



*Employers entrusted to deliver
Sustainability Growth Innovation*

Policy Kit

with regard to the French Presidency of the Council of the EU

1 January 2022 – 30 June 2022

SGI Europe represents employers and enterprises of services of general interest since 1961. Our members are organisations active in fields such as:

- Central & local administrations,
- Healthcare,
- Education,
- Housing,
- Waste management,
- Energy,
- Transport,
- Water,
- Environment,
- Communications.

Modern public services and services of general interest (SGIs) support the fundamental goals of the EU, enabling business, cohesion, economic and social solidarity, and a better quality of life for citizens.

This Policy Kit, prepared considering the priorities of the French presidency of the European Union, aims to present key SGI Europe positions on the main files to be discussed at the EU level over the next six months.

Relance, Puissance, Appartenance

Relance

COVID-19

- Services of general interest have been **at the heart of the management of the impacts of the COVID-19 crisis**, which has clearly **shown how crucial the provision of SGIs**, such as healthcare, water, energy, waste management, telecommunications, education, housing and transport, **is to the well-being of citizens and the economic resilience of the EU**.
- Whilst most SGIs have been working properly throughout the crisis, they **have also been dealing with several constraints**, like international supply chains disturbances and shortages such as, amongst others, adequate protective equipment for workers, or changes in the users' habits, translating into sharp increases in usage for some services (such as domestic electricity consumption or broadband) or unprecedented drop for others (such as public transports). **Those disruptions exercise intense pressure** – both in nominal and real terms – **on indispensable resources to keep those activities running**.
- **Measures to protect SGIs and economic structures are needed to avoid total collapse and, shortly, enable full rehabilitation** and the consequent re-establishment of growth.

More: [SGI providers and employers facing the COVID-19: Contribution to Sharpening Emergency Measures](#)

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Recovery and Resilience Facility

- The French Presidency comes at a crucial moment for the EU recovery. Amidst an improving economic outlook, but with significant uncertainties, **facilitating the continuation of the disbursements of funds related to the implementation of the national recovery and resilience plans (NRRPs) stands as one of the most critical priorities** of the French Presidency.
- In light of the lessons learned from the COVID-19 pandemic, SGI Europe highlights the need to strengthen **the EU resilience, recovery, and strategic autonomy**.
- Against this backdrop, SGI Europe believes the pandemic has highlighted that the provision of SGIs is of paramount importance to the well-being of citizens and the overall economic resilience of the EU.
- In the post-pandemic recovery, ensuring access to high-quality SGIs to every person, family, and enterprise, particularly across deprived regions and communities, should prevent pre-existing inequalities from widening.
- To prevent potentially uncoordinated and unsynchronised management of economic policies between the Recovery and Resilience Facility (RRF) and the European Semester, SGI Europe calls for a **thorough assessment of the overall economic governance which should consider both new criteria and parameters as well as greater involvement of the social partners**.

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Puissance

The contribution of the SGIs to the EU Strategic Autonomy

- **At the core of Europe's resilience**, the Single Market effectively withstood immense internal and external pressures during the COVID-19 crisis thanks to the **critical lifeline provided by providers of SGIs in keeping our economies open and functioning**.
- Europe's quest for strategic autonomy will depend on a **more coordinated and effective defence and security policy** and strengthened trade tools whilst **relying on quality and resilient SGIs**. When orienting policy choices for the recovery, the industrial strategy should not overlook the importance of **SGIs as essential pillars upon which to build a strong and resilient industrial ecosystem**.
- A proper forward-looking industrial strategy aimed at making Europe stronger should boost market cascade effects enabling SGIs to **upgrade their capacity to absorb and make innovation operational**.
- For a transition strengthening our resilience and autonomy, the EU needs to urgently fix its vulnerabilities in strategic SGIs sectors, such as the prevention of natural disasters and climate change with **investments in mitigation/adaptation plans integrated as key SGI provisions**; the cyber-resilience of administrations, including healthcare systems; the security of our energy grids and critical infrastructures.

