

ETUC position in reply to the public consultation on Green Paper on Ageing

Adopted at the virtual Executive Committee Meeting of 22-23 March 2021

Background and context of the 2021 Green Paper on Ageing

This Commission has put demography high on the EU policy agenda. In June 2020, it presented the [Report on the impact of demographic change in Europe](#)¹ setting out the key facts of demographic change and its likely impacts. The ETUC Social Protection Committee, commenting on the Report in Autumn 2020, highlighted both the positive and negative aspect of the approach to the demographic change adopted by the Report:

- a wide and **comprehensive approach** of the 2020 Report, considering the implications of the demographic change in several dimensions (societal, economic, territorial, intergenerational, gender...). It allows to duly put into value the need for **integrated policy design**, given the interrelations among the various dimensions;
- the **importance of “a larger and more inclusive labour market”**², responding to the [ETUC calls for effective employment policies aimed at making the principles of the European Pillar of Social Rights more concrete](#);
- the **call for robust public health systems**³, coherent with the pandemic emergency as well as the long-time unmet needs of the population, and in line with the ETUC’s reiterated demands⁴ for universal, accessible, good-quality and affordable health and long-term care services responding to the demographic needs, as enshrined in the EPSR. The EC Report of 2020 also underlined the importance of improving working conditions in the long-term care sector.

However, the 2020 Report reveals a series of **contradictions** among the **recognised needs** of an ageing society and **the arguments in support of their fiscal sustainability**. Such arguments, although implicitly, confirm a series of **unacceptable assumptions** that found the European economic governance approach to ageing as merely cost-related:

- the Report underlines the **longer life expectancy** across the EU as a positive outcome of wide-spread well-being, but fails to underline the **great disparities** emerging when analysing the **socio-economic perspective**⁵;
- the Report reiterates the usual **confusion** between **demographic ratios** and **economic dependency ratios** and, in doing so, fazes out the

¹ (COM (2020) 241 final, 17.6.2020)

² Positive elements taken into account are: boosting employment rates especially of women, expressively linked to the effective reconciliation of work and family life; increasing employment rates of older workers thus progressing with “policies that enable people to work longer, stay fitter and maintain their skills up-to-date”; investing in the qualifications of people with low educational levels; “bringing more people from different backgrounds into employment”; “opening up the labour market to people with disabilities”; combating all forms of discrimination. pp. 16-17 of the Report

³ P. 20 of the Report calls for the development of a “long-term vision for well-performing and resilient public health systems, notably by investing in disease prevention and surveillance, and improving access to healthcare, diagnosis and treatment for all”.

⁴ See the ETUC briefing on [critical aspects for healthcare in the EU COVID 219](#) “Health care during the Covid19 crisis: the results of short-sighted economic policies that put public safety and human health at stake”, 2020.

⁵ P. 4



enormous potential of improving labour market integration of people in working age (especially women, young and older workers, migrants) in the future evolution of economic dependency and, consequently, in the financial sustainability of pension systems⁶.

Finally, the 2020 Report fails to bring its positive arguments into the pension sustainability⁷ discourse, which represents a major concern linked to the demographic trends. On the contrary, by confirming the anachronistic goal of keeping down 2070's public pension spending level to that of 2016⁸, it neglects the importance of labour market integration and attention to people's needs, that should have deserved greater attention.

Overall approach of the Green Paper on Ageing and general remarks

The [Green Paper on Ageing](#) is the first outcome of the 2020 Report, it launches a debate on the ongoing defining demographic transformation in Europe. The ETUC identifies some positive aspects:

- It builds on the work of the EU institutions and bodies actively engaged in facing the challenges, and taking up the opportunities, of Europe's ageing society;
- It sets up the discussion on ageing in a broad and integrated manner, approaching ageing as a phenomenon that, starting with birth, affects every aspect of people's lives, throughout all their lives. Such a life-time approach, reflecting the universal impact of ageing on all generations and stages in life, provides attention to a wide range of dimensions impacted by the demographic trends, such as economic growth, health and long-term care, well-being and social cohesion;
- it covers several policy areas, from promoting healthy lifestyles and lifelong learning, to strengthening health and care systems, to catering for an older population. It underlines the need to bring more people into the labour market and highlights the opportunities for job creation;
- it represents an opportunity for the ETUC to develop its integrated position with respect to ageing in a broad manner and relate the demographic challenge with the environmental and the digital transitions, designing a comprehensive picture of policies necessary to achieve social progress also in the framework of the post-Covid recovery.

However, some crucial elements in the general framework outlined by the Green Paper fail to capture and address the important aspects. In many circumstances, the introduction to the main policy questions for policy design, is rather generic if not simplistic.

The main failures of the overview made by the Green Paper reside in the lack of consideration for the socio-economic inequalities that affect people in the EU. Whereas it is not possible to provide one policy response fitting all needs, it is not acceptable that the Green Paper **undervalues the poor inclusiveness of the**

⁶ "Europe will face a major challenge in funding its age-related spending, in a way that is also fair across generations. This is because the ratio between people paying taxes and social security contributions and those receiving pensions and other benefits is decreasing rapidly. In 2019, there were on average 2.9 persons of working age for every person above 65. In 2070, this ratio is projected to fall to 1.7" (p 21)

⁷ "Thanks [to the impact of substantial reform of pension systems in most Member States, public pension spending relative to GDP] is subsequently [from 2040 onwards] projected to grow more slowly than GDP, returning to about the same share of GDP as in 2016" (p 21).

⁸ Anachronistic because against the demographic projections 2016-2070 showing a 50% increase of the share of the age group 65+ among the total population (from 20% in 2016 to 30% in 2070).

labour market, the low quality of jobs and working conditions, the scarce attention to OHS and flexible arrangements in a life-cycle approach when addressing the challenges of an ageing society.

Thus, the ETUC reply to the Green Paper focuses mainly on those aspects that remain neglected in the broad debate on ageing:

- The impact of socio-economic determinants on healthy and active ageing;
- Disparities in longer life expectancy as an impact of socio-economic inequalities, including in a gender perspective;
- The pandemic's disproportionate impact on elderly people;
- Demographic trends and the skill challenge in times of green and digital transitions;
- Labour market and working conditions: more and better jobs for all ages;
- Intergenerational solidarity and fairness between young and old generations;
- Productivity and ageing societies: a matter of investments and redistribution;
- The challenges of fiscal sustainability for an ageing society
- The role of social partners.

The ETUC intends to **effectively reframe the themes covered by the Green Paper in the evidence-based perspective of the population's societal needs**. In many cases, this will not only imply a shift in policy views, but also a consistent alternative vision of the economic and fiscal policies with respect to the trends affirmed within the public budgetary control enacted via the mechanisms of the European economic governance up to now.

The debate on ageing must be linked to:

- **A right-based approach**, implying the full and ambitious implementation of the European Pillar of Social Rights in each Principle through the Action Plan and the fulfilment of the ETUC priorities;
- **A renewed approach to the EU social and economic governance**, based on full employment with high quality jobs, an inclusive society, and increased public spending and investments, especially delivering quality public health, education and training, social protection for all and inclusion of vulnerable people. Within the exit phase from the pandemic crisis specific attention needs to be given to the circumstances of elderly and young people, especially women. The new governance should be based on creating stimulus for public and private investments, and new, revised rules that allow member states to keep up with societal needs; the European Semester should play a role in implementing demography-related policies,
- **Strong social partners' engagement** towards "investment-related and preventative" strategies in key policy and action fields (such as active ageing policies, education policy, social policy, labour market policy, business culture),
- **Employment-supporting macroeconomic policy** and reducing unemployment,
- (Re)integration of the unemployed and jobseekers in gainful employment,
- Securing and creating **high-quality vocational education and training**,
- Creation of framework conditions for the improved **work-life balance**,
- Improving **health protection and lifelong learning** as a condition for prolonging working life,
- Improved increased **age integration of employment** (age-appropriate workplaces, etc.),

- Creating **adequate jobs for people with limited work capability**,
- Transforming precarious and informal forms of work into **regular employment**,
- Balanced distribution of gainful **productivity** schemes through employment,
- **Fair distribution of wealth** acquired through work.

Laying the foundations

Healthy and active ageing

The Green Paper recalls how “healthy and active ageing is about promoting healthy lifestyles throughout our lives and includes our consumption and nutrition patterns and our levels of physical and social activity”. However, such a physical and psychological healthy approach for many European citizens and residents does not represent a viable choice, due to their socio-economic situations, AND ALSO DUE to the gender biases and stereotypes that lead to underestimate ageing people’s needs and in particular when women.

For a healthy approach to ageing, it is crucial to address the issue of age discrimination. In our societies and labour markets, ageing is still ground for negative stereotypes and prejudices, especially in a gender perspective, as it is often the case. While the EU leads the promotion of human rights worldwide, it still needs to demonstrate in practice its commitment to equality at all ages. The EU needs to engage in a fair cultural shift towards a serene and non-discriminatory approach to age.

