RESEARCH REPORT

Industrial relations and social dialogue

Involvement of employer organisations and trade unions in the European Semester in 2024–2025

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Eurofound

European Foundation for the Improvement of Living and Working Conditions

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Abbreviations

AK	Chamber of Labour Vienna
APR	annual progress report
CDSEI	Social Dialogue Committee for European and International Issues
CSR	country-specific recommendation
DG	directorate-general
EESC	European Economic and Social Committee
EMCO	Employment Committee (an advisory committee to the Employment, Social Policy, Health and Consumer Affairs Council)
EPSCO	Employment, Social Policy, Health and Consumer Affairs Council
ESG	European Semester Group
ETUC	European Trade Union Confederation
MCESD	Malta Council for Economic and Social Development
MTFSP	medium-term fiscal-structural plan
NED	National Economic Dialogue
NESC	national economic and social council
NGO	non-governmental organisation
ÖGB	Austrian Trade Union Federation
RRF	Recovery and Resilience Facility
RRP	recovery and resilience plan
SCF	Social Convergence Framework
SER	Social and Economic Council
SG REFORM	European Commission’s Reform and Investment Task Force
SPC	Social Protection Committee
WKÖ	Austrian Economic Chambers
ZSSS	Association of Free Trade Unions of Slovenia

Executive summary

Introduction

Eurofound has a long-standing tradition of monitoring the involvement of social partners in the European Semester. Recently, some new elements were added to the European economic governance framework. At the end of 2024, governments submitted, for the first time, medium-term fiscal-structural plans (MTFSPs). Also for the first time, they produced annual progress reports (APRs) on the implementation of their MTFSPs in 2025. The creation of the Social Convergence Framework (SCF) is another development. At the same time, the well-established practices of running European Semester fact-finding missions, and producing related country reports and country-specific recommendations, continued.

This report looks at how social partners were involved in these aspects of the European Semester. It combines information from document analyses and expert interviews with information provided directly by national governments and by representatives of national employer organisations and trade unions. The information is analysed from a comparative perspective and is summarised for each EU Member State in country fiches.

Policy context

In April 2024, a new European framework for the coordination of macroeconomic governance entered into force with the implementation of Regulation (EU) 2024/1263. This regulation includes a reference, in Article 11(3), to social partner consultation on MTFSPs, and a reference, in Article 21(5), to APRs on the implementation of those MTFSPs. Country reports and country-specific recommendations are rooted in Articles 121 and 148 of the Treaty on the Functioning of the European Union and in Council Regulation (EC) No 1466/97 and Regulation (EU) 1176/2011. The SCF is rooted in the European Pillar of Social Rights and based on the social scoreboard in the annual *Joint Employment Report*. It is monitored by the Employment Committee, which is the advisory committee for employment and social affairs ministers in the Employment, Social Policy, Health and Consumer Affairs Council (EPSCO) and the Social Protection Committee. The role of the council, in accordance with Article 148 of the Treaty on the Functioning of the European Union, is to promote the coordination of employment and labour market policies at both European and national levels. The Council recommendation of 12 June 2023 on strengthening social dialogue in the European Union fosters the role of social partners in the implementation of the SCF, and in the European Semester in general.

Key findings

The MTFSPs from 15 Member States indicate that consultations took place on their formulation, as referred to in Article 11(3) of Regulation (EU) 2024/1263. Five Member States (Cyprus, Denmark, the Netherlands, Poland and Portugal) indicated that no consultations took place on the production of their plans; however, they reported that instead of consultations, discussions were organised. For the seven other Member States, no information was included in the MTFSP on whether or not a consultation took place, although this is a requirement in Article 13(g)(vi) of Regulation (EU) 2024/1263.

Information collected by the Network of Eurofound Correspondents confirmed differences between Member States. In some Member States, governments reported not having consulted social partners; in others, they consulted them on parts of the MTFSP, but not on the entire MTFSP. For some Member States, a specific ad hoc approach was used to inform or consult social partners, while in other Member States a discussion was held in the national economic and social council. In Bulgaria, Czechia and Finland, a practice of multilayered consultation was reported.

A quality assessment provided by national employer organisations and trade unions showed that few organisations assessed their involvement as meaningful: one trade union from Malta, and four employer organisations from Austria, Bulgaria, Czechia and France. Employer organisations and trade unions from many Member States indicated that they were not involved in the drafting of MTFSPs, or that information was only shared with them, or that the consultation held was a formality that did not allow them to propose changes. The involvement of national employer organisations and trade unions in the preparation of the first APRs on the implementation of the MTFSPs (in 2025) was assessed as being at a similar level.

Higher levels of social partner involvement were reported as regards the European Semester fact-finding missions. In almost all Member States, social partners appreciated their involvement in these missions. Some variation is reported in terms of the timing of the fact-finding missions, the way in which meetings with social partners are organised, and how this can affect the involvement of social partners and their assessment of it.

The difference in approach between drafting MTFSPs and conducting fact-finding missions when it comes to the perceived involvement of social partners is striking. In the fact-finding missions, the European Commission interacts directly with national employer organisations and trade unions, facilitated by Economic Counsellors in their Member States. In contrast, with regard to MTFSPs, the responsibility lies entirely with the authorities of the Member States, in accordance with Regulation (EU) 2024/1263, with no direct role for European Commission services.

Many social partner organisations indicated they need more support for capacity building to allow them to strengthen expertise and familiarity in their organisation as regards different aspects of the European Semester.

Measuring social partner involvement in the European Semester objectively is challenging. Findings are nuanced and must be interpreted with the context of how information was collected in mind.

Policy pointers

- An earlier start to the process of drafting MTFSPs and APRs provides more time for consulting with social partners.
- In most Member States, it is the ministry of finance that leads the drafting of the MTFSP and the APR. The involvement of other ministries, such as the ministry of employment or social affairs, could be considered, as they may have more experience with social partner consultation.
- Social partners point to the need for enhanced transparency regarding consultation procedures, including guidance on the right time to provide input.
- Social partners indicated the importance of structured feedback mechanisms, which allow them to see how their input has influenced outcomes.
- The need for support for capacity building for social partner organisations is emphasised by social partners from many Member States.
- The MTFSPs, the 2025 APRs and the SCF were not subject to extensive public debate. Knowledge of associated governance processes is limited to a small number of experts, as the processes are complex and difficult to explain. Raising public awareness and improving social partners' understanding of objectives and methods could also contribute to improving ownership of the processes and increasing the legitimacy and effectiveness of the entire economic governance framework.

Introduction

This report contains information on the different ways in which trade unions and employer organisations are involved in the European Semester. The information is based on a variety of sources. The empirical evidence used includes document analyses and information gathered from national authorities through the Network of Eurofound Correspondents, interviews conducted with Economic Counsellors and a survey of national member organisations of the EU social partners.
The aim of this study was to find out how trade unions and employer organisations perceive their involvement in different aspects of the European Semester process in 2024 and 2025 and whether factors can be identified that explain variations in perceptions, along with how the social partners can contribute to strengthening their perceived ownership and the effectiveness of European Semester processes.

A detailed analysis of the involvement of national social partners in the production of medium-term fiscal-structural plans (MTFSPs) in the 27 EU Member States is conducted in Chapter 1, while the involvement of social partners in the drafting of the first annual progress reports (APRs) on the implementation of the MTFSPs (published in 2025) is analysed in Chapter 2.

Chapter 3 describes how national and European organisations interact in the European Semester. This mainly happens during fact-finding missions, with an important role for Economic Counsellors. These are officials representing the European Commission in the capitals of the Member States, with a liaison function for the purpose of the European Semester. The focus in Chapter 3 is on how social partners assess their involvement in fact-finding missions, in other regular contact with Economic Counsellors and in the compilation of country reports and country-specific recommendations (CSRs).

Chapter 4 focuses on the EU level, providing a more general perspective on the entire European Semester process. It looks at how familiar national member organisations are with the entire European Semester and how they perceive their capacity to contribute to it. Their familiarity with the process is also assessed in relation to the Social Convergence Framework (SCF), which was implemented for the first time in 2025.

Annexed to this report are country fiches, gathering key information from each of the four chapters for each Member State. The fiches feed into the conclusions in Chapter 5, indicating in which Member States good practice was reported on the involvement of social partners, and where there is room for improvement in the coming years. Since there are no established EU-level indicators of the quality of social partner involvement, the information in these fiches could also contribute to a framework for how social partner involvement is assessed. Work on the current project, including this report and future reports, aims to contribute to providing a better understanding of the involvement of social partners in economic governance and improving methods for measuring and analysing their involvement in respect of the partners' different views.

In Chapter 5, comparisons are made between methods of involving social partners in different aspects of the European Semester and how these vary depending on how the Semester is implemented in different Member States. Chapter 5 also considers how the involvement of social partners can contribute to improving the perceived ownership and effectiveness of European Semester processes.

1 Social partner involvement in drafting MTFSPs

This chapter combines information from three sources.

Section 1.1 looks at what is included in the text of the MTFSPs. A European Commission web page (1) contains the MTFSPs from all 27 Member States, plus standardised European Commission assessments of the MTFSPs. These standardised assessments (2) are, in fact, Commission recommendations for Council recommendations endorsing the national MTFSPs. The information included in the MTFSPs on whether social partners were consulted is analysed in the first section of this chapter.

In Section 1.2, governments' perspectives on the involvement of social partners are presented. They are taken from a questionnaire completed by Eurofound's national correspondents, based on information collected from the ministries responsible for drafting the MTFSPs. The views included in this section provide clarification on the analyses of MTFSPs in Section 1.1.

In Section 1.3, the views of social partners are given on how they were or were not consulted on the draft MTFSPs. The views were collected using a questionnaire that was developed in cooperation with the European social partners: the European Trade Union Confederation (ETUC), BusinessEurope, SMEunited and SGI Europe (3). These organisations forwarded the questionnaire to their member organisations. To increase the response rate, support was sought from Eurofound's national correspondents and Management Board members to identify the staff of national social partner organisations following up on European Semester matters and ask them to complete the questionnaire. Based on responses from national social partners, their assessments of their involvement in the making of MTFSPs can be categorised.

The final section of this chapter (Section 1.4) compares the findings from the three sources of information in Sections 1.1, 1.2 and 1.3.

1.1. Document analysis of the MTFSPs produced for the 27 Member States

Of the 27 MTFSPs, 17 are available in English. The 10 MTFSPs that are not available in English are from Bulgaria, Croatia, France, Hungary, Lithuania, the Netherlands, Romania, Slovakia, Spain and Sweden. These language barriers are not the only difficulties faced in analysing the MTFSPs. The fact that they substantially vary in format, structure and length poses another challenge. Therefore, the standard assessments of the MTFSPs produced by the European Commission are used in this section.

Table 1 displays the dates on which the MTFSPs were submitted and details of the Commission's assessments of the MTFSPs. It also provides an indication of what the MTFSPs say about whether or not social partners were consulted in their drafting, as envisaged in Article 11(3) of Regulation (EU) 2024/1263. The table identifies MTFSPs that do not contain any information on social partner involvement.

(1) https://economy-finance.ec.europa.eu/economic-surveillance-eu-member-states/country-pages_en.

(2) In each of the standard analyses of the MTFSPs, there is a point (usually point 8) on whether social partners were consulted on the plan. For three Member States (Germany, the Netherlands and Portugal), social partner consultation is covered in point 9.

(3) National employer organisations and trade unions that are not affiliated to these European social partner organisations were not included in this study. It is assumed that those national organisations are treated the same as those that contributed to this study. For an overview of all national social partner organisations in each of the Member States, refer to Eurofound's cross-industry representativeness study from 2023 (Eurofound, 2023).

Table 1: Information on social partner consultation included in the MTFSPs (document analyses)

Member State	Date	Commission assessment	Social partner consultation, as envisaged in Article 11(3)	Consultation did not take place	No information is available on consultation
Austria	13 May 2025	COM(2025) 341 final	X		
Belgium	18 March 2025	COM(2025) 263 final			X
Bulgaria	27 February 2025	COM(2025) 238 final	X		
Croatia	14 November 2024	COM(2024) 729 final	X		
Cyprus	15 October 2024	COM(2024) 710 final		X	
Czechia	16 October 2024	COM(2024) 711 final	X		
Denmark	20 September 2024	COM(2024) 712 final		X	
Estonia	11 October 2024	COM(2024) 713 final			X
Finland	10 October 2024	COM(2024) 715 final	X		
France	31 October 2024	COM(2024) 716 final			X
Germany	16 July 2025	COM(2025) 514 final	X		
Greece	7 October 2024	COM(2024) 714 final			X
Hungary	4 November 2024	COM(2025) 14 final			X
Ireland	15 October 2024	COM(2024) 717 final	X		
Italy	15 October 2024	COM(2024) 718 final	X		
Latvia	15 September 2024	COM(2024) 720 final	X		
Lithuania	30 April 2025	COM(2025) 616 final	X		
Luxembourg	15 October 2024	COM(2024) 719 final	X		
Malta	20 September 2024	COM(2024) 721 final	X		
Netherlands	15 October 2024	COM(2024) 722 final		X	
Poland	9 October 2024	COM(2024) 723 final		(x)	
Portugal	11 October 2024	COM(2024) 724 final		X	
Romania	25 October 2024	COM(2024) 725 final	X		
Slovakia	15 October 2024	COM(2024) 727 final	X		
Slovenia	15 October 2024	COM(2024) 728 final	X		
Spain	15 October 2024	COM(2024) 730 final			X
Sweden	11 October 2024	COM(2024) 726 final			X
EU			15 Member States	5 Member States	7 Member States

Note: With regard to Poland, '(x)' indicates that the assessment suggests that a consultation process, as indicated in Article 11(3), did not take place; however, a discussion was held with social partners and civil society representatives in Poland regarding proposed reforms and investments in the context of the national European Semester Group.
Sources: Council recommendations endorsing the national MTFSPs of each Member State (see reference numbers in the table).

Length of the MTFSPs

There is significant variation in the length of the MTFSPs. The shortest is from Estonia, at 20 pages without annexes and 36 pages with annexes. The longest are from France and Italy, with 172 and 165 pages, respectively, or 219 and 224 pages including the annexes. The average number of pages for all 27 MTFSPs is 62.5 without annexes, and 88 with annexes included.

Eight Member States produced an MTFSP of less than 50 pages. This is the case for Estonia (36), Hungary (39), Ireland (40), Luxembourg and Slovakia (both 41), Czechia (42), Slovenia (46) and Sweden (47).

Eleven Member States submitted an MTFSP of between 50 and 100 pages. The MTFSPs for Denmark and Lithuania have 57 pages. These are followed by Poland (59 pages), Spain (65), Austria (68), Finland (69) and Belgium (70). The MTFSPs for Cyprus and the Netherlands each have 80 pages, the MTFSP for Malta has 92 pages, and the MTFSP for Portugal has 98 pages.

Eight Member States have an MTFSP that numbers more than 100 pages. Slightly above this figure are Germany (107 pages), Bulgaria (111), Croatia (115) and Romania (121). The MTFSP for Greece has 149 pages. The longest MTFSPs have about 200 pages or more. This is the case for Latvia (199), France (219) and Italy (224).

How is the number of pages relevant to the involvement of trade unions and employer organisations in the process of drafting MTFSPs? One hypothesis is that MTFSPs with more pages include more information on reforms with which social partners are likely to be concerned or involved.

Among the countries for which the MTFSP indicates that social partners were consulted, the average number of pages is 90, while for the countries reporting no consultation, the average is 57 pages. This supports the hypothesis that longer (more detailed) MTFSPs are more likely to indicate social partner consultation, even if plan length is only one of many factors.

Submission dates for the MTFSPs

The time between the date of submission and the date drafting started is the drafting period. A starting assumption is that a longer drafting period provides more time for consultation. Events, such as elections, that take place during the drafting period and subsequent government formation may affect the start or end of the drafting period.

Regulation (EU) 2024/1263 requires all 27 Member States to submit an MTFSP ([4]). Article 36 of that regulation indicates that the first plans needed to be submitted by 20 September 2024. The MTFSPs from Denmark and Malta were submitted by that date. Most Member States submitted their plans in the first half of October 2024. France and Romania did so at the end of October 2024, and Croatia and Hungary submitted theirs in the first half of November 2024. Five Member States submitted their MTFSPs in 2025: Bulgaria put forward its plan in February, Belgium in March, Lithuania in April, Austria in May and Germany in July.

Among the five Member States submitting their MTFSPs in 2025, four (corresponding to 80 %) stated in their plan that social partners were consulted. Only in Belgium were no consultations reported. Among the 22 other Member States that submitted their MTFSPs in 2024, 12 (55 %) indicated that social partners were consulted.

Table 2 indicates the 10 Member States where there were elections in 2024 or at the beginning of 2025, the dates of formation of new governments after elections and the dates on which drafting of MTFSPs started and on which finalised MTFSPs were submitted. Nine Member States held parliamentary elections in 2024. Austria, Belgium, Bulgaria, Germany and Lithuania submitted their MTFSPs in 2025, while all other Member States submitted their MTFSPs in September, October or November 2024. For each of the five Member States where the MTFSP was submitted in 2025, delays relate to elections and government formation, as illustrated in Table 2. The German Bundestag elections scheduled for 23 February 2025, and the government crisis and election campaign before those, caused the longest delay in the making of an MTFSP. The 2024 elections in Croatia, France, Ireland, Portugal and Romania did not affect the timing of the MTFSP.

In Portugal, elections were held in March, with a government formed in April. In Croatia, elections were held in April 2024, with a government formed in May 2024. In both Croatia and Portugal, elections and government did not have an effect on the timing of MTFSP submission. In Ireland, elections were held in November 2024 and in Romania they were held in December 2024. In Ireland and Romania, the MTFSPs were submitted by the outgoing governments without significant delays. In France, elections were held on 7 July 2024. After those, the Barnier government was formed on 5 September 2024, which submitted the MTFSP in October 2024. The government fell in December 2024, before the 2025 APR was submitted.

In Austria, Belgium, Bulgaria and Lithuania, the 2024 elections, and the following government formation, delayed the submission of the MTFSPs until 2025. In Germany, the delay in MTFSP submission was caused by the February Bundestag elections, and the March vote on the loosening of the ‘debt brake’ (*Schuldenbremse*) in the German Constitution (Article 109(3) and Article 115), which had to be completed before the MTFSP could be finalised.

The 17 Member States for which there were no elections in 2024 or in the first half of 2025 all managed to get their MTFSPs submitted in September, October or November 2024.

([4]) Regulation (EU) 2024/1263 of the European Parliament and of the Council of 29 April 2024 on the effective coordination of economic policies and on multilateral budgetary surveillance and repealing Council Regulation (EC) No 1466/97 (OJ L, 2024/1263, 30.4.2024, ELI: http://data.europa.eu/eli/reg/2024/1263/oj).

Table 2: Elections and government formation during 2024 and at the beginning of 2025

Member State	Date drafting of the MTFSP started	Date the MTFSP was submitted	Date of the 2024/2025 parliamentary elections	Date of government formation
Austria	18 March 2025	13 May 2025	29 September 2024	3 March 2025
Belgium	3 February 2025	18 March 2025	10 June 2024	31 January 2025
Bulgaria	October 2024	27 February 2025	27 October 2024	January 2025
Croatia	September 2024	14 November 2024	17 April 2024	17 May 2024
France	May 2024	31 October 2024	7 July 2024	5 September 2024
Germany	No information	16 July 2025	23 February 2025	6 May 2025
Ireland	July 2024	15 October 2024	29 November 2024	23 January 2025
Lithuania	November 2024	30 April 2025	13 and 27 October 2024	22 November 2024 and 26 August 2025
Portugal	May 2024	11 October 2024	10 March 2024	2 April 2024
Romania	May 2024	25 October 2024	1 December 2024	23 May 2025

Notes: Only the nine countries with 2024 parliamentary elections are included in the table, together with Germany, which held elections in February 2025 that caused delays in the making of its MTFSP. In Czechia and the Netherlands, elections were held in October 2025 (3–4 October 2025 in Czechia and 29 October 2025 in the Netherlands). They had no effect on the timing of MTFSP submission. In Lithuania, the government led by Gintautas Paluckas was approved by the parliament on 12 December 2024; Mr Paluckas himself was approved as prime minister on 22 November 2024, but resigned on 31 July 2025. After this, a new government, led by Inga Ruginienė, was installed on 26 August 2025. In Cyprus, elections are planned for 2026. The latest parliamentary elections in Cyprus and Czechia were held in 2021. In Denmark, Hungary, Italy, Latvia, Malta, Slovenia and Sweden, they were in 2022. In Estonia, Finland, Greece, Luxembourg, Poland, Slovakia and Spain, the latest parliamentary elections were held in 2023.
Source: Internet search for the latest parliamentary elections in all Member States.

