

# Newsletter

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## Corporate Sustainability Due Diligence Directive: **BUREAUCRATIC MONSTER OR MEANINGFUL TOOL?**



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European companies are strongly committed to being part of the multifaceted and complex drive towards global sustainability and have for many years made environmental, social and governance (ESG) criteria a core component of their business strategies.

Facing an increasing number of different national regulations in this area, EU businesses have started to call for a harmonised approach to due diligence at EU level that would create a level playing field in the Single Market and take the complexity of modern global supply chains into account by setting out rules that are practical, effective and workable and that build on existing international instruments.

On 23 February, the European Commission launched its proposal for a Corporate Sustainability Due Diligence Directive, which sets an obligatory framework for companies to identify and act on adverse environmental and human rights impacts across their own organisation – and their entire value chain.

Unfortunately, the proposal as it stands does not deliver on the aspired goals. It is important to note that the Commission's own Regulatory Scrutiny Board (RSB) pointed to serious flaws in the impact assessment – not just once but twice.

The general criticism was that "the problem description remains vague and does not demonstrate the scale and likely evolution of the problems the initiative aims to tackle. It does not provide convincing evidence that EU businesses, in particular SMEs, do not already sufficiently reflect sustainability aspects or do not have sufficient incentives to do so."

With regard to policy coherence it states: "To ensure greater regulatory coherence, the report should consider aligning the personal scope better with the scope of parallel initiatives, such as the Corporate Sustainability Reporting Directive. It should also discuss more thoroughly how coherence will be ensured with the parallel sectoral and product due diligence initiatives and whether these could become (partially) superfluous."

These are just two of the RSB's many considerations, but they highlight a baseline problem with this proposal. It is too static. The co-legislators should not limit themselves to purely impose another stiff set of rules onto businesses. They should be more ambitious and aim at a process-oriented approach based on trust building and engagement that recognises that European companies want to and can be essential drivers for improving the HR situation and environmental performance on the ground.

This means that businesses should be expected to design their human rights due diligence processes in a way that is risk-based and proportionate to their potential and actual impacts. It also means that close attention has to be paid to unintended negative impacts regarding development goals.

As companies need legal certainty and have to minimise liability risks, they might feel forced to shorten supply chains and withdraw from regions with potentially problematic human rights situations and cease business activities.

This decision to "cut and run" instead of "stay and behave" would have serious implications. Global trade would be damaged and many employees in developing and emerging countries would lose their jobs. SMEs from these countries would be denied access to global supply chains.

It is worth mentioning a very recent [survey conducted on behalf of the German Federal Ministry for Economic Affairs and Climate Action](#), which asks, in view of this EU proposal, what can be done to increase the chances of promoting a "stay and behave" approach.



According to the report, preventive risk management can be significantly reduced if business partners operate in countries where human and labour rights are effectively enforced by the state and where violations can be brought before independent courts (low risk).

For countries whose legal systems are less reliable, there should be positive and negative lists for companies based there (high risk). The former should identify safe commercial partners, the latter unacceptable partners. An individual examination of human rights risks would then only be necessary for companies from non-secure supplier countries that are neither on a positive list nor on a negative list.

Such an approach has the potential to prevent red tape since all companies affected by the law in its current form would have to check all their commercial partners, resulting in inefficient duplication of inspections and verifications.

The EESC's opinion INT/973 on "Sustainable corporate governance", to be discussed at July plenary session, equally emphasises the need for regulatory and policy coherence. The UN Guiding Principles for Business and Human Rights (UNGPs) and the OECD Guidelines are the benchmarks that clearly outline the duties and responsibilities of all actors and we need to stick to these. They were drawn up and are continuously improved through intensive stakeholder processes.

The European Parliament and the Council of the EU have to choose: do they want to create a constructive, partnership-based, future-proof, outcome-oriented and real-world approach to sustainable global supply chains? Do they want to make sure that parallel product-related initiatives are better aligned? If so, then there is still a lot to do. We can assure the co-legislators that employers feel committed to contribute their share to ensure a successful outcome. This Directive touches upon the core business of our members. We have no choice but to get it right.



