



European Economic and Social Committee
Employers' Group

Newsletter

April 2018

The Plastics Strategy: an opportunity to build a competitive European market for secondary raw materials



Dear readers,

Plastics are present in every aspect of day-to-day life: from transport to construction, from telecommunications to consumer goods, and from food to health. Every year, Europeans consume 25 million tonnes of disposable plastic, which is mostly discarded as waste, with less than 30% being sent for recycling.

Action on plastics was identified as a priority in the 2015 Circular Economy Action Plan in order to help European businesses and consumers use resources in a more sustainable way. In this context, the European Strategy for Plastics in a Circular Economy, adopted on 16 January 2018, aims to transform the way plastic products are designed, produced, used and recycled in the EU. The Commission's proposal will have significant implications for consumers and businesses, both in the European Union and globally.

The European Economic and Social Committee is currently working on its opinion on a European strategy for plastics. The rapporteur for the document is Antonello Pezzini, member of the Employers' Group. The vote on the opinion will take place at the plenary session in May.

In the meantime, we would like to present you with a number of views on the strategy. We are honoured to have contributions from BusinessEurope, Orgalime, and the Polish Union of Plastic Converters in this edition of the Employers' Group newsletter. The authors focus on various aspects of the strategy and point out possible challenges that the strategy could present for Europe's plastics industry.

Jacek P. Krawczyk

President of the Employers' Group

Plastic is everywhere in our lives and in our economy. In the European technology and machinery sector represented by Orgalime, plastic is a highly developed material used in complex products that delivers a wide range of performance benefits and inspires innovation. For example, plastic allows advances in weight reduction and miniaturisation throughout a variety of applications, such as electrical and electronic equipment, reducing carbon emissions. It can be designed to meet very specific performance characteristics, including increasing energy efficiency or reducing waste.

At the same time, there remain undisputed environmental challenges stemming from the way our society uses and produces plastics today. The European engineering industries support further optimising the use of plastic throughout its life cycle in light of Europe's broader ambition for a circular economy, and to do so with the aim of modernising our economy and with important long-term societal objectives in mind: a competitive, low-carbon, circular, sustainable economy that creates jobs and growth, and enhances citizens' quality of life.

Europe's engineering and tech companies are global leaders in material efficiency innovation, overall product sustainability and the development of innovative waste management technologies – increasingly including digitally enabled solutions. This means that there is also an important business case for well-designed policy action, in particular for helping to build a competitive raw materials market.

But what is the best way to achieve these shared goals?

To deliver a win-win approach that will protect the environment, ensure consumer safety and safeguard the competitiveness of European industry, we see several promising short-term actions to **make recycled plastic more competitive** – and so stimulate the next step, namely the market-driven uptake of recycled plastic in a new generation of products.

We must start by **improving the output of the recycling process and boosting the quality of secondary raw materials to make these more attractive for use**. For companies using recycled materials in their products, their number-one concern is understandably that materials meet the right technical criteria in terms of performance, robustness and safety, next to their availability in sufficient quantities at a competitive price.

To respond to these challenges and stimulate a long-term market for recycled plastics, it will be essential to **prioritise stepping up the deployment of cutting-edge intelligent collection, sorting and recycling equipment**. In this context, Europe urgently needs to modernise its existing waste management infrastructures and invest in innovative waste management technologies, including digitally enabled systems. This will lay the groundwork for the development of large-scale sorting and recycling technology solutions here in Europe.

In addition, **minimum quality criteria for secondary raw materials based on ISO or EN standards** should be set. Easy and fair access to competitive, affordable and quality raw materials that meet technological and safety requirements will be a must to secure the competitiveness of Europe's industry in a circular economy.

A third pillar for success will be to ensure **harmonised waste treatment standards across Europe**: when it comes to waste electrical and electronic equipment (WEEE), for example, laying down minimum quality standards for the treatment of WEEE



based on the already existing standards developed by European standardisation organisations could help make quality levels more consistent across the EU.

In the light of the international dimension of the Plastics Strategy and the complex global supply chains of European manufacturers in terms of sourcing materials and components, it will also be important to **insist on high environmental standards in EU global trade policy instruments** – in particular, to elevate harmonised EU waste treatment standards to the global level.