Social partner consultation in the formulation of the MTFSPs

Table 1 shows three options regarding social partner consultation (social partner consultation, no social partner consultation and no information regarding such consultation). It also shows the dates on which MTFSPs were submitted and the Council recommendations, including the European Commission's assessment of the MTFSPs.

The first option is selected if the plan mentions that the government engaged with social partners in a consultation process prior to the submission of the national MTFSP. The Commission, for the purpose of its assessments, refers to Article 11(3) of Regulation (EU) 2024/1263 of 29 April 2024, shaping the new European economic governance framework in the European Semester. Article 11(3) stipulates that 'Prior to the submission of its national medium-term fiscal-structural plan, each Member State shall conduct, in accordance with its national legal framework, a consultation of civil society, social partners, regional authorities and other relevant stakeholders.' Some 15 Member States subscribed to this in their MTFSPs, according to the Commission's assessments of the plans (Table 3). Five MTFSPs mention only that a consultation took place, without specifying how. This is the case for Austria, Bulgaria, Italy, Lithuania and Romania, where references are only made to a consultation process with social partners and other relevant stakeholders. Three other MTFSPs mention a specific ad hoc consultation procedure. For Czechia, an interministerial consultation involving social partners is mentioned, along with a round-table discussion on the draft plan with social partners and non-governmental organisations (NGOs). In Latvia, a meeting was held with cross-industry social partner organisations, which are clearly mentioned in the plan. In the assessment of the MTFSP for Luxembourg, a meeting in July 2024 is mentioned, regarding the 2024 country report, the 2024 CSRs and the modifications related to the new economic governance framework. For seven other MTFSPs, the assessment indicates that the consultation process happened through an established structure such as the national economic and social council (NESC). For two of these Member States, the timing of the consultation is indicated: in Germany, the consultation happened at the national-level Macroeconomic Dialogue meeting of 10 July 2025, a week before the plan was submitted; in Finland, the consultation happened on 2 October 2024, also a week before the submission of the plan. In Croatia, Ireland, Malta, Slovakia and Slovenia, the consultation happened with the NESC, with no indication of timing. The aim of Sections 1.2 and 1.3 in this chapter is to give more insight into how the consultations on the MTFSPs took place and how valuable and meaningful they were perceived to be by social partners.

Table 3: Provision of specific information on how social partners were consulted in the European Commission's assessment of MTFSPs (document analyses)

How social partners were consulted	Member States	Number of Member States
Consultation in the NESC or another established structure	Croatia, Finland, Germany, Ireland, Malta, Slovakia, Slovenia	7
Ad hoc consultation process	Czechia, Latvia, Luxembourg	3
Consultation but no further information	Austria, Bulgaria, Italy, Lithuania, Romania	5
No consultation according to the MTFSP	Cyprus, Denmark, Netherlands, Poland, Portugal	5
No information	Belgium, Estonia, France, Greece, Hungary, Spain, Sweden	7

Sources: Council recommendations endorsing the national MTFSP of each Member State (references to the relevant Council recommendations are included in Table 1).

The second option is that the assessment of the MTFSP clearly indicates that a consultation did not take place, as envisaged in Article 11(3) of Regulation (EU) 2024/1263. As justification, reference is made to Article 36(1)(c) of Regulation (EU) 2024/1263, which stipulates that, 'by way of derogation from Article 11(3), Member States may conduct a public consultation of social partners, regional authorities, civil society organisations and other relevant national stakeholders along the principles set out in Article 11, with appropriate deadlines'. The use of the word 'may' points to the possibility of including consultation in a transitional provision for the first MTFSP, whereas the word 'shall' in Article 11(3) points to the obligatory consultation of social partners for the second and subsequent MTFSPs.

Four Member States have made use of this derogation, indicating in their MTFSPs that no such consultation took place. This is the case for Cyprus, Denmark, the Netherlands and Portugal.

For Poland, the assessment indicates that a consultation process, as indicated in Article 11(3), did not take place; however, the state engaged in a discussion with social partners and civil society representatives regarding proposed reforms and investments in the context of the national European Semester group. The next section of this chapter illustrates that the approach taken by Poland to the formulation of its MTFSP may also have been adopted by social partners in several other Member States (see Table 17).

The above example from Poland shows that the section based on the information provided in the Commission's assessment of the MTFSPs needs to be read together with the information in the following sections of this chapter. Bringing together different perspectives is the main aim of this report, to clarify not only if consultations took place, but also how they were carried out and how they were perceived and categorised by social partners. For those countries for which no information was included in the MTFSPs on whether or not social partners were consulted, the information in the following sections is even more revealing.

The third option is that, according to the Commission's assessment of the MTFSP, the plan did not report on the consultation of social partners (this can be seen under the heading 'No information is available on consultation' in Table 1). This was the case for seven Member States: Belgium, Estonia, France, Greece, Hungary, Spain and Sweden.

According to Article 13(g)(vi) of Regulation (EU) 2024/1263, MTFSPs are required to 'contain information on … the consultation of national parliaments and the consultation referred to in Article 11' (which includes social partner consultation). Article 16(4) states that 'The Commission shall examine for all Member States whether their national medium-term fiscal-structural plans comply with the requirements set out in Article 13.' When it comes to non-compliance with Regulation (EU) 2024/1263, Article 19(b) needs to be examined. There, non-compliance with Article 16(2), (3) and (5) is mentioned, but not with Article 16(4). Putting the information from Articles 13, 16 and 19 of the regulation together, it can be deduced that MTFSPs must contain information on social partner consultation, as set out in Article 13(g)(vi), and the Commission's assessments must state whether or not a consultation took place, as envisaged in Article 16(4); however, according to Article 19(b), not including this information cannot be considered non-compliance with the regulation.

1.2. Information from governments on the drafting of the MTFSPs

This section gives the perspectives of national governments on how the drafting of the MTFSPs took place and how the governments consulted social partners. The section 'Sources of government information' explains how Eurofound's national correspondents collected the information on which this section is based. Subsequently, the specific government departments that took the lead in drafting the MTFSPs are indicated, along with the role of the ministries of labour or social affairs in the process of drafting MTFSPs. This section concludes by discussing the length of time it took to draft MTFSPs and the way in which governments engaged with social partners about the plans during that drafting period.

Sources of government information

Eurofound national correspondents contacted the relevant ministries and were provided with answers or redirected to other government services that could provide information on the MTFSPs and social partner involvement in their formulation. The author is grateful for the cooperation of government officials from the department responsible for drafting the MTFSP in Austria, Belgium, Bulgaria, Croatia, Cyprus, Czechia, Estonia, Finland, Germany, Greece, Ireland, Latvia, Lithuania, Luxembourg, Malta, the Netherlands, Poland, Slovakia and Sweden. In Hungary, Italy and Slovenia, information was provided by the ministries of work and social affairs. In Denmark, France, Portugal and Romania, the information is based on publicly available documents from the ministries of finance.

In Spain, the contribution had not been finalised by Eurofound's national correspondent at the time of writing, because the government contact was not available. In Italy, not much information could be obtained by the national correspondent. In both cases, the difficulty was in finding a contact within the government who could provide the necessary information. Considering these limitations, this section will provide valuable information on how the MTFSPs were drafted and a better understanding, from a government perspective, of the ways in which social partners were consulted.

Leading role of ministries of finance

In 24 Member States, the ministry of finance took the lead in drafting the MTFSP. In 17 Member States, the ministry of finance played this role on its own. In France and Greece, finance and economy are covered by one ministry, which took the lead in drafting the MTFSP. They are marked in green in Table 4. In five Member States, marked in pink in the table, the leading role was played together with the prime minister's office or the ministry of economic affairs. Spain is the only country where the ministry of economy took on the leading role, while in Belgium and Lithuania, a coordinated approach was chosen for the drafting of the MTFSP.

Regarding the drafting of the MTFSPs, two realities can be deduced from Table 4. First, the ministries of finance in 24 Member States play an important leading or co-leading role: only in Belgium, Lithuania and Spain did the ministry of finance not have a leading or co-leading role. Second, in the majority of Member States (20), the responsibility for leading the drafting process lies with a single ministry, while for the 7 remaining Member States a co-leading or coordinative approach was adopted.

These two realities together point to a leading role of the ministry of finance alone in 17 Member States. France and Greece could also be considered part of this group, because finance and economy are covered by a single ministry. States where ministries take sole responsibility are shown in blue in Table 4; in the purple-marked Member States, ministries/offices take on a co-leading role with others.

In **France**, the leading role was adopted by the Ministry of Economy, Finance and Industrial and Digital Sovereignty, while the General Secretariat for European Affairs, residing within the Prime Minister's Office, supported coordination with other government ministries.

In **Greece**, the Ministry of National Economy and Finance (Υπουργείο Εθνικής Οικονομίας και Οικονομικών) is responsible for the drafting of the MTFSP; its name was changed in summer 2023 from the Ministry of Finance (Υπουργείο Οικονομικών). The

Table 4: Leading role of government departments in the drafting of MTFSPs

Government department	Member States	Number of Member States
Ministry of finance	Austria, Bulgaria, Croatia, Cyprus, Czechia, Denmark, Estonia, Finland, France, Germany, Greece, Hungary, Ireland, Italy, Latvia, Luxembourg, Malta, Netherlands, Poland, Portugal, Romania, Slovakia, Slovenia, Sweden	17 alone, 5 co-lead and 2 with finance and economy covered by a single ministry
Ministry of economy	France, Germany, Greece, Hungary, Poland, Spain	1 alone, 3 co-lead and 2 with finance and economy covered by a single ministry
Prime minister's office	Croatia, Portugal	2 co-lead
Other	Belgium, Lithuania	2 alone

Notes: Member States in purple are those where leadership was shared between several government ministries. Member States in green are those where finance and economy are together in a single ministry.
Source: Network of Eurofound Correspondents.

current official title includes both ‘economy’ and ‘finance’; the English version of the name on the official website is Ministry of Economy and Finance [5]. The change in the ministry’s name was not associated with any changes to its structure. The leading role in drafting the MTFSP is taken up by the General Accounting Office of the State (Γενικό Λογιστήριο του Κράτους), which is responsible for the organisation and control of the state’s fiscal management. The office has always been a part of the Ministry of National Economy and Finance, regardless of its name.

Spain is the only country where the ministry of economy is the sole leader of the process of drafting the MTFSP. More precisely, the Directorate-General (DG) for Macroeconomic Analysis, which is part of the Ministry of Economy, Commerce and Business, takes responsibility for drafting the MTFSP.

In seven Member States, a co-leading or coordinative approach was taken to the drafting of the MTFSP. This was done in three different ways. In some states, the ministry of finance and the ministry of economy were co-leads, while in others the ministry of finance and the prime minister’s office took on co-leading roles, or the responsibility for leading the drafting of the MTFSP was given to a coordinating group or government department.

Co-leading roles for ministries of finance and ministries of economy can be found in Germany, Hungary and Poland. In **Germany**, the Federal Ministry of Finance shared the leading role with the Federal Ministry for Economic Affairs and Energy, and other ministries were also consulted. In **Hungary**, leadership was shared by the Ministry of Finance and the Ministry for National Economy. In January 2025, these ministries were merged (Budapest Business Journal, 2025). In **Poland**, Chapters 1 and 3 of the plan were prepared exclusively by the Ministry of Finance, while Chapter 2 was compiled by the Ministry of Economic Development and Technology.

The responsibility for drafting the MTFSP was shared between the ministry of finance and the prime minister’s office in **Croatia** and **Portugal**.

In **Belgium**, the Federal Public Service Policy and Support led the drafting of the MTFSP. In **Lithuania**, a coordination group was established to take on the leading role, comprising the vice-head of the Ministry of Finance, advisors of the prime minister, vice-ministers from different ministries and the Director of the Government Strategic Analysis Center.

In 15 Member States, government representatives indicated that the ministry of labour or the ministry for social affairs contributed to the drafting of the parts of the MTFSP relevant to their areas of responsibility (Table 5). These ministries provided text or information on measures in their policy areas. Detailed examples of how this worked in practice with regard to both employment and social affairs were given by Bulgaria, Croatia, Czechia, Finland and Slovakia. In Sweden, the Ministry of Employment contributed, as did the Ministry of Education, but the Ministry of Health and Social Affairs did not. In Hungary, input was gathered from various ministries responsible for employment matters, as there is no self-standing ministry of social affairs or employment. Poland gave the example of the Ministry of Family, Labour and Social Policy participating in formal consultations on the draft at various levels of the government’s legislative process.

Examples of how ministries of labour and social affairs contributed to the formulation of MTFSPs

In **Bulgaria**, the Ministry of Labour and Social Policy made a substantial contribution to the preparation of the section of the MTFSP that deals with labour market and social policy reforms and investments. The MTFSP was drafted in coordination with all relevant institutions, including the Ministry of Labour and Social Policy, and the ministry provided comments and observations on the draft. The ministry was involved in

Table 5: Involvement of ministries of labour and ministries of social affairs

Role of ministries of employment/social affairs	Member States	Number of Member States
Contributed	Austria, Bulgaria, Croatia, Czechia, Finland, Greece, Hungary, Ireland, Latvia, Lithuania, Luxembourg, Netherlands, Portugal, Slovakia, Sweden	15
Commented or consulted	Belgium, Italy, Malta, Poland, Romania	5
Informed		
Not involved	Cyprus, Denmark, Estonia	3
No information	France, Germany, Slovenia, Spain	4

Source: Network of Eurofound Correspondents.

(5) https://minfin.gov.gr/en/.

preparing some of the information in Chapter 7 (on reforms and investments), and specific targets were provided for the implementation of the set reforms and investments.

In **Czechia**, the Ministry of Labour and Social Affairs participated in the preparation of the MTFSP in the spring and summer of 2024. The ministry focused on the following areas with significant budgetary and macroeconomic impacts: the development of further education and retraining, the development of skills for the environmental and digital transitions, capacity building of childcare services, the modernisation of social care infrastructure, the sustainability of the pension system, support for social and affordable housing, and the social benefits system reform, encouraging recipients to participate in the labour market. Subsequently, an interdepartmental comment procedure was carried out on the final version of the MTFSP with the involvement of social partners.

In **Finland**, the Ministry of Finance was responsible for reporting through the MTFSP, but collaborated with both the Ministry of Economic Affairs and Employment and the Ministry of Social Affairs and Health regarding the parts of the plan relevant to their jurisdiction, for example those covering the social security reform. This national reform, along with all other measures in the MTFSP, had already been decided on. Therefore, the collaboration between ministries was related to how reforms and strategies should be displayed in the MTFSP.

In **Croatia**, the Ministry of Labour, Pension System, Family and Social Policy participated in the process of drafting the MTFSP. It contributed to the definition of measures to be implemented in the area of the labour market and social protection during the plan's implementation period. It also provided comments on the text of the MTFSP during the harmonisation of the text of the draft plan. Furthermore, before the final text of the plan was submitted, in line with the government's procedure, the ministry provided its official opinion on the MTFSP.

In **Ireland**, several government departments contributed notably to the drafting of the MTFSP by providing input for the structural reform chapter. This included the Department of Social Protection, which contributed to the part of the structural reforms chapter on promoting social inclusion (i.e. reform area 6).

In **Slovakia**, the Ministry of Labour, Social Affairs and Family, through its representatives in the Employment Committee (EMCO) and the Social Protection Committee (SPC), has significantly contributed to the very strong focus of plans on employment and social affairs. The ministry's contribution related to active labour market policy, working incentives, education and skills development, measures increasing participation in the labour market, inadequately represented groups, and the significant improvement in the results of education, including adult education. The CSRs for Slovakia include measures to reduce the risk of poverty and social exclusion, and to improve access to housing and healthcare. The Ministry of Labour, Social Affairs and Family also commented on the proposal for a Council recommendation endorsing the national MTFSP of Slovakia, which was part of the 2024 Autumn Package of the European Semester.

Employment ministries contributed in Hungary and Sweden, but social affairs ministries did not

In **Hungary**, various ministries provided input for the MTFSP on employment measures (as mentioned above, there is no self-standing ministry of social affairs or employment). The Ministry of Interior, which is responsible for social affairs, did not contribute, according to an official within the ministry. The Ministry for National Economy, responsible for employment, indicated: 'the responsible departments contributed with content (in the form of providing materials and annexes) to the relevant chapters'.

A similar situation was reported in **Sweden**. The Ministry of Employment provided several recommendations on areas of the MTFSP within its jurisdiction, as did the Ministry of Education and Research. However, the Ministry of Health and Social Affairs did not provide input and thus did not directly contribute to the drafting of the plan, although it was consulted in the process.

Examples of how ministries of labour and social affairs were consulted

In France, the Ministry of Labour was consulted in the making of the 2024 MTFSP on matters that fall within its jurisdiction. In Poland, the Ministry of Family, Labour and Social Policy participated in formal consultations on the draft plan at various levels of the government's legislative process.

Drafting periods of MTFSPs

Government respondents were asked by Eurofound national correspondents to indicate the drafting period of their state's MTFSP. Based on responses received, much depends on when the leading government department started work on the plan.

Some 14 of the 23 Member States for which information is available on the drafting period indicated that it had taken four months or more to draft the MTFSP. Nine Member States started drafting the MTFSP between March and May 2024, resulting in a drafting period of about six months. Three Member States started in June, and two others started after the envisaged deadline; they submitted their plans in 2025, joining the other Member States with a four- to five-month drafting period.

Table 6: Drafting period for MTFSPs in the Member States

Drafting period	Member States	Number of Member States
Around 6 months	Czechia, Denmark, Finland, France, Latvia, Netherlands, Portugal, Romania, Sweden	9
4–5 months	Bulgaria, Greece, Lithuania, Poland, Slovenia	5
2–3 months	Austria, Croatia, Ireland, Luxembourg, Malta, Slovakia	6
Less than 2 months	Belgium, Cyprus, Estonia	3
No information	Germany, Hungary, Italy, Spain	4

Source: Network of Eurofound Correspondents.

In Latvia, drafting started in March 2024, and in Denmark and Sweden drafting began in April 2024. In Czechia and the Netherlands, the spring of 2024 is indicated as the starting point. As such, the MTFSPs for Czechia, Denmark, Latvia, the Netherlands and Sweden had a drafting period of six months. In four other Member States (Finland, France, Portugal and Romania), drafting started in May 2024. Since Finland and Portugal submitted their MTFSPs on 10 and 11 October 2024, respectively, their plans had a drafting period of about 5.5 months, while France and Romania submitted their plans at the end of October 2024, meaning they had a drafting period of 6 months.

In five Member States, the drafting period lasted between four and five months. This is the case for Greece, Poland and Slovenia, where drafting started in June and plans were submitted in mid-October. Bulgaria started drafting its MTFSP in October 2024 and finished at the end of February 2025, whereas in Lithuania drafting took place from November 2024 to the end of April 2025. Both states therefore took about five months to draft their plans, even though they started after the envisaged deadline.

Table 6 indicates that MTFSPs had a drafting period of about two or three months in six Member States. In Ireland, Luxembourg and Slovakia, the drafting of the MTFSP started in July, and the plan was submitted in mid-October, resulting in a three-month drafting period. A two-month drafting period was reported in Malta, from mid-July to 20 September. In Croatia, drafting took place from September to 14 November, and in Austria the plan was drafted from March 2025 to 13 May 2025.