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# The Last Dance for Transatlantic Partners?

**In turbulent geopolitical times, there is a great responsibility for the European Union and the United States. Together with other like-minded partners, they must push forward a modern cooperation framework for trade and technology, which supports an open and sustainable economy, free and fair trade and respects values, decent work and human rights.**

The new EU-US Trade and Technology Council (TTC) could be a unique forum for co-operation between the world's two leading economies. Both parties must engage in building a permanent, effective TTC platform to achieve concrete results beyond political election cycles and changes of administration. Pragmatic work on improving international and transatlantic trade relations should continue regardless of who is leading the White House or the Berlaymont.

In the new geo-economics we should not underestimate the power of the EU and the USA. Although Brazil, China, India and others play a growing role in the world economy, the EU and the USA still have the most integrated, bilateral economic relationship in the world. It gives them a strong position on which to build modern rules-based international trade and to respond to rising market disruption by non-market economies.

The numbers are significant: today, US investments in the EU are three times higher than US investments in all of Asia. EU investment in the USA is eight times higher than EU investment in China and in India. Together the EU and the US economies account for about half of world GDP and for nearly a third of world trade flows. This gives them the needed license to operate in and to regulate world trade. Transatlantic rules and standards have the potential to become the model for global ones.

Due to ongoing crises, the EU and the USA must find ways to strengthen the resilience of open economies by securing value and supply chains, including the supply of raw materials and semiconductors and by supporting energy security and green transformation. Furthermore, the EU and the USA must invest in strengthening multilateralism and international co-operation by tackling not only challenges related to trade and investment but also to climate change, decent work and human rights. Therefore, they should continue the work to modernise the WTO, the UN and other inter-governmental bodies. Global challenges require global solutions.

Despite the close integration of the transatlantic economy, it is regrettable that we have not worked towards a bilateral EU-US trade agreement. Our trade is still mainly based on WTO/GATT rules and similar values behind trade practices. President Obama



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tried to push forward the Transatlantic Trade and Investment Partnership (TTIP), but those negotiations failed for various reasons. At the moment, president Biden is not keen on negotiating any new trade deals with the EU or any other states. On the EU side, only a few politicians have called for new EU-US trade deal negotiations.

Naturally on both sides of the Atlantic there should be always a readiness to make compromises and even negotiate bilateral trade deals, particularly when they would create added value for both partners. But trade negotiations are always hijacked by other sensitive and political concerns. It is nonetheless a first step to strengthen our ties via this new TTC, which is based on practical regulatory cooperation.

In order to avoid the failures of TTIP, transparency and stakeholder engagement are the only way for the TTC to reach its targets. The TTC is more like a bottom-up forum in which trade and technical experts, together with stakeholders, identify obstacles and possible solutions as to how to improve conditions for trade, investment, work, travel and study on both sides of the Atlantic. Under 10 TTC working groups experts are seeking solutions to tackle differences in legal and technical frameworks.

After one year of preparation, it is now high time for the TCC-platform, with its 10 working groups and high-level political leadership to begin to contribute short- and long-term solutions to improve bilateral and international trade and the investment environment. Concrete results are needed in order to keep all stakeholders engaged with the TCC. Otherwise, the TCC may lose its momentum to be an effective platform for contributing solutions to practical challenges. This may be the last dance for the transatlantic partners.



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# The cost of non-Europe is thousands of missed opportunities to deepen our internal market

**Almost 35 years after the publication of the Cecchini Report, the question of the "cost of non-Europe" is resurfacing as a relevant and useful perspective for advancing the debate on further European integration.**

The central idea is that the lack of common action at European level can lead to the economy as a whole becoming less efficient. Conversely, in specific sectors, pooling resources at EU level would enable us to forge a genuine economic, industrial and technological identity. The potential economic benefits of a given action can thus be measured in terms of additional gross domestic product (GDP) generated, public savings or other expenditure.

