

Commission Consultation on a European Qualifications Framework for Lifelong Learning

Position of Swissmem

Swissmem is the Association of the Swiss Mechanical and Electrical Engineering Industries, representing about 950 member companies with some 135'000 employees.

General Remarks

The Europe-wide transparency of acquired qualifications decisively facilitates mobility across borders between countries and languages. However, the success of such a system is closely linked with preconditions, such as e.g. (a) an **easy handling and understanding** of the tool and, thus, (b) a complexity as low as possible as well as, compared to already available tools, (c) a **clear added value for employees and employers** in all European countries. If the European Commission is creating a complex system that is of little use for employers, it will be largely neglected in the private sector. Thus, the aim has to be a simple and transparent tool with a clear added value for employers across geographical borders.

It is questionable whether, after the creation of the **Europass**, a reference system such as the EQF is necessary and beneficial at all. Due to the broad variation of educational systems and to cultural aspects influencing e.g. the description and recognition of competencies, it is highly unlikely that the ambitious initiative of the European Commission will become a great success.

The EQF-project as it is presented today certainly does not fulfil the preconditions mentioned above. The proposed **system is far too complex** to effectively support (larger) companies in recruiting staff from abroad. Thus, the proposal from the European Commission needs to be simplified considerably, clarified and tested extensively (!) in order to improve and ensure its usefulness for (larger) employers.

Swissmem welcomes the fact that the envisaged tool should encompass both, higher education and vocational education and training. Lifelong learning eventually will close the gap between these two largely separated educational systems.

Specific comments

As companies in other European countries, Swiss industry will increasingly depend on highly qualified employees. Due to the demographic development, highly qualified workers may become scarcer than they are today. As a consequence, mobility of employees across borders to more attractive companies and jobs may well increase. A simple system to present the competences and qualifications acquired will be an asset for employees and may facilitate recruitment in companies.

A knowledge/competence/skill frame needs to be **output oriented**. The **description of the qualifications** (knowledge skills and competences) and not the time spent for educational purposes must be in the focus of such a tool which has to clearly characterise the abilities of any person on the job

market and ultimately to **improve and facilitate recruitment of personnel** (matching of presented personal profiles with defined job profiles). It is questionable whether, in comparison with the Europass, the EQF will effectively facilitate the difficult recruitment task.

The present EQF initiative proposes a system of 8 different competence levels. Taking into account that the **precise definition of a given person's levels of competencies as well as their interpretation** are rather done in an individual than in a uniform manner, such a sophisticated system may not become a useful and highly used tool to guide potential employers.

As there are numerous projects on their way – either on national or sectoral level – it remains obscure how the proposed EQF could foster an alignment of e.g. sectoral initiatives. Will it be an **inspiring reference paper** and merely remain a **source of ideas**?

If the EQF-project is to be continued, it has to be subject to an **extended trial phase involving several national systems and sectors** in order to clearly **prove its usefulness** as well as its compatibility with existing systems. In case of serious deficits, the idea of an EQF would have to be abandoned.

Since the national education and training systems vary widely and since the description of knowledge, skills and competences is not uniform and in part even depending on cultural influence, a system like the **EQF must not have a compulsory impact** on national qualification, classification and certification systems.

Conclusion

Swissmem has considerable doubts that the proposed EQF will become a widely used tool and that it will be useful for industrial companies. Due to the shortcomings – e.g. the complexity, the **vast room for interpretation** and, as a consequence, the **limited reliability** of the system –, it is questionable whether the European Commission should continue its efforts on such a sophisticated system. From an employer's point of view, it is hard to see any added value. In contrast, the Europass is a useful and simple measure already established here and there. If the Commission decides to proceed with the EQF, an extended trial period has to be introduced in order to improve the system and to adapt it as good as possible to the real needs e.g. of employers.

December 22, 2005 / PS