



CONTRIBUTION TO THE CONSULTATION ON THE QUALITY JOBS ACT

28 January 2026

As the European Cleaning and Facility Services Industry (EFCI), the recognised employers' organisation and Social Partner for the cleaning industry sector, we welcome the opportunity to contribute to the **first-phase consultation on the Quality Jobs Act**. The EFCI supports the objective of the Quality Jobs Act and acknowledges the need for a European framework that ensures **job quality, competitiveness, and social sustainability**.

1 Identification of issues and possible areas for further EU action

The EFCI considers that the European Commission has correctly identified the **main challenges affecting job quality**, notably the enforcement of labour and wage conditions, risks linked to subcontracting chains, occupational health and safety, and the **central role of social dialogue and collective bargaining**. These issues are relevant across Member States and sectors, including cleaning and facility services.

At the same time, many Member States already have **well-developed legal frameworks, enforcement mechanisms and social-dialogue structures** in place. Any future EU action under the Quality Jobs Act should therefore:

- **Fully take account of existing national and sectoral instruments**
- **Avoid creating overlapping or disproportionate administrative burdens for companies**
- **Leave sufficient room for national and sectoral solutions**
- **Recognise sector-specific characteristics instead of applying a uniform approach to sectors with fundamentally different economic and operational realities**

For example, the cleaning sector differs significantly from the construction sector, even though both involve work related to immovable property or real estate services.

2 Need for the EU to address the identified issues (direction and scope)

The EFCI considers that EU action is needed, provided it remains supportive and

facilitating rather than prescriptive.

Supportive EU action focused on fair competition and enforcement

A key priority should be to **safeguard fair competition**, as regulatory frameworks in many Member States are already extensive and the main challenges relate to **unfair competition from rogue operators, abuse in subcontracting and social dumping**.

Based on the experience of labour-intensive sectors, it is essential to reinforce the link between **quality jobs and competitiveness** by ensuring **workers' dignity, fair competition among companies, and the creation of economic and social value**.

EU action should therefore focus on **improving cooperation between inspection and enforcement authorities across Member States** and supporting **targeted, risk-based inspections**, with **effective sanctions** where violations of legal and collective bargaining rules occur, in particular regarding **pay and social contributions**.

More broadly, unfair practices are often linked to the presence of **vulnerable workers** who may be insufficiently aware of their rights and duties, a situation that can affect, though not exclusively, **workers with a migration background**. In this context, **EFCI encourages the EU to strengthen efforts towards clear, legal and well-planned migration pathways**, supporting **effective integration, training and employment**, and fostering a **skilled workforce**.

Strengthening workers' awareness of their rights and responsibilities and ensuring **effective enforcement** can significantly improve job quality and reinforce a **competitive system based on clear rules, legal certainty and effective sanctions**.

Subcontracting: building on existing national liability frameworks

Regarding subcontracting, the EFCI underlines the importance of **existing national liability mechanisms**, including **joint and several liability, registration and notification systems and chain responsibility**.

Any EU measures should **build on these frameworks**, take account of **sector-specific characteristics** and **avoid imposing additional administrative burdens** on companies that comply with the rules.

Gaining competitive advantages through **opaque or unlawful practices** related to workers' remuneration or social contributions should be made **difficult and risky**, in order to protect both **workers' dignity and law-abiding businesses**.

Health and safety: addressing sector-relevant risks with practical tools

In the area of health and safety, EU initiatives should focus on sector-relevant risks, notably **ergonomic workloads, risk identification and assessment**, and **safety** when working at third-party premises. EU support should prioritise the provision of **practical tools** to help companies and workers **identify and manage ergonomic and psychosocial risks**.

Telework-related issues are of limited relevance in many labour-intensive sectors.

Digitalisation: enabling innovation through guidance, not new obligations

The EFCI notes that in the cleaning sector, technology is primarily used for **operational purposes** such as **planning, time registration and quality monitoring**, while the use of **advanced AI or intensive monitoring remains limited**.

EU action should therefore take the form of **non-binding guidance and the exchange of best practices**, ensuring that regulation **supports digitalisation and innovation rather than hindering them**, and **does not create additional administrative obligations**.

Just transition and restructuring

While labour-intensive sectors experience **few traditional restructurings**, frequent changes of contracts and transfers of personnel are common and are often addressed through **existing legislation and collective agreements**.

EU action should **respect these mechanisms** and **avoid adding unnecessary complexity**.

3 Necessity to initiate a dialogue under Article 155 TFEU on any of the issues identified in this consultation

The EFCI considers that **such a dialogue can be positive and meaningful**, subject to certain conditions.

Any **EU-level social dialogue** should remain **complementary to existing national and sectoral collective labour agreements**, preserve the **necessary flexibility for integrated service sectors such as cleaning**, and ensure that measures are **adaptable to the diversity of national collective bargaining systems**.

National social partners should be systematically involved, and any outcomes should be **proportionate to the complexity of the sectors concerned**.



In this context, the EFCI would favour results in the form of **recommendations, practical tools and the exchange of best practices**, rather than binding instruments, in order to support **effective implementation** while respecting **established social dialogue frameworks at national and sectoral level**.