Both Estonia and Croatia started the drafting process in September 2024. Estonia submitted its MTFSP on 11 October, resulting in a drafting period of about five weeks. Croatia submitted its plan one month later (on 14 November), resulting in a drafting period of just over two months.

Together with Estonia, Belgium and Cyprus reported a short drafting period. In Belgium, drafting took place from 3 February to 18 March 2025. In Cyprus, the MTFSP was drafted in about two weeks, at the beginning of October 2024.

Governments’ perspectives on social partner consultation

The information provided by national governments, collected through Eurofound national correspondents, indicates that no government consultation at all took place in seven Member States: Belgium, Cyprus, Denmark, Estonia, Greece, Hungary and Spain.

This section will look at the information from consultations with governments from the other 20 Member States. The information collected covers four aspects of social partner involvement: (1) whether consultation on the MTFSP was carried out on an ad hoc basis or using specific structures, (2) whether the consultation adopted a one-off approach or used a multilayered process, (3) whether consultation took place on the entire MTFSP or only on parts of it, and (4) whether or not the MTFSP was a point of discussion in the NESC, with or without input from government representatives.

In eight Member States (Austria, Bulgaria, Czechia, Finland, Germany, Ireland, Italy and Poland), a **specific consultation structure** or an ad hoc approach was used to enable consultation on the MTFSP. Bulgaria, Czechia and Finland conducted a **multilayered consultation process**, with subsequent or parallel opportunities for social partners to provide feedback. In seven Member States, the government reported **no consultation on the MTFSP as a whole but did consult social partners on parts of the plan**, for example specific reforms, or indirectly through consultation on the recovery and resilience plan (RRP) or on another planning instrument containing a large number of similar reforms and investment matters. This was the case in Croatia, Latvia, Lithuania, Luxembourg, the Netherlands, Poland, Portugal and Sweden. In other Member States, **NESCs play an important role** as vehicles for social partner consultation on MTFSPs. The findings in this paragraph are presented and analysed in more detail in the sections that follow. Overviews are provided in Tables 7, 8 and 17.

Specific structures or ad hoc approaches to discussions on MTFSPs

In **Austria**, consultation was carried out not through a specific structure but using an ad hoc approach (some kind of email exchange). The situation was similar in **Italy**, where the Ministry of Labour and Social Policies engaged in an ad hoc consultation with social partners. The Treasury department of the Ministry of Economy and Finance shared a draft text with the Ministry of Labour and Social Policies, which had approximately 10 days to respond. In this short period of time, an ad hoc social partner consultation took place. While the Ministry of Labour and Social Policies gave some input, the Treasury department drafted the actual MTFSP. Government officials indicate that a rapid procedure was justified because the Italian structural plan largely mirrored measures that were already present in the national recovery plan, particularly those that were under the Ministry of Labour's competence. In Bulgaria, Czechia and Finland, some procedures that normally do not involve social partners were used for social partner involvement. In **Bulgaria**, the European Affairs Council has two relevant working groups: Working Group No 11, on economic and monetary union, and Working Group No 31, on the European Semester. It was in the extended format of the working group, including representatives of social partners, that the MTFSP was included in written exchanges. In **Czechia**, a governmental interdepartmental commenting procedure was carried out with the involvement of social partners. In **Finland**, an EU cooperation body within the Ministry of Finance meets regularly with representatives of different ministries. Twice a year, social partners and representatives of the Bank of Finland are invited to attend these meetings. The MTFSP was discussed in this context. When the CSRs were received, the Ministry of Finance called for another meeting with the EU cooperation body (and by extension ministry representatives, social partners and the bank) to discuss the recommendations.

Poland has a tripartite task force for the European Semester. Within this, major reforms and investments were debated with social partners in September 2024, a month before the submission of the Polish MTFSP. In **Germany**, the Federal Government presented key points of the MTFSP to social partners in a meeting of the Macroeconomic Dialogue on 10 July 2024.

In **Ireland**, the government hosted the National Economic Dialogue (NED) in May 2024 to present the MTFSP. The NED can be considered to be a specific structure. It is an annual event that functions as a deliberative forum enabling stakeholders to participate in an open and inclusive exchange with the government on economic and social priorities ([6]). The annual stakeholder engagement event is hosted by the Department of Finance and the Department of Public Expenditure, Infrastructure, Public Service Reform and Digitalisation ([7]). Last year's NED took place ahead of the publication of the MTFSP. Discussions at the event included a medium-term focus in the context of the government's obligations under the revised EU fiscal framework. Discussions at the 2025 NED, held in June, also had a similar medium-term focus in the context of the MTFSP. Beyond this, the Irish government indicated that opportunities for dialogue with stakeholders take place ahead of the annual budget each year through both direct and indirect forums. From a direct perspective, bilateral meetings provide an opportunity for stakeholders to engage, on a one-to-one basis, with the Minister for Finance and/or senior officials in the Tax Division of the Department of Finance.

Examples of multilayered consultation on MTFSPs

For Bulgaria, Czechia and Finland, examples can be given of how several parallel and subsequent exchanges on the MTFSPs took place, which together constitute a multilayered consultation approach. This is in contrast to most other Member States, where only a single consultation took place.

According to the Ministry of Finance in **Bulgaria**, the 2025–2028 MTFSP was prepared by the Ministry of Finance, in close cooperation and coordination with the competent institutions within Working Groups Nos 11 and 31 of the European Affairs Council. The draft MTFSP was agreed in writing with the social partners and NGOs in the context of the extended format of Working Group No 31.

In **Czechia**, an interdepartmental commenting procedure was carried out for the MTFSP, with the involvement of social partners. Subsequently, social partner representatives presented their views at the Working Group for the European Union of the tripartite Council of Economic and Social Agreement on 10 October 2024. On 17 September 2024, a round-table discussion on the draft MTFSP took place, to which representatives of social partners, the non-profit sector, representatives of regions and both chambers of the Czech parliament, and other relevant institutions, including the National Budget Council, were invited. A working version of the plan was also provided to the government's advisory bodies representing, among others, non-governmental actors: the Government Council for Sustainable Development and the

([6]) A full list of stakeholders that registered for the event is available at https://www.gov.ie/en/department-of-finance/publications/bodies-and-organisations-that-registered-for-the-national-economic-dialogue-2024/.

([7]) Previously the Department of Public Expenditure, National Development Plan Delivery and Reform.

Committee for the European Union of the Government Council for Non-Governmental Non-Profit Organizations. The plan was discussed in more detail on 8 October 2024, in the Committee on National Economy, Agriculture and Transport and the Committee on EU Affairs of the Senate of the Czech parliament [8]. The Senate discussed the MTFSP on 22 January 2025. Media coverage of the MTFSP was minimal.

In **Finland**, the first layer of consultation took place through the tripartite Economic Council. The Economic Council is a cooperation body led by the prime minister, which includes the most important interest groups. In addition to members of the government, the Economic Council includes representatives of peak-level social partners [9]. Under the Ministry of Finance, an EU cooperation body meets regularly, forming the second layer of consultation. The body has both a limited composition, where only representatives of different ministries are present, and a more extensive format, where interest organisations and peak-level social partners are represented, as well as the Bank of Finland. The extended body meets twice a year. The MTFSP was discussed with social partners through this body. When the national CSRs were received, the Ministry of Finance called a meeting with the extended body to discuss the recommendations. In a third layer of consultation, the draft MTFSP was presented at an open consultation forum in early October 2024. The measures included in Finland's MTFSP were determined nationally, predating the drafting of the plan. Therefore, standard consultation round procedures for all measures involving the social partners were adhered to.

Consultation on parts of MTFSPs

For eight Member States, governments indicate that instead of having consulted social partners on the entire MTFSP, certain parts of the plan were subject to specific consultation processes. This was the case for Croatia, Latvia, Lithuania, Luxembourg, the Netherlands, Poland, Portugal and Sweden.

Some of the reforms and investments included in MTFSPs were discussed in other settings, for example during the consultation processes for national recovery plans in Poland and Sweden. In Portugal, the MTFSP was part of consultations on the planning of the 2024–2028 'major options' (Portugal's primary macroeconomic policy and strategic planning instruments), and in Luxembourg it was part of discussions on state-related structural issues included in the European Semester country report and in the CSRs.

In **Latvia**, the consultations on the measures included in the MTFSP were carried out on specific parts of it, but in the context of the entire draft MTFSP, which was publicly available in the government's TAP portal [10]. The text of the MTFSP mentioned that social partners had been consulted on the part of the plan regarding reform and investment (Chapter 9). The plan also mentions that, within the tax revision package (Section 7.2.4), the tax policy revision scenario envisages an increase in the minimum wage [11] that is agreed with social partners. In the MTFSP, it is reported that the government had engaged in a consultation process with social partners and other relevant stakeholders, in a meeting centred on how Latvia is planning to address the CSRs. During the entire drafting process, from March 2024 to October 2024, the draft MTFSP was publicly available in the TAP portal. Over this period, social partners could comment on:

- all basic terms of the state budget, which forms the basis for the MTFSP – the terms include sectoral policies;
- fiscal risks (provided in the fiscal risk management report);
- the 2024–2028 stability programme (providing forecasts of macroeconomic indicators, mid-term goals of the general budget and priorities of fiscal policy);
- an informative report on economic development.

However, it is acknowledged by the Latvian government that, despite these consultations, the social partners' opinions on Latvia's MTFSP have not been reflected in the plan.

In **Poland**, social partners were not consulted on the entire MTFSP. However, proposals for major reforms and investments had been debated with social partners and NGOs during a meeting of the Task Force for the European Semester in September 2024. Some of the reforms and investments included in the MTFSP had also been discussed during the consultation process of the Polish national recovery plan.

(8) https://mf.gov.cz/cs/rozpoctova-politika/makroekonomika/fiskalne-strukturalni-plan-a-konvergencni-program/2024/fiskalne-strukturalni-plan-ceske-republiky-pro-obd-57403.

(9) The Central Organisation of Finnish Trade Unions, the Confederation of Unions for Professional and Managerial Staff in Finland and the Finnish Confederation of Professionals, on the trade unions' side, and the Confederation of Finnish Industries and Local Government and County Employers in Finland on the employers' side. Other members are the Association of Finnish Local and Regional Authorities, the Central Union of Agricultural Producers and Forest Owners, the Bank of Finland and the Finland Chamber of Commerce.

(10) https://tapportals.mk.gov.lv/legal_acts/0eee8c8d-e14f-4971-87db-d2186b7afdd0.

(11) An increase from EUR 700 to EUR 740 per month in 2025, then to EUR 780 per month in 2026, EUR 820 per month in 2027 and EUR 860 per month in 2028.

In **Sweden**, social partners were not consulted on the MTFSP itself, but in the context of the RRP, which contains most of the measures that are also included in the MTFSP. The Swedish Prime Minister's Office is responsible for coordinating collaboration with social partners, which are invited three times annually to meetings where they can comment on the government's economic policy. These meetings are organised to align with the publication of the spring and autumn budgets. Social partners were also consulted through Sweden's National Reform Programme of April 2024. In addition to the meetings coordinated by the Prime Minister's Office, social partners were invited to contribute to a written consultation on the reform programme. All contributions to the written consultation were included in the final reform programme document. As the MTFSP built strongly on the pre-existing reform programme, another round of consultation was not deemed necessary. Social partners were, however, informed about the MTFSP.

In **Portugal**, social partners were not consulted on the MTFSP as such. However, consultations on the measures included in the MTFSP took place in the formulation of a 2024–2028 planning strategy adopted in July 2024. The Law on Major Options for 2024–2028 is a fundamental planning instrument for the government (referred to in the Constitution of the Portuguese Republic, in Articles 90 and 91) ([12]) and requires the mandatory opinion and notice of the Economic and Social Council and its participation as a body for consultation and coordination in the field of economic and social policies. The Law on Major Options for 2024–2028 was drafted in the first half of 2024 and adopted in July 2024, partly in parallel and partly before the drafting of the MTFSP, which took place from May to October 2024.

In **Luxembourg**, as part of national social dialogue, the government has regular exchanges with social partners to discuss the country's structural issues in the context of the European Semester. The most recent meeting was held on 4 July 2024. It focused primarily on the 2024 country report for Luxembourg, proposals for specific recommendations for Luxembourg for 2024–2025 and changes related to the new European economic governance framework. These meetings are physical meetings between partners, most often held at Senningen Castle. The cross-industry social dialogue council in Luxembourg is the Economic and Social Council (Conseil économique et social). The MTFSP was not discussed in the context of this institution, but certain measures included in the plan may have been part of the regular exchanges described above.

In the **Netherlands**, all relevant stakeholders, including social partners, are involved through regular legislative processes or meetings in the development of some of the policies described in the MTFSP. They are also involved in or consulted on the design of specific measures where the input of social partners adds value or is relevant. The involvement of social partners often takes place through the Labour Foundation (Stichting van de Arbeid), which represents both employers and employees. Social partners were not consulted separately in the process of preparing the MTFSP.

In **Croatia**, consultations are ensured in the preparation of laws, by-laws and other acts through working groups for specific expert topics. Consultations also take place when adopting these acts, in accordance with the procedure for adopting regulations. There is both interdepartmental coordination and public consultation. This means that interest groups can in theory influence the content of the final versions of laws, by-laws and other acts in accordance with the procedure for adopting regulations. Reports on the

Table 7: Information from governments on how they consulted social partners on MTFSPs

Method of consultation	Member States	Number of Member States
Discussed in cross-industry social dialogue or NESC or similar social dialogue structures	Croatia, Czechia, Finland, France, Malta, Netherlands, Romania, Slovakia, Slovenia	9
Exchanges in a specific structure or using an ad hoc approach	Austria, Bulgaria, Czechia, Finland, Germany, Ireland, Italy, Poland	8
Multilayered consultation approach	Bulgaria, Czechia, Finland	3
Consultations only on parts of the MTFSP	Croatia, Latvia, Lithuania, Luxembourg, Netherlands, Poland, Portugal, Sweden	8
No discussion or consultation	Belgium, Cyprus, Denmark, Estonia, Greece, Hungary, Spain	7

Source: Network of Eurofound Correspondents.

([12]) https://www.planapp.gov.pt/go-poenmp/.

progress and outcomes of consultation procedures are published on the central online portal for public consultations in the state (eSavjetovanja) and on the websites of the bodies that are proponents of the acts. Moreover, the planning of reforms included in the MTFSP involves public presentations, even if no consultation took place on an entire plan. The consultation mechanism described above was used on some parts or measures included in the MTFSP but not on the plan as a whole.

Role of national economic and social councils in consultation on MTFSPs

Information collected by Eurofound national correspondents from government sources indicates that in nine Member States some kind of discussion on the MTFSP took place in the NESC (Table 8) ([13]). In Croatia, Czechia, Finland, France, Malta, Romania, Slovakia and Slovenia, the social dialogue structures involved are tripartite, including government representatives; therefore, debates can be considered a consultation process. In the Netherlands, the Social and Economic Council (SER) is a bipartite social dialogue structure in which the Dutch Central Bank presented on the new EU budgetary rules but there was no presentation from the government or discussion on the MTFSP. As the Dutch MTFSP indicated, there was no consultation on the MTFSP in the Netherlands (see Table 1).

In **France**, the MTFSP was discussed at a meeting with the cross-industry social partners within the Social Dialogue Committee for European and International Issues (Comité du dialogue social pour les questions européennes et internationales (CDSEI)), which was chaired by the Minister for Labour. Issues related to employment and social affairs are discussed at this meeting, which takes place at least a week before each EPSCO meeting. The French national authorities had the opportunity to gather comments from the main social partners; nonetheless, the social partners only commented on the already finished version of the MTFSP. National authorities consulted the social partners, who submitted their comments on the content through the CDSEI. During the consultation process, each ministry (the Ministry for the Economy, Finance and Industrial and Digital Sovereignty and the Ministry for Europe and Foreign Affairs) presented the main points of the MTFSP, after which each social partner could express its views during a round-table discussion. After the meeting, the social partners could send their written contributions to the Ministry of Labour. However, a government source indicated that no information was available for this exercise regarding where these written comments should be sent. Unlike previous European Semester practice, when social partners' contributions were annexed to the national reform programme, they do not appear as an annex to the MTFSP sent to the Commission.

In **Croatia**, the draft MTFSP was presented on 12 November 2024, at the session of the Economic and Social Council. In Croatia, the involvement of relevant stakeholders is ensured in the preparation of sectoral strategic documents related to specific reform activities (see the information in the section 'Consultation on parts of MTFSPs').

In **Malta**, consultations took place through the Malta Council for Economic and Social Development (MCESD). The MCESD is a tripartite advisory council that issues opinions and recommendations to the Maltese government on matters of economic and social relevance. It does not appear that consultations took place outside this body. In relation to MCESD consultations, the Ministry for Finance stated: 'Social partners' consultation was done via the MCESD. Given the strategic position of the Council, representing the primary social partners in Malta, it was consulted regarding the reforms and investments outlined in the MTFSP.' Furthermore, the ministry delivered a presentation outlining the CSRs and structural challenges affecting competitiveness, focusing on research and innovation, education and skills, energy and transport and fiscal issues and tax. Moreover, an outline of EU funding was provided to ensure optimal use of EU instruments. Members of the European Commission Representation in Malta were present for the presentation. Afterwards, a discussion was held with MCESD members wherein they expressed their opinion on the matters raised. Government sources from Malta reported that the combined feedback and recommendations of social partners from that meeting were captured in a memorandum and sent to the Minister for Finance for his consideration.

In the **Netherlands**, the Social and Economic Affairs Committee (Commissie Sociaal-Economische Aangelegenheden) of the SER held a meeting on 3 October 2024. In this meeting, the Dutch central bank (De Nederlandsche Bank) delivered a technical presentation on the new budgetary regulations of the EU. There was, however, no presentation or discussion

([13]) A distinction needs to be made based on the composition of these structures. Some are bipartite, composed of delegates representing workers and employers. In some cases, civil society organisations are also represented. Other economic and social committees are tripartite in the sense that they also include government representatives. This is relevant to the current study because discussions of MTFSPs in structures in which governments participate can be considered consultations or exchanges between government and social partners. Bipartite structures, with no government involvement, cannot be considered the same, unless the government are present at a specific meeting regarding an MTFSP, taking comments from the committee back to the ministry drafting the MTFSP. Based on the limitations of the information collected for the purpose of producing this report, this distinction cannot be made appropriately in this study. In follow-up research, Eurofound will address this specific issue, allowing clarification in future reports.

Table 8: Debates on MTFSPs in the NESCs or in similar social dialogue structures in 2024

Member State	Name of the national structure in which the MTFSP was discussed	Date of discussion
Croatia	Economic and Social Council	12 November 2024
Czechia	Tripartite Council of Economic and Social Agreement	10 October 2024
Finland	Economic Council	3 October 2024
France	CDSEI	October 2024
Malta	MCESD	4 July 2024
Netherlands	SER's Social and Economic Affairs Committee (*)	3 October 2024
Romania	National Tripartite Council for Social Dialogue	16 October 2024
Slovakia	Economic and Social Council	14 October 2024
Slovenia	Economic and Social Council	2 October 2024

(*) The secretariat of the SER clarified that the meeting of the council's social affairs committee on 3 October 2024 was not a consultation on the MTFSP.
Source: Network of Eurofound Correspondents.

with the government on the MTFSP on this occasion. This is because the SER is a bipartite advisory body consisting of employer representatives, employee representatives and independent Crown-appointed experts ([14]). According to the Dutch industrial relations model, the SER is supposed to advise the government and parliament on the orientation of socioeconomic policies, which could not happen with regard to the MTFSP. The Dutch government reported that there was no consultation on the MTFSP; however, measures and policies described in the MTFSP were discussed. The SER, for its part, submitted a letter to the Ministry of Finance on 11 July 2025 regretting that it was not consulted on the MTFSP or on the 2025 progress report, and asking that it be consulted properly on future APRs. The reply from the Ministry of Finance indicated that, while no specific consultation on the MTFSP took place, as part of the legislative process, normal consultation procedures had been applied to policies included in the plan. The ministry also told the SER that arrangements could be made to ensure proper consultations are conducted on future MTFSPs and APRs.