The pandemic crisis has dramatically underlined how people exposed to the greatest income and wealth inequalities are those more exposed to the risk of death in the event of contracting Covid-19: in fact, most deaths occur among those with basic diseases such as hypertension, diabetes and heart or respiratory diseases – often linked to smoking - which science proved as very much affected by the impact of socio-economic determinants. The pandemic has, however, just magnified what the scientific experience has already acknowledged for a long time⁹: poor living conditions, low income and education levels in fact do now allow to actually opt for and lead a healthy lifestyle. So, the more socially and economically disadvantaged a person is, the more likely it is for him/her to suffer from risky health conditions, especially, but not only, in times of Covid19¹⁰.

It is crucial to acknowledge that poverty, inequalities¹¹, social exclusion, poor working conditions, low income, are **socio-economic determinants responsible for a high impact on the sanitary situation of a wide range of the population, both in Europe and worldwide**.

The pandemic crisis is leading Europe to deeper economic divergences and to social challenges that need to be addressed urgently. It brought some Member State to take the momentum to call for common efforts to overcome the current difficulties that hit the entire EU population. It is an exercise of solidarity but with excessively fragmented policy responses. Income support and high coverage and effectiveness of social transfers might allow to maintain consumption levels, in turn stimulating economic recovery. However, the supporting social transfer

⁹ European Commission, [Economic implications of socio-economic inequalities in health in the European Union](#), 2007; FEPS, [Health Inequalities in Europe: Setting the Stage for Progressive Policy Action](#); European Parliament, [Addressing health inequalities in the European Union](#), 2020; <https://equityhealth.biomedcentral.com/articles/10.1186/s12939-017-0670-3>; https://www.who.int/quantifying_ehimpacts/publications/ebd10.pdf ;

¹⁰ The Lancet, 2020

¹¹ According to Eurostat data on income inequality (2018) on the difference in the income of the richest citizens (1/5 of the population) as compared to the poorest citizens (1/5 of the population) show that on average the richest earn 5 times more than the poorest citizens.

policy will have to be revised, to improve the socio-economic status of European people, as it has been quite uneven and ineffective with respect to their needs so far.

The **youngest generations** are the most vulnerable to the consequences of the socio-economic status of their families. While the situation requires to be addressed in a comprehensive way, especially tackling the poor employment, working and remuneration conditions of their families, it is necessary to ensure **children's** access to high-level education and care since their earliest age. To promote their inclusion into the education at least along all the obligatory years, ensure their healthy and safe development as human beings from both the material and the psychological points of view. In this sense the **EC initiative on the Child Guarantee** represents an opportunity not to be missed.

The European Commission has often called for **public preventive policies** to lead people towards “healthy choices”. However, these are not educational attainments that can be reached via simplistic solutions. Preventive healthcare requires massive investments in education (“edu-care”), including leisure, sport and social care facilities since the earliest stages; consistent policies for school meals, public awareness-raising, social services for informative and material support for the most deprived. Digitalisation can here play a role only if accompanied by a massive investment in a collective and integrated effort.

Another determinant to ensure good health since the earliest ages and in the long term is represented by **universal access to high-quality, preventive, effective and affordable health care**. The European Economic Governance repeatedly emphasised the need to preserve public budget sustainability vis-à-vis the ageing population. Such an approach compelled governments to save on, and cut, public expenditure on health, in spite of the increase in care needs. A market-oriented approach on services that are supposed to be public because they are vital to the population, prevailed. The European Commission repeatedly stated that “to ensure fiscal sustainability and maintain universal access to quality healthcare, Member States need to **increase cost-effectiveness** by investing in innovation, improving the integration of healthcare at the primary, specialised outpatient and hospital care levels, and strengthening links with social care to meet the needs of an ageing population”¹². An ambivalent, compromise wording, with no reference to investments in the sector to meet the needs, to the issues linked to the effectiveness of the privatisations, nor to long-term prevention. This resulted, prior to the pandemic, **that one out of three citizens were already renouncing treatments due to excessive costs**. In addition, the cuts in public expenditure for healthcare implied a drastic reduction in the healthcare workforce, insufficient to cope even with the pre-pandemic patients’ needs.

The ETUC has a long-term positive approach to active ageing and intergenerational solidarity, on which it built its position to engage in the negotiations for the [European Social Partners’ Autonomous Framework Agreement On Active Ageing And An Inter-Generational Approach](#) signed in 2017 and currently under implementation across Europe. The results of this collective exercise will be available at the end of 2021. The agreement enhances the role of social partners in designing and enhancing active ageing policies, and including collective prevention policies at work, that need to be promoted to help people lead healthy working lives, to prevent health problems related to work (musculoskeletal disorders, psychological problems including burn outs, work-related stress, etc.) through collective bargaining and agreements with employers to ensure good working conditions at all ages

¹² Lastly, *Annual Growth Survey 2019*

Since 2012, the ETUC and its affiliates together with the Youth Committee and FERPA, committed fully to the development of an [Active Ageing Agenda](#). Essentially implementing preventive measures that will enable and encourage older workers to remain in the labour market until the statutory age, taking into account the particular features and stresses of professions that require early retirement schemes. The measures taken must comply with the aims of intergenerational solidarity, which means simultaneously combating all potential obstacles preventing younger people from entering the labour market and older worker from remaining employed. The Active Ageing Agenda includes a series of actions that involve the legislative level, the improvement of living and working conditions, and granting greater effectiveness to education and training systems.

Question 1.

How can healthy and active ageing policies be promoted from an early age and throughout the life span for everyone? How can children and young people be better equipped for the prospect of a longer life expectancy? What kind of support can the EU provide to the Member States?

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Integrated policy measures to be adopted must include:

- *Tackling the issues that we know decrease life expectancy, such as poor air quality, pollution, exposure to chemicals, poor housing*
- *Tackling inequalities and poor socio-economic conditions*
- *Increasing the quantity and the effectiveness of social transfers to address poverty and social exclusion, main socio-economic determinant for poor health*
- *Implementing a comprehensive [European anti-poverty and social inclusions strategy](#), including the adoption of a [European framework directive setting minimum standards for adequate, accessible and effective minimum income schemes](#) across the EU*
- *Addressing inequalities via redistribution policies, starting with ensuring fair minimum wages and secure working conditions for all workers, through the strengthening of collective bargaining and its coverage, while reforming national taxation policies along progressive logics, in order to ensure a solidarity-based redistribution of wealth through public budget*
- *Ensuring that all workers – independently from their employment status - have access to effective and adequate social protection schemes, including benefits in the event of sickness, accidents at work and occupational diseases*
- *Public effective and comprehensive investments for preventive care*
- *Investment in universal access to high-quality, preventive, effective and affordable health care responding to the actual needs of the population*
- *an ambitious Child Guarantee to children across the EU to prevent and raise them from poverty and the downturns of a poor socio-economic status. It must avoid the loopholes encountered by the Youth Guarantee, and must prove effective and integrated, supported by funding proportional to needs, and leading to greater equality and inclusion.*
- *Developing an Active Ageing Agenda, essentially implementing collective preventive policies that will enable and encourage older workers to remain in the labour market until statutory age, negotiated by social partners*
- *The “Framework Directive” 89/391/EEC, on measures to encourage improvement in workers”, a cornerstone of the OSH regime in the EU, providing principles of prevention with which employers are charged, must be fully implemented.*

Education and training in a lifelong learning perspective, Territorial aspects in access to education

The disruption caused by school closures and the prospects of economic depression due to the global pandemic is without precedent, with dramatic consequences for society. It however has just aggravated pre-existing social tensions, weakened social cohesion, and amplified inequalities at all levels. Educational equality plays an important role for the recovery and economic development based on high living standards and quality employment through skills and competences to adapt to future innovation-intensive jobs. It serves as a counterforce to division in society in its ability to foster mutual understanding, integration, and fairness.

According to the latest data (2019), despite EU calls to focus investment-related economic policy either on education and training, on skills, and/or on research, **critical low levels of investment in education**¹³ as a percentage of the Growth Domestic Product (GDP) were still recorded in almost one third of EU countries. In all those countries underfunding is clearly associated with issues of equity, inclusiveness and quality of education¹⁴.

Educational attainments still influenced by **socio-economic** and/or **migrant background** raise major concerns as they are key determinants in under-performance of students across almost all European countries. Inclusion difficulties in the classrooms reported in almost all European countries have the potential to hamper quality education for all, and to exacerbate inequalities in society. They narrow opportunities, and act as major obstacles for social mobility, fairness, social justice and progress.

Training should take into account the perceptions of older people that are different from those of young people. They require also financial resources, if not financed by public funds or the employer. **In this context, having non-standard work (low-quality, precarious work) makes it difficult to access training.**

Regional disparities and **rural-urban divides** are still affecting negatively the success of students in rural and economically deprived areas. However, these disparities are greater when students from migrant or other background (e.g. Roma population or other linguistic minorities) are concentrated in such areas. In some countries, **rationalisation of school infrastructure** is posing serious barriers to access education, especially in **rural areas**. It is also resulting in disruptions in schooling cycles, shortages of available school places in urban areas, and even shifts in the operation of schools, thus affecting working conditions of teachers and learning conditions of students.