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Resilience and adaptation to climate change

- SGI Europe **fully supports the ambition of the EU Green Deal of making Europe the first climate-neutral continent by 2050**. Together with its members, SGI Europe is committed to developing a balanced and sustainable strategy relying on economic, social and environmental development. **It will be essential to consider these three dimensions for the Green Deal to reach its objectives**.
- **The first environmental damages are already there, and measures for an adaptation strategy are needed:** SGI Europe calls for further actions in other areas of climate protection, such as enhancing biodiversity, limiting local air pollution, ensuring quality water supply and land use, and including them in the process to reduce our emissions and environmental impacts.
- Maintaining communication systems, ensuring energy and water production and distribution, and maintaining buildings and transport networks is increasingly difficult and costly. **The resilience of infrastructure is an important issue, and SGIs are at the forefront to build and protect them**.
- With their long-standing experience and proximity to citizens and communities, SGIs have a central role in facing climate challenges. However, these challenges correspond to massive investments linked to the satisfaction of needs.

More: [SGI Europe Opinion on the EU Green Deal](#)

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Appartenance

Conference on the Future of Europe

- SGI Europe is one of the three general cross-industry social partners at the EU level, representing employers and providers of services of general interest. **SGI Europe is a committed and proactive actor at the highest level of the Conference on the Future of Europe (CoFoE) process**.
- The expectations of SGI Europe about the CoFoE are high, as we believe that it has the potential to become a **foundational moment for a new paradigm**.
- We are committed to listening to the citizens' demands and responsibly demonstrating our representativeness and leadership in taking concrete actions to revive the European project.
- Most Europeans show positive opinions and attitudes towards the EU following the effective and successful response to the COVID-19 pandemic. Therefore, it is for the CoFoE to now capitalise on this window of opportunity to move one step closer to the citizens and revive the European project.
- Another important aspect is to **bring the CoFoE closer to the communities whilst avoiding to create false expectations**: the commitments taken will have to be delivered.

More: [SGI Europe at the first plenary of the Conference on the Future of Europe](#)

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Financial Affairs

Review of the EU Economic Governance

- On 24 December 2021, SGI Europe submitted its contribution to the public consultation on the review of the EU economic governance. In its paper, SGI Europe calls for **meaningful and sound reforms adapting our economic governance and tools to the new post-pandemic reality**. The new framework should be informed by the lessons learnt from the pandemic: acknowledging that existing rules are not fit-for-purpose and that **fiscal policy has a crucial role in economic policy-making** and growth-oriented policy choices.
- SGI Europe also advocates urgently adapting to the post-pandemic economic reality: current high debt levels and low interest rates should lead to a **new approach to reconcile the objectives of debt reduction and fiscal consolidation whilst fostering the investments** needed for the twin transition. The objective should be to design a better functioning fiscal regulatory framework and simplify the rules, evolve from a one-size-fits-all to a more targeted approach, find a balance between investments and sustainability of public finances, and reform its governance in line with the best practices of the RRF.
- SGI Europe believes that the EU now faces a **window of opportunity for establishing a new ambitious pact** to concretely invest in the future of Europeans and reinforce social cohesion. With adequate resources and a functioning economic governance framework, this new pact should prevent further divergence and lay the ground for a relaunch of the EU project on solid and long-lasting foundations.
- With the general escape clause expiring in 2023, we believe 2022 should be the year we agree on new fiscal rules. The objective should ensure certainty to Member States, businesses and stakeholders on their future-oriented plans and projects linked to the twin transition.

More: [Response to the consultation on the review of the EU economic governance](#)

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Sustainable Finance and the EU Taxonomy