In **Romania**, the MTFSP was presented for public debate on 16 October 2024 in the National Tripartite Council for Social Dialogue. The council is the institutionalised tripartite consultation body of national interest, established at the level of the Romanian government under Law No 367/2022 on social dialogue.

In **Slovenia**, the government discussed the MTFSP with social partners in the context of the Economic and Social Council, whose extraordinary session took place on 2 October 2024. At this meeting, the council was informed of the draft MTFSP and the starting points for revising the Fiscal Rule Act. The council adopted the decision that, in the future, it would review the proposed MTFSP on an annual basis. Additionally, the social partners presented various proposals during the Economic and Social Council meeting on 2 October 2024, most of which were related to Chapter 7 of the MTFSP, on proposed reforms and investments. In Chapter 7 of the plan, the government stated that it took into account the opinions of the social partners to the greatest possible extent. However, representatives of trade unions and employer organisations who were interviewed pointed out that their involvement was limited to being informed about and discussing the entire document at the meeting of the Economic and Social Council, with no opportunity to influence the content due to time constraints. It was also noted that employer organisations and trade unions were not involved in the preparation of the documents.

In **Slovakia**, the national authorities consulted with social partners on the proposed 2024 MTFSP within the Economic and Social Council (a tripartite body for interdepartmental social dialogue). The Economic and Social Council includes representatives of the government of Slovakia, the Confederation of Trade Unions of the Slovak Republic, the Federation of Employers' Associations of the Slovak Republic, the Slovak Employers' Federation, the Association of Industrial Unions and Transport and the Association of Towns and Municipalities of Slovakia. Slovakia's MTFSP for 2025–2028 was discussed by the Economic and Social Council on 14 October 2024. This first national MTFSP is based on the macroeconomic and tax forecasts of September and October 2024, which were

([14]) The Crown-appointed members of the SER are independent experts. They are often professors in the fields of economics, finance, law or social sciences, appointed by the King of the Netherlands on the recommendation of the government. Their task is to contribute knowledge and defend the public interest.

approved by the committees for macroeconomic and tax forecasts (in the Ministry of Finance of the Slovak Republic). An independent fiscal institution, the Council for Budget Responsibility, is a member of those committees.

In **Sweden**, there is no singular cross-industry economic and social committee, but methods of social partner consultation are coordinated by the Prime Minister's Office. These procedures and the additional written consultations have been described above.

In **Hungary**, there was no exchange with the government on the MTFSP, but a round table was organised by the European Economic and Social Committee (EESC) on 6 December 2024 (with no involvement of government representatives). This event took place before Hungary's addendum to its MTFSP was submitted – to share the viewpoints of organised civil society, including social partners. However, no government representative was available to discuss the MTFSP. The event was organised as part of the consultation carried out by the EESC's European Semester Group (ESG) ([15]) to prepare an information report ([16]). In fact, only one or two civil society groups were in attendance, but trade unions and employer organisations were well represented ([17]).

The MTFSP was one of the items discussed, but the main focus was the reform and investment measures in the 2024 CSRs and a desired improvement in the involvement of civil society. The meeting also discussed progress in the implementation of the RRP. The Hungarian round table was not the only national round table that was organised by the ESG of the EESC. An overview of the European Semester round-table meetings and other European Semester activities organised by the EESC are presented in Section 4.4.

1.3. Social partners' assessment of their involvement in drafting MTFSPs

In cooperation with the European social partner organisations ETUC, BusinessEurope, SMEunited and SGI Europe, Eurofound developed a questionnaire that the four organisations then distributed to their member organisations. Respondents included trade unions affiliated to ETUC from all 27 Member States. Employer organisations from 24 Member States responded. Table 9 indicates the organisations that participated in this study.

Table 9: National trade unions and employer organisations that participated in this study

Member State	ETUC	BusinessEurope	SMEunited	SGI Europe
Austria	AK (and ÖGB)		WKÖ	
Belgium	ACV	VBO		
Bulgaria	CITUB	BIA		
Croatia	SSSH			
Cyprus	SEK	OEB		
Czechia	ČMKOS	SP ČR		
Denmark	FH	DA		
Estonia	EAKL	ETKL		
Finland	SAK			KT
France	FO	MEDEF		
Germany	DGB	BDA		
Greece	GSEE	SEV	IME GSEVEE	
Hungary	SZEF	MGYOSZ		

(15) https://www.eesc.europa.eu/en/sections-other-bodies/other/permanent-group-european-semester.

(16) https://www.eesc.europa.eu/en/our-work/opinions-information-reports/information-reports/point-view-organised-civil-society-eu-member-states-national-reform-and-investment-proposals-and-their-implementation.

(17) Attendees were the European Commission and the EESC; the Ministry of Energy; the Magyar Nemzeti Bank (central bank of Hungary); the Confederation of Unions of Professionals (ÉSZT); the National Federation of Workers' Councils (MOSZ); the Hungarian National Federation of Consumer Co-operative Societies and Trade Associations (AFEOSZ-COOP); the Metalworkers' Union (VASAS); the Democratic League of Independent Trade Unions (LIGA); the Confederation of Hungarian Business (VOSZ); the Hungarian Trade Union Confederation (MASZSZ); the Forum for the Co-operation of Trade Unions (SZEF); the National Federation of Agricultural Cooperatives and Producers (Mezõgazdasági Szövetkezõk és Termelõk Országos Szövetsége); the Hungarian Economic Association; the Chamber of Hungarian Architects; the think tank Kopint-Tárki; the National Association for Large Families (NOE); the House of Parents; and the Clean Air Action Group.

Member State	ETUC	BusinessEurope	SMEunited	SGI Europe
Ireland	ICTU	IBEC		
Italy	UIL			
Latvia	LBAS	LDDK		
Lithuania	LPSK and LPSS	LPK		
Luxembourg	OGB-L and LCGB	UEL	CdM UEL	
Malta	GWU	MCCEI		
Netherlands	FNV	VNO-NCW		
Poland	OPZZ	Lewiatan		
Portugal	CGTP-in	CIP	CCP	
Romania	BNS and CNS 'Cartel Alfa'	CP Concordia		
Slovakia	KOZ SR			
Slovenia	ZSSS	ZDS		
Spain	CC.OO	CEOE	PIMEC	
Sweden	TCO	Swedish Enterprise		
EU	27 Member States	22 Member States	5 Member States	1 Member State

Notes: The organisations included are those that provided information based on a questionnaire addressed to national employer organisations and trade unions. See Eurofound (2023) for further details on the employer organisations and trade unions mentioned in this table.
Source: Author.

In 23 Member States, questionnaires were completed by both trade unions and employer organisations. In Croatia, Italy and Slovakia, only trade unions responded. In Lithuania, one employer organisation completed the questionnaire. Two trade unions (LPSK and LPSS) indicated that, partly due to organisational capacity limitations, and partly owing to their limited involvement in European Semester activities in 2024 and 2025, they could not complete the questionnaire, even though they had both contributed some information in a separate email.

For Austria, responses came from the Chamber of Labour Vienna (AK), although it was confirmed that this input also covers the Austrian Trade Union Federation (ÖGB), which is affiliated to ETUC. For Luxembourg, one coordinated trade union response was submitted, covering both trade unions, Luxembourg Confederation of Independent Trade Unions (OGB-L) and the Luxembourg Confederation of Christian Trade Unions. In Romania, there were two separate responses, one from the National Trade Unions Block and a second from the National Trade Union Confederation 'Cartel Alfa'.

On the employers' side, responses have been promised by Italy and Slovakia. For Croatia, it was not possible to get any input, as there appears to have been a change in the person responsible for the European Semester in the Croatian Employers' Association.

The views of trade unions and employer organisations sometimes diverge. There are three alternative and complementary explanations for this. Differences could be due to different subjective perceptions or assessments of the same situation. Some variation could also be due to the level of knowledge and awareness of the contact and consultations that took place among the people answering the questionnaire for the purpose of this study. Diverging views could also reflect a situation in which different organisations in the same country were involved separately, at a different moment in time or in a different way.

The first question the national social partner organisations were asked was **whether they were consulted on the MTFSP** that was submitted by their government to the European Commission. In the case of the trade unions, there are replies for all 27 Member States (Table 10). In 12 Member States, the trade unions indicated that they were consulted by the government on the MTFSP. In Czechia and Malta, the trade unions indicated that they were consulted multiple times. In the 10 other Member States, trade unions reported that they were consulted on only one occasion.

In Austria, the AK indicated that it was consulted once, but only on parts of the MTFSP. In Slovenia, the Association of Free Trade Unions of Slovenia (ZSSS) indicated that it was only informed at the very last moment. This highlights two matters of interpretation that need to be considered when analysing the questionnaire responses. First, the analysis should establish whether the consultation was on the entire MTFSP, or on parts of the plan. Second, a subjective assessment may have been made by respondents if a meeting on the MTFSP effectively took place but it was not considered by social partners to be a consultation because it involved only one-way information sharing, without any discussion or information exchange.

Table 10: National social partners reporting that they were consulted on the MTFSP

Consulted	ETUC members	BusinessEurope members	SMEunited members	SGI Europe members
Multiple times	Czechia, Malta	Latvia, Netherlands	Austria	
Once	Austria, Croatia, Finland, France, Germany, Italy, Latvia, Slovakia, Spain, Sweden	Bulgaria, Czechia, France, Romania, Slovenia		
Not at all	Belgium, Bulgaria, Cyprus, Denmark, Estonia, Greece, Hungary, Ireland, Lithuania, Luxembourg, Netherlands, Poland, Portugal, Romania, Slovenia	Belgium, Cyprus, Denmark, Estonia, Germany, Greece, Hungary, Ireland, Lithuania, Luxembourg, Malta, Poland, Portugal, Spain, Sweden	Greece, Luxembourg, Portugal, Spain	Finland

Source: Information based on responses to a questionnaire addressed to national employer organisations and trade unions.

Employer organisations from 24 Member States specified whether they were consulted on the MTFSP (18).

The Austrian Economic Chambers (WKÖ), the Confederation of Netherlands Industry and Employers (VNO-NCW) and the Employers' Confederation of Latvia (LDDK) reported that they were consulted on multiple occasions, while employer organisations from Bulgaria, Czechia, France, Romania and Slovenia indicated that they were consulted once.

Trade unions from 15 Member States and employer organisations from 16 Member States indicated that they were not consulted on the MTFSP. In 11 Member States, both trade unions and employer organisations indicated that they were not consulted at all. This is the case for Belgium, Cyprus, Denmark, Estonia, Greece, Hungary, Ireland, Lithuania, Luxembourg, Poland and Portugal. (Lithuanian trade unions advised that they were not consulted (hence their inclusion in Table 10), but they did not return a completed questionnaire, so they are not included in later tables as no answers were received from them.)

A second question asked national social partner organisations about the type of interaction they had with the government on the MTFSP. Table 11 shows that, for some organisations, several options applied.

Table 11: Format that best describes social partners' interaction with governments on MTFSPs

Type of interaction	ETUC members	BusinessEurope members	SMEunited members	SGI Europe members
Phone call				
Online meeting	Czechia, Spain	Netherlands		
Individual meeting	Germany, Malta		Spain	
Email exchange	Austria, Czechia	Bulgaria, Czechia, Latvia, Poland	Austria	
Public consultation	Austria, Italy	Bulgaria, Latvia, Romania		
Consultative committee	Croatia, Finland, France, Latvia, Malta, Slovakia, Slovenia	Bulgaria, France, Portugal, Slovenia	Austria	
Working group				
Conference or round table	Sweden	Czechia		
Other		Cyprus, Romania		
No interaction	Belgium, Bulgaria, Cyprus, Denmark, Estonia, Greece, Hungary, Ireland, Luxembourg, Netherlands, Poland, Portugal, Romania	Belgium, Denmark, Estonia, Germany, Greece, Hungary, Ireland, Lithuania, Luxembourg, Malta, Spain, Sweden	Greece, Luxembourg, Portugal	Finland

Notes: The responses for Belgium, Finland, Romania and Slovenia were provided through another questionnaire developed by SMEunited. In Italy, the General Secretary of the trade union UIL had a meeting with the government. In Austria, business organisation WKÖ reported an email exchange on the draft MTFSP and an information event (an interministerial meeting with stakeholders was considered to be a meeting of a consultative committee). In Cyprus, the employer organisation reported being consulted indirectly through letters and attending meetings where attendees submitted/discussed proposals aimed at safeguarding the economy and enhancing the business environment. The employer organisation from Romania mentioned a meeting with other business organisations.
Source: Information based on responses to a questionnaire addressed to national employer organisations and trade unions.

(18) As indicated for Croatia, Italy and Slovakia, no responses were submitted by employer organisations.

Table 12: Timing of consultations in relation to the date MTFSPs were submitted

Timing	ETUC members	BusinessEurope members	SMEunited members	SGI Europe members
More than a month before	Czechia, Latvia, Malta, Sweden	Cyprus, Netherlands, Portugal	Austria	
2–4 weeks before	Austria, Italy, Slovenia	Bulgaria, Czechia, Latvia, Slovenia		
Up to 1 week before	Croatia, Germany, Poland, Slovakia, Spain	France, Poland		
After submission	Finland, France	Latvia, Romania		
No information				
Not at all	Belgium, Bulgaria, Cyprus, Denmark, Estonia, Greece, Hungary, Ireland, Luxembourg, Netherlands, Portugal, Romania	Belgium, Denmark, Estonia, Germany, Greece, Hungary, Ireland, Lithuania, Malta, Spain, Sweden	Greece, Luxembourg, Portugal, Spain	Finland

Note: In France, the trade union respondent reported that the meeting took place on the day the MTFSP was submitted to the European Commission, after the plan was validated by the French Council of Ministers and officially submitted to the French parliament.
Source: Information based on responses to a questionnaire addressed to national employer organisations and trade unions.

A third question on social partner involvement in drafting MTFSPs relates to the timing of their involvement. In four Member States, trade unions indicate that they were consulted more than a month before their state's MTFSP was submitted (Table 12). Four employer organisations in four other Member States indicated the same. Responses about the timing of discussions on MTFSPs are indeed significantly different between trade unions and employer organisations. Further research is needed to clarify whether this is due to different interpretations or if different organisations were contacted about the MTFSPs at different times.

A follow-up question asked whether any documents had been received prior, during or after a meeting on the MTFSP. Again, answers are very different between trade unions and employer organisations in the same country (Table 13). Trade union organisations from 11 Member States reported receiving documents. The same is reported by employer organisations from eight Member States. In five Member States (Austria, Czechia, France, Malta and Slovenia), both trade unions and employer organisations report receiving documentation. However, different types of documents were reported as received in all five cases.

Table 13: Documents received before, during or after meetings on MTFSPs

Available documents	Responses from trade unions			Responses from employer organisations		
	Prior to the meeting	During the meeting	After the meeting	Prior to the meeting	During the meeting	After the meeting
Concept notes	Cyprus, Malta	Czechia		France		
Analytical data		Czechia		France		
Early MTFSP draft	Italy	Czechia		Czechia, France, Slovenia	Bulgaria	Austria
Advanced draft of the MTFSP	Austria, Croatia, France, Malta, Slovakia, Slovenia		Belgium	France	Czechia	Austria, Latvia, Poland
Other documents	Malta	Hungary			Malta	Austria, France, Latvia
No documents						

Notes: A trade union in Finland reported that the timing (following submission of the MTFSP; see Table 12) and the fact that the final version of the MTFSP had already been submitted at the time of the meeting (see Table 13) meant that information was only shared (see Table 16) with social partners. The trade union stated that documents that were eventually given to them were the same documents that had already been published as the final documents. In the case of the employer organisations in Austria, the other documents were the slides presented at the meeting.
Source: Information based on responses to a questionnaire addressed to national employer organisations and trade unions.

Table 14: Government interlocutors in meetings on MTFSPs (only the highest level present is included)

Interlocutor	ETUC members	BusinessEurope members	SMEunited members	SGI Europe members
Decision-makers	Croatia, Italy, Latvia, Malta, Slovenia	Cyprus, Czechia, Malta, Portugal, Romania	Austria	
Advisors	Spain	Bulgaria, Slovenia	Spain	
Civil servants	Austria, Czechia, France, Sweden	France, Latvia, Poland, Sweden		
Other				

Notes: The table includes only the type of interlocutor with greatest decision-making power. In Malta, all three – decision-makers, advisors and civil servants – were present but the table shows only the interlocutor with the greatest decision-making power.
Source: Information based on responses to a questionnaire addressed to national employer organisations and trade unions.

Besides the timing of the consultation, and the availability of documents, a question was also asked about the level of the government interlocutors in the meeting on the MTFSP. This question was inspired by the consideration that decision-makers have more opportunities to take feedback on board in further decision-making processes. Many trade unions and employer organisations indicated that, in the meetings they had, several levels of interlocutor were present. In Table 14, only the highest level reported is included. This is to maximise the readability of the table, not to ignore the presence or importance of lower-level staff in such meetings.

Table 15 combines the answers to two questions in the questionnaire issued to social partners: whether they had the option to contribute to the draft MTFSP in writing or informally (orally), and whether they received any feedback on their comments on the MTFSP, either in writing or orally. No distinction is made here between contribution opportunities created by the leading government institutions (mostly ministries of finance), opportunities created by the contributing employment or social affairs ministry and comments provided by social partners at their own initiative.

An option to provide comments was available for a relatively small number of Member States. There was an option for trade unions to provide written input in seven Member States, and only spoken input in two other Member States. Employer organisations in five Member States reported having had the option to make written comments, and in five other Member States organisations had the option to provide spoken comments. Some social partners noted the lack of feedback provided in response to comments. Only in Czechia and Malta did both trade unions and employer organisations confirm that they had received feedback on their comments from their government interlocutors.

Table 15: Social partners’ input to the MTFSPs and receipt of feedback from governments

Social partners	Contribution			Feedback from the government		
	Written	Oral/informal	No contribution	Written	Oral/informal	No contribution
ETUC members	Austria, Czechia, France, Italy, Latvia, Malta, Slovenia	Italy, Latvia, Malta, Poland, Sweden	Belgium, Bulgaria, Croatia, Denmark, Luxembourg, Netherlands, Spain	Czechia, Malta	Slovenia	Austria, France, Italy
BusinessEurope members	Bulgaria, Czechia, France, Latvia	Cyprus, Malta, Poland, Slovenia	Greece, Portugal, Romania	Czechia, Latvia	Bulgaria, Malta	Cyprus, Poland, Slovenia
SMEunited members	Austria	Spain	Greece, Portugal	Austria		
SGI Europe members			Belgium, Bulgaria, Croatia, Denmark, Luxembourg, Netherlands, Spain			

Note: Some social partners in Slovenia reported that they did not get meaningful feedback on their input.
Source: Information based on responses to a questionnaire addressed to national employer organisations and trade unions.

Table 16: Social partners' assessment of their consultation with governments on the (draft) MTFSPs

Timing	ETUC members	BusinessEurope members	SMEunited members	SGI Europe members
Information sharing	Finland, Germany, Latvia, Spain	Cyprus, Denmark, Luxembourg, Malta, Netherlands, Portugal, Sweden	Luxembourg	
Purely formal consultation	Austria, Croatia, Czechia, France, Italy, Slovakia, Slovenia, Sweden	Latvia, Poland, Romania, Slovenia		
Meaningful involvement/possibility of proposing changes	Malta	Bulgaria, Czechia, France	Austria	
Proposed changes considered		Czechia (partly)		
Joint drafting				
No interaction	Belgium, Bulgaria, Cyprus, Denmark, Estonia, Greece, Ireland, Luxembourg, Netherlands, Poland, Romania	Belgium, Estonia, Greece, Ireland, Lithuania, Spain	Greece, Portugal	
No information	Hungary, Lithuania, Portugal	Germany, Hungary		Finland

Source: Information based on responses to a questionnaire addressed to national employer organisations and trade unions.