Digitalisation and decarbonisation are having an enormous and highly risky impact on the European workforce¹⁵. Thus, ETUC has been demanding **effective upskilling and reskilling strategies that support workers of all ages in this transition.**

ETUC is also deeply concerned that the COVID-19 crisis, and its economic consequences, will contribute to long-term unemployment of many people whose

¹³ [ETUCE Statement Turn the Tide: Invest in Education](#), November 2019

¹⁴ CSEE-ETUCE, [Thematic overview of the Country Reports 2020 of the European Semester in the education and training field](#), Brussels, ETUCE, 2020.

¹⁵ According to the latest CEDEFOP report, 46.1% of the adult population, approximately 128 million adults in the EU-27 Member States, the UK, Iceland and Norway, need upskilling and reskilling. "These adults may present low education, low digital skills, low cognitive skills or are medium-high educated at risk of skill loss and obsolescence. The estimates paint an alarming picture and hint to a much larger pool of talent and untapped potential than the 60 million low-educated adults usually referred as low-skilled".

skills will become obsolete during the job search period. Therefore, workers and the unemployed urgently need support not only in accessing upskilling and reskilling trainings, but also in validating their skills and competences.

The obstacles of workers' training at all ages mostly reside in discrepancies on accessing trainings by different geographical regions and sizes of companies, but also of different contractual situations of workers. It is the educated full-term permanently employed workers' trainings and paid education leave that are most supported by the employers.

Question 2.

What are the most significant obstacles to lifelong learning across the life-cycle? At what stage in life could addressing those obstacles make most difference?

How should this be tackled specifically in rural and remote areas? - 2500 characters

A new emphasis is needed on local development, not only because of employment and demographic concerns, but also because of sustainability needs.

2500-character(s) maximum including spaces – online form will include only the text in italic

It is necessary to:

- *Recognise the unfair impact of Covid-19 and **broaden the scope of investment to vulnerabilities in access to equitable and quality, all-inclusive education and training systems** through targeted measures focusing on the most disadvantaged, including by providing additional support to make sure students have access to digital learning or internet facilities.*
- *Remove further barriers to access education posed by the rationalisation of school infrastructure, both in urban and rural area, **by investing in sustainable, low-carbon emission, and safe school buildings as well as in secure, quality, digital infrastructure which protects human and privacy rights.***
- *Ensure that EU financial support **does not fall prey to for-profit private commercial interests of organisations offering new models of hybrid teaching and learning and/or digital material in education**, through outsourcing, public-private partnerships, or even through the promotion of reforms whereby private ed-tech companies would be embedded in public education systems detracting from achieving quality public education for all.*
- *Ensure all learners and educators, the school community and society, are able to benefit from the accelerated use of digital technology in education by ensuring that all issues around **technological developments, Artificial Intelligence, learning analytics, data mining and protection, and new digital content that supports education**, while nurturing teachers' professional autonomy, is developed in partnership with teachers and educators.*
- *Target education funding to **education personnel's in-service digital training, both initial and continuous, that is tailored on teachers and educators' needs and aligns with students' pedagogical experience.***
- ***Implement the benchmarks on adult learning, learning for low-skilled people, and learning on digital skills**, as per an [improved European Skills Agenda](#) with special attention to elderly workers and adults, supported by effective investment (at the EU and national level) and national adult learning strategies.*
- *Allocate **adequate and long-term investment to support reskilling and upskilling of elderly workers***
- ***Implement the first principle of the EPSR to ensure that elderly adults and workers have the right to and are guaranteed access to quality and inclusive***

employee training so as to participate fully in society and manage successfully transitions in the labour market. This means **ensuring trainings on key competences (to improve their life), basic skills and professional skills** development at all skills levels.

- *Ensure better focus to reintegration of elderly adults in the labour market and just transition of elderly workers by guaranteeing training to the **unemployed and low-qualified people** with the effective implementation of the Council Recommendations on [Upskilling Pathways](#) and on [the integration of the long-term unemployed into the labour market](#). Comprehensive national policies to support all group of low-qualified adults (the migrants, Roma, low-skilled workers, etc) should target elderly people in these groups too.*
- ***Ensure that elderly workers benefit from paid educational leave** (ILO Convention 140) for training, to access full qualifications, and to participate in validation processes.*
- *Ensure effective **social dialogue** on European and national vocational education and training and adult learning policy to support elderly people.*
- ***Support trade unions** to enhance their training provision and processes of validation of skills and competences for all workers, with special attention to elderly workers.*
- ***Ensure free quality guidance and counselling** about training and job opportunities for adult learners of all age, and support the training representation systems of the trade unions with effective national support*
- ***Monitor the effective provision of trainings by, and financial contributions of, the employers to workers' training, with special attention to elderly workers supported by [Social Partners Agreement On Digitalisation](#)** which says that employers need to pay for the job-related trainings.*

Making the most of our working lives

Bringing more people into the workforce

The ETUC acknowledges the risk of labour shortages within the EU, however, the shrinking of the working age population is not the main cause of such a phenomenon – nor extending working lives represents an effective solution. **Bringing more people into the labour market and ensuring more, high-quality and secure jobs** – not raising the retirement age indiscriminately - allows more people to lead a life in dignity, be protected against poverty, accrue entitlements for social protection benefits and actively participation in society. This is also the recipe for **higher productivity**, as it allows to take advantage of **retaining older workers who have gained experience and know-how** in the companies, and **to increase job satisfaction**, which is crucial for better outputs. It also makes public and solidarity-based social protection systems more adequate, effective and fiscally sustainable. All this, provided that the working conditions are fair, that jobs are secure and of high profile, and that employment contracts do not lead to the exploitation of the workforce.

Substantial investments, both public and private, must focus on a higher inclusiveness of the labour markets, that still excludes millions of people.

Unemployment rates, even before the pandemic, were concerning. In 2019, in EU 27 only 73.1% of those of working age (20-64) were in employment,

including millions in precarious jobs and involuntary part-time employment¹⁶. In 2019, almost half of the unemployed people were **long-term unemployed** (unemployed for more than 12 months).

Women unemployment represents a huge, missed opportunity. The **gender employment gap** stood at 11.7% in 2019, with a high rate of women trapped in **involuntary part-time jobs**¹⁷. The lack of investments in care facilities and in ambitious work-life balance measures, and the under-evaluation of women's work, hampers their participation into the labour market, and the risk of exclusion increases with age. The best-case scenario for women is to rely on the income of the male "breadwinner" in the household, where they don't add to the cohort of 50+ women living at risk of poverty.

People with disabilities are systematically marginalised from the labour market. Besides the loss for society and the economy in terms of talents, productivity and social transfer, such marginalisation condemns people with disabilities to a high risk of poverty, especially in old age.

The dramatic expansion of non-standard and insecure work in recent decades is a direct result of a business model that shifts the risks from the employer onto the worker. 50+ and young workers are the most affected by precariousness and job insecurity. Transitions toward open-ended contracts are limited because liberal legislation across member states creates a negative economic bias against standard forms of employment. Many older workers (50+) risk to remain out of the labour market if they lose their jobs in the latest stage of their working life.

Income insecurity and low wage levels determine that for many Europeans, living on social transfers can be preferable than entering the labour market – however, the shrinking of the public assistance benefits only generates huge cohorts of in-work poverty cases.

The European economic governance has repeatedly overlooked the **quality of work**, despite the reference made to it within the employment guidelines (see [ETUC position](#) and [draft JER 2021](#)). **Activation measures** are either poorly funded, or too selective, often excluding large portions of potential beneficiaries, particularly young people, women and (elderly workers 50+), thus highly **ineffective**. Investment in **labour market access facilities** is not improving and this can be seen in the non-convergence in [quality-of-employment indicators](#). The lack of skill-assessment, especially with respect to digital skills, neglects older workers (see above in the para concerning the skill challenges).

As a matter of fact, indicators show neither convergence nor improvement at EU level concerning the quality of work, in terms of attention to **health and safety prevention and protection, job security, fair and decent remuneration, transition among jobs, skills development and ALMP**. However, given the post-Covid scenario, such a situation must be fixed before it is too late.

The Covid crisis has certainly worsened the situation that was already characterised by job insecurity, involuntary part-time and precarious work, marginal employment, inequalities in employment relations and poorer and poorer working conditions. Already in the first three months of the COVID-19 restrictions, unemployment increased by 900,000 units across the EU to a

¹⁶ Eurostat: accessed on 10/03/2021

¹⁷ *ibidem*

shocking total of 14.3 million. Eurostat estimates that 16.236 million men and women in the EU, of whom 13.825 million in the euro area, were unemployed in October 2020. Experience shows that countries with less inclusive and more fragmented labour markets will go through prolonged economic stagnation and unemployment rates. Quarterly data of Eurostat shows that employment indicators move slower compared to GDP and other shock indicators. However, the marginal increases on a quarterly basis (as in June 2021) in the data referring to involuntary non-work periods among workers are unprecedented and are a sign that, unfortunately, confirms what the ETUC claimed to be the effect of the crisis on 45 million workers. Many of these will be young and elderly workers, among which women. Relative containment of unemployment has been mainly due to the role played by job retention schemes. However, despite various safety nets, unemployment is projected to rise to more than 9% and real disposable income to drop by 1%, disproportionately affecting women and poorer households.