The Czech Republic has focused on this aspect for its presidency of the Council of the European Union, to build the strategic resilience of the European economy and deepen our single market. In Europe, we have the *acquis communautaire*. This is the sum of everything that we have managed to build together, and our single market should be a perfect illustration of this. In reality, however, nothing can be taken for granted, and the situation is getting worse.

Non-Europe is the fragmentation of this market. There are 27 separate governments that regulate our economies and our jobs, but also global issues such as sustainability.

40 years ago, European workers worked on average one week a year to finance 'non-Europe'. Five years later, non-Europe represented a loss of EUR 8 billion for businesses. In 2019, the collective cost of this fragmentation was estimated at EUR 990 billion.

To fully understand the issue here, if barriers to services are reduced by 50%, the potential benefits amount to some EUR 279 billion in additional GDP per year. A reduction of 80% would amount to EUR 457 billion in gains.

Let us also tackle barriers to the free movement of goods. These represent between EUR 228 billion and EUR 372 billion in economic benefits per year. The European Parliament debated these amounts in May.

The figures are there, and they are huge.

So what can be done?

Is it a financing problem? Not really. In April 2021, the Council adopted its Single Market Programme for the period 2021-2027. This has a budget of EUR 4.2 billion.

Because together we consider the internal market to be important, we are allocating ourselves a budget to make it clear that the internal market is important and must not be fragmented.

This is unusual to say the least.



Notification, use of regulations, maximum harmonisation, etc... we have the tools to make this single market work and reduce this cost of non-Europe.

Ultimately, non-Europe is also and above all our failure, the failed legitimacy of our work in the institutions, because each Member State seems to want to do better or differently on its own territory, by going back on the work that all had agreed on in Brussels, and changing it.

The report that the EESC has drawn up for the Czech Presidency will be discussed at the EESC's July plenary session. It is based on facts, to highlight the cost of non-Europe and also recommends that a number of tools should be used to address this problem. But it also highlights the absolute need to convince ourselves, as well as national legislators, governments and European citizens, that the European solution can take account of our specific characteristics, that it represents the best solution for cross-cutting and collective issues.

We must succeed in prohibiting any form of commercial, social, regulatory, fiscal or environmental dumping that distorts competition in our market.

A well-functioning single market is an essential prerequisite for our "open strategic autonomy".

I do not think that the work will stop with the report's adoption. It will still have to be put into practice. Preaching the good word in Paris, Berlin, Prague, Bratislava, .... fixing non-Europe is above all a question of will, and not just political will, and each Member State will have to be persuaded one by one.



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# Conference on the Future of Europe and significant next steps

## NO NEED TO REINVENT THE WHEEL

Concerns about the state of democracy around the world have increased the EU institutions' interest in strengthening citizens' participation in policymaking. New ways of involving citizens would complement representative democracy and voting in elections, as well as other existing forms of participatory democracy, such as public consultations or the European citizens' initiatives. The aim is to bring the EU closer to citizens. The Conference on the Future of Europe has been the most extensive recent experiment.

The most significant added value of the Conference compared to the various surveys addressed to citizens came from the interaction between citizens, policymakers, and other stakeholders with different backgrounds, and all this took place transnationally. It is much the same as what we are doing at the European Economic and Social Committee. We have discussions between employers, workers, and other representatives of organized civil society, and we are seeking common ground. It is extremely valuable that in this way the members with strong links to real-life actors in their constituencies systematically discuss EU issues transnationally and form joint opinions. The EU institutions should utilise this even more than they do at the moment.

Now that the final report on the Conference is ready, it is time to assess the successes and weaknesses of the Conference and to focus on its follow-up. Since this was the first time the Conference has been held, there are no established ways to handle the next steps. Of course, it is not intended that all 49 recommendations and 326 related measures will be automatically implemented as such.

Citizens were asked about their views on the future direction and the priorities of the EU. It is understandable that the EU institutions are responsible for the way these proposals might be implemented practically. The least that participants can expect is that the EU institutions clearly explain how they will proceed with the recommendations: why and how some of them are implemented and why some are not. EESC has asked for a dashboard that ensures transparency in the follow-up of the recommendations.