However, it is also advisable to take a full-lifecycle approach to determine whether the use of recycled materials as inputs is necessarily the best approach in all cases. It would be useful to **develop a robust methodology to weigh up the overall costs and benefits for society** of re-using recycled materials containing certain substances compared to disposal. This can also help ensure effective implementation of the Ecodesign Directive as regards resource efficiency, by avoiding simple shifting of environmental burden from one lifecycle stage to another – something that could ultimately expose consumers to safety risks, or manufacturers to the risk of non-compliance with sector-specific product legislation.

Finally, additional measures in EU waste and substance policy can help contribute to the strategy's success, such as an **efficient implementation of the Waste Package** – in particular the tightened EU landfill and recycling policy – together with **improved implementation of the REACH Regulation** and especially the quality of Safety Data Sheets and Registration Dossiers. We advocate that **substance restrictions be implemented based on scientific evidence and coupled with sufficiently long compliance deadlines and an exemption mechanism where substitution is not technically viable**. A common RoHS and REACH substance evaluation methodology should be agreed to improve overall legislative consistency.

If we can take these steps, we can incentivise businesses and stimulate market acceptance for more recycled plastics in products over time. The result will be a win-win solution for citizens, the planet and European industry over the long term. The European engineering industries stand ready to help build this more competitive European secondary raw materials market – turning today's plastics challenges into tomorrow's opportunities for all Europeans.



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Everyone has a role to play in the EU Plastics Strategy

To reach the ambitious goals of the Plastics Strategy, the European Commission has called on companies to come forward with voluntary pledges to create a European market for recyclable plastics of at least 10 million tonnes annually by 2025. BusinessEurope Director General Markus J. Beyrer explains how business and consumer associations can both inform and help companies to make these pledges.

Plastics are an integral part of our daily life in Europe. They provide countless benefits, such as protecting our food and making it easier and cheaper to manufacture and transport products. But many plastics end up in places where they are not supposed to. Furthermore, many plastics are currently not recycled, and that's a problem considering that we as Europeans use more than 49 million tonnes of it each year.

Therefore, the European Commission is asking companies across Europe to pledge by 30 June 2018 how many tonnes of recycled plastics they think they are able to take up in their production processes by 2025. In turn, the Commission will inform waste handlers, who collect and sort the plastic waste, how much demand for recycled plastics they can expect by that time. Voilà, a future market for recycled plastics is created. Easier said than done? At the moment, I believe mostly companies that are active stakeholders in Brussels are really aware of this pledging exercise. Although the Commission held a series of workshops on this in March, much more needs to be done to spread the word beyond Brussels.

And that's where everyone has a role to play:

- BusinessEurope and its national member federations engage with their company members in the Member States to inform on what the Commission is looking for in terms of pledging. You can find more info about this on the Circular Economy Industry Platform (www.circulareconomy.eu/resources). On the Industry Platform we have also collected over 120 examples of good practices how plastics producers and other sectors add to the circular economy, and what challenges they face.
- Consumer organisations and consumers can stimulate companies to submit a pledge by expressing their preference for recycled plastics over virgin plastics.
- The Commission, in addition to the workshops, must do much more, for example engage via its national representative offices with national governments to inform companies.

Awareness raising is only the first step of course. The next step is for the companies to make an assessment of how much they can realistically pledge from a business case point-of-view. This will require intensive discussions between many layers of a company, such as its management, its manufacturing plants and other departments. Because this can be a very time-consuming exercise, we have asked Commission Vice President Katainen and Commissioner Vella to be mindful of the fact that companies might not be able to make a pledge before the 30 June deadline, even though they wish to do so.



