



EFCI'S POSITION ON THE EU PAY TRANSPARENCY DIRECTIVE

18 May 2026

The European Federation of Cleaning Industries (EFCI) fully supports the objectives of the Pay Transparency Directive towards strengthening gender equality and ensuring fair and transparent pay practices across the European Union. At the same time, **effective delivery of these objectives requires implementation that is pragmatic and workable in practice**, particularly in labour-intensive sectors such as cleaning and facility services. In this context, the EFCI puts forward the following recommendations:

- Phased and supportive implementation
 - EU level targeted simplifications
 - Proportionate national implementation, avoiding gold-plating and duplication
 - Recognition of certification schemes
 - Acknowledgement of collective bargaining as pillar of fair pay systems
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1 Phased and supportive implementation

The EFCI calls on the European Commission to actively support a **phased and supportive implementation** of the Directive. In particular, the Commission should promote a gradual approach to enforcement, particularly in the initial phase following transposition. This should include providing clear guidance and coordination to Member States to prioritise capacity-building, compliance support and corrective measures over sanctions, and to allow sufficient time for companies - especially SMEs and labour-intensive sectors - to adapt to the new requirements.

Furthermore, the Commission should make full use of its powers to provide **practical guidance**, including on key concepts such as the assessment of work of equal value, reporting methodologies, and data requirements. Clear and harmonised guidance will be essential to reduce legal uncertainty and ensure consistent application across Member States.

2 EU-level targeted simplifications

To ensure a practical and workable implementation of the EU Pay Transparency Directive, **targeted simplification measures should be developed at EU level**, complemented by coherent national approaches, while fully preserving the Directive's core obligations. In this context, the European Commission should support Member States and social partners by:

- providing **clear and standardised methodologies** for the assessment of work of equal value
- ensuring **proportionate and streamlined administrative processes**, particularly for SMEs
- implementing **GDPR-compliant and practical data collection and reporting tools**
- offering **clear guidance on the application of burden of proof and comparators**

Such measures would reduce administrative complexity and legal uncertainty, while ensuring effective and consistent application of the Directive.

3 Proportionate national implementation avoiding gold-plating and duplication

The EFCI calls on Member States to ensure that the **transposition of the Directive remains strictly limited to its requirements, avoiding gold-plating** and ensuring simple, clear, and workable rules. Implementation should be aligned with existing national frameworks to avoid duplication of obligations and unnecessary administrative burden.

In procurement-driven sectors such as cleaning and facility services, particular attention should be paid to **avoiding cumulative and overlapping compliance requirements** stemming from the Directive, collective agreements, tender rules, and existing certification or reporting frameworks. Such overlaps risk creating significant administrative burden without corresponding added value in terms of pay transparency or equal pay objectives.

4 Recognition of certification schemes

The EFCI urges the European Union and Member States to promote **a non-duplicative approach** by recognising established non-discrimination and social responsibility certification schemes - such as SA8000, PAS 24000, UNI/PdR 125, and ISO 30415 - as **supporting evidence of structured compliance systems**. Transposition and enforcement frameworks should take these systems into account by enabling **streamlined reporting, reduced administrative overlap, and risk-based supervision**, while fully preserving the Directive's core obligations.

5 Acknowledgement of collective bargaining as pillar of fair pay systems

The EFCI stresses that collective agreements in many Member States already ensure transparent, non-discriminatory and gender-neutral wage-setting systems, particularly in labour-intensive sectors. **National transposition measures should therefore recognise these systems as compliant with the objectives of the Directive** and avoid imposing duplicative or conflicting obligations. Implementation must fully respect the autonomy of social partners and the binding nature of collectively agreed remuneration structures, in line with Article 152 TFEU.