At the Conference, it was valuable that citizens were directly involved via the digital platforms, citizens' panels and in the plenary. Yet, we must be frank: in the end only a small number of them took part, and this must be taken into account in further reflections.

The European Parliament has already set out its own views on the way forward. They want to abolish the Member States' veto in most policy areas, which is, by the way, possible without amending the Treaties, and introduce new EU powers in areas such as health, energy, migration, and defence. In addition, they want a right of legislative initiative for Parliament. For the first time, the European Parliament has proposed amendments to the Treaties.



It is very unfortunate that the emphasis after the Conference and even before it, has been on institutional issues, especially on Treaty change. They are, of course, very practical, and important issues, but on the other hand, from the general public's perspective they can seem somewhat unfamiliar and bureaucratic. Less attention has been paid to the topics related to values, security, and the fight against climate change – issues, which were all emphasised throughout the recommendations.

In the Commission communication on the Conference on the Future of Europe and its follow-up, the Commission assessed the proposals of the Conference and categorised them. According to European Commission Vice-President Šuica approximately 10% of the proposals would require a Treaty change. Therefore, lots can and should be done without Treaty changes, the need for which also strongly divides the Member States.

The Commission communication lists legislation and other initiatives through which the Commission is delivering, or will deliver, on the proposals and measures resulting from the Conference. Unfortunately, the list does not include some of the key measures that the Employers' Group has strongly advocated for such as the competitiveness check, the innovation principle, and support for SMEs. These should receive much more attention, especially as we know that the EU now urgently needs major private investment to accelerate the green and digital transition and strengthen EU resilience.

In the future, the Commission will enable Citizens Panels to deliberate and make recommendations ahead of certain key proposals. It is still unclear how this will be done in practice. While this is being considered, it must be ensured that existing channels such as the EESC, as a representative of organized civil society and a bridge between the European institutions and civil society, are fully utilized. There is no need to reinvent the wheel.



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# Fit for 55 can only work if SMEs are on board

**Micro-, small- and medium-sized enterprises, be they traditional enterprises, family businesses, traders, social economy enterprises, crafts or liberal professions are an essential part of the solution towards a competitive, climate-neutral, circular and inclusive EU economy, provided that the right conditions are created and prevail.**

MSMEs generate a positive impact by improving their own environmental performance and by providing expertise and solutions to other enterprises, citizens and the public sector. While acknowledging and highlighting the diversity and different needs of MSMEs, specific attention must be paid to the smallest and most vulnerable ones.

Many MSMEs lack knowledge on the continuously evolving legislative requirements, established to deliver on achieving climate neutrality, and they do not know how to respond to them. Furthermore, they have difficulties in identifying potential business benefits and opportunities provided by the green transition.

Therefore, it is urgent to support MSMEs in understanding and managing the green transition in the best possible way. One tangible measure is to launch wide-ranging and targeted information and awareness-raising measures, delivered in a coordinated and complementary manner by the European Commission and Member States, together with business organisations, chambers, social partners and other relevant stakeholders. Another way to help them is through a comprehensive programme, aimed at supporting MSMEs through all the issues they face in their business operations and activities in going green and complying with legislation. As there are considerable differences between MSMEs, highly customised solutions and well-targeted policies and measures are necessary.

Immediate and targeted short-term support for MSMEs is pivotal for boosting their economic recovery from the pandemic and helping them manage the implications of the Russian invasion of Ukraine, such as high energy prices and lack of supply of materials and products. Due to the extraordinary circumstances, proper flexibility in the European Green Deal schedules should be given over time until the end of the crisis, while ensuring that the objectives are not abandoned for any reason.

To improve the resource efficiency of MSMEs, it is important to establish "circularity hubs" in various regions. This should enhance cooperation between companies across sectors and facilitate the development of new practices and processes, including demonstrating new technologies. MSME organisations, chambers, academia, social partners and other relevant stakeholders should be an integral part of the process. It is important to involve MSME representatives in preparing sectoral climate action roadmaps at national level, as well as in shaping the EU level transition paths for



various business ecosystems, thus also enhancing knowledge on sharing best practices, proper resource allocation and efficient implementation.