Furthermore, European policymakers and national governments should push forward with the Plastics Strategy as soon as possible, so they create the right environment for companies to make the business case for recyclable plastics as soon as possible. For that, we have proposed to the European Parliament and the Council to:

- Help make Europe **a frontrunner in sorting and recycling** of plastics waste by investing in proper waste management infrastructure. It can also provide support for value chain cooperation, raise awareness for responsible behaviour to consumers and invest in digital infrastructure like big data and smart solutions for plastic packaging.
- Agree on an **EU-wide approach for life cycle assessments**. These take into account the environmental impact of the production, use and after-use phase of a plastic product. We can then know exactly how environmentally friendly each product is throughout its lifetime.
- **Push countries outside of Europe to make similar efforts**. Because 98% of marine pollution happens outside of the EU and the US, international cooperation is the only way to solve the issue, just like on climate change. As recyclable plastics are more expensive than virgin plastics, we must prevent that our plastic producers face unfair competition from non-circular imported plastic products.

In sum, I am positive that with the right policy framework and good awareness raising, we can together reach the goals of the Plastics Strategy. Luckily, we do not start from scratch, as 3 million tonnes of plastics are currently recycled today: That's 30% of the target. At the end of this exercise, we can not only have a bigger circular economy in Europe, but we will also be able to benefit from the export of our circular technologies and good practices.



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The EU Strategy for plastics as seen by plastic converters

In January 2017, the European Commission published its Roadmap for the Strategy on Plastics in a Circular Economy. Following this document, the European Commission published its Strategy for plastics on 16 January, which had been long awaited by a range of industrial and environmental sectors. This document sets out basic information on plastics and focuses on key issues relating to the use of plastics and managing waste, in particular: improving the economics and quality of plastic recycling, reducing the amount of plastic waste and litter, stepping up innovation and investment, and taking action on a global scale. The Commission declared, among other things, that it would strive to ensure that by 2030, 100% of plastic packaging will be suitable for reuse or recycling.

European industry, represented by European Plastics Converters (EuPC) – which brings together many sectoral organisations and associations from the Member States – together with the polymer producers' association, PlasticsEurope, not only welcomed most of the proposals set out in the Strategy, but also proposed a range of voluntary initiatives inspired by the examples of the VinylPlus® and Petcore Europe projects, which are intended to make it easier to achieve the objectives without the need to bring in restrictive regulations.

Alongside discussions of the Strategy, EuPC and five other European organisations active in the plastics converting value chain undertook – in cooperation with the European Commission – to launch a circular economy platform aimed at achieving a plastic waste recycling rate of 50% by 2040.

The positive reception of the Strategy does not alter the fact that the bodies overseeing the industrial companies involved in the production, converting and recycling value chain see no solutions on the horizon that would remove the most significant barriers to implementing the goals in the Strategy.

The first of these barriers is the fact – mentioned in the Strategy itself – that there is only a very small price difference between recyclates (waste that has been converted for reuse) and "new" plastics on the recyclates market. The margins at all stages of the converting process are very small, as it would be absurd if the price of recyclates was higher than the price of "new" plastics – and yet such situations have occurred. The reasons for this have long been understood by members of this industry, but we have so far been unable to solve this problem. Most economic operators therefore find it economically impossible to decide to invest in increasing capacity to process plastic waste. If the market does not create incentives to develop recycling capacity, the question remains: how is the expected increase in recycling to come about?

The Strategy also presents the opportunities, risks and difficulties relating to the use of plastics made from bio-based feedstocks and compostable and biodegradable plastics.

Unfortunately, the document does not mention the fundamental constraint on the use of this type of plastics, namely the fact that they cost twice or three times as much, and that their



characteristics (transparency, ability to withstand usage temperature, mechanical strength) do not equal those of the plastics currently used.

Undoubtedly, the platforms mentioned above will improve the situation, avoiding waste (e.g. badly sorted plastics ending up in landfills) and a lack of forethought (e.g. the promotion of design solutions which, while visually attractive to consumers, constrain the ability to recycle).

However, it is debatable whether this progress is commensurate to the extent of expectations.

Surveys on plastics indicate that public views on the impact of plastics on the environment are closer to myth than reality. Public opinion is aware of the principal negative impacts of plastics but also ascribes them various shortcomings that in reality do not exist, and – even worse – is not aware of most of the positive aspects of plastics: not only practical ones, but also those connected to environmental protection. This state of affairs means that various levels of governance might be tempted to achieve the Strategy's objectives by means of arbitrary prohibitions, because there will be no mass demonstrations in defence of plastics.