The COVID-19 pandemic has accelerated the **digital transition**. Telework and distance learning have become a reality for millions of people in the EU, however revealing the limitations of our current digital preparation. The digital gap has accentuated the already existent and new inequalities, since many people do not have the required level of digital skills or are in workplaces or schools or training centres lagging behind in internet access, computers at all, as well as in digitalisation skills¹⁸. In addition, issues regarding the digital divide and unequal access to distance teaching and learning have come to the forefront and must receive attention.

The added value of older workers must be better and fully assessed and appreciated by Social Partners¹⁹. The potential of experienced employees should be properly used (e.g., mentoring). It seems particularly important to emphasize the benefits that the company can derive having a diverse team (e.g., in terms of age), whose members have different life experiences and competences. A unique team of employees, diverse in many respects, will have a better chance of developing innovative solutions. It is also justified to support older workers in returning to work (e.g., after a long illness, accident). **The implementation of age management however requires employers to change the way they consider older employees.** It is important to recognise their potential and competences that are valuable from the company's point of view.

However, it is also crucial to **undertake structural changes** in order to provide an appropriate and supportive framework, in order to enable "older" workers to continue working where they would otherwise, due to a variety of external and internal conditions, would be likely to drop out.

A first main intervention will concern education, lifelong learning, skilling and re-skilling of workers: it must aim to improve workers employability in the aftermath of the pandemic. Many of them will need to acquire **new skills and move to new jobs** in different sectors of economy and be prepared for the digital and green transition. More workers will need

¹⁸ In Brussels, during the pandemic, it was observed that unemployment of young people was decreasing compared to the 2 other regions, which looked strange given that in Brussels, young people attain lower educational levels. Looking at it a bit further, the explanation was found that in fact, more young people in Brussels were not connected to the internet and consequently got out of the system, were not mentioned anymore as unemployed while not having a job. The same problem of no access to the internet is probably true at all ages, depending on the socio-economic status

¹⁹ As for the experience of social dialogue, experience and knowledge of older workers is an important asset whose positive effect can be multiplied through the provision of an (in)formal structural framework for knowledge transfer between generations and tailored processes of life-long learning.

to upskill to keep their job in a new work environment. It will be even more challenging for many young and elderly people to enter the labour market. The lack of digital training specifically designed for elderly people must be urgently addressed.

Active labour market policies must be strengthened when not re-designed. Public employment services should be strengthened so as to contribute to the integration of aging workers and other vulnerable groups of society in the labour market; such groups, when found to have an evident disadvantage on the labour market, could also benefit from incentives to be hired or support job-to-jobs transitions; schemes for upskilling and reskilling should be established; and social partners should be involved in the design and monitoring of these policies. Gender gaps in employment and pay widen with age over the life-course.

Legislative job protection policies must be launched and monitored across all member states. External flexibility approaches (easing redundancies or boosting temporary contract arrangements), especially in the current crisis, will only put cohorts of workers in the vulnerable situation of precariousness, loss of income protection, unemployment, which in the case of older workers risks being long-term. However, **internal flexibility schemes** (like the promotion of sound telework and flexible work arrangements) can be an effective manner to protect these workers, as well as to boost **productivity** and economic activity. Outplacement guidance in case of dismissal should offer a solution so that older employees have once again a good chance in the labour market.

Legislative initiatives must also be undertaken to address undeclared and informal work, because it leaves many workers unprotected and exposed to health and economic risks and represents a loss for society. **Domestic work** in particular must be regulated and controlled, so as to value the hidden work performed mostly by women and often migrant even in their old age.

Investment policies and legislative initiatives must be undertaken to allow **greater women participation in the labour market. Investments must target childcare structures, as per the [indications of European Social Partners](#), and care facilities in general. Work-life balance policies** must be properly funded and implemented in an ambitious way, well beyond the minimum standards foreseen in the Directive currently under implementation. In addition, a fair approach to **productivity** and its gains implies that the work performed by women, systematically undervalued, is remunerated correctly and in a way that, while offsetting any pay gaps, the recognition of its social value is full.

Occupational Safety and Health and the related employers' responsibility policies must be strengthened in the light of the ageing of the population. The 'Framework Directive' 89/391/EEC, on measures to encourage improvement in workers' is the cornerstone of the OSH regime in the EU, providing principles of prevention with which employers are charged. Among them is the obligation for the employers to assess risks at the workplace and to adopt general and particular measures to prevent them. The obligation placed on employers to analyse all the factors in their firm's operations that might endanger health and safety is a prerequisite for preventive activity, all the more crucial in a situation of ageing society. Measures that take into account the gender of workers, in consideration of the different pathologies that afflict men and women in adulthood. Risk assessment must embed the gender dimension and pave the way to gender-

sensitive preventive measures. Without **risk assessment** all that is left is to react – usually too late – to unacceptable situations.

Reasonable accommodation at the workplace - adapting the workplace and the job tasks to the functionality of the worker – becomes a must in an ageing society. Working conditions can also be proactively adapted to an ageing workforce^[1]. However, it is also crucial to [make the labour market more inclusive towards people with disabilities](#). Directive 2000/78/EC establishing a general framework for equal treatment in employment and occupation, article 5 provides for **reasonable accommodation for disabled persons**. The idea of **adapting the workplace and the job tasks to aged workers** should also be considered.

Active ageing policies developed through social dialogue have proved positive and proactive since 2012, focusing on adapted employment and job retention opportunities for older workers²⁰.

The [European Social Partners' Autonomous Framework Agreement on Active Ageing and an Inter-Generational Approach](#) is expressively conceived to ensure a healthy, safe and productive working environment and work organisation to enable **workers of all ages** to remain in work until legal retirement age. It is to facilitate the transfer of knowledge and experience between generations at the workplace and takes into account the changing national demographic and labour market realities. It must be acknowledged across Europe and must effectively inform workplace and working conditions policies for the whole society, as it **adopts a life-cycle approach to healthy, safe, secure and long working lives**.

Migrant workers are essential for European societies, they offset the demographic decline and revitalise our labour markets. Many member states (for example Spain) have experienced a remarkable increase of population thanks to migration. However, important differential features across Europe and even within member states concern the speed with which immigration grow; the type of migration, whether more aiming at finding a job or for residential reasons; the allocation of migrant workers by sectors, company size, territorial and local reality.

A vast majority of migrant workers work in crucial sectors such as construction, transport, tourism, agriculture, food industry, healthcare, domestic and care work. Women make up a significant part of the workforce in many of these sectors and are overrepresented in insecure jobs as well as

^[1] Social dialogue practices show the positive experiences that foresee flexible working time that is suitable for workers and at the demand of the workers: part-time work, career breaks, flexible working hours & flexible work schedules which suites the employees, tailor-made work schedules (looking for a better balance between their professional life and their private needs), (occasional) telework. These practices can be coupled with knowledge transfer schemes and inclusion of younger workers.

²⁰ As an example: Belgian Collective Agreement nr. 104 - employment plans for older workers (<https://werk.belgie.be/nl/themas/werkgelegenheid-en-arbeidsmarkt/werkgelegenheidsmaatregelen/werkgelegenheidsplannen-voor>) an inter-professional collective labour agreement, which has been declared universally applicable, requiring all companies with more than 20 employees to draw up an employment plan to maintain or increase the number of workers aged 45 and over. This employment plan must allow an overview of company-specific measures to be worked out in order to maintain or increase the employment of employees aged 45 and over. These measures may include, for example: the selection and hiring of new employees; the development of workers' competences and qualifications, including access to training; career development and career guidance within the company; the possibilities of acquiring a function adapted to the evolution of the possibilities and competences of the employee through internal mutation; the possibilities for adapting the working time and working conditions; the health of the employee, the prevention and elimination of physical and psychosocial obstacles to remaining at work; systems for the recognition of acquired skills.

in the informal economy. Mobile, migrant, refugee and asylum-seeking women and girls are particularly affected by discrimination, social exclusion and lack of job opportunities, and are continuously exposed to abuse, violence and harassment.

Improving integration of migrant workers is crucial, for their protection and well-being, and for the society they join:

- From the point of view of employment, it is necessary to act to counter both their inclusion in the irregular economy and the non-application of labour standards and collective agreements; reduce the deterioration of the employment situation of the migrant population, as this can impair working conditions and the application of labour rights among all workers; fight racism and discrimination and exclusion of those perceived as different and responsible, directly or indirectly, for the deterioration of their own quality of life;
- From the point of view of integration, it is necessary to inform migrants about their rights within the national legislation, as well as of the social and administrative resources at their disposal; to review the system of validation of their professional qualifications; and promote integration into trade union life for the best protection of their rights. In addition, trade union must be supported in organising and representing them, in order to extend the real application of rules and conventions;
- From the point of view of the regulation, it is necessary to develop a migration policy that defines what measures can be taken to channel entries, what social integration policies should be promoted, and how to enhance the actions of the Labour and Social Security Inspection to prevent the exploitation and labour abuse of the migrants.

Labour migration should not be based on the highly or talented ones but focused on a wider range of skills that the European labour market actually needs. It should **not be discriminating** some nationalities or countries (often transformed in discriminations in the labour market) but having a transparent and common system of entry, residence and work in the EU.