Social partners assessed what consultation meant for them (Table 16). Was it merely a sharing of information? Was it purely a formality, with no possibility of proposing changes? Alternatively, did the consultation involve meaningful discussion, with the opportunity to propose changes, and clear consideration of their suggestions by the government?

A crucial question in this area is how trade unions and employer organisations can best describe the type of interaction they had with the government on the (draft) MTFSP. Only the trade unions in Malta indicate meaningful involvement, with the possibility of proposing changes. Such meaningful involvement is reported by employer organisations in Austria, Bulgaria, Czechia and France.

Only the employer organisation in Czechia indicated that its proposed changes were considered.

Trade unions and employer organisations were also asked about the positive and negative aspects of their consultation, and what they think could be done to improve the way they are consulted on the MTFSP in the context of the new macroeconomic governance framework.

1.4. Summary of information available on social partners' consultations on MTFSPs

This chapter brings together information from three different source. First, information can be found in the European Commission's standard analyses of MTFSPs. This information was analysed in Section 1.1 and is presented in the overview in Table 17 (column 2). The table includes:

- 15 Member States for which the MTFSP indicates that social partners were consulted (green-coloured background in Table 17);
- 4 Member States indicating that there was no consultation (in red font in Table 17);
- 1 Member State (Poland) where there was no consultation but there was a discussion;
- 7 Member States where the MTFSP did not contain any information about whether or not there was a consultation.

The second source of information is perspectives of national governments, based on information collected by Eurofound national correspondents, who contacted the ministries responsible for drafting the MTFSP in their country to find out how the MTFSP was drafted and what kind of consultation with social partners took place according to the government sources. This is shown in columns 3–7 of Table 17. There are five options based on the information provided by government representatives contacted by Eurofound national correspondents.

Table 17: Social partner consultation reported in MTFSPs and from governments' perspectives

Member State	Information in MTFSP	Information from Eurofound national correspondents (government sources)					Social partners' evaluation of their involvement	
	Consultation	No consultation	On parts only	Multilayered	Specific structure or ad hoc	National social dialogue or NESC	Trade unions	Employer organisations
Austria	Yes				■		Formality	Meaningful
Belgium	No information	■					None	None
Bulgaria	Yes			■	■		None	Meaningful
Croatia	Yes		■			■	Formality	No reply
Cyprus	No	■					None	Information sharing
Czechia	Yes			■	■	■	Formality	Meaningful
Denmark	No	■					None	None
Estonia	No information	■					None	None
Finland	Yes			■	■	■	Information sharing	No reply
France	No information					■	Formality	Meaningful
Germany	Yes				■		Information sharing	Information sharing
Greece	No information	■					None	None
Hungary	No information	■					None	None
Ireland	Yes				■		None	None
Italy	Yes				■		Formality	No reply
Latvia	Yes		■				Information sharing	Formality
Lithuania	Yes		■				No reply	None
Luxembourg	Yes		■				None	Information sharing
Malta	Yes					■	Meaningful	Information sharing
Netherlands	No		■			■	None	Information sharing
Poland	No/discussion		■		■		None	Formality
Portugal	No		■				None	Information sharing
Romania	Yes					■	None	Formality
Slovakia	Yes					■	Formality	No reply
Slovenia	Yes					■	Formality	Formality
Spain	No information	■					Information sharing	None
Sweden	No information		■				Formality	Information sharing
EU	15 Member States	7 Member States	8 Member States	3 Member States	8 Member States	9 Member States		

Sources: This table gathers information from three tables with different sources (Tables 1, 7 and 16). Table 1 is based on analyses of Council recommendations; these are the source of information for the second column. The information from national correspondents is taken from Table 7, and that comes from information from the Network of Eurofound Correspondents. The source of information for the two final columns is Table 16, based on responses to a questionnaire addressed to national employer organisations and trade unions.

The options, presented in detail in Section 1.2, are:

- no consultation at all (seven Member States);
- no consultation on the entire MTFSP, but only consultation on parts or measures included in the plan (eight Member States);
- a multilayered consultation approach combining different channels and approaches (three Member States);
- consultations through specific structures, or an ad hoc approach based on, for example, email exchanges or wider public consultation, or a one-off process (eight Member States);
- debates on the MTFSP in national cross-industry social dialogue or the NESC (nine Member States).

The third source of information is the views and interpretation of national trade unions and employer organisations based on a questionnaire completed by them. Their own perceptions and assessments of their involvement in drafting the MTFSPs are included in columns 8 and 9 of the table. When they assessed the consultation to be meaningful, with opportunities to propose changes, cells are coloured green. When they reported that no interaction or exchange on the MTFSP took place, cells are marked in red font. Not coloured are the instances in which information was merely shared with social partners, with no opportunity for discussion; where there was a consultation, but it was only a formality, with no possibility of proposing changes; and where no reply was received to the questionnaire.

There are five Member States for which one social partner organisation reports that the consultation with the government on the MTFSP before it was submitted was meaningful, providing them with an opportunity to propose changes. This is the case for employer organisations in Austria, Bulgaria, Czechia and France (four Member States) and for the trade union confederation in Malta (one Member State). Although in France no information on consultation was provided in the MTFSP, in the four other states consultation was mentioned in the MTFSP. Positively assessed practices in these five Member States are presented in more detail in the section ‘Interesting examples of social partner consultation on MTFSPs’.

Interesting examples of social partner consultation on MTFSPs

Interesting practices, in terms of social partner **involvement in drafting MTFSPs**, are reported in Austria, Bulgaria, Czechia, France and Malta. **Czechia** is the only country where both trade unions and employers see positive points in their involvement. A multilayered approach to consultation was undertaken in Czechia, including a round-table discussion with social partners and other stakeholders, a month before the MTFSP was submitted. About two weeks before the MTFSP was submitted, a discussion was organised in a committee of the Senate and in the NESC, followed by an interdepartmental commenting procedure including social partners, a week before the MTFSP was submitted. Both the Czech trade union confederation and the employer organisation report additional email exchanges and online meetings. The Czech employer organisation assessed its involvement as meaningful, with possibilities of proposing changes, while the trade union confederation considered its involvement to be only a formality, with no opportunity to propose changes. Despite these opposing views, they agree that there were multiple instances of consultation, which started about a month before the MTFSP was submitted.

In **Malta**, there was a discussion on the MTFSP in the MCESD, six weeks before it was submitted. In combination with this discussion, the trade union confederation reports being consulted multiple times in individual meetings. However, the employer organisation in Malta only mentioned the discussion in the NESC, stating that it only received information, while the trade union confederation in Malta categorised the consultation as meaningful, with opportunities to propose changes.

In Austria, Bulgaria and France, employer organisations were more positive about their involvement in drafting the MTFSP than the trade unions. In **Austria**, there was a public consultation, providing multiple opportunities for consultation, along with email exchanges, all starting about a month before the MTFSP was submitted. The Austrian elections at the end of September 2024 caused a delay in preparing the MTFSP, which was only submitted in the middle of May 2025 (see Table 2). Remarkably, in March 2025, in the newly established Austrian People’s Party (ÖVP) and Social Democratic Party of Austria (SPÖ) coalition, 8 of the 21 ministers had held a previous position in a social partner organisation. This was the highest share for decades (Eurofound, 2024).

In **Bulgaria**, a consultation was organised in two different government working groups – the Ministry of Finance’s working group on the economic and monetary union and the European Semester working group of the European Affairs Council of the Bulgarian government – about three weeks before the MTFSP was submitted. For the employer organisation, this was a meaningful consultation, presenting an opportunity to propose changes. It is not clear whether the trade unions also participated, as they reported that no consultation took place.

In **France**, the consultation took place in the CDSEI. There was disagreement over the timing of this consultation: according to the trade union respondent, it took place after the MTFSP was submitted; however, the employer organisation indicated that it was conducted a few days before. Nevertheless, the employer organisation categorised it as a meaningful consultation, providing the opportunity to propose changes, while for the trade union respondent it was only a formality, with no possibility of proposing changes.

In **Finland**, a multilayered approach was taken that involved several consultation opportunities, including a discussion in the NESC. From the information provided by the government, the approach can be considered good practice. One trade union reported that it merely received information, while an employer organisation replied that it could not recall the exchange on the MTFSP. The details of this multilayered approach were described in Section 1.2 and appear to indicate a reality that was observed perhaps not by the European Semester expert of the social partner organisations but at a higher level of leadership.

The MTFSP was discussed in the NESC in 10 Member States, as mentioned in Table 17 and earlier in the report (Table 8).

Discrepancies in the assessment of social partner involvement

In the five Member States for which the MTFSP indicated that no consultation took place, this lack of consultation is confirmed by the information provided by social partners. Danish social partners report that there was no exchange with the government on the MTFSP. In the four other states – Cyprus, the Netherlands, Poland and Portugal – employer organisations mention that there was no real consultation, but some information was shared with them on the MTFSP.

In three Member States, the MTFSP reports that there was a consultation, while both trade unions and employer organisations indicate that this did not happen. In Lithuania and Luxembourg, the government claimed that, even though there was no consultation on the MTFSP as such, there were consultations on measures included in the MTFSPs. In Ireland, a discussion on the MTFSP took place in the annual meeting of the NED, which did not appear to be considered a consultation by social partners.

This may point to a degree of subjectivity in the evaluations of social partners. The different assessments of trade unions and employer organisations may indicate that they were consulted separately in different ways. However, in some cases the organisations may have simply provided different assessments of the same situation. Efforts to reveal the reality behind the subjectivity were made by asking specific questions of social partners about their interactions with the government on the MTFSP. The findings are presented in Tables 10–15.

In eight Member States, the MTFSP indicated some consultation, while the assessment of the social partners was that governments only shared information with them, or that consultation took place as a formality, with no opportunity to propose changes. This was the case in Croatia, Finland, Germany, Italy, Latvia, Romania, Slovakia and Slovenia.

In **Germany**, social partners pointed out that the mention in the German MTFSP that a consultation took place as envisaged in Article 11(3) of Regulation (EU) 2024/1263 is misleading. The meeting of the German Macroeconomic Dialogue on 10 July 2024, which is mentioned in the MTFSP, was only for information. Social partners were not able to make any suggestions or propose changes. During a European Semester dialogue in June 2025, it was also clarified that due to the newly installed government, the plan to submit the MTFSP at the end of July and uncertainty around the ministry taking the lead in drafting the plan, it would not be possible to organise a substantive hearing on the document.

Of the seven Member States for which the MTFSP did not contain any information as to whether or not a consultation took place, only France appears to have held a consultation, through the NESC. In Spain and Sweden, a degree of consultation was conducted as a formality, or social partners simply received information on the MTFSPs. In the four other Member States – Belgium, Estonia, Greece and Hungary – governments did not discuss the MTFSPs with social partners, as confirmed by government sources.

2 MTFSP implementation: 2025 progress reports

Article 21 of Regulation (EU) 2024/1263 stipulates that 'Each Member State shall submit to the Commission an annual progress report, by 30 April of each year.' While MTFSPs are forward looking, covering a period of four or five years, depending on the regular length of the legislative term of the Member State concerned, APRs are backward-looking administrative and factual documents, although Member States may also use them to announce new policy initiatives in the area of structural reforms and investments ([19]). The monitoring of the implementation of MTFSPs through APRs is confirmed to be included in the European Semester in Article 3(3) of Regulation (EU) 2024/1263. The 2025 APRs are publicly available ([20]).

The most relevant part of Regulation (EU) 2024/1263 for this chapter is Article 21(5). It states that 'Member States may, in accordance with their national legal frameworks, discuss the progress report in their national parliaments, and with civil society, social partners and relevant stakeholders.' The Commission's guidance for Member States on the information requirements of MTFSPs and APRs (Section 4.1) ([21]) indicates that the APR should provide information on discussions about the progress report with relevant stakeholders (e.g. social partners).

2.1. The 2025 APRs of the 27 Member States

By the deadline of 30 April 2025, 21 Member States had submitted their 2025 APRs. Estonia, Germany, Latvia, Luxembourg, the Netherlands and Slovenia did so in the week before the deadline. Fifteen Member States submitted their APR on 30 April 2025: Belgium, Czechia, Denmark, Finland, France, Greece, Hungary, Italy, Lithuania, Malta, Poland, Portugal, Slovakia, Spain and Sweden. Five Member States submitted their APR with a slight delay in May 2025: Bulgaria on 2 May 2025, Ireland on 6 May, Austria on 13 May, Cyprus on 14 May and Croatia on 22 May.

Romania has not submitted its APR on action taken and on the implementation of the set of reforms and investments underpinning the extension of the adjustment period. The major political turbulence in Romania in recent months has shifted the government's focus to the budget deficit and the need to implement significant fiscal adjustments. It is therefore unlikely that a substantial progress report will be filed any time soon.

In the case of 11 Member States (Cyprus, Czechia, Finland, Greece, Ireland, Latvia, Malta, the Netherlands, Poland, Portugal and Slovenia), the APR was submitted in English. Document analysis of APRs is not easy, because the remaining 15 APRs have not been translated into English and because no standardised analyses are carried out by the European Commission, as they are for MTFSPs. Furthermore, as was the case for MTFSPs, the number of pages in APRs varies significantly (Table 18). The Czech APR is 20 pages, the Portuguese APR is 26 pages and the Spanish APR comes to 36 pages. Four other Member States have a 2025 APR with fewer than 50 pages: Austria, Ireland, Lithuania and Slovenia. The EU average is 107 pages. The Member States with the longest 2025 APRs are Cyprus, Finland, Italy, Latvia and Malta, each with more than 200 pages.

Drafting periods of the APRs

The situations of the five Member States whose submission of their MTFSPs was delayed in 2025 deserve to be looked at in closer detail. In these countries, the 2024 and 2025 elections and government formations (see Table 2) could have had implications for the drafting period of the MTFSP but also for the drafting of the 2025 APR. The five Member States that submitted their MTFSP in 2025 are Austria (13 May 2025), Belgium (18 March 2025), Bulgaria (27 February 2025), Germany (16 July 2025) and Lithuania (30 April 2025).

([19]) Notice – Guidance to Member States on the information requirements for the medium-term fiscal-structural plans and for the annual progress reports, (OJ C, C/2024/3975, 21.6.2024, ELI: https://eur-lex.europa.eu/eli/C/2024/3975/oj).

([20]) https://economy-finance.ec.europa.eu/economic-governance-framework/stability-and-growth-pact/preventive-arm/annual-progress-reports_en.

([21]) Notice – Guidance to Member States on the information requirements for the medium-term fiscal-structural plans and for the annual progress reports, (OJ C, C/2024/3975, 21.6.2024, ELI: https://eur-lex.europa.eu/eli/C/2024/3975/oj).

Table 18: Date, language and number of pages of the submitted 2025 APR

Member State	Start date for drafting	Date submitted	Language	Number of pages
Austria	18 March 2025	13 May 2025	German	46
Belgium	18 March 2025	30 April 2025	French	58
Bulgaria		2 May 2025	Bulgarian	139
Croatia	March 2025	22 May 2025	Croatian	124
Cyprus	April 2025	14 May 2025	English	275
Czechia	March 2025	30 April 2025	English	20
Denmark	November 2024	30 April 2025	Danish	64
Estonia	March 2025	29 April 2025	Estonian	66
Finland	January 2025	30 April 2025	English	205
France	January 2025	30 April 2025	French	146
Germany		23 April 2025	German	80
Greece		30 April 2025	English	128
Hungary	27 February 2025	28 April 2025	Hungarian	55
Ireland	March 2025	6 May 2025	English	44
Italy	April 2025	30 April 2025	Italian	235
Latvia	December 2024	29 April 2025	English	239
Lithuania	February 2025	30 April 2025	Lithuanian	46
Luxembourg	November 2024	25 April 2025	French	76
Malta	March 2025	30 April 2025	English	204
Netherlands	January 2025	29 April 2025	English	54
Poland	January 2025	30 April 2025	English	78
Portugal	January 2025	30 April 2025	English	26
Romania		None		
Slovakia		30 April 2025	Slovak	124
Slovenia	January 2025	28 April 2025	English	47
Spain		30 April 2025	Spanish	36
Sweden	March 2025	30 April 2025	Swedish	171

Source: Information based on responses to a questionnaire addressed to national employer organisations and trade unions.

In Austria and Lithuania, the MTFSP and the 2025 APR were submitted on exactly the same day, and the drafting period for both the MTFSP and the APR was the same. There is no information on the drafting period of the 2025 APR for Bulgaria. For Belgium, the drafting of the APR is reported by government officials to have started the day the MTFSP was submitted, while Germany's 2025 APR on the implementation of the MTFSP was submitted 2.5 months before the MTFSP itself.

The elections in Austria in September 2024, and the formation of its new government on 3 March 2025, were indeed the cause of the delay in MTFSP submission and in the drafting of the 2025 APR. The elections in October 2024 in Bulgaria and Lithuania resulted in government formation in November in Lithuania and in January in Bulgaria. This did not affect the drafting of the 2025 APRs. The elections in June 2024 in Belgium resulted in the formation of a new government on 31 January 2025, delaying the submission of the MTFSP but having no impact on the submission of the 2025 APR. In Romania, the elections of 1 December 2024, resulting in government formation on 23 May 2025, may explain the fact that it was not possible to draft a 2025 APR.

Table 19: Duration of the drafting period of the 2025 APR

Drafting period	Member States	Number of Member States
More than 4 months	Denmark, Latvia, Luxembourg	3
3–4 months	Finland, France, Lithuania, Netherlands, Poland, Portugal, Slovakia, Slovenia	8
Around 2 months	Austria, Belgium, Croatia, Czechia, Estonia, Hungary, Ireland, Malta, Sweden	9
Around 2 weeks	Cyprus, Germany, Italy	3
No information	Bulgaria, Greece, Romania (no 2025 APR), Spain	4

Source: Network of Eurofound Correspondents.

In three Member States (Denmark [22], Latvia and Luxembourg), the drafting of the APR had already started at the end of 2024, soon after the MTFSP was submitted. This resulted in a drafting period of more than four months (Table 19). In Finland, France, the Netherlands, Poland, Portugal and Slovenia, drafting of the APR started in January, resulting in a four-month drafting period. In Lithuania and Slovakia, drafting started at the beginning of February, resulting in a drafting period of about three months.

In the Netherlands, progress report preparation began at the start of 2025. The report was sent to the Senate (Eerste Kamer), the House of Representatives (Tweede Kamer) and the European Commission on 29 April 2025. In Slovenia, the drafting of the progress report on the implementation of the MTFSP took place during the first quarter of the year, with preparatory work starting shortly after the end of the previous fiscal year and continuing until the spring. The process of drafting the 2025 progress report occurred between January and April 2025, ahead of its review by the Economic and Social Council on 25 April 2025.

Nine Member States had about two months to draft their APR. In Austria, drafting happened between 18 March and 13 May; in Belgium between 18 March (the date of MTFSP submission) and 30 April; and in Hungary from 27 February to 28 April. In addition to Austria, Belgium and Hungary, Croatia, Czechia, Estonia, Ireland, Malta and Sweden also reported a two-month period for the 2025 APR. In the case of Cyprus, Germany and Italy, drafting of the 2025 APR took only a few weeks. In Germany, the Federal Cabinet approved the APR on 16 April 2025, almost eight weeks after the early national election on 23 February. The report was prepared in the weeks of the transition period between the two governments.

2.2. Information from governments on social partner involvement in drafting the 2025 APRs

Government respondents from 13 Member States reported to Eurofound national correspondents that no consultation on the 2025 APR took place. No information was provided for Italy or Portugal. Romania has no 2025 APR. Some countries pointed to reasons for not consulting social partners, while others discussed parts of the APR but not the APR as a whole, or only informed organisations about the 2025 APR. The nine Member States (marked in green in Table 20) where social partner involvement in the drafting of the 2025 APR was reported are Austria, Bulgaria, Czechia, Finland, France, Malta, Poland, Slovenia and Sweden.