The EU and Member States shall accelerate green investments of MSMEs by ensuring an enabling, predictable and encouraging regulatory environment, including smooth permission procedures and avoiding burdensome administrative duties, as well as by providing fast, easy, simple and traceable access to finance, tailored to the different needs of diverse groups of MSMEs.

Close cooperation between education providers and MSMEs is key in shaping training to meet the competences and skills needed in the green transition, including through upskilling and reskilling of employees and entrepreneurs alike. Moreover, it is necessary to support innovation activities for the MSMEs by incentivising and facilitating cooperation with other businesses, their organisations, chambers, universities and research organisations.

Another aspect of support is the promotion of trade in green solutions produced by MSMEs, including in the context of public procurement, by providing MSMEs with a level playing field in the single market and by facilitating their access to foreign markets of green products, technologies and services. A competitive business environment must be ensured for EU enterprises in relation to third countries, deploying all means of diplomacy, including in the spheres of climate, resource and trade policy, and paying specific attention to moves by China and other emerging markets.

Europe will have to "Think Small First" to make Fit for 55 a success. We need to find ways to get SMEs on board and give them the chance to contribute to a climate neutral Europe.



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# An integrated and competitive defence industry will increase synergies with civil innovation

With a number of recent opinions, the CCMI has extended the scope of its work to the areas of security, defence and space, which have now become key elements of the European industrial system, and are now subject to intense regulatory action at EU level.

This has been a gradual process, starting with the Common Security and Defence Policy (CSDP) in 1999, the establishment of permanent structured cooperation (PESCO) in 2017, the launch of the European Defence Fund (EDF) in 2019, and the creation of the European Commission's Directorate-General for Defence Industry and Space (DG DEFIS) in 2021.

It is the industrial dimension in particular, from space to communications, from drones to dual-use goods, semiconductors and research and innovation policies, that is the main focus of the CCMI.

This has enabled the EESC to provide the European Commission with input and proposals on some important legislative initiatives, and thereby also contribute to the objectives of the March 2022 Strategic Compass, which aims to secure the EU's access to contested domains such as the cyber sphere, outer space and the high seas, and thus reduce strategic dependencies and streamline decision-making.

The CCMI opinions show that civil innovation and defence are closely linked and that civil applications increasingly draw on the same technological base, creating new synergies between the different research areas. This points in a clear direction. If technology is to be an enabler of a stronger and more secure economic system, the following elements need to be in place: state-of-the-art industries, efficient governance for data management, a financial system adapted to the needs of SMEs, public-private partnerships focusing on the most innovative sectors, a training system that responds to the needs of business, and the optimal use of human resources.

Undoubtedly, Europe has high-quality research institutions and a strong and diversified industrial base from which to build its response to the technological challenges and international competition. However, at national level, there are still regulatory obstacles, slow and cumbersome administrative procedures, and structural bottlenecks, which prevent Europe from fully harnessing its scientific, technological and industrial strength. This has prompted a series of suggestions to the Commission proposing, for example, that the existing regulatory framework for public procurement and state aid be rapidly updated.

On top of this is the fact that the enduring dividing line between defence and civil research, the absence of a specific regulatory framework at EU level, and the limited cooperation between Member States and lack of coordination are exacerbating the problems arising from the lack of public funding. All of this is



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particularly important because these areas are crucial for the open strategic autonomy and technological independence pursued at EU level.

Furthermore, the 2016 Global Strategy highlighted that a sustainable, innovative and competitive defence industry is essential, given that strategic autonomy in defence is equivalent to economic independence.

The update of the new 2020 Industrial Strategy (Building a stronger single market for Europe's recovery) in May 2021 also confirmed that technology leadership remains the key driver of competitiveness and innovation, particularly for critical technologies. The Commission's Action Plan on synergies between civil, defence and space industries, published in February 2021, also reiterated the urgent need to promote cross-fertilisation between civil and defence technologies.