From an expert point of view, it is clear that the most important prerequisite for achieving the goals that the Strategy was drafted to attain is to work intensively to come up with reliable data about the advantages and disadvantages of plastics so that consumers understand why it is better for the environment to buy juice in a (not entirely transparent and smooth) bottle made from compostable plastic rather than in a glass bottle that is bought together with the juice or brought along from home to be refilled. Without this information, consumers will not accept that this kind of bottle is more expensive than the other kind, which they were used to in the past. Without this information, consumers will not use their smartphone to scan the code on the label telling them what to do with an empty bottle in the destination they are currently spending their weekend.



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Evaluation of the Better Regulation Agenda and way forward: the view of civil society

Last October, the European Commission issued a Communication outlining the state of play in the implementation of the Better Regulation Agenda. Its aim was to take stock of the programme's main achievements since its adoption in May 2015 and take a look at future priorities and actions.

It is no coincidence that the Commission issued the Communication together with its 2018 annual work programme: the Secretariat-General is carrying out a comprehensive evaluation of the better regulation programme this year, including a broad stakeholder consultation before the summer. The results of this review will determine in which form – and to what extent – the Agenda will continue under the new Commission in 2019.

The EESC has acquired considerable knowledge and expertise in better regulation over the past years. This comes not only from our participation in the Commission's REFIT Platform and the evaluations we conduct, but especially the excellent opinions members have drafted on the topic and its sub-areas – be it on impact assessments, stakeholder consultations, implementation or enforcement. Meanwhile, our recently published study on transparency in trilogue negotiations has become a central reference point in the current debate on how to improve transparency and accountability in this so important – yet opaque – stage of EU policy-making.

Is it therefore surprising, to say the least, that the Commission has not asked us specifically for an opinion on their assessment. This has not, however, prevented us from making our views known and contributing to the on-going evaluation. With the support of our colleagues in the study group, we have drawn up an own-initiative opinion that not only constitutes a retrospective assessment of what the Commission has achieved in better regulation since May 2015, but also represents a coordinated and agreed EESC position that can serve as basis for a contribution to the forthcoming public consultation and input by civil society into the designing and priority-setting of the EU's better regulation programme after 2019.

Looking back, it is important to acknowledge the achievements the Commission has made since 2015 in bringing about better regulation: the policy-designing process is today more transparent and inclusive than before; impact assessments are carried out more systematically, their quality is being scrutinised by the independent Regulatory Scrutiny Board (RSB) and better account is now being taken of the particular needs of SMEs; the Better Regulation Guidelines and Toolbox provide Commission services with a proper framework for ensuring legislative quality; existing legislation is evaluated before it is revised or new laws proposed; and the REFIT Platform offers a mechanism for bottom-up feedback by those for whom legislation is intended on its performance in practice. For these



reasons, we welcome the progress made to date and encourage the Commission to ensure continuation of the programme after 2019.

That said, better regulation is a process subject to constant improvement and continued efforts are required from all parties involved. In this regard, unfortunately, the Communication remains too vague on how exactly the Commission seeks to develop the Agenda further. Our opinion therefore sets out concrete suggestions for each of the aspects of better regulation addressed in the Communication. Our ideas cover the entire policy cycle: from the policy-designing phase (impact assessments, consultations, scrutiny) to implementation and enforcement and back to ex-post evaluations and regulatory simplification. Finally, yet importantly, we call upon the Commission and the other EU institutions to formally appreciate the important role of the EESC in this area by including the Committee in the Inter-institutional Agreement on Better Law-Making.

In conclusion, I would like to again thank all members of the study group for their excellent collaboration on this important work and all our colleagues in the INT section for their encouraging support.



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The employers' priorities for 2018

SUMMARY OF THE SECOND PART OF THE DEBATE

Brexit, the next EU budget and the future of the single market are the core interests of the European employers' organisations. On 14 March 2018, representatives of BusinessEurope, EuroChambres and CEEP presented the priorities of their organisations for 2018 and discussed the issues with the members of the Employers' Group.