Reasons for not consulting social partners on the APRs

Table 20 indicates that the governments of 13 Member States did not consult the social partners on the 2025 APR. Two countries (Ireland and Slovakia) also gave reasons for not doing so. The first reason is that the main purpose of the APR is to report on the *ex post* implementation of the MTFSP rather than adding additional reforms – that is, it is more of an administrative document. The second reason is that the focus in 2025 was on understanding the implications of government commitments in the MTFSPs and the Programme for Government. In Ireland, the MTFSP was submitted on 15 October 2024 and elections were held on 29 November 2024, resulting in a new government being formed on 23 January 2025. The first APR was therefore submitted less than half a year after the MTFSP. The Ministry of Finance of the Slovak Republic stated that the national authorities did not consult the social partners on the draft 2025 progress report on the implementation of the MTFSP for 2025. Due to time constraints, the 2025 APR could not go through the usual interdepartmental commenting procedure and consultation of the (tripartite) economic and social council.

[22] In Denmark, government sources reported a drafting period from October 2024 to April 2025.

Table 20: Governments' perspectives on social partner consultation on 2025 APRs

Member State	No consultation	Consultation on parts of APR	Information only	Specific structures or ad hoc approach	Innovative examples	Topic in social dialogue or in NESC
Austria					■	
Belgium	■					
Bulgaria				■		
Croatia	■					
Cyprus	■					
Czechia					■	
Denmark	■					
Estonia	■					
Finland				■		
France						■
Germany	■		■			
Greece	■					
Hungary	■					
Ireland	■					
Italy	No information					
Latvia	■		■			
Lithuania	■					
Luxembourg		■				
Malta						■
Netherlands		■				
Poland				■		
Portugal	No information					
Romania	No APR					
Slovakia	■					
Slovenia						■
Spain	■					
Sweden					■	
EU	13 Member States	2 Member States	2 Member States	3 Member States	3 Member States	3 Member States

Source: Network of Eurofound Correspondents.

Discussions on information included in the APRs, but not on the APRs themselves

In Luxembourg and the Netherlands, there were no consultations on the APRs themselves, even though some discussions happened on elements of the plans.

In **Luxembourg**, discussions were held with the social partners on 2 December 2024 and 1 April 2025, allowing ongoing dialogue on budgetary and structural aspects in the context of the European Semester. These meetings were physical meetings between partners, most often held at Senningen Castle. The cross-industry social dialogue council in Luxembourg is the Economic and Social Council (Conseil économique et social).

In the **Netherlands**, government officials indicate that social partners were involved in measures included in the 2025 APR through regular legislative processes and regular meetings. This often took place through the Labour Foundation (Stichting van de Arbeid), which represents both employers and employees. However, social partners were not consulted separately in the process of preparing the 2025 progress report.

Only information, with no consultation

In **Germany** and **Latvia**, no consultation on the 2025 APR took place; social partners were merely informed about the plan. In Germany, social partners were not consulted during the preparation of the APR itself. According to the Federal Ministry of Finance and the Federal Ministry for Economic Affairs and Energy, this was due to the specific political situation following the early national election on 23 February 2025. As no

MTFSP had been submitted at that time, the APR could not reflect progress with respect to the plan and therefore could not fully be considered a progress report. Due to time constraints, the ministries of finance and economic affairs and energy decided not to consult social partners; however, the APR was sent to them for information. In **Latvia**, according to the information in the section 'Consultations, opinions and access to information' of the progress report, the report is available on the website of the Ministry of Finance. Social partners were informed about the part of the MTFSP that deals with the implementation of reforms and investments (Table 9 in the annex to the plan). The Saeima (Latvian parliament) was informed by government officials about the progress report in the context of the Saeima European Affairs Committee. The 2025 APR was not discussed in the National Tripartite Co-operation Council, the NESC, in Latvia.

Specific consultation structures or ad hoc procedures for formulating the APRs

Examples of specific structures or ad hoc procedures applied to consultations on the 2025 APR are available for Bulgaria, Finland and Poland.

In **Bulgaria**, the 2025 APR was prepared by the Ministry of Finance, in close cooperation and coordination with the competent institutions in the context of two working groups of the European Affairs Council: Working Group No 11, on economic and monetary union, and Working Group No 31, on the European Semester. The draft report was agreed in writing with the social partners and NGOs in the context of the extended format of Working Group No 31. In **Finland**, the 2025 APR did not include anything novel compared with the MTFSP, and therefore was primarily prepared by the ministry's civil servants. The progress report was discussed in meetings of the Ministry of Finance's EU cooperation body. In **Poland**, the 2025 APR was presented by the Ministry of Finance and the Ministry of Economic Development and Technology at a meeting of the Task Force for the European Semester in April 2025. The progress report was presented to the Social Dialogue Council in May 2025, after its approval by the government.

Innovative examples of consultations on the APRs

In **Austria**, a coordination meeting was held on 18 March 2025 with all ministries and social partners (with each organisation represented by one person). In addition to the new EU rules, the timeline for publication and the content of the APR were outlined in this meeting. The social partners offered to provide their own text for the plan, which was accepted. This text from the Austrian social partners was included unchanged in the 2025 APR. In **Czechia**, a regular interdepartmental commenting procedure was carried out, within which social partners were given the opportunity to comment on the submitted document. In **Sweden**, two forums were arranged in March 2025 where peak-level social partners (as well as civil society organisations) were invited to contribute to the 2025 progress report (Finansdepartementet, 2025, p. 5). Written consultations were included as an annex to the progress report. There is no singular cross-industry social council in Sweden, but the method of consultation coordinated by the Prime Minister's Office was standardised. The group invited to regular consultations included representatives of each ministry whose jurisdiction the European Semester involves, along with representatives of all peak-level social partners (see Chapter 1).

Discussion of APRs by national economic and social councils

In France, Malta and Slovenia, the 2025 APRs were topics for discussion in the NESCs. In **France**, the national authorities consulted social partners on the draft 2025 APR. This consultation was conducted through the CDSEI. In **Malta**, the process was the same as described for the MTFSP, whereby consultation occurred through the MCESD. Based on the presentation by the Ministry for Finance of the draft 2025 APR, a discussion with the MCESD members on 27 March 2025 intended to equip the MCESD with the necessary knowledge on the MTFSP's progress. The MCESD social partners actively contributed to the meeting, offering valuable insights that reflected their sectoral realities. They reaffirmed their commitment to supporting the development of informed national decisions, policies and investments, with the aim of ensuring the sustainable well-being of the country through open and constructive dialogue. In **Slovenia**, the government submitted the draft report to the Economic and Social Council on 10 April 2025. The council discussed it on 25 April 2025, when it was informed by government officials about the 2025 APR in the context of the MTFSP for 2025–2028. In this context, the social partners urged the government of Slovenia to ensure timely involvement in the preparation of European Semester documents, along with amendments to the 2026 budget and the preparation of the 2027 budget.

2.3. Social partners' assessment of their involvement in drafting the 2025 APRs

The same questions answered by national social partners regarding the MTFSP (analysed in Chapter 1) were also asked regarding the 2025 APR. The first question was whether organisations were consulted by their governments on the 2025 APR (Table 21).

In Austria, France, Poland, Slovenia and Sweden, employer organisations and trade unions confirmed, as indicated in the previous section, that consultations

Table 21: Social partners reporting whether they were consulted on the 2025 APR

Consulted	ETUC members	BusinessEurope members	SMEunited members	SGI Europe members
Multiple times	Latvia, Malta	Czechia	Austria	
Once	Austria, France, Italy, Luxembourg, Poland, Slovenia, Sweden	Bulgaria, France, Latvia, Luxembourg, Poland, Slovenia, Sweden	Luxembourg	
Not at all	Belgium, Bulgaria, Croatia, Cyprus, Czechia, Denmark, Estonia, Finland, Germany, Greece, Hungary, Ireland, Netherlands, Portugal, Slovakia, Spain	Belgium, Cyprus, Denmark, Estonia, Germany, Greece, Hungary, Ireland, Lithuania, Malta, Netherlands, Portugal, Spain	Greece, Portugal, Spain	Finland

Notes: Member States in green are those for which government sources in the previous section indicated some kind of consultation on the 2025 APR. In Bulgaria, Finland and Poland, consultations took place through specific structures or ad hoc procedures; in Austria, Czechia and Sweden, innovative examples of consultations on the 2025 APR were reported; and in France, Malta and Slovenia, the 2025 APR was discussed in the NESC.
Source: Information based on responses to a questionnaire addressed to national employer organisations and trade unions.

took place on the 2025 APR. In Bulgaria and Czechia, this was only confirmed by employer organisations, and in Malta only by the trade union. In Finland, the government reported that it consulted social partners on the 2025 APR through the EU cooperation body of the Ministry of Finance, although this was not confirmed by the trade unions' European Semester experts.

The Polish trade union respondent indicated that the 2025 APR was indeed presented at a meeting of the European Semester team. It should, however, also have been discussed in the tripartite social dialogue council, which did not happen. In Slovakia, the 2025 APR was only published on the Ministry of Finance's website, without any involvement of social partners or other experts.

In 12 Member States (Belgium, Cyprus, Denmark, Estonia, Finland, Germany, Greece, Hungry, Ireland, the Netherlands, Portugal and Spain), both trade unions and employer organisations indicate that they were not consulted on the 2025 APR. In Croatia and Slovakia, this was also confirmed by trade unions, while no responses were received from employer organisations. In Lithuania, it was confirmed by employer organisations that no consultation took place, and no information was provided by trade unions. In Italy, this question was not answered, although Table 22 indicates that the trade unions reported some kind of public consultation process. In Germany, social partners were only informed about the 2025 APR 2.5 months before the MTFSP was submitted, in July 2025.

The second question was about the type of interaction social partners had with governments on the 2025 APRs. The answers to this question from national trade unions and employer organisations are provided in Table 22.

Table 22: Social partners indicating how they interacted with the government on the 2025 APR

Type of interaction	ETUC members	BusinessEurope members	SMEunited members	SGI Europe members
Phone call				
Online meeting		Latvia		
Individual meeting	Malta			
Email exchange	Austria, Latvia	Bulgaria, Germany, Poland	Austria	
Public consultation	Austria, Italy			
Consultative committee	France, Malta, Poland, Slovenia	France, Slovenia, Sweden		
Working group				
Conference or round table	Luxembourg, Sweden	Czechia, Luxembourg	Austria, Luxembourg	
Other				
No interaction	Belgium, Bulgaria, Croatia, Cyprus, Czechia, Denmark, Estonia, Finland, Germany, Greece, Hungary, Ireland, Netherlands, Portugal, Slovakia, Spain	Belgium, Cyprus, Denmark, Estonia, Greece, Hungary, Ireland, Lithuania, Malta, Netherlands, Portugal, Spain	Greece, Portugal, Spain	Finland

Source: Information based on responses to a questionnaire addressed to national employer organisations and trade unions.

Table 23: Timing of interaction in relation to the date 2025 APRs were submitted

Timing	ETUC members	BusinessEurope members	SMEunited members	SGI Europe members
More than a month before	Malta	Sweden	Austria	
2–4 weeks before	Austria, Italy, Latvia, Luxembourg, Sweden	Bulgaria, Czechia, Latvia, Luxembourg	Luxembourg	
Up to 1 week before	France, Poland, Slovenia	France, Germany, Poland, Slovenia		
After submission				
No information				
Not at all	Belgium, Bulgaria, Croatia, Cyprus, Czechia, Denmark, Estonia, Finland, Germany, Greece, Hungary, Ireland, Netherlands, Portugal, Romania, Slovakia, Spain	Cyprus, Denmark, Estonia, Greece, Ireland, Lithuania, Malta, Netherlands, Portugal, Spain	Greece, Portugal, Spain	Finland

Source: Information based on responses to a questionnaire addressed to national employer organisations and trade unions.

There are diverging views regarding the timing of exchanges with governments on the 2025 ARPs, (Table 23). The trade union in Malta indicated that the exchange on the 2025 APR happened more than a month before it was submitted. The employer organisations in Austria and Sweden also indicated that discussions happened more than a month before plans were submitted, while the trade unions in both countries reported that they took place two to four weeks before they were submitted. This two- to four-week period is the most reported option among social partners. In France, Poland and Slovenia, exchanges were confirmed by both sides to have taken place in the week before the 2025 APR was submitted. This was also true for Germany, but, as indicated earlier, there was no real exchange of information – the government merely shared information.

Seven trade union respondents and seven employer respondents indicated that documents were made available to them prior to, during or after a meeting or exchange with the government (Table 24). The five Member States for which both trade unions and employer organisations reported documents regarding the 2025 APR being made available are Austria, France, Latvia, Luxembourg and Slovenia. This is the case for trade unions in Italy and Malta, and for employer organisations in Bulgaria and Czechia.

Regarding the level of the interlocutors involved in exchanges on the 2025 APRs, both trade unions and employer organisations from Luxembourg and Malta indicated that they had discussions with decision-makers. Only the highest level indicated is included in Table 25.

Table 24: Documents available to social partners about the 2025 APR

Available documents	Responses from trade unions			Responses from employer organisations		
	Prior to the meeting	During the meeting	After the meeting	Prior to the meeting	During the meeting	After the meeting
Concept notes	Latvia	Luxembourg		France	Austria	
Analytical data				France		
Early draft of the APR	Italy, Malta			Czechia		Austria, Latvia
Advanced draft of the APR	Austria, France, Malta, Slovenia		Latvia	Bulgaria, France, Slovenia	Czechia, Luxembourg	Austria
Other documents						
No documents						Austria

Source: Information based on responses to a questionnaire addressed to national employer organisations and trade unions.

Table 25: Government interlocutors in meetings on 2025 APRs

Interlocutor	ETUC members	BusinessEurope members	SMEunited members	SGI Europe members
Decision-makers	Italy, Luxembourg, Malta, Poland, Slovenia	Czechia, Luxembourg, Malta	Austria, Luxembourg	
Advisors		Slovenia		
Civil servants	Austria, France, Sweden	Bulgaria, France, Latvia, Poland, Sweden		
Other				

Source: Information based on responses to a questionnaire addressed to national employer organisations and trade unions.

Table 26: Social partners' input to the 2025 APRs and receipt of feedback from governments

Social partners	Contribution			Feedback from the government		
	Written	Oral/informal	No feedback	Written	Oral/informal	No feedback
ETUC members	Austria, France, Italy	Luxembourg, Malta, Poland, Slovenia	Netherlands, Sweden		Luxembourg, Slovenia	
BusinessEurope members	Bulgaria, Czechia, Latvia	Cyprus, France, Malta, Poland, Slovenia, Sweden	Lithuania	Czechia	Malta	
SMEunited members	Austria		Greece	Austria		
SGI Europe members						

Source: Information based on responses to a questionnaire addressed to national employer organisations and trade unions.

Table 26 indicates that trade unions in Austria, France and Italy provided a written contribution or statement to the government on the 2025 APR, and the trade unions in Luxembourg, Malta, Poland and Slovenia gave spoken or informal contributions. Only trade unions in Luxembourg and Slovenia received feedback on their contributions from the government.

Employer organisations in Austria, Bulgaria, Czechia and Latvia provided written contributions or statements, and those in Cyprus, France, Malta, Poland, Slovenia and Sweden did so orally or informally. Feedback on these were received by employer organisations in Austria and Czechia in writing; feedback was received orally in Malta.

Most trade unions and employer organisations reported that the way in which they were involved in the 2025 APR was either only through receiving the finalised APR when it was submitted, or as a pure formality, which did not allow them to propose or request any changes (Table 27).

Table 27: Social partners' assessment of their consultation with governments on the (draft) 2025 APRs

Timing	ETUC members	BusinessEurope members	SMEunited members	SGI Europe members
Information sharing	Germany, Poland, Slovakia, Slovenia	Bulgaria, Cyprus, Germany, Malta, Slovenia, Sweden		
Purely formal consultation	Austria, Czechia, France, Italy, Latvia, Luxembourg, Sweden	Latvia, Luxembourg, Portugal	Luxembourg	
Meaningful involvement/ possibility of proposing changes	Malta	Czechia, France		
Proposed changes considered		Czechia (partly)	Austria	
Joint drafting				
No interaction	Belgium, Bulgaria, Croatia, Cyprus, Denmark, Estonia, Finland, Greece, Hungary, Ireland, Netherlands, Portugal, Spain	Denmark, Estonia, Greece, Hungary, Ireland, Lithuania, Netherlands, Portugal, Spain	Greece	Finland
No information				

Source: Information based on responses to a questionnaire addressed to national employer organisations and trade unions.

Meaningful consultation on the 2025 APR was reported by the trade union in Malta, and by employer organisations in Czechia and France. Suggestions or contributions were considered to a degree by the Czech government, and a joint social partner contribution was taken on board in the 2025 APR for Austria.

2.4. Summary of social partner involvement in formulating the 2025 APRs

Innovative examples on the involvement of social partners in the drafting of the 2025 APR were reported in Austria, Czechia and Sweden. Meaningful social partner involvement in the 2025 APR was reported by a trade union in Malta and by employer organisations in Austria, Czechia and France.

In **Austria**, the 2025 APR was submitted on 13 May 2025, together with the MTFSP. The delay was due to the Austrian elections at the end of September, after which it took until March 2025 to install a new coalition government. Just like for the MTFSP, there was a public consultation on the APR, offering multiple opportunities to comment, in combination with email exchanges. All consultation activities started about a month before the APR was submitted. For the 2025 APR, there was an additional coordination meeting, about two months before the plan was submitted and immediately after the government was established in March 2025. In fact, neither ÖGB nor the Federation of Austrian Industries (IV) was involved here, but rather AK and WKÖ. AK indicated that its involvement was in close cooperation with ÖGB, while the Federation of Austrian Industries answered that it left consultation up to WKÖ (which is a member organisation of SMEunited). While WKÖ categorised its consultation as meaningful, with opportunities to propose changes, AK, on the workers' side, assessed it as a formality only.

In **Czechia**, just like for the MTFSP, an interdepartmental commenting procedure was carried out, within which social partners were given the opportunity to comment on the document submitted. The employer organisation assessed the consultation as meaningful, with opportunities to propose changes, while the trade union confederation considered it purely a formality, with no opportunities to propose changes.

In **France**, the consultation happened in the tripartite CDSEI, only a few days before the APR was submitted. The assessment of social partners was the same as in Austria and Czechia. In all three countries, employer organisations assessed the consultation as meaningful, with opportunities to propose changes, while the trade union confederation found it to be purely a formality, with no opportunities to propose changes.

In **Malta**, the involvement in the 2025 APR was assessed as meaningful by the trade union, with opportunities to propose changes, while the employer organisations perceived it as amounting only to information sharing by the government. In fact, in Malta the same approach was adopted for both the MTFSP and the 2025 APR: a consultation in the tripartite council for economic and social development (MCESD) on 27 March 2025. In that council meeting, a presentation was delivered by the Ministry for Finance, which was then discussed with MCESD members. The social partner delegates in the MCESD actively contributed to the meeting, offering insights that reflected their views and considerations. The secretariat of the MCESD reported that during that meeting the MCESD also reaffirmed its commitment to supporting the development of informed national decisions, policies and investments in the European Semester, with the aim of ensuring the sustainable well-being of the country through open and constructive dialogue.

In **Sweden**, two forums were arranged in March 2025, where peak-level social partners (along with civil society organisations) were invited to contribute to the 2025 progress report (Finansdepartementet, 2025, p. 5). Written consultations were included as an annex to the progress report. There is no singular cross-industry social council in Sweden, but the method of consultation coordinated by the Prime Minister's Office is standardised. The group invited to these regular consultations includes representatives of each ministry whose jurisdiction the European Semester involves, along with representatives of all peak-level social partners.

An overview of social partner involvement in the 2025 APR is included in Table 28 (columns 6 and 7). This can be compared with the situation for the MTFSP, shown in columns 3 and 4 of the table.

