

**COMMISSION PROPOSAL FOR A RECOMMENDATION
OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL
ON A EUROPEAN QUALIFICATIONS FRAMEWORK FOR LIFELONG LEARNING**

CEEMET POSITION

CEEMET represents the interests of employers' organisations in the metal, engineering and technology-based industries from 21 countries with a particular focus on social policy issues. Furthermore, CEEMET has established and is developing a network of contacts with employer organisations from the new EU Member States. Our member organisations currently represent around 200,000 companies, employing some 12,5 million people.

CEEMET acknowledges the Commission's proposal for a Recommendation of the European Parliament and of the Council on the establishment of a European Qualifications Framework for life long learning. CEEMET welcomes the fact that some of the comments included in its Position Paper¹ to the previous consultation document have been taken into account.

Before entering into the detailed comments, CEEMET emphasizes that a **common understanding of the principal technical terms** used is an indispensable prerequisite which in its opinion is missing in the proposal for a Recommendation of the European Parliament and of the Council on a European Qualifications Framework for Lifelong Learning of 5 September 2006. Any such common understanding must, of course, not interfere with national systems or definitions.

THE EQF'S PURPOSE

According to the Commission, the EQF shall "act as a translation device and neutral reference point for facilitating a comparison between qualifications across different education and training systems and to strengthen co-operation and mutual trust between the relevant stakeholders".

CEEMET welcomes the main goals of the EQF, namely a greater transparency and improved comparability of the qualifications in the different European vocational and higher education systems.

However, CEEMET would like to underline that the EQF can **only be of indicative and voluntary nature**.

THE DEVICE

CEEMET welcomes the "**learning outcomes approach**". The corresponding principles have to be actually applied and the qualifications should be classified according to the results of learning and not to the duration of the studies. Moreover the results of learning taken into account should be really assessed and validated. It is therefore crucial to avoid the time-based approach. In this respect, though CEEMET is favourable to the integration of the Bologna process in the EQF, it sees some difficulties

¹ CEEMET position on the Commission consultation on a European Qualifications Framework for Lifelong Learning – December 2005

in this integration since both systems are based on different approaches. Would time-based reference levels be included in the EQF system, this would set a frontier between higher education (with qualifications based on duration) and VET (with qualifications based on learning outcomes) by preventing a proper comparison. Similarly, CEEMET would also like to underline that if the EQF and ECVET are to be implemented and combined, it is important that they are compatible. In this respect, the learning outcomes approach of the EQF is the only feasible way.

As to the **terminology**, CEEMET is concerned about the proper use of the term “competence”. In CEEMET’s view, it is not clear which “competences” are addressed. Generally, for employers, the term “competence” is defined as “the proven/demonstrated - and individual - capacity to use know-how, skills, qualifications or knowledge in order to meet usual - and changing - occupational situations and requirements”. The difficulty thus stems from the fact that the levels of autonomy and responsibility are still very seldom evaluated before delivering a qualification/certification, especially when this is done at the end of initial training of younger people. Even though in some countries the assessment systems adopted by the schools or universities nowadays include elements of competence based assessment organised jointly with the employers, in many countries the assessment systems tend to focus on skills and knowledge only.

Therefore, CEEMET wonders **how the EQF level will be determined** on the basis of the levels of each column (skills, knowledge and competence) which could differ. Indeed, if the “best fit” principle enables to refer to a qualification at a level according to the descriptors in the two first columns referring to “knowledge” and “skills”, it cannot necessarily be concluded that the person has the corresponding “competences”. And vice-versa a person with a certain level of “competences” does not necessarily have the corresponding levels of skills and knowledge - this issue is important for the consequences concerning the classification linked to collective agreements of the manufacturing industries in several countries. CEEMET thus fears that the use of the EQF based on one level resulting from the combination of the three criteria – knowledge, skills and competences – will result in the prioritisation of the knowledge reference, and hence, to the under-evaluation of “competences” as well as of vocational training and continuous education as a whole.

THE IMPLEMENTATION

As a general remark, CEEMET feels that some **more experimentation** of the EQF shall demonstrate if it is an operational and neutral device and, only of that basis, decide of its evolution if necessary.

The use of the EQF references implies an evaluation of the educational programs/diplomas at national level for the establishment of NQF. This could result in an under/over-evaluation of qualifications by reference to the EQF or in a under/over-evaluation of some forms of education/training compared to others in the NQF.

It is also important that the EQF implementation does not lead to a reduction of flexibility of the educational programs to adapt to labour market needs.

Finally, since social partners have been little involved at European level in the preparation of the EQF, CEEMET feels that qualifications will be better accepted on the labour market if the social partners at national level are involved in its definition and in the decision of classification within the NQF.

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