The ETUC considers that the EU and national policies on regular migration should respond to labour market shortages. In this regard, the Commission should analyse inefficiencies in labour market tests and labour migration schemes that do not respond to real labour needs. In addition, the EU should, in consultation with social partners at relevant levels, develop its legal framework to cover, to a greater extent, migrants seeking work across skill levels.

Considering the adoption of the [European Skills Agenda](#), ETUC believes that migrants, refugees and asylum seekers should be treated equally irrespective of skills and qualifications level. They should have the possibility to validate their skills and competences and receive quality apprenticeships as well as reskilling and upskilling, to be integrated in the labour market based on flexible learning pathways to match their specific needs.

Question 3

What innovative policy measures to improve participation in the labour market, in particular by older workers, should be considered more closely?

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It is crucial to:

- **Extend short-time work schemes activated in reaction to the pandemic** to cover all categories of workers and complement them with massive investments in active labour market policies, to avoid increases of structural unemployment, especially among women, young and 55+ workers. The use of all available resources under SURE and other EU sources is a must.
- **Implement [specific measures via the RRF](#), for more inclusive and gender-balanced labour markets.** The RRF should create synergies with other structural funds, including the ESF+, which should boost companies' investment in employee training. Such funds would need to be monitored through specific data collection and policy benchmarks.
- **Boost inclusiveness of labour markets**, engage in both public and private investments for more and high-quality jobs, therefore [fully implementing the EPSR in all its parts](#)
- **Contrast the – often long-term – unemployment** of youth, 50+, women, people with disabilities. Massive investments are needed for re-skilling and up-skilling of the workforce, to better adapt to the future challenges and transitions. Public funding for the provision of digital services for teaching and learning tailored on 50+ is to be prioritised as a public responsibility.
- **Develop a common understanding of actions and instruments that fall under the ALMP concept**; monitor government spending, investment and progress and outcomes of activation measures; improve the collection of statistical evidence of 50+ workers; develop new EU benchmarks for the post-2020 strategy **relating to ALMPs and transitions and access to skills and training**, expressively tailored for elderly workers, delivered as well-financed public services in order to promote Euro Area Recommendations, CSRs and investment guidance for Member States
- **Assess the national and EU acquis and adoption of legislative initiatives in light of the new forms of work and prepare for the future of work:** labour guarantee, protection against unfair dismissal, right to full-time employment, and workers' sovereignty over working time. It includes an analysis of the effect of reforms promoted through CSRs on individual and collective dismissals and the effect on other individual and collective rights of workers, especially in light of the future of work, just transitions and strengthening of collective bargaining. It is also crucial to engage in policies that bring about job protection and job **security**, to contrast external labour flexibility, and to ensure fair and decent remuneration, transition among jobs, and internal flexible schemes.
- **Support the full implementation of the [European Social Partners' Autonomous Framework Agreement on Active Ageing and an Inter-Generational Approach](#)**, expressively designed to allow workers to lead a healthy working life until retirement age, and strengthen collective bargaining to make it effective
- **Revise the OHS protection and prevention and equal treatment encompassing ageing**
- **Invest in skill assessment and skills development** of all workers and in more effective ALMP and Public Employment services. Social partners should be involved in the design and monitoring of these policies.
- **Contrast undeclared, unprotected work**, engage in investments in care facilities and implement ambitious and effective work-life balance measures

- **Develop an integrated strategy for [labour migration](#)**, encompassing the [European Skills Agenda](#). The ETUC calls for more regular and decent labour migration pathways, across different skills levels and sectors. The [ETUC upholds an open Europe](#), with opportunities for migrants and their families to enter and work in the EU. The EU should bind national legislation to respect minimum rights, decent working standards and the equal treatment principle in favour of all workers regardless of their nationality, migration or residence status.

Productivity, innovation and business opportunities - Employment and productivity from a territorial perspective

Investment in research and development can certainly help an ageing society face the challenges ahead. Productivity is a key issue since the EU might experience labour market shortages caused by the shrinking or ageing of the population and the reduced supply of work.

Unfortunately, such investment trends have seen a progressive decline in the last years, and the intervention of private companies and investors have jeopardised the collective capitalisation of the outcomes. The decrease in private and public investment, restrictive measures, increasing unemployment (that will imply waste of skills, or burdensome re-hiring practices), deterioration of assets, make labour productivity a real challenge.

Higher productivity implies to equally scale up all productive factors that contribute to raise it: investments in technologies, in the public sector, in labour market facilities, in skills and in the reconstruction of the supply chain must be made, through the RRF and the structural funds.

Productivity, human capital and profits are so strictly related, that **only a balanced allocation of resources among these three factors** can guarantee progress at economic, societal and territorial level.

The debate on productivity must be developed as a worker-centred strategy. Creating quality jobs and ensuring upward convergence of working conditions, education, training and high skilling, while addressing old and new economic challenges will be key to increase productivity.

In addition, creating quality jobs contributes to strengthen the value of SMEs and to **support an enabling environment for investing in them.** Investments in green and digitalisation can in turn generate productivity – it is a win-win approach.

A virtuous triangle between investments, productivity and quality of working conditions needs to be activated, based on:

- **the re-evaluation of the workforce**, especially when skilling, using experience, mastering know-how; and consequently being motivated, retained, permanently re-skilled and kept up to date facing the economic transitions;
- **collective bargaining** is crucial to re-establish a balance between productivity, profits and workforce, to make the economic system work at a high pace and for the benefit of all, with fair redistribution logics. In addition, collective bargaining can also help addressing the systematic undervaluation of the [work mostly performed by women](#) in [the care sector](#);
- **a debate on a different management of working time**, increasing workers' time sovereignty, and possibly implying the reduction of working

time while keeping the same compensation levels – given certain conditions.

Such considerations can substantiate support for the development of the so-called “**silver economy**”. The investment in the human capital is particularly important for a thriving silver economy, given the high labour-intensive sector.

It must be clear that the variety of services provided in the framework of **the “silver economy” are public services** such as health care, long-term and elderly care, that are **not mere business opportunities**. They represent the foundation of a right-based society for all ages. For this reason, higher productivity must be accompanied with massive public investment in public care services and infrastructures. In addition, investing in the silver economy does not mean to merely rely on technologies to increase the potential of health care - or to cut on public and social care staff²¹. Revaluation of jobs, including working conditions, training, formalising domestic work and securing career paths and pay, in the silver economy is also urgent.

High quality-job opportunities must be created for technology developers as well as for highly skilled health staff and carers, while delivering the breakthrough needed to respond to an ageing society.

Also, the regularisation and formalisation of career paths of the high rate of **undeclared domestic and elderly care workers** is particularly important to allow greater rates of the workforce, mainly women and migrants, to be part of a collective development strategy.

Such a worker-centred approach to productivity, applied to the silver economy, can also represent an opportunity for the less developed regions, especially those that experience both depopulation and ageing challenges.

Investments must be made in order to boost the social and economic potential of these areas, providing digital facilities and civil infrastructures. The environmental requirements impose that such investments are made in **full respect of the green transition**, thus with **no deterioration of the local territories, while enhancing their attractiveness for investments and human capital**. This would also make rural and marginalised areas more attractive for workers, new investments and residents.

Question n. 4

Is there a need for more policies and action at EU level that support senior entrepreneurship? What type of support is needed at EU level and how can we build on the successful social innovation examples of mentorship between young and older entrepreneurs?

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Question n. 5

How can EU policies help less developed regions and rural areas to manage ageing and depopulation? How can EU territories affected by the twin depopulation and ageing challenges make better use of the silver economy?

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²¹ See the action of our CZ (CMKOS) Health and Social Services Workers to draw attention to this.
<https://www.darujme.cz/projekt/1204431?locale=en>

- *Enhancing public services that support local and regional development (access to broadband, but also access to health etc) is crucial. This requires public planning and coordination, to ensure service providers are present throughout the territory.*
- *Older people do not only need 'care' they also need public transport, access to culture...*
- *The need is to activate a **virtuous triangle between investments, productivity and quality of working conditions**, based on:*
 - *The **re-evaluation of the workforce**, especially when skilled, experienced, mastering know-how, to be motivated, retained, permanently re-skilled and kept up to date facing the economic transitions*
 - ***Collective bargaining** is crucial to re-establish a balance between productivity, profits and workforce, to make the economic system work at a higher pace and for the benefit of all, with fair redistribution. In addition, collective bargaining can also help addressing the systematic undervaluation of the work mostly performed by women in the care sector.*
 - ***An open debate on a different management of working time**, increasing workers' time sovereignty, and possibly implying the reduction of working time while keeping the same compensation levels - given certain conditions.*
- *A worker-centred approach to productivity can represent an opportunity for the less developed regions, especially those that are experience depopulation and ageing challenges.*
- *Investments must be made in order to boost the social and economic potential of these areas, providing digital facilities and civil infrastructures. Investment in technologies, in public sector, in labour market facilities, in skills and in the reconstruction of the supply chain must be enacted, also through the RRF and the structural funds.*
- *The environmental requirements impose that such investments are made in the full respect of the green transition, thus with no deterioration of the local territories, while enhancing their attractiveness for investments and the residents.*
- *Designing an investment strategy around higher productivity for the silver economy could represent a development opportunity for rural and marginalised areas to become more attractive for workers, companies and residents - mainly implying investment in quality material and immaterial infrastructures, quality-job creation, effective education opportunities, training and high skilling.*

New opportunities and challenges in retirement

The approach proposed by the Green Paper on the challenges of old age and retirement fails to fit consistently in the integrated views adopted in the previous chapters.