- SGI Europe supports **setting the proper framework to redirect capital flows towards sustainable economic activities**. A sustainable finance mechanism and the Taxonomy Regulation can enable the objectives of the EU Green Deal. This framework should be guided by shared principles that safeguard similar levels of ambition across various sectors, aim for a technology-neutral approach, and respect public undertakings' role. The taxonomy needs to consider the current national and EU legislation fully. It should **simplify the process and make sustainable and resilient projects more attractive**.
- Enterprises and investors may lose interest if the information burden is too high and opt for traditional funding requiring less disclosure. The **design of the EU Taxonomy should not undermine investments in sustainable and resilient projects and promote harmonisation with other sustainable investment instruments**.
- Due to its high complexity and its implementation timeline, a **gradual implementation of the Taxonomy would bring about a considerable increase in market implementation** and acceptance and thus reorient private funds more quickly to sustainable economic activities.
- It will be essential that the EU Taxonomy framework is guided by shared principles that safeguard a **similar level of ambition across various sectors and aims for a technology-neutral approach**. It will also be essential to ensure that the EU Taxonomy considers the maturity of the technologies and the contribution they will make in reducing CO2 emissions and add to the circular economy principle.
- Based on available evidence, **nuclear has to be included within the taxonomy scope whilst remaining subject to the appropriate DNSH criteria**. In this regard, the JRC has proposed a set of science-based criteria that should form the core of the delegated act.
- The **use of natural gas in highly efficient electricity and heat generation technologies is necessary to ensure the security of supply in several Member States**, at least during a clearly defined transition phase of the energy system, combined with a binding perspective of H2 readiness.

More: [Position Paper on the Preliminary recommendations for Technical Screening Criteria for the EU taxonomy](#), [Position on a complementary delegated act to the EU taxonomy on nuclear and natural gas](#)

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Employment and Social Affairs

Proposal for a Directive on adequate minimum wages in the EU

- SGI Europe believes that EU actions to address the challenges of fair minimum wages **should not seek to harmonise the level of minimum wages across the EU, nor to establish a uniform mechanism to set minimum wages or levels of pay** that falls within the contractual freedom of the social partners and the remit of Member States' authorities.
- SGI Europe calls on the French presidency to ensure a balanced and cautious approach. Rather than setting prescriptive requirements, the directive should only go so far **as providing a framework for Member States and social partners to tailor to their national situation**. In its current form, the directive proposed is likely to lead to many court rulings with no legal certainty.
- Further efforts are necessary regarding wage convergence. However, it remains critical that any **future actions are anchored to the full respect of the competence and autonomy of the national social partners regarding wage-setting processes and following national practices**. These efforts should also aim to strengthen collective bargaining, which would also contribute to fairer wages, but without setting binding requirements that would damage the autonomy of social partners.
- The setting of the minimum wage **should be governed by the economic circumstances, linked to the situation in a country, region or sector whilst paying attention to the situation of struggling enterprises**. The adequacy of minimum wages has to be assessed considering the impact on employment, competitiveness, productivity and demand.
- Establishing **thresholds for adequacy in a directive would be too far-reaching**. Besides the question of EU competence, this would interfere with collective bargaining systems and setting nationally relevant criteria. Any such aspects should not be binding.
- SGI Europe hopes that the co-legislators will reach an agreement that considers all stakeholders' key concerns. Apart from an important political signal, the directive is a piece of legislation for which it is necessary to consider every aspect of its future implementation carefully.

More: [Response to the open consultation on the Minimum Wage Directive Proposal](#)

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Proposal for a Directive on pay transparency and enforcement mechanisms

- SGI Europe acknowledges the importance of the principle of equal pay and the role that pay transparency plays in its implementation. However, **to tackle the gender pay gap, one must look further than wage setting**.
- SGI Europe supports a dual approach that takes a **broad and holistic perspective through specific actions alongside gender mainstreaming**. The interconnection between working conditions and living conditions (work-life balance, opportunities for full/part-time work, parental leave, sharing of unpaid domestic work, the intersection of various axes of discrimination, the impact of occupational segregation,...) needs to be taken into account when addressing the gender pay gap.
- The **extensive and far-reaching obligations for employers** in the European Commission proposal for a directive on pay transparency **are likely to create a considerable administrative and financial burden**. The proposal also makes it extremely difficult for employers and enterprises to anticipate its impact on their activities and know how and when they have fulfilled their obligations according to the directive.
- SGI Europe believes that the Commission's proposal **lacks proportionality and subsidiarity** due to its extensive, detailed, complex, and unclear nature and raises many questions that must be answered. The specific situation of the public sector has not been taken into account in this proposal. One of its characteristics is the numerous gender-neutral collective agreements with high coverage.
- SGI Europe is concerned that these **unclearities and the detailed requirements will affect national labour market models and the capacity and autonomy of social partners** to maintain, negotiate, conclude, and enforce collective agreements following their tradition. Collective agreements with gender-

neutral wage-setting criteria are easily accessible in many Member States and monitored by the social partners negotiating, revising, and updating them.