EP elections, MFF and better regulation in the focus of CEEP

The upcoming European elections and advocating for broad participation in the vote is one of the priorities for CEEP in 2018. Cooperation between all employers' organisations and reaching people with joint positive messages would help to counteract populism and Euroscepticism, underlined Valeria Ronzitti, general secretary of CEEP.

CEEP also intends to focus on the next Multiannual Financial Framework (MFF) and provide SMEs with practical tools for investment. The EU migration policy must also play a role in the upcoming MFF through dedicated programmes for integrating migrants into labour markets. These kinds of activities will require the joint involvement of employers and trade unions.

Better regulation and the legacy of REFIT platform activities is another topic on which CEEP is working jointly with BusinessEurope and chambers of commerce. The organisations are preparing a joint position paper pointing out the inconsistencies that arise from EU law in relation to the MFF. The second document will focus on gold-plating and specific examples of how over-implementation creates problems for companies in Europe.

Trade, single market and industrial strategy – priorities for BusinessEurope

Although there are reasons for moderate optimism in terms of economic recovery, we must acknowledge that growth is still slower than elsewhere, said Markus Beyrer, director general of BusinessEurope. BusinessEurope's reform barometer, soon to be published, clearly shows that the EU is still underperforming in implementing the necessary reforms.

On the subject of trade, Mr Beyrer referred to the uncertainty caused by the recent US measures and expressed his hope that the situation would not further escalate. He underlined the



importance of ongoing trade negotiations and pointed out that in trade deals the EU must not be naïve as the reality was becoming more and more difficult.

With regard to industrial strategy, BusinessEurope strongly supports having long-term targets, enabling progress to be evaluated. Moreover, good results are possible only with proper levels of investment. BusinessEurope is against merging the industrial pillar with societal challenges in the next Framework Programme (FP9).

The single market remains a key concern for BusinessEurope as we still face a wave of protectionism. The progress and final shape of certain issues in the coming months will be a kind of test for policy-makers' commitment to defending the achievements of the single market.

EuroChambres stresses SMEs' needs

Disagreement around trade with the US is also a serious concern for EuroChambres and we need to find a solution that respects the WTO rules, stated Ben Butters, policy director for EuroChambres. The organisation is calling for an SME-friendly trade policy that will help SMEs capitalise on trade agreements.

Certain support for SMEs is also necessary in preparation for Brexit as small businesses do not have proper contingency plans for Brexit. Closer cooperation between customs authorities would help SMEs to assess the implications of Brexit for them.

Mr Butters also elaborated on growing concerns related to skills mismatch and challenges that employers are facing in finding skilled workers. Further promotion of workers' mobility and integration of migrants would be a part of the solution.

Referring to the next EU budget, Mr Butters underlined that it has to have the right structure, be SME friendly and respect the subsidiarity principle. EuroChambres continues to work on the "think small first" principle to ensure that it is respected and implemented as there still remains room for improvement.

It is time for the employers to stand up together, remain united and defend basic values and the interests that are important for us, said Jacek P. Krawczyk, president of the Employers' Group, summarising the debate. It is especially important in the current challenging times with growing competitive pressure from outside the EU.



Bridging the Skills Gap

THE EMPLOYERS' PERSPECTIVE

In order to bridge the skills gap, we must first identify precisely which skills are needed for the future. This remains difficult, due to the rapid pace of change we are seeing today. Adaptation of education systems, development of lifelong learning systems and close cooperation between employers, policy-makers and academics are some of the ways to help people adapt their skills to the demands of future labour markets. These were among the conclusions reached at the conference on "Bridging the Skills Gap for Growth and Job Creation – the Business Perspective", which took place on 22 March 2018 in Sofia, Bulgaria.

"Ten years ago, the fastest growing high tech companies were oil companies. Data is now the new oil," underlined Bojidar Danev, Executive President of the Bulgarian Industrial Association and President in rotation of the Association of the Organisations of Bulgarian Employers. In his view, the digital economy requires fewer but better qualified workers with specific technical competences, which are increasingly scarce in labour markets.

"European companies are experiencing increasing difficulties in finding skilled workers," recalled Jacek P. Krawczyk, President of the Employers' Group, in his speech. He underlined that a highly skilled labour force is indispensable if we are to benefit from digitalisation and boost competitiveness through increased productivity. Employers are obliged to help public authorities and educational institutions in their efforts to adjust education systems to the needs of the future.