Staying active

It is definitively a positive outcome of increased well-being that the European social and economic model could ensure that elderly people can engage in volunteering activities, mobility and intergenerational exchanges. These are certainly practices that exist and must be supported, and fostered, in the framework of civil dialogue and a wide and active participation in society.

Both formal and informal intergenerational learning deserves to be supported and fostered. The action of organisations devoted to these practices can be enhanced at local level in various ways. Different generations can only mutually benefit from common projects and initiatives, especially in an increasingly individualised society where both young and elderly people suffer from isolation, loneliness, exclusion and the related impact on both physical and mental health.

Question n. 6

How could volunteering by older people and intergenerational learning be better supported, including across borders, to foster knowledge sharing and civic engagement? What role could a digital platform or other initiatives at EU level play and to whom should such initiatives be addressed? How could volunteering by young people together with and towards older people be combined into cross-generational initiatives?

2500-character(s) maximum including spaces – online form will include only the text in italic

- *It is definitively a positive outcome of increased well-being that the European social and economic model could ensure that elderly people can engage in volunteering activities, mobility and intergenerational exchanges. These are certainly practices that exist and must be supported, and fostered, in the framework of the civil dialogue and a wide and active participation into the society.*
- *Both formal and informal intergenerational learning must be supported and fostered. The action of organisations devoted to these practices can be enhanced at local level in various ways. Different generations can only mutually benefit of common projects and initiatives, especially in an increasingly individualised society where both young and elderly people suffer from isolation, loneliness, exclusion and the related impact on both physical and mental health*
- *- It is necessary to prevent that volunteering practices, especially organised by platforms, become a form of employment in disguise. Under no circumstance shall voluntary activities replace work that deserves to be remunerated because of the time and the commitment involved.*

Old-age poverty

The Green Paper rightly underlines how the situation of many people in old age and after retirement is highly concerning due to the drop of income. Among elderly people, the most in need are those that experience disability, mental and physical illness, as well as women as a consequence of the magnified effect on pension gap of the gender pay and employment gaps.

The major reason for old-age poverty resides in the lack of access to universal, effective and adequate social security, poor access to public essential services, such as health and long-term care, and very low levels of social assistance. Equality should be guaranteed among citizens and across territories in order to guarantee an autonomous choice of life for old-age person.

Old age poverty has its roots in precarious and interrupted careers, lack of inclusiveness in the labour market and in skill and trainings, low wages and involuntary part-time and atypical jobs. This is especially the case with women whose works are often undervalued and underpaid even if essential to the society (care-assistance). These situations hamper access to and effectiveness and

adequacy of social security schemes, as experienced by atypical and self-employed workers across Europe.

While decent minimum levels of income and social benefits should be guaranteed to all, data on old age poverty show how the social challenges consistently flagged by trade unions still need to be tackled, and this is even more true in a post-Covid scenario. Since 2016 the public expenditure rate in social protection proportionately increased, in real terms, less than the GDP did in most Member States.

The elderly remain extremely vulnerable, due to the persistent inadequacy of pension income, which only provides for a relative protection against the risk of poverty. Even more worrying is the situation of older women, since one in every five women aged 65+ is at risk of poverty or social exclusion in the EU. The gender pension gap in the EU is 35.7%. Pension adequacy must be promoted to allow the elderly to live in dignity. The demographic challenge must be faced investing in more jobs and quality jobs.

Access to healthcare was a challenge for millions of people during the peak of the pandemic. The drastic reduction in public expenditure in health and long-term care emerged as outrageous and anachronistic. Out-of-pocket payments for health measured 20% of current health expenditure in the EU.

The protection of elderly people from poverty and social exclusion must start with secure and quality jobs, fair remuneration, and full access to social security.

It must continue with the provision of public and adequate social assistance benefits and safety nets - while the public expenditure for social benefits in absolute terms is in steady decrease across member states, in spite of what could appear from the rates of GDP. In particular, adequate and effective income support allowing to lead a life in dignity and effective participation into the society should be guaranteed across all ages (Principle 14 EPSR).

Investment in social housing and public essential services should be made to increase the accessibility and affordability to all.

Question n.7.

Which services and enabling environment would need to be put in place or improved in order to ensure the autonomy, independence and rights of older people and enable their participation in society?

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- *It is crucial to provide people of all ages with the opportunity of secure and stable careers, easy transition among jobs through training and skilling, to perform high quality jobs and enjoy fair remuneration; and to accrue social security benefit that must be universal, effective and accessible in all situations.*
- *Everyone, at all ages, must be able to enjoy the right to adequate and effective minimum income benefits, that allow to live a life in dignity with full participation in society.*
- *Public essential services such as health care, long-term care, social care, assistance in the case of disability and illness, must be guaranteed to all, and must be of high quality, accessible and affordable.*
- *Safety nets in case of lack of access to social security systems must be guaranteed for people of all ages but especially for the elderly, in a way that allows to live a life in dignity and participate into the societal life.*

8. How can the EU support vulnerable older persons who are not in a position to protect their own financial and personal interests, in particular in cross-border situations?

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...

Adequate, fair and sustainable pension systems

The Green Paper implies that retirement age should be increased to 68, 70 or 72 in the member states in order to uphold the old-age dependency ratio.

The arguments proposed in the Green Paper with respect to pension systems are biased and based on partial and misinterpreted data, and fail in considering how working lives matter in accruing adequate pensions that are also sustainable in terms of public finances.

The assumption is based on the notion that longer working lives are automatically prolonged on the basis of life expectancy as the main solution to address the fiscal pressure on pension system.

The Green Paper misinterprets and confuses the old age dependency ratio (population in working age 20-64/population of retirees 65+) with the economically relevant pension “support ratio” (contributors/pensioners). As documented in the Commission’s Ageing Report 2021, there is a tremendous difference between these two data. The alleged impact of extending working life to the age of 70 is based on a fundamental misinterpretation of demographic figures, by equating those of working age with the number of contributors and those above working age with the number of pensioners, wherever the age limit is set.

The reality is quite different: in 2019, in EU 27 only 73.1% of those of working age (20-64) were in employment, including many millions in precarious jobs and marginal part-time employment. On the other hand, 28% of all pensioners were aged below 65 (2016 figure/Ageing Report 2018). The reference to purely demographic data and, thereby, fully ignoring economic dependency realities, not only neglects the previous part of the Green Paper addressing the realities of the labour market, but also falls way behind the analyses in earlier documents of the Commission²².

Such an approach also fails to take into account the possibility of better employment integration across all ages in quality jobs, when it comes to discuss the future development of (economic) dependency ratios and the alleged need for (further) raising legal retirement age. Moreover, it is in sharp contrast to what is said in other parts of the Green Paper – see chapter

²² Demography Report 2008: “[There is] considerable scope for increased employment in most Member States and, consequently, an opportunity for achieving a much more favourable balance between the population in employment and retired older people. ... Raising employment levels is arguably the most effective strategy with which countries can prepare for population ageing” (p. 143/144).

White Paper on Pensions 2012: „The ageing challenge is often illustrated by the doubling of the old age dependency ratio (population 65+ to population 15-64) ... Yet the real issue is the economic dependency ratio, defined as the unemployed and pensioners as a percentage of the employed. ... Many countries have considerable scope for improving the future adequacy and sustainability of their pension systems by raising employment rates, and this not just in the higher age groups, but also for groups with lower employment rates such as women, migrants and youths. Reaching the EU employment target or catching up with the best-performing countries could almost neutralise the effects of population ageing on the weight of pensions on GDP” (p 7/8).

“Bringing more people into the workforce”²³. The Green Paper does not consider addressing pension fiscal sustainability through addressing precarious working conditions and non-standard jobs. In the case of these forms of employment, the social risks and social costs are shifted on the individual, and then to public finances. It would be worth to take up an analysis of the cost for society and public finances of performing work in a non-standard form or in forced self-employment and questioning whether it can be accepted in the light of the social mission of the European Union and its effects on finances and future generations. Perhaps the burden of future generations would not be so high if they were not condemned to low-quality jobs, instability and lack of access to social protection!

Vis-à-vis the expected demographic change and pensions, evidence provides valid arguments against the automatic increase of retirement age in line with life expectancy:

- the well documented and well-known disparities in life expectancy across sex and EU regions, and the other socio-economic factors that influence it, for example educational attainments;
- the type of jobs performed and the impact of arduous jobs on people’s health, capacity to work and life expectancy;
- the length of working lives in some sectors and regions and the age of entrance into the labour market;
- the very poor re-integration rates in work of people aged 55+.

In this sense, it should be considered to supplement national pension systems based on retirement age with fair and just mechanisms that allow workers to retire in good health and thus that take into due account all these critical circumstances.

In general, higher retirement ages are problematic for several reasons. One is that they make it more difficult for unemployed, including youth unemployed, to find work.