- Social partners are responsible for determining the criteria for wage-setting systems via collective agreements, including ensuring that they are based on the principle of equal pay and that they are gender-neutral. **The final text of the directive should include sufficient flexibility and respect the different Member States' traditions and the autonomy and responsibility of the social partners, not only at the national, but also at the sectoral and local level.**

More: [Opinion on Pay Transparency](#)

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Proposal for a Directive on improving working conditions in platform work

- In our two-stage social partner's consultation, **SGI Europe called to refrain from proposing any definition of "platform work". It affirmed its strong preference for non-legislative instruments**, which could include, for example, "monitoring in the framework of the European Semester, guidance for ensuring fair platform work or reinforced mutual learning between Member States." SGI Europe also stated that better working conditions for platform work could be achieved through a combination of measures, such as the better support and strengthening of collective organisation and bargaining power of platform workers regardless of their employment status.
- SGI Europe expressed that **"platform work" covers many different realities and that there is no uniform labour market that can be called "platform work"**. Several Member States have been granting additional layers of protection to specific categories of self-employed. This diversity stands against a one-size-fits-all approach at the EU level through a binding legal instrument. Furthermore, specific issues related to platform work, such as algorithmic management and data protection, are already dealt with.
- Considering the new proposal for a directive, **it will now be crucial for the interinstitutional negotiations that the definition of the status of people that perform work through digital platforms – and whether they are to be seen as employees or self-employed – remains at the national level** in the hands of Member States, national social partners, or national courts.

More: [Response to the second stage consultation on a possible action addressing the challenges related to working conditions in platform work](#)

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European Pillar of Social Rights (EPSR) Action Plan

- The EPSR is an essential political commitment and a reference to guide policy choices. The full respect of the limits imposed on EU action and the principles of subsidiarity and proportionality is imperative.
- Seen the different models of labour market and delivery of SGIs in the EU, the responsibility of implementing the EPSR at national, regional, and local levels must be kept in mind. SGI Europe recalls that there is **no one-size-fits-all solution to achieve a fair, sustainable and inclusive society**.
- Instead of engaging in new legislations, the EPSR should now be about **fostering national ownership of the principles via the European Semester and guidance for the use of EU funds**. SGI Europe wants to materialise the vision of a social Europe relying on social dialogue and essential services, long-term care, healthcare, and housing. **The Pillar identified the importance of SGIs in the framework of Protocol 26** – i.e., quality, safety, affordability, equal treatment, universal access, and user's rights. Those considerations should become a reality in the implementation.
- The COVID-19 pandemic also had a tremendous impact on the provision of health and social care services in Europe. This adds to the already existing challenges of the healthcare system, such as years of underinvestment, recruitment and retention and demographic ageing.

More: [Response to Public Consultation on the Action Plan for the EU Pillar of Social Rights](#)

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Competitiveness

Digital Market Act

- The **DMA is an important starting point to ensure fair competition** in the digital world and increase consumer choice. The setup of a **swift and flexible intervention mechanism is essential to tackle structural competition concerns** raised by large digital platforms acting as gatekeepers which are not fully addressed under the current competition law framework. An ambitious DMA has the potential to **lead the way in defining better market dynamics in the field of core platform services**.
- Providers of SGIs serve the public good, protect fundamental rights and take Europe forward in serving and acting in the general interest whilst being critical players in the digital environment. **Global online players benefit significantly from the public infrastructures operated and provided by SGI providers across Europe and the content they provide**. The behaviour of these global online players and the regulatory framework on digital players have a significant impact on the activities of SGI providers.
- To ensure that the DMA reaches its objectives, SGI Europe calls for:
 - **Building fairer and better Digital Markets** for every EU citizen
 - Better inclusion of Member States for **more transparency**
 - Clear **definition of gatekeepers**
 - Improving **access to data**
 - **Prohibiting gatekeepers' self-preferencing practices**
 - **Preventing gatekeepers from bundling and tying services**