This led to the Commission's recent decision to draw up a roadmap, on which the CCMI has set out its views in opinion CCMI/189 "Roadmap on security and defence technologies", which will be discussed at the EESC's July plenary session; this is a strategic document aimed at a holistic approach that transcends the strict boundaries between civilian and military objectives and covers both EU and national programmes.

In its opinions, the CCMI calls for a more integrated and competitive European defence market to be developed, by strengthening cooperation between States, which is a prerequisite for reducing costs and improving operational efficiency. This will enable Europe to decide and act without being dependent on third countries, when it comes to raw materials or technological devices.

Security of supply and supply chains, along with access to critical technologies, are crucial in this respect. That is why the European defence technological and industrial base is essential to enable the EU to ensure the security of its citizens while protecting its values and interests.



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## Letter to Commissioner Várhelyi

# UKRAINIAN SMES NEED TO BE SAVED NOW

Ukrainian businesses, and especially SMEs, need to be saved now to be able to act as the driver of reconstruction after the war. A joint letter signed by Employers' Group President Stefano Mallia, President Gennadiy Chyzhykov from the Ukrainian Chamber of Commerce and Industry and Executive Director Anna Derevyanko from the European Business Association in Ukraine called for immediate actions to support Ukrainian SMEs already during the war. The letter was sent to the European Commissioner for Neighbourhood and Enlargement Olivér Várhelyi.

As mentioned in the European Commission's Communication on *Ukraine relief and reconstruction*, the impact of the war on Ukraine's economy is immense and a major pillar of Ukraine's reconstruction has to be the support for "the recovery of Ukraine's economy and society by promoting sustainable and inclusive economic competitiveness, sustainable trade, and private sector development, while contributing to the green and digital transition of the country".

However, waiting for the end of the war to support Ukrainian companies, especially SMEs, will be too late. SMEs presented 99.9% of Ukrainian enterprises in 2019 and accounted for 55% of the country's gross domestic product. This vital sector of Ukraine's economy and society needs to be kept alive to act as the basis for Ukraine's future economic development. SMEs that close down now will be lost forever.

Having said this, in its resolution *Ukraine – from relief to reconstruction – proposals by the European civil society*, the EESC called for efforts "to provide emergency funding for SMEs in Ukraine, which should go first towards preserving these SMEs and then helping them to grow."

Whilst welcoming the support measures with which the European Union responded to the war in Ukraine so far, we are urgently calling for targeted support to specifically assist Ukrainian SMEs during this period of war. Such help should set up and further develop following initiatives:

- Helping SMEs to open offices/production facilities in safer parts of the country and to open temporary offices/production facilities in neighbouring EU countries,

- Granting comprehensive assistance, including legal support and advice, on conducting business in the EU,
- Fostering a broad B2B matchmaking platform including all sectors,
- Facilitating access to information about export opportunities for Ukrainian companies,
- Ensuring decent infrastructure and logistics to help those SMEs that continue to stay in Ukraine to move their materials and products,
- Providing access to finance,
- Facilitating the participation of Ukrainian SMEs in various programmes and grants,
- Supporting Ukrainian SMEs with the digital transition which will facilitate their access to markets outside of Ukraine too,
- Granting preferential conditions at trade exhibitions for SME representatives from Ukraine and providing free space for stands as well as organising business tours for Ukrainian company leaders abroad to share experience with foreign companies.
- Ukrainian SMEs need to survive now, in order to be the backbone of the Ukrainian reconstruction tomorrow.

The EESC Employers' Group and its Ukrainian partners, the Ukrainian Chamber of Commerce and Industry and the European Business Association in Ukraine, are convinced that the future of Ukraine needs to be strongly based on a thriving economy that can generate prosperity for all Ukrainians and that helps Ukraine on its way to EU membership, now as a candidate country.

In addition to the indicated urgent support, and with an eye to the period immediately after the war, we are therefore jointly calling for a strong focus on the reconstruction of a positive business environment for SMEs also in the scope of the Ukraine reconstruction platform as well as the deployment of necessary funds, including for educational programmes and training courses for employees and managers.

Read the full letter: [eesc.europa.eu/!6TkQpP](https://eesc.europa.eu/!6TkQpP)

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