Whereas the handling of social partner involvement in the 2025 APRs was, in several Member States, similar to that for the MTFSPs, the assessments of social partners in general are mostly the same, although in some cases slightly less positive. In Bulgaria, for example, an employer organisation found its involvement in the MTFSP to consist of meaningful consultation with the possibility of proposing changes, while for the 2025 APR it found that it was only informed, not consulted, about the report. In Finland also, social partners viewed involvement in the 2025 APR less positively, while in Luxembourg involvement in the 2025 APR was slightly better than in the MTFSP.

Austria and Sweden are the only two states where the involvement of social partners in the 2025 APR involved consultation opportunities in addition to those for the MTFSP, although social partners provided a similar assessment of their consultation. In total, trade unions in 13 Member States reported not having had any interaction with the government on the MTFSP, while trade unions in 15 Member States reported no interaction when it came to involvement in the 2025 APR. Employer organisations in 10 Member States reported no interaction on the MTFSP; employer organisations in 11 Member States reported no interaction on the 2025 APR.

Table 28: Comparison of the involvement of social partners in drafting MTFSPs and 2025 APRs

Member State	Information on MTFSPs from government sources (gathered through the NEC)	Social partners' assessment of their involvement		Information on APRs from government sources (gathered through the NEC)	Social partners' assessment of their involvement	
		Trade union	Employer organisation		Trade union	Employer organisation
Austria	Ad hoc and online	Formality	Meaningful	Innovative practice	Formality	Meaningful
Belgium	None	None	None	None	None	None
Bulgaria	Government working group	None	Meaningful	Government working group	None	Information only
Croatia	In NESC/on parts only	Formality	No response	None	None	No response
Cyprus	None	None	Information only	None	None	Information only
Czechia	Multilayered/in NESC	Formality	Meaningful	Innovative practice/ in NESC	Formality	Meaningful
Denmark	None	None	None	None	None	None
Estonia	None	None	None	None	None	None
Finland	Multilayered/in NESC/ad hoc	Information only	None	Specific structure	None	None
France	In NESC	Formality	Meaningful	In NESC	Formality	Meaningful
Germany	Specific structure	Information only	Information only	None	Information only	Information only
Greece	None	None	None	None	None	None
Hungary	None	None	None	None	None	None
Ireland	Specific structure	None	None	None	None	None
Italy	Ad hoc	Formality	No response	No information	Formality	No response
Latvia	On parts only	Information only	Formality	None	Formality	Formality
Lithuania	On parts only	No response	None	None	No response	None
Luxembourg	On parts only	None	Information only	None/on parts	Formality	Formality
Malta	In NESC	Meaningful	Information only	In NESC	Meaningful	Information only
Netherlands	On parts only	None	Information only	None/on parts	None	None
Poland	Semester group/on parts only	None	Formality	Specific structure	Information only	None
Portugal	On parts only	None	Information only	No information	None	None/formality
Romania	In NESC	None	Formality	No 2025 APR		
Slovakia	In NESC	Formality	No response	None	Information only	No response
Slovenia	In NESC	Formality	Formality	In NESC	Information only	Information only
Spain	None	Information only	None	None	None	None
Sweden	On parts only	Formality	Information only	Innovative practice	Formality	Information only

Notes: The cells with a blue background indicate where government officials reported innovative practices; the cells with a green background indicate where social partners assessed their involvement as meaningful, giving them a chance to propose changes. NEC, Network of Eurofound Correspondents.
Sources: Tables 7 and 16 for the MTFSPs and Tables 20 and 27 for the 2025 APRs. The source for Tables 7 and 20 is the Network of Eurofound Correspondents, while the sources for Tables 16 and 27 are responses to a questionnaire addressed to national employer organisations and trade unions.

3 European Semester fact-finding missions, country reports and country-specific recommendations

In this chapter, direct interactions between the European Commission and social partners are analysed. This is based on national social partners' responses to a questionnaire (23) (Table 9) and interviews with Economic Counsellors conducted by Professor Mario Munta (24) under a contract with Eurofound. For the purpose of this report, Professor Munta conducted semi-structured interviews with Economic Counsellors from 20 Member States (25) between April 2025 and July 2025. A list of these interviews is included in Annex 1 of this report.

Section 3.1 analyses fact-finding missions. Section 3.2 presents information about contact between Economic Counsellors and social partners. Economic Counsellors are responsible for organising the European Semester fact-finding missions and contributing to or commenting on their state's draft country report. Section 3.3 considers how they give social partners opportunities to comment on the country reports and CSRs.

3.1. Fact-finding missions

During the COVID-19 pandemic, fact-finding missions were held online. In some Member States, they were combined with the fact-finding missions on recovery and resilience plans. Since 2024, fact-finding missions have been organised again in person, in EU Representation offices in the capitals of the Member States. In Austria, Latvia and Luxembourg, the 2024 fact-finding missions were still organised online, while the 2025 missions were conducted in person.

Composition of meetings with social partners during the fact-finding missions

In most countries, meetings with social partners involve both trade unions and employer organisations. Such combined meetings were reported in Austria, Bulgaria, Cyprus, Estonia, Finland, Germany, Hungary, Ireland, Latvia, Malta, the Netherlands, Portugal and Sweden. However, in a number of Member States, often at their own request, social partner meetings during fact-finding missions are held separately for trade unions and employer organisations. This practice is reported by Economic Counsellors in Belgium, Czechia, France, Greece, Luxembourg and Spain. Some Economic Counsellors find that this approach gives social partners more space to voice their views and opinions. The Commission tries to facilitate these meetings to ensure everyone can voice their views in the best way.

In some countries, meetings with social partners lasted only one hour. This was reported by social partners in Estonia, Ireland, Luxembourg and Spain. In Poland and Portugal, meetings lasted two hours. Ahead of the meetings, Economic Counsellors from the countries sent an agenda and specific questions to the social partners, allowing them to prepare brief 10-minute contributions to be delivered in the meeting. Question-and-answer sessions were held after the first round of spoken contributions. All Economic Counsellors indicated that it was possible for social partners to provide detailed written input after the meeting. Employer organisations in Austria and Belgium reported that they had done this. This appears to be a widespread practice, as during the fact-finding mission meeting it was not always possible to discuss in detail all the topics in the country report that social partners may have wanted to address.

Economic Counsellors indicated that social partner delegates participating in meetings vary, depending on the setting. Meetings can be high level, bringing together the leadership of trade unions and employer organisations. Alternatively, colleagues may deputise for the higher-level staff and attend in their place but may not be able or willing to express their organisation's opinion on the variety of topics covered. In other cases, specific experts from trade unions or employer organisations are invited to meetings on specific topics. In some countries, if, for example, there are meetings on education or healthcare, trade unions

(23) The national social partners' responses indicate their involvement in European Semester fact-finding missions, whether they have been consulted on country reports or CSRs and the nature of their contact with Economic Counsellors.

(24) Professor Munta conducted 22 interviews with Economic Counsellors between May 2016 and February 2017. The results of those interviews indicated whether they contributed to building national ownership and the legitimacy of the European Semester. Findings from the interviews are published in Munta (2020).

(25) Economic Counsellors from all 27 Member States were approached, and 20 initially agreed to have an interview within the scope of this report. As this was considered sufficient for the descriptive analysis of the overall approach and the variations in practices, no interviews were initiated for the other seven Member States to collect data for this report.

and employer organisations from the relevant sector(s) may be invited, instead of cross-industry confederations. During a two- or three-day fact-finding mission, up to 30 or 40 meetings can be organised. In some cases, three or four meetings take place at the same time, each with different services of the European Commission (from different DGs) involved.

In most cases, social partners are invited to a wider cross-industry meeting touching on a wide variety of topics included in the country reports, and thematic meetings on specific topics. This practice was reported by Economic Counsellors in Austria, Croatia, Cyprus, Germany, Latvia, Slovakia, Slovenia and Spain. In France and Luxembourg, specific meetings on, for example, healthcare or education were attended by sectoral social partners from those specific sectors. In Czechia and Malta, participation was limited to thematic meetings relevant to a specific sector, with no cross-industry social partner meetings attended.

In some countries, the meeting with social partners is also attended by other stakeholders, while in other countries there are specific meetings only with social partners. Examples of fact-finding missions conducted with social partners and all other stakeholders in 'jumbo-format with NGOs, think thanks and academics', were reported by Economic Counsellors from Estonia and Poland.

Timing of fact-finding missions and order of social partner meetings

Fact-finding mission meetings were most often held in January or February. Economic Counsellors indicated that, in some countries, the fact-finding missions were organised earlier in the cycle, in other countries later. Preparations for fact-finding mission meetings started in the autumn of the previous year. In Greece, the 2024 fact-finding mission was completed in March, but the one in 2025 was completed in February. In Estonia, the fact-finding mission was completed in November 2024, and the next one was held in the beginning of December 2025. In Cyprus, the fact-finding mission was also held in the beginning of December 2025, while in Luxemburg it was reported that the fact-finding mission took place at the end of November 2025. The advantages of earlier fact-finding missions are different from the advantages of those scheduled later.

Some social partners indicated that fact-finding missions taking place earlier in the cycle, in November or December, would allow more room for giving input and suggestions regarding the content and priorities of the country report. Feedback from European Commission officials pointed out that this may be a matter of perception, as scheduling later fact-finding missions also has some advantages.

European Commission officials ensure that all missions take place before the drafting of the main chapters of the country reports and well before the drafting of the CSRs. A slightly later timeline for the fact-finding missions may allow more updates to data or more recent policy developments to be discussed than missions conducted in the previous Semester cycle. Even if missions take place slightly later, they still inform the selection of key priorities and the drafting of country reports.

Economic Counsellors indicated that, in most Member States, one day is allocated for meetings with governments and another is earmarked for meetings with social partners and other stakeholders, such as specific NGOs or experts. Government authorities are always consulted separately from social partners and other stakeholders.

In the overall context of fact-finding missions, the ordering of consultation with government authorities and discussion with social partners and other stakeholders can be different. In most Member States, meetings with government authorities are conducted on day 1 of the fact-finding missions, and meetings with social partner organisations and other stakeholders are held on day 2 or 3. In Cyprus, Ireland and the Netherlands, for example, the meetings with social partners and other stakeholders come first. The advantage of having social partner and stakeholder meetings before meetings with government authorities is that it can give the European Commission delegates information or ideas, based on comments from social partners or stakeholders, that enable them to ask national authorities specific questions. In most countries, however, Economic Counsellors indicated that meetings with social partners and stakeholders are held at the end of fact-finding missions.

For European Commission officers, fact-finding missions are an opportunity to find information, enabling them to understand developments on the ground and related policy discussions. This feeds into the selection of the key topics for the country report and allows the fine-tuning of topics associated with political sensitivities.

From the Economic Counsellors' point of view, the quality and usefulness of social partners' inputs during fact-finding missions depends on the organisational and human capacities, expertise and strength of individual social partner organisations. Social partners' interventions can vary from general comments on social and economic developments and feedback on government policies, to more substantial and evidence-based contributions. The Commission encourages social partners to submit written contributions prior to or following the fact-finding missions; and employer organisations and trade unions used this opportunity in

Table 29: Examples of the format of social partners' input, as reported by Economic Counsellors

Format of social partners' contributions to fact-finding missions	Member States
Only oral input during meetings	Croatia, Hungary, Latvia, Malta
Oral input during meetings and written input afterwards (including position papers)	Austria, Belgium, Cyprus, Estonia, Finland, France, Poland, Portugal, Sweden

Notes: The table provides examples of Member States where the practices were reported in the interviews conducted. It cannot be considered to include complete lists of states where these practices occur. The input of social partners and stakeholders can, in some cases, also be transmitted either directly to the European Commission or through their European umbrella organisation.
Source: Interviews conducted by Professor Munta with Economic Counsellors between April and July 2025.

most countries analysed (Table 29). Information provided by social partners, presented in Table 36 (in Section 4.1), illustrates that the availability of organisations to contribute depends on their human resources and the available expertise among their staff.

Social partners' assessment of their involvement in the fact-finding missions is widely positive. Participation in fact-finding missions in 2024 and 2025, as reported by social partners, is presented in Table 30. In 20 Member States, both trade unions and employer organisations confirmed their involvement in the European Semester fact-finding missions, both in 2024 and in 2025. In Poland, trade unions reported being involved in fact-finding missions in both years, and the employer organisation confirmed its involvement in 2024 but not 2025. In Portugal, the employer organisation confirmed its involvement in both years, while the trade union only confirmed its participation in 2024. In Bulgaria, the employer organisation reported that it was involved in the mission in 2025, but not in 2024. Feedback from the European Commission indicates that social partners not being involved does not mean that they were not invited to participate. For six Member States, the involvement of social partners in fact-finding missions was only confirmed by either trade unions or employer organisations. In Croatia, Finland and Italy, only trade unions confirmed their involvement. In Bulgaria, Cyprus and Lithuania, social partner involvement was only confirmed by employers. The employer organisations in Bulgaria and Cyprus did, however, indicate that trade unions were also present in their meetings during fact-finding missions. Other inconsistencies could be due to the fact that separate meetings were held with trade unions and with employer organisations, or that some organisations were invited but were unable to attend the meetings. The French trade union respondent indicated that if they were unable to attend a meeting they were given the opportunity to attend a catch-up meeting online at a later date, or to provide written comments.

In conclusion, participation of social partners in fact-finding missions is the standard approach, and is positively appreciated by the social partners and Economic Counsellors. Where participation in fact-finding missions did not materialise, this does not mean that social partners were not invited to participate.

Table 30: Social partner organisations reporting participation in fact-finding missions

	Trade unions		Employer organisations	
Member State	**2024**	**2025**	**2024**	**2025**
Austria	X	X	X	X
Belgium	X	X	X	X
Bulgaria	(x)	(x)		X
Croatia	X	X	No information	No information
Cyprus	(x)	(x)	X	X
Czechia	X	X	X	X
Denmark	X	X	X	X
Estonia	X	X	X	X
Finland	X	X	(x)	(x)
France	X	X	X	X
Germany	X	X	X	X
Greece	X	X	X	X
Hungary	X	X	X	X
Ireland	X	X	X	X

Member State	Trade unions		Employer organisations	
	2024	2025	2024	2025
Italy	X	X	No information	No information
Latvia	X	X	X	X
Lithuania	No information	No information	X	X
Luxembourg	X	X	X	X
Malta	X	X	X	X
Netherlands	X	X	X	X
Poland	X	X	X	
Portugal	X		X	X
Romania	X	X	X	X
Slovakia	+	+	+	+
Slovenia	X	X	X	X
Spain	X	X	X	X
Sweden	X	X	X	X
Directly confirmed	23 Member States	22 Member States	22 Member States	22 Member States
Indirectly confirmed	3 Member States	3 Member States	2 Member States	2 Member States
No information	1 Member State	1 Member State	2 Member States	2 Member States

Notes: (x), In Bulgaria and Cyprus, no information was provided by trade unions on their involvement in the fact-finding missions. Only employer organisations reported on their involvement, but they indicated that trade unions were also present at the meetings. In Finland, only a trade union provided information, no information was received from an employer organisation. +, In Slovakia, the information provided by social partners was incomplete; however, the Economic Counsellor filled in the gaps.
Source: Social partner questionnaire completed between May 2025 and December 2025.

3.2. Economic Counsellors

One, two or three Economic Counsellors are based in each Commission Representation office in each Member State. The counsellors used to be called European Semester officers, until a memorandum of understanding between two European Commission services (DG Communication and DG Economic and Financial Affairs) redefined their role and changed their title, so that it has a clearer meaning to the general public. However, many counsellors still call themselves European Semester officers. In their role in the European Semester, most counsellors are formally part of the Reform and Investment Task Force (SG REFORM) ([26]).

In February 2025, SG REFORM was created within the Secretariat-General of the European Commission, merging the Recovery and Resilience Task Force and DG Structural Reform Support. A decision of the College of Commissioners of 17 December 2024 set out SG REFORM's mandate until December 2027. SG REFORM has 309 members of staff in Brussels, and about 50 Economic Counsellors working in the Representations in the Member States, at its disposal. SG REFORM's management plan for 2025 indicates that its main stakeholders are the Member States (European Commission, 2025). Social partners are not mentioned directly. The plan does, however, refer to the European Semester, which also encompasses contacts with social partners and other stakeholders. SG REFORM manages the implementation of the Recovery and Resilience Facility (RRF) and the Technical Support Instrument, which is why their primary stakeholders are the government authorities of the Member States. In tandem, SG REFORM and DG Economic and Financial Affairs coordinate the European Semester. Since the RRF comes to an end in 2026, a challenge for SG REFORM is to prepare the transition to a post-2027 framework, beyond the RRF's lifetime. To do so, SG REFORM will consider synergies ([27]) between the European Semester and the Technical Support Instrument, which provides expertise to Member States in designing and implementing reforms and CSRs ([28]).

([26]) Exceptionally, Economic Counsellors depend on DG Economic and Financial Affairs. This is, for example, the case in Greece, where there has been a DG Economic and Financial Affairs team since 2013, in the memorandum period (following the financial crisis). The team continue their work now as Economic Counsellors in the current European Semester context.

([27]) The European Semester is a policy instrument, while the Technical Support Instrument is a funding programme. An example of how they can strengthen each other is presented in Table 36. This shows the European Social Fund Plus (ESF+) funding allocated to projects that build the capacity of social partners to enhance their opportunities to contribute to European Semester processes.

([28]) https://commission.europa.eu/publications/management-plan-2025-reform-and-investment-task-force_en?prefLang=nl.

How Economic Counsellors describe their role in the European Semester

The information in this section is based on the interviews with Economic Counsellors, and feedback provided by European Commission officials.

In the context of the European Semester, the Economic Counsellors perform three roles. First, they monitor the implementation of the RRP and ensure follow-up to enable RRF payments. Second, they organise the European Semester fact-finding missions mentioned in Section 3.1. Third, they are part of the country teams coordinating the drafting of country reports and CSRs. The core of these country teams consist of about 15 officials ([29]), half from DG Economic and Financial Affairs and half from SG REFORM, plus the Economic Counsellors. In a wider composition, policy officers from the numerous European Commission line DGs participate in the country teams, which makes their scopes much larger.

Economic Counsellors are also part of the Commission Representation teams conducting outreach activities for DG Communication, which can also include social partners or other stakeholders. In addition, the counsellors provide support for other DGs, such as DG Employment, Social Affairs and Inclusion and DG Financial Stability, Financial Services and Capital Markets Union, that wish to organise a meeting or mission in a given country.

There has been a change over time not only in the name but also in the role of Economic Counsellors. When the RRF was rolled out, several Economic Counsellors stated that they were mainly concerned with monitoring its implementation. Most Economic Counsellors who were interviewed indicate that this is still the largest part of their role. However, this also depends on the size of the budget allocated to the RRP of their country and the stage of the payments already made. The priorities of the Economic Counsellors are aligned with the calendar of the European Semester and of RRF implementation.

At the end of the year, in November or December, they work with the country team in Brussels to determine the priorities for the country report of the coming year. At that time, they also prepare the fact-finding mission that, in most Member States, takes place in January or February. Between March and April, they are involved in finalising the draft country report and proposed CSRs. In June, when the country report and proposed CSRs are published, some Economic Counsellors organise a meeting to present them, inviting social partners and, in some cases, other stakeholders. From that time until the end of the year, the focus shifts back to the RRF, whereas in the first half of the year it is divided between RRF work and European Semester work, alongside the fact-finding missions, country reports and CSRs.

From the interviews conducted with Economic Counsellors from 20 Member States, it appears that they are not involved in work on the MTFSP, or on the SCF. In the case of the MTFSP, it is DG Economic and Financial Affairs that deals directly with government authorities; in the case of the SCF, DG Employment, Social Affairs and Inclusion has separate direct contact with social partners.