More: [Position Paper on the Digital Markets Act \(DMA\)](#)

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Digital Services Act

- By obliging the different types and sizes of platforms/intermediaries, the proposed DSA aims to increase and clarify a standard set of responsibilities to keep users safe from illegal goods, content, or services and protect their fundamental rights online. The DSA should also provide **more transparency and greater regulatory oversight** over these online platforms.
- SGI Europe believes that **Europe can set and lead the global standard for a more competitive, non-discriminatory, responsible, and fairer online environment** with the DSA. The EU has a unique opportunity to show digital leadership, highlighting the positive aspects of a modern digital single market that makes societies more inclusive, benefits European citizens and companies of all sizes and establishes a level playing field.
- SGI Europe has also addressed in its final recommendations some challenges that might hamper the development of a functional, fair, and competitive digital market, calling to:
 - Provide further and **clear definitions on obligation criteria** for online Platforms
 - Provide a clear **definition for Very Large Online Platforms (VLOPs)**
 - Secure the **application of sector-specific law** and **Member States' ability to regulate cultural issues**
 - **Protect editorial media content** and services from interference by online platforms
 - Enhance the **transparency of platforms' recommender systems**
 - Ensure that **what is illegal offline should be illegal online**, with clear instructions for individuals and entities to improve security on illegal activities and clear definitions in line with human rights.

More: [Position Paper on the Digital Services Act \(DSA\)](#).

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Industrial Strategies and the SME definition

- The current definition of small and medium-sized enterprises (SME) under EU law is based on the Commission Recommendation 2003/361/EC, which has subsequently been embedded in EU binding law by being included in the Commission Regulation (EU) No 651/2014.
- Under this legal framework, **SMEs mainly or entirely owned by public authorities do not fall under the EU definition of an SME**. This non-recognition has negative consequences on their access to financing opportunities by limiting the scope of funding and financial programmes available to them and

their right to benefit from administrative simplification measures, leading to distorted conditions of competition for public SMEs.

- SGI Europe considers that private and public enterprises equally small in their size are not accorded equal treatment. This definition contradicts the principles of the TFEU by creating discrimination between enterprises based on the ownership criteria.
- This situation mainly affects Local Public Services Enterprises (LPSEs) by restricting their ability to fulfil their mission of general interest as providers. **Given their strategic role in the EU territories, these public enterprises need to be supported, particularly in the recovery context.**

More: [Opinion "Rethinking the SME Definition"](#)

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Telecommunications, Transport & Energy

RED, EED and EPBD

- SGI Europe believes that **energy efficiency alone will not be sufficient to meet the targets set in the EU Green Deal**: energy efficiency will play a significant role in decarbonising the economy only if the European Commission adopts a climate-centric approach leading to a higher reduction of fossil fuel consumption.
- The Energy Efficiency First principle (EE1 principle) can be a helpful guideline across many sectors whilst being subordinated to the decarbonisation and reduction of climate impacts. It, however, can also be costly without prioritising the most critical actions for the climate. The **RED, EED and EPBD revisions should focus on a "climate-efficiency centric approach"**, with the need to reduce at the same time emissions and energy consumption, with more ambitious targets on carbon than on energy efficiency.
- SGI Europe calls for avoiding unnecessary "double legislation" with the EU energy and climate legislation. In evaluating future policies, the reviews should be done systematically with the a dual focus on both cost-effectiveness and carbon efficiency across all EU policies in all sectors. **A coherent policy between the EED, the RED, the EPBD and the ETS will enable a switch towards low-carbon energies and open a natural and economically efficient way** to deploy renewables.
- Given the ambition **to achieve a net-zero target for the EU by 2050, both renewable and low carbon gases will be necessary**. As the goal should remain the decarbonisation, a GHG indicator calculated along the value chain is the best indicator, promoting all types of renewable and low-carbon energies. Waste heat, energy from waste and residual materials are climate-friendly and GHG-neutral, equated with renewables. Member States should also be free to opt for the best options in this regard.

