



Brussels, 08 February 2022

## **Consultation Meeting with Social Partners on Learning Mobility**

### **ECEG's Written Feedback**

The European Chemical Employers Group (hereafter: [ECEG](#)) would like to take this opportunity to submit its written feedback to the Commission's Consultation on learning mobility. The association already expressed its views during the meeting with the Commission (25 January), where ECEG's Chair of the Working Group Education & LLL, Ms Anni Siltanen, participated.

#### ***1. Do you agree with the general objectives and scope of the initiative?***

The ECEG fully agrees with the general objectives and scope of the initiative. Improving learning mobility for apprenticeships and teachers is of the outmost importance for the industry.

More specifically, ECEG shares the concerns expressed by CEDEFOP in its study<sup>1</sup>, which identify several challenges both at institutional, system levels but also in terms of mobility for employers. Identifying main obstacles for an effective mobility policy, is the first step to find short and long-term solutions.

**2. Do you consider the mobility of VET learners and in particular apprentices a priority in your sector and, if so, what are the main obstacles?**

In the chemical, pharmaceutical, plastics and rubber industries, mobility is a key priority. More specifically, ECEG considers that (long-term) mobility is beneficial, both for students, but also for apprentices especially in terms of acquiring language and soft skills.

In line with the CEDEFOP's analysis, the ECEG has however identified several challenges and barriers to a well-extended use of mobility programmes, namely:

- **Possible brain drains from some countries.** Mobility might be more beneficial for larger and financially stable EU countries, while smaller countries and/or countries experiencing financial instability, might suffer from brain drain. The same applies to less industrialised countries and/or where a "rare" language is spoken. These countries may indeed be less attractive for apprenticeships.
- **Risk of losing manpower.** Certain companies, especially SMEs, might fear brain drain from their companies to bigger ones, as a consequence of mobility. Enterprises are therefore not always encouraged to promote mobility programmes to avoid loss of human capital.
- **Lack of administrative capacity,** especially for SMEs that at times lack necessary infrastructure, administrative, and financial means to support mobility, in addition to awareness on existing funding, and how to put mobility structures in place.

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6. <sup>1</sup> [\*Cross-border long-term apprentice mobility - Making it work: suggestions for national policy-makers\*](#), June 2021; [\*Enablers and disablers of cross-border long-term apprentice mobility: evidence from country- and project-level investigations\*](#), September 2021.

**3. Within the overall mobility of VET learners, what is the importance of apprentice mobility (including long-term mobility) in your sector? Is there an unmet demand by apprentices and companies?**

A **European way of comparing VET skills and competence needs** should be put in place in the long run. Employers would therefore be able to assess skills and competences gained abroad and compare these to local requirements.

Looking at the demand by apprentices and companies, ECEG does not have specific data, at this stage.

**4. What actions can be undertaken at the EU level, in terms of policies and tools, to better support the mobility of apprentices and of adult learners respectively? If so, what specific issues should be considered?**

To better support mobility of apprentices and adult learners, ECEG suggests the following actions to be coordinated and taken at EU level:

- To have a **systematic approach** to understand **how learning periods are documented**. Thus, long-term mobility will be beneficial since employers can better evaluate apprentice's skills and competences.
- A **European way of comparing VET skills and competence needs** to be put in place in the long run (See reply to Question 3).
- In order to avoid brain drain from some Member States to others (see answer to Question 2), the **language** issue should be addressed. English is certainly a *lingua franca* for mobility issues. Mobility to countries with "rare" languages (i.e., Baltics states, South European countries, etc.) might need extra support both before and during the mobility period.
- **Awareness raising campaigns** on existing EU initiatives and fundings, such as Erasmus+ budget line, which supports mobility programmes both for students and apprenticeships.

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#### About ECEG

ECEG, the European Chemical Employers Group, founded in 2002, is a recognised European Sectoral Social Partner, representing the chemicals, pharmaceuticals, rubber and plastics industries in Europe.

Our sector provides approximately 3.3 million direct jobs in more than 94.000 enterprises.