Another is that workers who perform arduous tasks, are not physically able to remain in their jobs until 70, often far from. These workers can often not retire in dignity but need to resort to social benefits until they are entitled to state pensions. Workers performing arduous jobs must have the possibility to retire earlier than the official pension age without losing full pension rights. It must be recognised that the nature of work influences the life expectancy of workers. It is a matter of fairness and equality.

Last but not least, there is an anachronistic approach in reprising the assumptions of the Ageing Report 2021, that the level of public expenditure for pensions, to be sustainable in the next decades – up to 2070 – must remain the same as in 2016 in spite of the foreseen ageing of the population.

Such a base-line scenario for public pension sustainability does not take into consideration any possible change in terms of inclusiveness into the labour market of more people, any progress in job continuity and security, job retention,

²³ On sustainability and retirement age, moreover, the annexed “fact sheet” is even more clear (and disappointing) as the related wording in the Green Paper. On page 4, referring to the projected increase of the purely demographic “old-age dependency ratio” (which completely ignores the economic status of people), it is stated: “This requires immediate action, if we want to ensure intergenerational fairness, and good living standards for all our citizens, young and old “. A graph illustrates that by raising the retirement age up to 70 each increase of this ratio could be stopped until 2040. Thus, not a sign of a strategy of better employment integration (in quality jobs, with secure careers and fair wages) of the tremendous number of those currently only marginally integrated (in precarious forms) or not integrated into the labour market at all throughout all ages. Instead, not to allow all those aged between 65 and 70 to enter retirement anymore is presented as key response to the ageing challenge.

and employment and remuneration conditions during the working lives of European people. No real progress in productivity is meant to impact workers lives and accrual of pension benefits. No real “making better of our working lives”.

Such a position is unacceptable. The potential of filling the gap between demographic and economic dependency must be exploited in order to ensure dignified working and living conditions for women, young, older and migrant workers outside the labour market; to ensure security for those in precarious jobs, underemployment and inactive people discouraged by the lack of opportunities.

The huge potential of more and better employment for more people as long as they can remain actively and safely at work must be exploited for the good of the society – otherwise one could wonder why the Green Paper addresses issues such as active ageing, inclusiveness into the labour market, and productivity.

Question n. 9

How can the EU support Member States' efforts to ensure more fairness in the social protection systems across generations, gender, age and income groups, ensuring that they remain fiscally sound?

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- *As a matter of fairness, it must be considered that life expectancy is much shorter than the EU average for many people in disadvantaged socio-economic situations; arduous workers; people who have poor education levels.*
- *Intergenerational solidarity and responsibility should not be separated from other forms of solidarity, i.e., between rich and poor. (Re)distributional social policies through, social contributions, solidarity-based social protection systems – funded by fair and progressive taxation - are needed, not only for the sustainability of our social systems but also to respond to climate change.*
- *It is also a matter of fairness to ensure everyone (young, women, elderly, migrant, disable workers) the possibility to live a life in dignity and secured adequate pensions for the future. The gap between demographic and economic dependency must be filled by investing into the labour market inclusiveness, contrasting flexi-jobs and atypical work not ensuring social security, improving employability via education and skilling; investing in secure and quality jobs fairly remunerated for as many people as possible.*
- *Intergenerational fairness can be ensured by providing young people quality jobs and fair working and remuneration conditions, able to ensure them effective and adequate pensions as it was the case of the past generations. **Intergenerational solidarity means simultaneously combating all potential obstacles preventing younger people from entering the labour market and older worker from remaining employed.***
- *The fiscal sustainability of such fair pension systems should be further funded by redistribution policies such as progressive taxation of high wealth and profits, and using the outcomes of boosted increase in productivity, for example linked to the digital transition.*
- *The taxation system should be adapted in order to tax progressively and properly digital and multinational companies where they carry out their activity.*
- *Safety nets and minimum guaranteed pensions that are adequate must be ensured to all workers and people in need.*

Question n. 10.

How can the risks of poverty in old age be reduced and addressed?

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See question n. 7

Question n. 11.

How can we ensure adequate pensions for those (mainly women) who spend large periods of their working life in unremunerated work (often care provision)?

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- *Public pension systems must be solidarity-based and funded adequately and consistently with the demographic and income needs of the European population. Assuming that pensioners must be struggling and risking poverty and social exclusion for mere fiscal reasons is not an option.*
- *Women's pension gap must be tackled via setting up all the work-life balancing measures thus enable them to take up secure, full-time employment. The gender pension gap must be addressed by tackling the gender pay gap and the systematic undervaluation of the work performed by women. Gender stereotypes in job access and career progression must be addressed. Domestic and informal care must be formalised, and professional care facilities must be funded, and should be accessible, affordable, and of high quality*
- *The EU should keep its focus on general equality and sharing of paid and family responsibilities between men and women, supported by working time arrangements, specific leaves, childcare and eldercare services*
- *It is crucial to engage in actions against undeclared and unprotected work; and to reduce forms of atypical work that do not foresee social security and that shift the responsibility of future risks, such as income maintenance in old age on individuals.*

Supplementary pensions can play a role in complementing public/quasi-public and collective pension income, covering the gap between the last salary and the pension received. Nevertheless, they cannot replace those systems.

The call for additional saving for retirement requires the recall that, according to Eurostat figures, 28% of European population aged 16+ does not even have the financial capacity to afford one-week annual holiday away from home. To demand, in this context, additional (private) retirement saving, such as via PEPP, as a key response to existing pension coverage and adequacy deficiencies does not seem consistent. The most inclusive way to promote supplementary pensions is through the second pillar and the collective bargaining. Third pillar pensions are only affordable for those who have savings capacity.

QUESTION N. 12

What role could supplementary pensions play in ensuring adequate retirement incomes? How could they be extended throughout the EU and what would be the EU's role in this process?

2500-character(s) maximum including spaces – online form will include only the text in italic

- *Supplementary pensions can play a role in complementing the main adequate income that should be ensured by public, universal, solidarity-based systems.*

- *First pillar pensions should guarantee a decent living standard for all. Supplementary pensions could help to improve the living standards of pensioners, but their lives should not depend on that income, especially in an environment of DC pensions, where the workers bear all the risks and there isn't a collective risk-sharing as in the first pillar pensions.*
- *Not only it is difficult for many Europeans to have a decent salary and an income that allows to lead a life in dignity, but private pension schemes hamper the effectiveness and profitability of solidarity-based schemes that are more secure and less costly for the workers*
- *There aren't good enough reasons to support individual private pensions, as per the conclusions of the [HIGH LEVEL EXPERT GROUP on pensions](#). In any case, if there is any development on supplementary pensions it should be through the collective bargaining and the second pillar. This is the only way to promote access to those systems to all individuals, and not only for those who have savings capacity.*

Meeting the health and long-term care needs of an ageing population

Retirement and old age should usher in a new phase of life to be enjoyed in peace and quiet, not in decline and loneliness, as clearly stated by the [FERPA](#), the European Federation of Elderly and Retired People in its [Charter of the rights of retired and elderly persons in Europe](#). Such right-based approach must be borne in mind when re-thinking of the future of an ageing society: elderly people are first of all people, not mere economic factors to invest or save on. A cultural development must be triggered to embrace the concept of **ageing in dignity**, focusing on well-being and physical and mental care of elderly people, and preventing situations of exploitation, violence, harassment, mistreatment and detriment of their dignity as human beings.

Poor health and abuse is the reality of many elderly women, which is widely ignored in official documents. Despite the increased awareness of abuse, discrimination and violence, data on violence against women over the age of 49, for example, are very limited.

The Green Paper proposes an interesting overview of the increasing needs of long-term care and the potential of the silver economy. As mentioned above, it must be clear that the variety of services provided in the framework of the “silver economy” include public services such as health care, long-term and elderly care, which are not mere business opportunities, but represent the foundation of a right-based society for all ages.

It is only public investment that can guarantee the public mission to provide accessible, high quality and affordable care to old age people is fulfilled. Although private, mainly non-profit and social economy organisations, have proved to be efficient providers of social care services, health and care are not areas where business can be made with high profit margins, without the detriment to quality of care and oppressive conditions on staff. The pandemic has, sadly, recently proved all this to be true.

To date economic and social policies have focused excessively on fiscal discipline rather than on public investment in health and care, this crisis clearly showed that this was to the detriment of people in general. This fiscal discipline focused on austerity, cuts and privatisation resulted in aging being seen as a cost on the country's budget, and therefore financing of the health sector dwindled. The ETUC has been denouncing the weakness of the health care systems in Europe for many years.

The European Economic Governance repeatedly emphasised that, as the population is ageing fast, the costs of health needs of the elderly will soon be unsustainable for public budgets. Indeed, over the last decade healthcare was primarily linked to the cost of supporting an aging population and therefore a threat to fiscal sustainability.

Such an approach compelled governments to save on and cut from public expenditure on health, in spite of the increase in care needs. A market-oriented approach on services that are supposed to be public because they are vital to the population, prevailed. This resulted, prior to the pandemic, in one out of three citizens already renouncing treatments due to excessive costs.

The Covid19 crisis exposes how this short-sighted approach was detrimental not only (although outstandingly) to the elderly, but also to wide population groups and potentially for everyone in the EU irrespectively of their age.

