



EUROPEAN COMMISSION

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Dear President,

The Commission would like to thank the Bundesrat for its Opinion regarding the Commission Communication "Rethinking Education" {COM(2012) 669 final} and apologises for the delay in replying.

The Commission is of the view that the Communication is neither a work programme, nor a legislative proposal. It constitutes a basis for discussion on the priorities in education and training cooperation. As a response to the Communication, the Council adopted conclusions on "Investing in education and training" on 15 February 2013. They welcome the central role assigned to education and training as a key driver for growth and competitiveness as well as the importance attached to skills, education, training and lifelong learning in enhancing employability and, in particular, tackling and preventing youth unemployment. In this context, the Council conclusions also invite the Member States to strengthen the role of education and training in the Europe 2020 Strategy.

The priorities listed in the Communication reflect the double challenge – youth unemployment and lack of skilled work force. They identify ways to build education and training systems that are better targeted towards the skills and competences required by labour markets. EU-level policies are designed to support national actions and help address common challenges. In this spirit, the EU Agenda for Modernising Higher Education identifies key issues to be taken forward by the European Commission, the Member States and higher education institutions.

The so-called Open Method of Coordination (OMC) does not foresee any harmonisation of national systems. The Europe 2020 process neither changes the division of competences laid down by the Treaty, nor does it challenge Member States' responsibility for their education and training systems. The issuing of country specific recommendations to Member States regarding their capacity to provide the skills needed for economic growth and employment is based on Art 145-150 TFEU on employment policy. The use of benchmarks and indicators is an important element of the OMC.

The Commission acknowledges the inclusion of ISCED97 level 4 in the German national target on tertiary attainment. In the annual monitoring through the Education and Training Monitor, results for Germany are presented both as defined for the national target and as defined for the calculation of the headline indicator in EU27 (ISCED97 levels 5 and 6). However, for the purpose of international comparability of the headline indicator, the Commission does not regard ISCED97 level 4 attainment to be equivalent to attainment at

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higher ISCED levels. The implementation of ISCED 2011 is expected to provide further clarifications regarding the attainment levels assigned to qualifications in different countries.

The Commission shares the concerns of the Bundesrat regarding the indicator used for the benchmark on adult participation in lifelong learning. The current five year frequency of the AES is unfortunately not suitable for benchmark monitoring and not all Member States participated in AES 2007. Work has been undertaken by Eurostat to examine the possibility of introducing a reference period of 12 months in the LFS. However, Member States have so far been reluctant to extend the reference period in the LFS. The Commission will continue to work with Eurostat and Member States on this issue, and a revision of the benchmark might be considered.

The Commission takes note of the fact that the German Bundesländer will not be taking part in the planned second European survey on language competences. It can assure the Bundesrat that the second round of this survey will be considerably simplified. The survey is not an end in itself but an operative way to follow progress towards the previously agreed objective for language learning in Europe. Given the Eurydice data on teaching content in lower secondary level in all Member States, the proposed benchmark for the second foreign language seems realistic.

The Commission is fully aware of the fact that a competence framework in the field of teacher training cannot be prescriptive. There has been an intensive collaboration at the European level in this field within the OMC over many years. The experts involved are well aware of the excellent German standards in teacher training.

The Commission welcomes the Bundesrat's support for greater consistency between the European Qualifications Framework, the credit systems and other tools for transparency and/or recognition. The vision behind the proposal for a European Area for skills and qualifications is to clarify, simplify and further develop existing tools and mechanisms.

The Bucharest Communiqué adopted the automatic recognition of comparable academic degrees as a long-term goal of the EHEA, and agreed to support a pathfinder group of countries in exploring ways to achieve this. The group has concluded that for automatic recognition to be possible, a shift away from individual recognition decisions towards system-level recognition is necessary.

In the light of the economic crisis, the efficiency of public funding has moved up high on the European agenda, including for the education and training area. The Commission is fully aware of the complexity of this undertaking and will ensure close cooperation with governmental and academic experts from the Member States and international organisations such as the OECD.

The Commission entirely agrees with the Bundesrat's views on the purpose of education. In spite of the Communication's focus on skills and competences for employability it fully embraces the holistic and individual-centred approach to early development.

The Commission confirms that all competence frameworks are optional and non-prescriptive. The development of entrepreneurship education is a priority, given the fact that Europe is lagging behind in entrepreneurial skills according to international comparisons. Assessment methods are far from satisfactory at this stage. These issues are addressed through the OMC.

The new EU Initiative on "Opening up Education" will be presented in a Communication to be published in mid-2013. One of its objectives is to integrate ICT in education and training through a combination of innovative pedagogies with an effective use of digital tools, like open educational resources, to improve the quality of teaching and learning processes and to provide the digital competences necessary for a knowledge-based economy and society.

The Commission bases its analysis on recognised sources. Eurostat is the main supplier of data, supplemented where necessary by OECD data or individual studies. The Commission notes that currently there is a lack of data sources to fully capture different elements of entrepreneurial competences. Amongst existing sources the Global Entrepreneurship Monitor (GEM) has the benefit of being a well-established annual assessment of the entrepreneurial activity, aspirations and attitudes of individuals across a wide range of countries. The Commission has recently set up an expert group to evaluate existing indicators and recommend future data developments in this area.

The Commission hopes that these clarifications address the concerns raised in your Opinion and looks forward to continuing the political dialogue with the Bundesrat.

Yours faithfully,

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Vice-President*