More: [Input to the Renewable Energy Directive II \(REDII\)](#), [Input to the Energy Efficiency Directive \(EED\)](#) and [Input to the Revision on the Energy Performance in Buildings Directive](#)

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Ten-E and a strategic approach to gas

- SGI Europe welcomes the Commission's guidelines for Trans-European Energy infrastructure to ensure its consistency with the 2050 climate neutrality objective and a more digitalised, decentralised, and sector integrated energy system. Intensified cross-border and regional cooperation will strengthen the resilience of the energy system, security of supply, and a clean energy transition. **SGI Europe believes that sector integration is vital to decarbonise the energy and transport sector, thereby unleashing the energy transition.**
- SGI Europe calls for an **all-inclusive approach in which all sectors work closely together to reach climate neutrality**. It is key to develop a **sustainable approach to gas and a low-carbon and renewable electricity market** to achieve this goal. Further electrification of the system, especially for individual mobility (cars) and heating and cooling, is important but will not be enough to meet the emission reduction targets. Moreover, electricity will not be sufficient for heating and cooling, particularly in urban areas where district heating and cooling systems play an important role.

- SGI Europe agrees that the **decarbonisation process in the energy sector must be cost-efficient for all sustainable technology types**. Sector integration and sector coupling must play a more significant role in European policies: stronger connections must be made between the electricity sector and other sectors such as heating, transport, industry, and gas.
- Innovative technologies such as **Power-to-Gas (P2G) will link sectors together**, with better use of decarbonised and renewable hydrogen playing an additional role. In this respect, the gas distribution infrastructure (DSOs) will likely gain bigger responsibilities, especially in reaching the goals in a cost-efficient way.

More: [Position on the Revision of the EU Gas Market Rules](#), [Input to the revision of the TEN-E guidelines](#)

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Transport and the Urban Mobility Framework

- **Urban Mobility must change substantively and fast.** The threats posed by the climate crisis call for immediate and concerted action at all levels of governance, whilst the green transition must not aggravate existing inequalities. **Public transport and active mobility (walking and cycling) are the most sustainable, affordable, democratic, dependable, and resilient modes.**
- With a coalition of actors in the transport sectors, SGI Europe calls for an ambitious urban mobility framework to foster a sustainable and just mobility transition. The Commission should adopt a **holistic approach towards the challenges** we must collectively face and not only focus on technological upgrades. Behavioural choices must be supported and encouraged by public transport and active mobility ecosystems.
- **Any solution that falls short of implementing a modal shift at the local level will take social inequality, economic inefficiency, congestion, and the local environment into the next decade.** Priority must be given to a radically expanded and more attractive public transport offer and more opportunities for active mobility, which will enable a carbon-neutral society whilst providing enhanced mobility for all; maximising the use of roads and rails; and reducing severance, congestion and pollution.
- **Public transport must be at the forefront of the Urban Mobility Strategy**, enabling it to achieve its maximum potential, in particular to:
 - Ensure that Sustainable Urban Mobility Plans (SUMP) **accelerate the uptake of sustainable and collective mobility;**
 - Support sustainable mobility with **appropriate funding opportunities;**
 - Create **multimodal mobility** on the ground and by harnessing the **benefits of data.**

More: [Position on the revision of the Urban Mobility Package](#), [Joint open letter on the EU's Urban Mobility Framework](#)

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Environment

Fit for 55

- SGIs are committed to **supporting the EU transition to a carbon-neutral model**. This transition must **balance the social, environmental, and economic dimensions**. The EU runs on SGIs, including local public services enterprises and semi-public SMEs, which are vital elements of our socio-economic model.
- Employers and providers of SGIs need the proper framework to **ensure the transition is just for workers and citizens**. The transitional pathways must offer workers quality jobs and provide financing incentives for citizens to renovate their homes and buy carbon-free. To that aim, we **welcome the proposed Social Climate Fund with a particular emphasis on alleviating social impacts** on the most vulnerable groups by offering new investment solutions to those affected by carbon pricing policies.
- **Coherence and a level playing field for all technologies need to be ensured**, with legal certainty, clarity, and consistency at the heart of the climate-neutrality path for 2050.
- SGI Europe notes the proposed extension of the ETS to transport and buildings, which should support setting an efficient carbon-pricing and send an economic signal to market actors to allow decarbonisation.