The ETUC and EPSU have repeatedly denounced the drastic reduction in public expenditure in health and long-term care as outrageous and anachronistic. Rather than investing in the sector, in particular when the ageing population is increasing and so are its needs, the opposite has been done. Data clearly show that while people are ageing, governments' expenditure in health is declining. There is a widening gap between the needs of the population and the response of the state.

Reducing the investment in health care, when the population is supposed to need it the most, neglects the most basic of human rights, which is to "age in dignity". The European Pillar of Social Rights takes a different approach. Health care is not considered a "cost"; rather a need and an opportunity for societal growth under several aspects.

The predicament of the elderly (especially the ones in need of long-term care) was serious prior to the Covid crisis, now it is dramatic. In many countries, the lack of medical and public hospital supplies has led to the situation where carers have to select which patients are given care. In some others, intensive hospital care was denied to 80+ with other conditions in addition to Covid – giving them a death sentence.

The relentless austerity approach hit hard on healthcare staff (over 70% of whom are female). Also, such an approach has had a consequent impact on the quality and the coverage of the essential services provided to patients.

The Stability and Growth Pact has imposed cost cutting only on the basis of future projections of ageing statistics. However, the consequences are clearly measurable and are being paid by people already in the pre-crisis: the steady decline in GDP percentage and in real terms for healthcare across the EU; the increase in out-of-pocket expenditure by people in accessing healthcare; and a drop in the number of hospital beds per inhabitant. Europe's capacity to respond to the Covid-19 emergency is severely challenged. The unpreparedness of care systems implies serious staff shortages, incapable to cope with the influx of patients.

The past decisions induced by the economic governance of the EU promoted privatisation, "rationalisation" and "cost-efficiency". This usually implied an aggregation of structures, a shift of already allocated resources, the de-

hospitalisation of care, and a total lack of public investment in personnel and services that would be needed²⁴.

Public spending needs urgently to progress in proportion to the most basic human needs and rights to dignified living conditions. The ETUC supports collectively funded public health and care, including long-term care services. Ageing populations should lead governments to spend more to protect the elderly and not less, as the current Stability and Growth Pact rules ask for investment in preventive healthcare, crucial in an ageing society, should be promoted and monitored.

Question n. 13

How can the EU support Member States' efforts to reconcile adequate and affordable healthcare and long-term care coverage with fiscal and financial sustainability?

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- *Following the logic of the “cost of ageing” an entire group of people were deprived of their future. A more forward-looking perspective to ensure quality healthcare requires a greater expenditure when the population is ageing, to better protect the elderly and not the reverse.*
- *Public spending urgently needs to progress in proportion to the most basic human needs and rights to dignified living across all ages and working conditions. So, the short- as well as the long-term interventions at EU level should allow for the shift of governance rules and room for manoeuvre, first addressing people's needs – also for the sake of the economy, of the environment and of the European social model.*
- *The ETUC thus advocates an integrated European approach to public health, with clear EU competence to support national governments to work more closely together to tackle challenges and find effective solutions, and thus for supporting quality public services, increasing investments, doubling the EU budget, also issuing EU debt, in order to ensure the multidimensional right-based approach of the SGD 3 and the EPSR principles 16 and 18.*
- *A more balance tax system is needed where multinational and digital companies are taxed in the country where they develop their activities. The ratio of the taxes paid by companies and by citizens should be rebalanced. Companies should contribute more in order to achieve those objectives.*

There is the need for an economic and social governance that invest and boost public and individual health protection and care in all MS:

- *in multidimensional preventive policies, encompassing education, healthcare and occupational health and safety, in a life-cycle approach;*
- *in the crucial health and long-term care sectors that can represent an opportunity to create more and high-quality jobs and bringing about an overall societal return;*
- *in more qualified and skilled staff, as it stands they are already incapable to meet pre-crisis demands,*
- *in planning a strategy for qualifying efficiently and in a forward-looking perspective based on current and future care needs;*

²⁴ The government expenditure for the EU remained stable or declining as -0.1% of GDP in 2015 and 2017 (Eurostat). Public investments in infrastructures (that may include infrastructures for the health system or long-term care) declined. In 2008, personal money that people needed to cover health expenditure ranged between 12% and 28% of the total expenditure for healthcare goods and services. In 2018, this range varied between 10 and 45%.

- in addressing and tackling the socio-economic inequalities that affect access to healthcare;
- in strengthening the coordination between health care and social services; in developing socio-sanitary structures able to prevent and serve dependency situations;
- in public funded research and development, to increase preparedness.

Question n. 14

How could the EU support Member States in addressing common long-term care challenges? What objectives and measures should be pursued through an EU policy framework addressing challenges such as accessibility, quality, affordability or working conditions? What are the considerations to be made for areas with low population density?

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- *It is crucial to recognise and formalise the situation of informal carers, in order to increase their skills and qualification, and to protect and ensure their rights*
- *The EU should focus on improving formal social care services.*
- *Care duties are usually performed by women: 70% of the health and long-term care staff is composed by women. The undervaluation of the work performed by women in the care sector must be urgently addressed. Cross-sectoral job evaluation schemes, based on objective criteria, should allow trade unions via collective bargaining to address equal pay for work of equal value. As per the [ETUC demands for a Gender Pay Transparency Directive](#), the value of work performed in feminised sectors, such as care, should be assessed and compared by reference to criteria including but not limited to: a) competence, including education, training, experience, knowledge, interpersonal skills, problem solving, organisational skills; b) effort, including physical, mental and psycho-social effort; c) responsibility, including accountability, responsibility for people, goods and equipment, information or financial resources; d) working conditions, including the nature of the tasks involved, organisational environment, physical, psychological or emotional environment.*
- *Technology and digitalisation should support staff and increase their productivity*
- *Technologies should not aim at replacing staff and their functions, especially in the relation to patients*
- *Public investment in long-term care must be engaged coherently with population needs*

Question n. 15

How can older people reap the benefits of the digitalisation of mobility and health services? How can the accessibility, availability, affordability and safety of public transport options for older persons, notably in rural and remote areas, be improved?

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Access to good health services locally should certainly be promoted. If necessary, mobile health facilities should be provided for the most remote areas. In this sense, digitalisation is a good step forward, but one should not be blind: elderly people are not necessarily able to book appointments or seek medical care online. In any case, physical accessible assistance should be provided to meet the needs of this group of people and help them in accessing medical care that cannot and must not be replaced by digital and technical facilities.

Efforts can be made in helping the elderly acquire most of the basic functions in terms of digital accessibility....

Improving well-being through intergenerational solidarity

European youth are severely affected by the pandemic. One in six young people lost their job due to the economic consequences of COVID-19. In September 2020, the EU youth unemployment rate was 17.1%. Youth unemployment has soared in several countries, including Spain (40,5%), Italy (29,7%), Bulgaria (18,3%) and France (19,6%).

The COVID-19 crisis has aggravated the situation of young people not in employment, education or training (NEETs). The number, especially in countries like Italy, Greece, Bulgaria and Romania, is on the increase. This includes the most vulnerable people, at a high risk of marginalisation, poverty and permanent disengagement from employment.

A [youth recovery](#) after Covid-19 requires quality jobs.

The latest demographic statistics and trends have shown a challenging situation ahead regarding the ageing society and workforce at European level. In this regard, trade unions together with the other social partners have to focus on encouraging intergenerational solidarity at the workplace and also in society. Different measures with the purpose of [strengthening inter-generational solidarity in the labour market](#) are needed, especially with the current high rate of unemployment among youth:

- Workers of all ages should benefit from a safe and healthy work environment, an inclusive and non-discriminatory workplace that allows them to develop and keep up with the new technologies;
- Creating policies that promote mentoring programs, ensuring a fair distribution of tasks according to their abilities/skills/knowledge, should be on the stakeholders' agenda in order to decrease the unemployment rate among youth.

The ETUC - Youth Committee and FERPA are engaged for a better Europe based on solidarity and equality, social justice and cohesion, peace and democracy also by promoting an intergenerational approach at all levels. We call for a timely implementation of the agreement signed by these two organisations in 2016 "A fairer Europe for all generations".

In 2013, the ETUC and its affiliates, together with its Youth Committee and FERPA, have committed fully (see ETUC Declaration [[<http://www.etuc.org/a/9433>]]) to ensure new impetus and a real commitment to develop active ageing and intergenerational solidarity-based policies. Indeed, the originality of the ETUC's and member organisations' action was the opportunity to address problems faced by young people and older people in the labour market, as well as their quality of life.

The measures taken must comply with the aims of **intergenerational solidarity**, which means **simultaneously combating all potential obstacles preventing younger people from entering the labour market and older worker from remaining employed**.

Question n. 16.

Are we sufficiently aware of the causes of and impacts of loneliness in our policy making? Which steps could be taken to help prevent loneliness and social isolation among older people? Which support can the EU give?

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Question n. 17

Which role can multigenerational living and housing play in urban and rural planning in addressing the challenges of an ageing population? How could it be better harnessed?

Public planning is very important. Multigenerational – and multi-income – living and housing (and parks etc) are important, not only in terms of an ageing population, but also for well-being, cohesion, environmental impacts, and quality of life.

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