiple organisations dashboard" is being developed. It will allow NAs to identify links between applicants using structured data and intelligent search functions, eliminating the need to manually cross-check across different platforms. Rollout of the dashboard is foreseen by end 2025. In parallel, the Commission is exploring automated data retrieval and the use of AI to support NAs with routine tasks such as data consolidation and document verification. Feedback from NAs will shape future applications, including AI-powered chatbots to improve user support. A proof of concept is also underway for an AI-based dashboard to detect double funding and plagiarism, while full automation of national agency reporting is planned for 2026. Finally, additional simplifications to budget transfers for Erasmus+ activities under Heading 6 will take into effect in 2026, further streamlining financial procedures.

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¹² COM(2025)500 - Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions - The Single Market our European home market in an uncertain world

For the reality checks planned in 2026, my services intend to gather evidence from stakeholders and practitioners in relation to the implementation of the legislation relevant to information and consultation of workers. Following the implementation dialogue on labour mobility held in September 2025, the Commission will take into account the stakeholders' input collected during the dialogue as part of its work on the upcoming Fair Labour Mobility Package aimed to help address the challenges and opportunities related to cross-border mobility and digitalisation.

My services will continue to actively support dialogue with Member States to facilitate the transposition and effective implementation of EU law. Where compliance cannot be achieved through cooperation and guidance, enforcement will be used as a necessary tool to ensure alignment with the EU legal framework.

In 2026, my services intend to propose for adoption four delegated acts and an implementing act that are legally required by Directive 2005/36/EC on the recognition of professional qualifications. In addition, depending on the outcome of the ongoing legislative process and future negotiations on the EGF amending Regulation, it may be necessary to amend the Implementing Regulation on beneficiary surveys.

I am firmly committed to a simplification agenda that upholds our high standards and serves the needs of both businesses and citizens. As we move forward, it is imperative to strengthen our current actions, while proposing innovative enhancements and further simplifications. This proactive approach will enable us to navigate an ever-evolving global landscape.

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Annex: examples

Use of Simplified cost options (SCO): The use of SCOs and similar mechanisms simplify the daily management of ESF+ across all regions, by increasing the focus on results, reducing the administrative burden for programme authorities and simplifying compliance. The reduction of administrative burden has been quantified in a study at 25%¹³. This also means reduced costs for preparing funding applications, thanks to a more streamlined and simplified process. This also ensures that the financial support has a tangible impact on the ground, making a difference in the lives of citizens.

Revision of the European Works Councils Directive: On 20 May, co-legislators reached political agreement on a proposal for a revision of Directive 2009/38/EC on European Works Councils, which includes important elements to reduce legal uncertainty, and to reduce the scope for disputes involving company management and workers, notably a clarification of the notion of "transnational matters" in its Article 1(4), which triggers the obligations set out in the directive. Furthermore, the revision will lead to clearer and simpler EU legal framework as one set of rules will apply to all Union-scale undertakings

<u>OiRA tools</u>: The Online interactive Risk Assessment (OiRA) tools developed by the European Agency for Safety and Health at Work, OiRA partners and the EU sectoral social dialogue partners enable micro and small companies from various sectors to carry out their own risk assessments required by EU rules on health and safety at work.

Pensions adequacy and long-term care: On a proposal from the Commission, the Social Protection Committee agreed to set up a working group to carry out a joint analysis of pension adequacy and long-term care. Instead of two separate working groups preparing two different reports, the process has been streamlined with one single working group and one single report. This adjustment will reduce the administrative burden for the involved authorities and enhance coherence and synergies between the two policy strands.

Data on qualifications: As part of the implementation of the European Qualifications Framework and the Europass Decision, the Commission has set up a tool where Member States share data on qualifications. Data is structured in the same way across countries, based on the same data model standard. Data are accessible to anybody in the Europass platform and on the Open Data Portal. This makes it easier for workers, learners and employers to access data on qualifications, simplifying their lives, and making the information more accessible and trusted.

Fair transition: DG EMPL carried out a progress review of the implementation of the Council Recommendation on ensuring a fair transition towards climate neutrality, based on peer review meetings with the Member States, and dedicated hearings with social partners and civil society organisations. As a result, self-assessment and reporting have been streamlined while ensuring synergies with the European Semester. In addition, the development of a pilot data collection tool – the AI for Fair Transitions tool – will help simplify this process and reduce the administrative burden both for the national administrations and the European Commission. The tool was launched in June 2025.

Counterfactual impact evaluations of active labour market policies: The EC-OECD Project on Counterfactual Impact evaluation (CIE) of active labour market policies (ALMP), which uses linked administrative data, started in April 2025. It aims to fill gaps in conducting counterfactual impact evaluations by expanding the range of previous analysis to cover the impact of ALMP on social outcomes, such as social inclusion and health outcomes. In addition, it will support countries to undertake cost-benefit analysis to promote cost-effective policies

Erasmus+: simplified project reporting and budget procedures: DG EAC introduced major simplifications to reporting requirements for Erasmus+ National Agencies (NAs). Annual reports now require 18% fewer items in the main template and 38% fewer annexes, hereby significantly reducing administrative burden for NAs and DG EAC. These changes will facilitate meeting the 90-day legal reporting deadline, while also improving time management

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¹³ New assessment of ESIF administrative costs and burden - Publications Office of the EU

and allowing earlier approval of work programmes. Additionally, DS EAC reduced the number of procedures and transactions linked to contribution agreements, streamlining budget processing and financial monitoring

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