Iliana Iotova, Vice-President of the Republic of Bulgaria, highlighted the unprecedented pace of the ongoing changes. "What used to take at least one or two generations now happens in 20 years," she said, referring to the fourth industrial revolution and its consequences for labour markets. She noted that this was why it was so important to invest in education, to develop more flexible forms of learning, and to strengthen the link between education and business.



"A major challenge we are facing now is identifying the skills that the labour market of the future will require," underlined Zornitza Rusinova, Deputy Minister of Labour and Social Policy. In her opinion, it is only by correctly predicting future trends that we will be able to plan better and link policies and actions for employment, education and training with the needs of employers.



While systemic changes to education and training are one side of the coin, people's attitudes and their eagerness to constantly acquire new skills are equally important. However, attitudes need to be shaped at a very early stage – both at school and by parents.

The conference was brought to a close with the joint declaration of the Employers' Group and the Association of the Organisations of Bulgarian Employers. This document calls for a number of practical measures aimed at adapting labour markets and education systems to the needs of the future. These include removing obstacles to job creation, motivating people to develop skills themselves and adopting an approach based on "flexicurity" in order to adapt labour legislation to the needs of the modern economy.

Within education systems, we need to foster creativity, an entrepreneurial mindset and mobility in education and training at all levels, to invest in STEM (science, technology, engineering and mathematics) skills, to foster lifelong learning while promoting work-based learning and VET and to reinforce links between businesses and education providers, thereby avoiding skills mismatches.

The event was organised jointly by the Employers' Group and the Association of the Organisations of Bulgarian Employers, and was one of the official events organised by the Bulgarian Presidency of the Council of the European Union.

The day before the Employers' Group event, the delegation of the EESC Members participated in high-level conference "Future of work: a lifecycle approach" organised by the Bulgarian Presidency.

"The ongoing changes are unavoidable consequences of the 4th industrial revolution and its elements: digitalisation, robotization, AI development, Internet of Things, etc. This brings both challenges and opportunities; it depends on our actions to determine which will prevail. It's an enormous change management process – underlined Jacek P. Krawczyk, President of the Employers' Group in his intervention. In order to bring more people to labour markets a number of actions is needed. He reminded that skills mismatches are already dragging down on potential economic growth and they reduce EU productivity by 2%.

On the second day of the conference, Milena Angelova, EESC rapporteur on the future of work, presented the EESC recommendations to the participants of the event.



The SMEs, Crafts and Family Business category in favour of granting the sector easier access to information regarding its needs and establishing a stronger ecosystem geared towards sound growth

Improving access to SME-related documents, ideas for facilitating access to EU programmes for SMEs and helping establish a more SME-friendly ecosystem – these were just a few of the points discussed during the meeting of the SMEs, Crafts and Family Business category. The meeting took place on Thursday 12 April 2018 and was chaired by the category's spokesperson, Pietro Francesco De Lotto.

The category will attempt to give EESC members and the public easier access to the EESC's work on SMEs. The main challenge will be ensuring easy access to EESC opinions which do not focus solely on SMEs, crafts and family businesses, but which do contain key references to this sector. This would increase the flow of information on this particular type of enterprise.

Regarding the future financial perspective (post-2020 EU MFF), the focus will have to be on increasing opportunities for SMEs to benefit from EU programmes which should be designed to be more accessible, less burdensome and bureaucratic, more effective and related to the real situation of SMEs, crafts and family businesses in the Member States. Particular attention should be given to strengthening the ecosystem in which this type of business operates. This would increase opportunities for growth.

The members of the SMEs, Crafts and Family Business category will follow the EESC's work on the post-2020 EU MFF which is due to start in May. Category members discussed the arrangements for future meetings. Two meetings are currently planned for 2018, one in September and one in November.

It was the first meeting organised after the extraordinary meeting (on 6 November 2017) during which the category's name changed from "SMEs, Professions and Crafts" to better reflect developments in the category's membership (40 members, 33 of whom are drawn from the Employers' Group and seven from the Various Interests Group).



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