



EUROPEAN COMMISSION
Impact Assessment Board

Brussels,
D(2012)

Opinion*

Title **DG EMPL - Analytical document accompanying the second stage consultation of the social partners on a Quality Framework for Traineeships**
(resubmitted version of 22 October 2012)**

(A) Context

Despite the benefits of traineeships, concerns about the effectiveness and quality of traineeships have been recognized by European Institutions. In 2010, the European Parliament called specifically for better and secured internships; for a European Quality Charter setting out minimum standards for internships to ensure their educational value and avoid exploitation; and for young people to be protected from those employers who are "exploiting the willingness of young people to learn without any future prospect of becoming fully established as part of their workforce". In 2011, the European Commission foresaw in its Youth Opportunity Initiative the launch of a Quality Framework on Traineeships by the end of 2012. The purpose of this analytical document is to support the decision of a possible launch of the second stage consultation with the social partners on the content of a possible EU initiative in this area. In order to fully respect the autonomous decision-making of the social partners, this document does not compare policy options or identify a preferred policy option. In case that the European social partners decide not to start negotiations in response to this consultation or do not reach an agreement, a full impact assessment report will accompany any further EU action in this area.

(B) Overall assessment

While the analytical document has been improved to some extent in line with the recommendations issued by the Board in its first opinion, it requires further work on a number of issues. First, the document should further strengthen the problem definition, by providing a clearer indication up-front of the key problems to be addressed. Notably, the document should better prioritise the key issues, and present a more developed baseline scenario that shows the evolution of the problem drivers taking into account the current economic situation and outlook. Second, it

* Note that this opinion concerns a draft impact assessment report which may differ from the one adopted

** On 26 October DG EMPL informed the Board that the responses to the first stage Social Partner consultation, which closed on 23 October, confirmed the views as expressed in the public consultation and committed to up-date the IA report accordingly.

still needs to demonstrate the need and value added by EU action, by more convincingly showing why Member States cannot address the key problems adequately and subsequently linking the reasoning to the appropriate legal basis. Finally, the document should better describe the concrete content of the policy avenues and provide more details on the potential impacts and costs, for all actors involved, in order to be better informed on the benefits of a potential initiative at EU level.

(C) Main recommendations for improvements

(1) Strengthen the problem definition and the baseline scenario. The document should still better distinguish up-front between the key problems that justify an EU action (e. g. ensuring valuable quality learning content of traineeships across the EU, facilitating cross border traineeships) and other issues, such as the lack of compensation. The reference to 'low pay and proper social protection coverage' as problematic issues are misleading and should be removed. The report should better clarify in section 2.1 ('Definitions') that unlike apprenticeships, traineeships are not employment contracts in most Member States. Moreover, the document should present a more developed baseline scenario by providing a clear description of how the individual problem drivers would evolve in the absence of further EU measures and by describing how the situation might be exacerbated by the current economic situation and outlook.

(2) Better demonstrate the need for EU action. The document still needs to demonstrate the necessity, added value and proportionality of EU action, by better linking the objectives of the initiative to the identified key problems. It should clearly show why Member States alone cannot sufficiently address the key problems and subsequently link that reasoning to the appropriate legal basis.

(3) Better present the content of the policy avenues and better analyse the impacts and costs. The purpose of this analytical document is to allow the College to decide whether EU action is advisable to address the identified problems, and whether the second stage of consultation on the content of such an EU initiative should be launched. Therefore, the document should further improve the presentation of the content of the presented policy avenues, including feasible combinations thereof. It should be clearer on the expected economic and social impacts, and be more transparent on cost aspects, particularly for SME's. To this end, it should better explain the content and context of the tables describing the foreseeable impacts of the policy avenues (tables 7, 8 and 9), including the underlying assumptions and assessment methodology. It should indicate in a more detailed manner to what extent the policy avenues would be effective in relation to the key objectives, including their efficiency in achieving them in the Member States.

Some more technical comments have been transmitted directly to the author DG and are expected to be incorporated in the final version of the impact assessment report.

(D) Procedure and presentation

The word 'remuneration' should be systematically replaced with 'compensation' and it should be also made clear from the onset that 'social protection coverage' only refers to coverage for health and safety or occupational risks. The document should include relevant studies and/or their executive summaries in the annex, particularly the "Traineeship Study". The document should be streamlined in its structure, coherence and logic.

(E) IAB scrutiny process	
Reference number	2012/EMPL/2013
External expertise used	No
Date of IAB meeting	Written procedure. An earlier version of this report was submitted to the IAB in September 2012, for which the Board has issued an opinion on 10 October 2012.