

Reply to Call for Evidence on Action Plan to implement the European Pillar of Social Rights

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Introduction

Pearle*-Live Performance Europe, representing over 13,000 organisations and companies in the music, performing arts, and live events sectors, welcomes the opportunity to contribute to the call for evidence on the future Action Plan of the European Pillar of Social Rights.

As a European employers' association and active participant in the European sectoral social dialogue, Pearle welcomes the ongoing commitment of the European institutions to further advance the implementation of the European Pillar of Social Rights. Pearle* recognises the importance of such a European Pillar as a cornerstone of the European Union and underlines the importance of ensuring that the future Action Plan builds on the progress achieved to date, while effectively tackling remaining and emerging challenges.

Below are our comments on the call for evidence.

Comments

Pearle* welcomes the realisation of the action plan in line with the 20 principles set out in the European Pillar of Social Rights. In this regard, Pearle* acknowledges the significant progress made under the **2021 Action Plan**¹, notably the **delivery of 74 out of 75 initiatives**. The introduction of the EU headline targets on employment, skills, and poverty reduction, which have set a common framework for action among Member States and strengthened the monitoring of socio-economic development at both national and EU levels, is therefore important. Pearle* particularly welcomes the commitment made to enhance social dialogue and to improve access to upskilling and reskilling opportunities, which are of increasing relevance in the context of the green and digital transitions.

Nevertheless, while Pearle* acknowledges the progress made under the 2021 Action Plan, from a sectoral viewpoint, we consider that several areas require further attention to fully realise the objectives of the European Pillar of Social Rights, as it needs time to implement new rules and adjust policies at the member state (and often regional and local) level. As every sector has its particularities and challenges, from the perspective of the live performance sector, the Action Plan can serve as a framework to further look into targeted or sectoral challenges.

¹ [The European Pillar of Social Rights Action Plan](#)

The cultural and creative sector works with professionals who have mixed employment status, different employers, and often internationally. Such models of traditional employment indicators and training schemes fail to capture adequately. Whereas employers pay directly for employees and indirectly for self-employed social contributions, the practice shows that there is a gap in access to social benefits (such as unemployment, healthcare, etc) or other instruments such as access to training. The Council recommendation on access to social protection (Council Recommendation (2019/C 387/01) of 8 November 2019) has been an important initiative that deserves to be further explored.

Secondly, although digital and green transitions receive recognition in the Plan, the social implications of these transitions are not equally considered in all sectors, such as the cultural and creative sectors. In these sectors, digitalisation affects production, audience engagement, and distribution of content. However, there is a lack of targeted measures to ensure that workers and organisations can adapt successfully, whether through access to tailored training, investment in digital skills, or support for sustainable business models in an evolving technological landscape. These efforts should also take into account regional development, addressing disparities between more urban and rural regions of the EU to ensure equal opportunities for adaptation and growth across territories.

The Plan could benefit from stronger instruments to ensure its targets translate into concrete results, particularly as regards monitoring and reporting of member states, and enhanced cooperation between member states concerning labour mobility.

Therefore, the new Action Plan offers an opportunity to close the gaps identified in the first framework and to respond more directly to the realities of Europe's diverse labour markets. In Pearle's view, the following should be prioritised in the new plan.

- **Social security and mobility**

Finalise the review of the social security coordination regulation, including an exemption for very short-term posting, which would improve and reduce admin burden for workers and employers. Furthermore, include measures to continue reinforcing the portability of social security rights across Member States. Concrete steps are needed to ensure that workers who move between countries or alternate between employment and self-employment can maintain access to social protection without administrative or legal obstacles, whilst admin burdens for employers need to be reduced, which is a concrete and real problem for micro and SMEs. Mobility is essential for artistic cooperation and touring, and a framework which is a better fit to the present realities would reduce fragmentation and legal uncertainty.