The extended ETS should provide a fair carbon price in the sectors covered and create a level-playing field for all technologies to incentivise investments that foster decarbonisation.

More: [Comments on the Fit for 55 Package](#) (Press release), [Input to the revision on the EU Emission Trading System \(ETS\)](#)

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Circular Economy

- The primary focus of **the EU approach to circular economy should be put on waste prevention** and on supporting Member States who risk failing recycling and waste prevention obligations. To enhance proper waste prevention, producers need to implement sustainability principles in product design.
- **Supply and demand for secondary raw materials are essential for developing a circular economy** and should be strengthened. To this aim, both legislative and economic measures must be applied to support the development of a solid market for secondary raw materials. An effective development system for end of waste criteria at the EU level should be considered, along with new requirements for recycled content for proper product categories.
- More support for **recycling methods in building infrastructures and adequate binding targets is needed**, such as fostering large-scale European experimentation in low-carbon construction and refurbishment systems that comply with recycling principles.
- **Waste-to-energy must be part of a sustainable circular economy** to implement the landfill ban, sink hazardous substances as a renewable energy resource, and recover secondary raw materials.
- **The enforcement of the waste hierarchy in every Member State must be prioritised** to reach the greenhouse gas emission reduction targets. For the waste sector, the aim must be to end landfilling of untreated municipal waste already by 2030.
- SGI Europe believes that the new EU Textile Strategy must be harmonised in line with the ambitious goals of the European Green Deal and the Circular Economy Action Plan (CEAP) and its related EU files to ensure a resilient, sustainable, and forward-looking development when making EU policies.
- The **new Textile Strategy is a necessity to make better use of the textiles industry and ensure better resource efficiency, whilst significantly improves its direct environmental impact on soil and water by introducing the polluter pays principle**. SGI Europe believes it is necessary to develop a functional method for recovering and recycling textiles.

More: [Opinion on the Circular Economy Action Plan](#), [Position on the EU Textile Strategy](#)

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Justice and Home Affairs

Migration

- Since 2017 (and renewed in 2020), the European Commission and the EU Social and Economic Partners (including SGI Europe) are jointly part of the **European Partnership for Integration**. The Partnership underlines the importance of a **multilevel, cross-sectoral approach for ensuring access to essential services such as housing, education and healthcare, and facilitating an early integration into the labour market**, benefiting both migrants and refugees and the economy and society.
- The **'Skills and Talent Package'** within the New Pact on Migration and Asylum could play a key role in tackling skills shortages and **directly connecting employers with eligible third-country nationals, requiring the active involvement of social partners**.
- The EU could use its resources, including diplomatic resources, to develop pre-departure infrastructure in third countries about the public employment services, universities, and training providers. Improving the recognition of professional qualifications and the validation of professional skills acquired in third countries remains essential. Making the EU globally competitive for high-skilled workers is essential, as we need to attract all levels of skills given the emerging needs in many sectors.
- **SGI Europe closely works with a large variety of actors at the local and national level**, promoting a multi-stakeholder approach, to provide affordable and accessible public services such as education,

healthcare and housing, whose crucial role in promoting migrants' social inclusion is emphasised in the New Action Plan on Integration and Inclusion 2021-2027.

More: [European Partnership for Integration offering opportunities for refugees to integrate into the Labour Market](#) and [Renewal of the European Partnership for Integration](#)

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Education and Culture

Skills and Education

- With its focus on "Strengthening skills intelligence", the European Commission rightly provided pathways to **address skills mismatch and shortages**. The existing articulations between the labour market and education and training programmes are insufficient. Developing a **shared understanding of future skills needs should help address the shortages experienced in essential utilities**.
- **Social partners have a central role to play in developing education and training**. Social partners should have the possibility to be more actively involved in the design and implementation of VET curricula. Social partners are the **best-placed to assess what skills are needed**. Better cooperation could help individuals in their career planning, facilitate mobility, and develop an overall educational strategy.
- It will be necessary to raise **further awareness about employment opportunities** and the challenges of the green transition, facilitate knowledge and experience-sharing across institutions and sectors, and promote the principles and values of sustainability.
- SGI Europe reiterates that a **one-size-fits-all approach is not appropriate to promote individual learning accounts (ILAs)**. The Commission needs to fully consider the tripartite opinion of the Advisory Committee on Vocational Training (ACVT). **ILAs** are only one possible tool and **should not replace existing employers or government-funded and/or social partners driven provisions to train** and other forms and modalities of training financing.

