



European Cleaning and  
Facility Services Industry

## EFCI'S CONTRIBUTION TO THE SECOND-PHASE CONSULTATION ON THE QUALITY JOBS ACT

---

28 September 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 second-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 Views on the objectives of possible EU action**

The EFCI supports the general objectives of the Quality Jobs Act initiative, particularly the aim of improving job quality, promoting safe and inclusive working environments, and supporting digital and environmental transitions in a socially sustainable way.

We have no objection to these objectives, provided that **any initiative takes into account the competitiveness and organisational and economic sustainability of businesses, as well as the diversity of sectors and economic realities**. In this context, competitiveness should remain a key enabler of quality jobs, while existing legislation should be effectively implemented and enforced before new obligations are introduced.

In particular, we consider the following priorities:

- **Strengthening occupational health and safety**, with particular attention to ergonomic, psychosocial and climate-related risks;
- **Supporting skills development and the management of professional transitions**;
- **Promoting the responsible and transparent use of artificial intelligence** in organisational settings;
- **Strengthening social dialogue** as a key tool for managing change.

Any new measures should be proportionate, sector-sensitive and SME-friendly, avoiding a one-size-fits-all approach to diverse economic realities. Collective bargaining and established national social dialogue structures should remain the preferred mechanisms for addressing sector-specific workplace issues and managing change.

---

## **2 Views on the possible avenues for EU action**

The EFCI welcomes EU action aimed at improving job quality, protecting workers, promoting fair competition and disseminating good practices across the different areas covered by the consultation. In our view, improving job quality and maintaining competitiveness are not competing objectives. In labour-intensive sectors such as contract cleaning, sustainable pricing, effective enforcement against non-compliant operators, investment in skills and proportionate regulation are among the most effective ways of delivering genuinely high-quality jobs across the EU.

Against this background, EU action should focus on the following areas:

- **Skills, training and workforce development:** The EU should support investment in skills, training and reskilling, particularly in the context of the green and digital transitions. Companies and social partners should have a meaningful role in designing and implementing transition pathways that reflect the practical needs of different sectors and workforces.
- **Occupational health and safety:** The EU should continue to modernise the occupational health and safety framework to reflect evolving forms of work, including telework and the widespread use of digital devices. At the same time, employers' responsibilities should remain proportionate to their actual ability to influence and control the working environment.
- **Effective enforcement and fair competition:** EU action should prioritise effective enforcement against rogue and non-compliant operators, social dumping and violations of workers' rights. Ensuring a level playing field through better enforcement would contribute to both worker protection and fair competition, without placing additional burdens on compliant businesses.
- **AI and algorithmic management:** The EU should promote greater transparency in the use of AI and algorithmic management and ensure meaningful human involvement in decisions that have a significant impact on employment relationships. However, any new requirements should be proportionate and should not discourage innovation or slow the adoption of digital tools that can improve efficiency, service quality and worker safety.

- **Subcontracting:** The EU should address abuses and ensure respect for workers' rights while recognising that subcontracting is a legitimate and often indispensable organisational model in many sectors. EU action should therefore focus on tackling non-compliance rather than restricting lawful subcontracting models. Broad full-chain liability requirements or measures that impose responsibilities disproportionate to a company's actual ability to influence subcontractors should be avoided.
- **Proportionate and coherent regulation:** New EU measures should complement, rather than duplicate, existing legislation and should take account of the specific circumstances of SMEs and labour-intensive sectors. New reporting, consultation and compliance requirements should be carefully assessed to avoid unnecessary administrative burdens or disproportionate costs that could undermine competitiveness.

Overall, EU action should seek to combine stronger worker protection with a competitive and adaptable business environment. Effective enforcement, investment in people and skills, meaningful social dialogue and proportionate regulation can contribute simultaneously to better jobs, fair competition and sustainable competitiveness across the EU.

### 3 Views on the proposed instruments

The contract cleaning industry believes that the **choice of instruments under the Quality Jobs Act should be guided by the principles of proportionality, regulatory simplification and EU added value**. Any legislative action should be limited to areas where genuine regulatory gaps exist or where significant differences between Member States undermine workers' protection, fair competition or the proper functioning of the internal market.

**Where well-established regulatory frameworks already exist**, including in areas such as data protection and occupational health and safety, **preference should be given to non-legislative instruments and implementation measures**, including Commission guidance, interpretative guidelines, practical implementation support tools, the collection and dissemination of good practices, sectoral guidance and social partner agreements, alongside stronger enforcement of existing rules.

The preferred approach should strengthen legal certainty and enforcement against non-compliant operators, while supporting competitiveness, minimising administrative burdens, particularly for SMEs, and preserving the flexibility required in labour-intensive service sectors

such as contract cleaning. Simplification, capacity-building, effective enforcement and social dialogue should be key implementation mechanisms for achieving the objectives of the Quality Jobs Act.

---

#### **4 Willingness to enter into negotiations under Article 155 TFEU**

The contract cleaning industry fully recognises the value of European social dialogue and the central role of the social partners in developing balanced and sustainable solutions. **The industry would therefore be willing to support negotiations under Article 155 TFEU where social dialogue can deliver clear practical added value**, particularly in areas with a strong organisational and sector-specific dimension.

This could include just transition, professional transitions and workforce adaptation to technological change, skills development, work organisation, and principles for the responsible deployment of artificial intelligence and algorithmic management at work. These areas are well suited to flexible, sector-sensitive solutions developed jointly by employers and workers' representatives, including through the promotion of social dialogue and the exchange of good practices.

At the same time, **any negotiations should ensure an appropriate balance between worker protection, business competitiveness and the diversity of national industrial relations systems**. They should respect the principles of subsidiarity and proportionality, the autonomy of the social partners and the specific circumstances of different sectors, particularly labour-intensive sectors and SMEs.

Issues such as occupational safety and health minimum standards and subcontracting liability frameworks may, where appropriate, be better addressed through legislative processes and national implementation mechanisms rather than through Article 155 negotiations.