In addition, access to social protection should be guaranteed for all workers, irrespective of their employment status, including self-employed and project-based workers, and should also take into account the reality of longer working careers. Recognition of non-standard and cross-border work patterns is therefore necessary, with particular attention to the portability of rights, clarity on applicable labour laws, and the coordination of social security systems.

Digitalisation of social security, such as the deployment of the ESSpass, the e-ID and the digital wallet, are tools that could be a game-changer for the benefit of all. In addition, the proposal

for an eDeclaration tool for the posting of workers², is to be included as a recent initiative to support the enforcement of the posting of workers.

- **Digitalisation and artificial intelligence**

Address the impact of digitalisation and artificial intelligence on work in the cultural and creative sectors. This requires investment in digital skills and training, support for SMEs and micro-enterprises to adapt to technological change, and safeguards to ensure that AI respects copyright and the value of creative works. Such measures are crucial to protect both workers and employers while fostering innovation in the sector.

- **Lifelong learning and skills development**

Ensure access to lifelong learning opportunities tailored to atypical work forms. Training schemes and reskilling initiatives should be designed to reflect the intermittent nature of work in the cultural sector. This would help equip workers with the skills needed to thrive in changing labour markets and the entire sector to grow and make progress. The possibility for social partners to access funding and set up training funds are ways to have an accelerating effect. The new MFF and in particular the ESFPlus, as well as cohesion funds, should facilitate this.

- **Connection with upcoming initiatives**

Establish stronger connections with other upcoming initiatives. The Quality Jobs Roadmap can provide a framework for fair and sustainable working conditions, while the Culture Compass offers an opportunity to integrate the specific needs of the cultural and creative sectors into the broader social policy agenda. Furthermore, concerning diversity and inclusion, new LGBTIQ+ equality and anti-racism strategies post-2025 should allow for further integration and ensure diversity policies across the EU. Building these links will help build stronger and more coherent EU-wide frameworks and ensure that future measures take into account diverse work and sectoral realities.

Conclusion

In conclusion, Pearle* welcomes the Commission's initiative to develop a new Action Plan to support the implementation of the European Pillar of Social Rights. We recognise the progress made under the previous Action Plan, but given the challenges that remain, the new plan must go further and reflect today's socio-economic and labour market realities. It should take into account sector-specific circumstances where needed and introduce targeted measures that respond to the diversity of employment patterns, such as in the cultural and creative sectors.

The new Action Plan should therefore strengthen the portability of social security rights for mobile and cross-border workers, ensure access to social protection for all forms of employment, address the social dimension of digitalisation and artificial intelligence, and promote lifelong learning opportunities adapted to atypical careers. At the same time, it should remain closely connected with broader EU initiatives, such as the Quality Jobs Roadmap and the Culture Compass, and contribute to simplification by clarifying rules and streamlining procedures.

² [Proposal for a REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL on a public interface connected to the Internal Market Information System for the declaration of posting of workers and amending Regulation \(EU\) No 1024/2012 \(COM\(2024\) 531\)](#)

On this note, we want to highlight that simplification is essential to ensure that social rights can be effectively implemented without creating disproportionate administrative or financial burdens, particularly for SMEs and micro-enterprises, which constitute the majority of players in the live performance sector. Simplification also ensures compliance, which means better functioning labour markets, a level playing field across Europe and enhanced social systems, whilst less costs for public authorities on enforcement measures.

Therefore, it is important that any new obligations introduced through the Action Plan are proportionate and manageable, as well as capacity-building support for smaller SMEs and micro-enterprises. A condition *sine qua non* should be that a rule should not take more than a few steps to comply with, at almost zero administrative cost. Simplified reporting requirements and introducing sector-specific guidance can help employers uphold social standards without excessive administrative costs.

By combining these elements, the Action Plan can achieve benefits for workers and employers, reinforce Europe's social model, and provide a coherent framework that enables the cultural and creative sectors and the wider European economic sector to remain competitive, resilient, and socially inclusive.