More: [Comments on the Update of the Skills Agenda for Europe \(joint with EFEE\)](#)

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General Affairs

Cohesion and the Long-Term Vision for Rural Areas

- SGI Europe **welcomes the new approach set out by the European Commission in the Long-term vision for EU's Rural Areas** and the intention to **address this issue holistically** for the first time at the EU level. Throughout the EU, every citizen and enterprise needs access to fast internet and secure energy, water, waste, and waste-water management. To that aim, **strengthening local services of general interest must remain at the heart of the Long-Term Vision for Rural Areas**.
- In the wake of the pandemic and to improve our resilience, it is now time to **adopt a new paradigm for Europe based on high-quality SGIs**. This approach should be shared throughout EU policy-making, especially concerning the green and digital transition.
- A successful long-term strategy for rural areas must include the **integration of SGIs to guarantee the sustainable development of our rural areas**. With its members, **SGI Europe will continue to shape more vital, more connected, prosperous and resilient rural areas**. Solutions should be designed for specific needs and assets with the involvement of regional and local authorities and local communities. Rural areas must deliver SGIs to become anchors for economic development and remain at the heart of the new Cohesion Policy.

More: [SGI Europe comments on the Long-Term Vision for Rural Areas](#)

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SGI Europe ongoing projects

Green Skills in VET (2021-2023)

- SGI Europe and the European Federation of Education Employers (EFEE) are jointly carrying out the European project "Green Skills in VET", aiming at **supporting EU public services and SGIs, as well as vocational education and training (VET) providers to build a skilled workforce for materialising the green transition**. The focus will be on three critical public services and SGIs to be affected by developing the resource-efficient and green economy: water, transport, and energy.
- This project aims to **create a lasting relationship between providers of education and training and public services and SGIs**. Such articulations will be indispensable for an efficient transition to climate neutrality, at the very core of EU action for the coming decades. The key angle for this project will therefore be to focus on education and training and the subsequent skills delivery to the labour market.
- In two years of activity, the project will target six Member States: the Netherlands, Portugal, Belgium, France, Germany, and Spain. SGI Europe and EFEE will work with project partners from their membership to **identify the current and future demands for green skills and jobs, improving VET providers' capacity to deliver green-oriented training and design standard solutions to adapt skills delivery in the context of a framework of collaboration between education and SGI providers**. In addition, SGI Europe will organise sectoral workshops to create a platform of dialogue and learning which will stimulate the exchange of best practices and seek to overcome the barriers that challenge the implementation of green-oriented training programmes.

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Involving SGIs in the European Semester (2021-2023)

- Public services' employers and SGI providers are essential actors of the European economy. They contribute to the European economy's competitiveness and social cohesion by **connecting territories and providing critical services to citizens and enterprises**. The **EU economic governance and the process of the European Semester have become a framework within which SGI Europe members can make active contributions**.
- SGI Europe and the three project partners, SALAR, UDES and UNISOC, intend to design tools and consultation methods to increase the quality of the input from the SGI employers and providers to the European Semester. For this to happen, the financial resources provided by the European Commission will be used to **create a structured involvement of SGI providers at the milestones of the Semester** – Annual Sustainable Growth Strategy, Country Reports and Country Specific Recommendations – **whilst further enhancing SGI Europe coordination capacities**.
- SGI Europe will **produce a methodology that will make its members' input more timely, structured, and relevant to the different Semester milestones**. Furthermore, after appointing National Semester Contact Points in its national sections, SGI Europe will organise a series of trainings to improve the knowledge and reinforce its Contact Points' participation in the Semester process.

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