Twice a year, a ‘return to Brussels’ conference is organised during which all Economic Counsellors gather for meetings with their superiors in Brussels, to exchange experiences with other Economic Counsellors from other countries and attend meetings with their country team. This normally happens in June and November every year. This is especially useful for newer Economic Counsellors, or for those who are on their own in their country, as it allows them to get to know Economic Counsellors from other Member States. At the same time, they can line up meetings with their country team. Throughout the year, every two weeks, Economic Counsellors report back within their country team, which is led by a head of unit from DG Economic and Financial Affairs, and a head of unit from SG REFORM.

When asked about seniority, 15 of the Economic Counsellors interviewed indicated when they started working in their current position. For five of the 15, this would be more than five years in 2026. For four of them, it would be five years in 2026; for three, it would be four years; and for another three, it would be between two and three years. Altogether, based on the information available, the average seniority of Economic Counsellors is 4.5 years. In the Member States, where there are two or three Economic Counsellors, some continuity is maintained if one of the Economic Counsellors changes position. There are, however, several Member States where there is only one Economic Counsellor. This is the case in Cyprus, Denmark, Estonia, Ireland, Latvia, Lithuania, the Netherlands and Sweden for example. A change in a person holding the position of Economic Counsellor may pose a challenge to social partner organisations in keeping established contacts in place, as there is no publicly available list of Economic Counsellors. Functional email addresses for Economic Counsellors could be a solution to this. Economic Counsellors can also be contacted (indirectly) through contacts provided on the web page of the Commission Representation for the country.

(29) The size of the European Commission country teams varies from country to country. ‘Geo-desk’ officers in other DGs also contribute to the annexes to country reports.

Economic Counsellors indicate that they have good contacts with government authorities. Some indicate that higher-level contacts liaise with colleagues higher up in the hierarchy. Others indicate that answers to certain questions can come from different ministries. In the Netherlands, it can be seen that good cooperation with the government authorities can benefit both counsellors and authorities. Before every Economic and Financial Affairs Council (ECOFIN) meeting, the Dutch Ministry of Finance gives a briefing to EU embassies, issuing an annotated agenda that it sends to the national parliament. It is transparent and open to hearing the position of the council, which sometimes relates to European Semester issues.

Social partner appreciation

Unless indicated otherwise, the information in this section is based on responses from employer organisations and trade unions to questions about their meetings and contacts with Economic Counsellors during the fact-finding missions and at other stages.

Contact with Economic Counsellors is widely appreciated: at least one social partner organisation in 21 Member States provided a positive assessment. In 10 Member States, both trade unions and employer organisations indicated that they had regular contact with Economic Counsellors from their country. These states are Austria, Belgium, Finland, Germany, Ireland, Italy, Latvia, Luxembourg, the Netherlands and Portugal.

Additional information provided by European Commission officials points to regular contact also taking place in other Member States. The responses from social partners may depend on how well the job title ‘Economic Counsellor’ is known and recognised among them, as they may see the Commission Representation as one unit. For example, the Commission Representation in Estonia has had regular contact with social partners (towards the end of 2025 almost monthly, due to an increase in the frequency of events). In 2024/2025, the Commission Representation in Tallinn was operating de facto without Economic Counsellors for almost 16 months, and tasks were divided between different members of the team. However, outreach to partners was still an important priority. Additional information provided by the European Commission illustrates that in Croatia counsellors have had regular contact with trade unions and employer organisations.

In four Member States (Czechia, France, Greece and Spain), both trade unions and employer organisations reported knowing the Economic Counsellor, but indicated that contact with them was limited to fact-finding missions. It should be noted that, beyond the fact-finding missions in those countries at the beginning of the year, the Economic Counsellors in Czechia and France indicated that they had organised a meeting to present their country report and the proposed CSRs in June, to which (some) social partners were invited.

In five Member States, employer organisation respondents indicated that they had regular contact with the Economic Counsellor in their country, while the representatives of the trade unions that completed the Eurofound questionnaire reported that they knew the Economic Counsellor but had not established regular contact. This may be due to capacity limitations on the part of organisations, as was reported by a trade union respondent from Lithuania ([30]). The Economic Counsellors interviewed highlighted the importance of staying neutral – that is, equally accessible to different stakeholders. The Member States where this was reported differently are Hungary, Lithuania, Malta, Romania, Slovenia and Sweden. It also needs to be added that, where no regular contact was reported, this does not mean that contact was not attempted.

Two cross-industry trade union confederations from Lithuania – LPSS and the Lithuanian Trade Union Confederation – indicated that lack of contact with Economic Counsellors may also be due to other reasons. These include staff changes, different staff members attending meetings than those who replied to the questionnaire in this report or simply limited organisational capacity of the trade unions. The organisations indicated that they try to participate actively in consultations and meetings as much as possible, but that this was difficult in 2024 and 2025, due to internal organisational issues. On 29 January 2026, they were invited again by the Economic Counsellor to the 2026 European Semester fact-finding mission at the European Commission Representation.

In four Member States (Bulgaria, Cyprus, Poland and Slovakia), both trade unions and employer organisations indicated that they did not have any contact with their Economic Counsellor. In Cyprus and Slovakia, no social partners were reported to be involved in fact-finding missions, while in Poland fact-finding missions involving some social partners were reported by both trade unions and employer organisations. It is possible that some of these meetings were held online, or in a setting that did not allow for recognised contact between social partners and Economic Counsellors. The Economic Counsellor for Estonia ([31]) reported having been invited by the employer organisation to present the country report and CSRs in a meeting at their premises.

([30]) A trade union respondent from Lithuania indicated that internal staffing limitations made it difficult for them to engage in meetings in 2024 and 2025. It was reported that, as of January 2026, contact had been initiated again.

([31]) In Estonia, several events, meetings and exchanges with social partners were reported by the Economic Counsellor in Tallinn, along with seminars with social partners and a visit from Executive Vice-President Roxana Mînzatu, to which social partners were invited.

Similar presentations of country reports and CSRs, in June or July, were reported in 12 Member States: Austria, Belgium, Croatia, Czechia, Finland, France, Germany, Hungary, Latvia, Malta, the Netherlands and Slovakia.

Some information about regular contact may not be included in the report, because some regular contact with social partner organisations may have been established with organisations other than those contributing to this study by completing the questionnaire. This is illustrated using examples from Estonia (previously in this section) and Denmark (in the following paragraph). In both countries, social partner respondents indicated that there had been no regular contact with an Economic Counsellor, while information provided by Economic Counsellors indicated that such regular (invitations to) meetings with social partners did exist.

In Denmark, for example, the difference in views could partly be due to the fact that the Danish Trade Union Confederation (FH) experienced a change in senior staff in 2023. Since then, it appears to have been more difficult for the Economic Counsellor to identify a relevant and responsive counterpart in the organisation. However, there has been regular contact between the Economic Counsellor and the Danish Chamber of Commerce and Danish Industry, which are both members of the Confederation of Danish Employers (DA). At the trade union level, there has been regular contact with the Danish Metalworkers' Union in relation to its involvement in the green tripartite agreement. Furthermore, meetings have been set up in Denmark at the technical level with colleagues from the Danish Metalworkers' Union, 3F, the Danish Union of Teachers, the Danish Trade Union Confederation, the Danish Chamber of Commerce and Danish Industry, and a number of specific DGs, like DG Education, Youth, Sport and Culture; DG Employment, Social Affairs and Inclusion; and DG Regional and Urban Policy. The Economic Counsellor also organised meetings with higher-level Commission officials, to which social partners were also invited.

3.3. Country reports and country-specific recommendations

Every year, the European Commission publishes a European Semester country report for each Member State, based on which it proposes CSRs. The country report and CSRs aim to provide policy guidance to Member States on macroeconomic, budgetary, employment and structural policies for the following 12–18 months, in accordance with Articles 121 and 148 of the Treaty on the Functioning of the European Union.

As mentioned in the previous sections of this chapter, Economic Counsellors are part of the drafting team. Together with their colleagues from their country teams in DG Economic and Financial Affairs and SG REFORM, they are involved in preparing the initial drafts of the main body of the country reports. These reports are based on the analyses of and cooperation with line DGs (32) and information gained during fact-finding missions.

The drafting process typically starts in November, when progress in implementing the CSRs from the previous European Semester cycle are discussed, and challenges (both old and new) are highlighted.

In January or February, fact-finding missions are organised by the Economic Counsellors to deepen the analysis through discussions (of the perceived challenges) with government authorities, social partners and other stakeholders. In March and April, the draft country reports are finalised based on the analysis of challenges, the level of implementation of previous recommendations and the key conclusions in the country report; the proposals for CSRs are then drafted by the Commission.

As of 2025, the draft country reports had been shared with the Member State authorities around April to allow for factual corrections, comments and further policy discussions over the course of two or three weeks. Following this, and based on the combined analysis, the CSR proposals are formulated.

The 2025 country reports were published (33) on 4 June 2025, together with the proposed CSRs (34), as part of the European Semester Spring Package. On 8 July 2025, the Council adopted the CSRs (35) after the discussion thereof in the relevant Council contexts. A European Parliament study (36) (on p. 12 and in Annex 1) includes the changes made to the CSRs between their proposal on 4 June and their adoption on 8 July 2025. The work

(32) Colleagues from the line DGs contribute to thematic annexes and related specific parts of country reports and CSRs. There is one annex per policy area, and the annexes are drafted by the line DGs in charge of those areas. The main body of the text of country reports builds on these annexes.

(33) https://economy-finance.ec.europa.eu/publications/2025-european-semester-country-reports_en.

(34) https://commission.europa.eu/publications/2025-european-semester-country-specific-recommendations-commission-recommendations_en.

(35) https://www.consilium.europa.eu/en/press/press-releases/2025/07/08/european-semester-2025-council-adopts-country-specific-recommendations/.

(36) https://www.europarl.europa.eu/RegData/etudes/STUD/2025/764365/ECTI_STU(2025)764365_EN.pdf.

Table 31: European Semester fact-finding missions linked or not linked to RRF missions

Approach	Member States
RRF and Semester missions combined	Bulgaria, Cyprus, Estonia, Germany, Greece, Malta, Slovenia
Back-to-back RRF and Semester missions	Croatia, Denmark, Poland, Spain
Separate missions	Finland, Portugal, Slovakia

Note: Not all Member States are included in the table; only the states that are implementing the approaches described are listed.
Sources: Interviews conducted by Professor Munta with Economic Counsellors between April and July 2025.

on the country reports and the CSRs is coordinated by the Secretariat-General of the European Commission, which is responsible for the overall coherence of the Commission's work – both in shaping new policies and steering them through the other EU institutions, and in coordinating the different line DGs.

The topics included in the country reports and CSRs are based on an analysis of progress made in those areas since the previous reporting year. As a result, depending on the level of implementation by Member States, topics may be repeated year after year, if the challenges identified persist. New topics may be proposed if they are well underpinned by adequate analysis, and can, as a result, feature in country reports or even in CSRs. A valuable source of information on the year-on-year variation in the country reports and CSRs is provided by a historical database of country reports ([37]), and a database containing the CSRs published from 2019 to 2024 ([38]). These sources show a significant degree of consistency in the topics of the country reports and the CSRs. The fact that some recommendations are only partially implemented calls for a multiannual perspective. A European Parliament study ([39]) found that, of all the CSRs for 2019–2023, full or substantial progress is reported for 13.5 %, some progress for 61.4 % and no or only limited progress for 25.1 %. Obviously, it may require some time to implement appropriate policies to tackle social or economic imbalances, and more time to allow such policies to have the desired effects.

In country reports, the situation with regard to specific policy areas is analysed and summarised; most government authorities and stakeholders agree with most actions that need to be taken from an economic and social perspective, even if in some cases they disagree on how they should be implemented or how objectives should be realised.

Some social partner organisations expressed concerns about linking the CSRs with the RRF, as it combines recommendation implementation with the 'money for reforms' conditionality principle. This would make the impact of the CSRs more extensive, even though they were adopted without having been democratically endorsed by the national parliament or by the European Parliament. Economic Counsellors recognise that the organisational challenge of balancing RRF and Semester duties further complicates the possibility of having timely, meaningful and in-depth discussions with societal actors on national policy challenges. Mostly due to considerations regarding efficiency, human capacity and costs, fact-finding missions take place in combination or back to back with RRF missions (Table 31).

In Finland, a combined RRP and European Semester fact-finding mission was carried out in February 2023; in January 2024, only an online Semester fact-finding mission took place. In February 2025, there was only an in-person Semester fact-finding mission.

In the 2025/2026 Semester exercise, the competitiveness compass continues to be the guiding tool. With the RRF ending in 2026, the coming years offer more opportunities for the reorientation of country reports and CSRs towards topics that were not covered by the facility. Social partners have already made some suggestions in this regard.

3.4. Summary and suggestions from social partner respondents

In the survey questionnaire completed by national social partners, an open question was included asking how social partner organisations assess their involvement in the preparation of the Commission's country reports and CSRs. In response to this question, and in follow-up exchanges to gain clarification, some suggestions were provided regarding social partner involvement in the drafting of country reports and CSRs.

The first suggestion is to separate discussion on the country report from that on the CSRs, and to provide a draft country report earlier in the process, to allow feedback to be provided. To improve social partner

([37]) https://economy-finance.ec.europa.eu/economic-surveillance-eu-member-states/country-reports_en.

([38]) https://ec.europa.eu/economy_finance/country-specific-recommendations-database/.

([39]) https://www.europarl.europa.eu/RegData/etudes/BRIE/2024/760248/IPOL_BRI(2024)760248_EN.pdf.

involvement, it would be more effective to publish the country report and the CSRs separately, as was done before the COVID-19 pandemic. This split approach would allow more focused discussion and analysis on each document. Social partners could be consulted on the country reports before the CSRs are officially published, as was previously the practice. This earlier consultation would allow for valuable input from social partners to be considered in the formulation of the recommendations, thereby enhancing their relevance and national ownership. The CSRs are adopted separately from the country report, but at the same time. In the past, the country reports were published in February, while the CSRs were published two to three months later.

A second suggestion is to bring forward the fact-finding mission, as earlier involvement increases the chances of social partners having an impact. Now, in most Member States, the fact-finding missions are organised relatively late in the process of drafting the country report (January–February), which leaves little to no room for social partners to suggest new priorities or policy issues for the country report. The Estonian country team has moved fact-finding missions to November or December of the preceding year to allow more time for reflection.

Table 32 indicates whether social partner organisations reported that they consulted with the European Commission on the country report or CSRs. Trade

Table 32: Social partner organisations reporting consultations on country reports and CSRs

Member State	Trade unions		Employer organisations	
	Country report	CSRs	Country report	CSRs
Austria	X	X	X	X
Belgium	X	X	X	X
Bulgaria				
Croatia	X		X	X
Cyprus	X		X	X
Czechia	X	X	X	
Denmark				
Estonia				
Finland	X		X	
France	X		X	X
Germany	X	X	X	X
Greece	X	X	X	X
Hungary			X	X
Ireland	X	X	X	X
Italy			No information	No information
Latvia	X	X	X	X
Lithuania	No information	No information	X	X
Luxembourg			X	X
Malta	X	X	X	X
Netherlands	X	X	X	X
Poland	X		X	X
Portugal	X		X	X
Romania	X		X	X
Slovakia			No information	No information
Slovenia				
Spain	X	X	X	X
Sweden				
EU	17 Member States	10 Member States	20 Member States	18 Member States
No information	1 Member State	1 Member State	2 Member States	2 Member States

Notes: In Denmark, social partners are not consulted on country reports and CSRs directly; however, the reports are discussed in sector-specific groups. For example, aspects of the reports' recommendations related to employment and social policy are discussed in a special committee of the Ministry of Employment, where civil society organisations are represented. However, for many years, there have been no CSRs related to social affairs.
Sources: Social partner questionnaires completed between May 2025 and December 2025.

unions from 17 Member States reported consultations for the country report and unions from 10 Member States reported consultations for the CSRs.
With regard to employer organisations, this was the case in 20 Member States for the country report and in 18 Member States for the CSRs.

Direct interactions between EU institutions and social partners in fact-finding missions are perceived to be very positive. Compared with the situation for the MTFSPs, perceptions could even be described as extremely positive. This also applies to exchanges on the country reports and on the CSRs, even if this works better for employer organisations than for trade unions.

Despite some limitations, social partners can influence the substance of country reports and CSRs if their inputs fall into the right place at the right time in a targeted, well-articulated manner. Likewise, social partners can use fact-finding missions strategically to provide solid evidence on key policy priorities of upcoming country reports, so that they can later use the reports as leverage in urging governments to act on issues.

However, several social partner organisations have voiced concerns, stating that it is not clear what is done with their input. The challenge is to formulate the comments or provide the data in such a way that they can be easily included in the country report, or in the annexes to the report. There is also a **human factor**: if information reaches the right person at the right time, it can be picked up more easily. In some cases, the heads of units attend fact-finding missions, while other rank-and-file staff draft the parts of the country report. Therefore, a third suggestion is to provide feedback to social partners indicating what has been done with their comments, as it is **not always clear when comments should be passed on or who the appropriate contact person is**, or why they could not be taken on board in the draft country report or CSRs. A fourth suggestion is to provide a list of Economic Counsellors to the social partners, and functional email addresses through which they can be contacted.

A practice that is largely appreciated by social partners is reported in 12 Member States, where Economic Counsellors organised a June presentation of the country report and CSRs, before they were adopted by the Council in July. This practice was reported in Austria, Belgium, Croatia, Czechia, Finland, France, Germany, Hungary (only for the employer organisation, at its request), Latvia, Malta, the Netherlands and Slovakia.

In the social partner survey, a question was asked about whether the country report or CSRs had been discussed in the national cross-industry social dialogue or in the NESC. This practice was confirmed by trade unions in Austria, Belgium, Czechia, Latvia, Malta and the Netherlands, and by employer organisations in Czechia, France, Lithuania, Malta and the Netherlands. Other kinds of exchange were reported to have taken place in Luxembourg, and for some sectors with sector-level social partners in Latvia and Sweden.

4 Perspectives on the European Semester and Social Convergence Framework

This chapter focuses on social partner involvement in the European Semester, with special attention given to the newly established SCF. National member organisations of European social partners ETUC, BusinessEurope, SMEunited and SGI Europe were asked their opinion on the design and effectiveness of the European Semester, its most relevant elements for their organisation, their familiarity with it and how they assess their organisation's capacity to contribute. They were also asked if more information is required on any specific area or if they have suggestions for improvement. Similar questions were answered specifically about the SCF. This chapter is based on information provided by the social partners and publicly available information on the European Semester and the SCF. After this study's interim results were presented in the second half of 2025, the European Commission indicated that it had consulted EU-level social partners on several occasions. A complete list of these consultations has not been included, as one had not been provided at the time of writing. The third section in this chapter aims to give an (as yet incomplete) overview of such exchanges or consultations between EU-level social partners and European institutions. The EESC's European Semester activities are presented in Section 4.4.

4.1. Social partners' opinions on the European Semester

The first question asked of the surveyed national trade unions and employer organisations was to what extent their organisation is familiar with the reformed European Semester process, which has been part of the EU's new macroeconomic governance framework since 2024. The replies – given on a five-point Likert scale, ranging from 'fully familiar' to 'not at all familiar' – are presented in Table 33. Trade unions and employer organisations in 15 Member States responded either 'fully familiar' or 'to a large extent familiar'. No trade union or employer organisation indicated that their organisation is 'not at all familiar'. There is, however, some room for capacity building where they indicated that their organisation is only 'partially familiar' or 'to a lesser extent familiar' with the European Semester process. This was the case for trade unions in 11 Member States and employer organisations in 10 Member States.

A second question was asked about the social partner organisations' opinions on the design and effectiveness of the European Semester process in their Member State. A third question inquired about what aspect of

Table 33: Social partner organisations' familiarity with the European Semester process since 2024

Familiarity with entire Semester	ETUC members	BusinessEurope members	SMEunited members	SGI Europe members
Fully	Austria, Germany, Luxembourg, Malta, Poland, Sweden (6 MS)	Cyprus, Greece, Malta (3 MS)	Austria (1 MS)	
To a large extent	Belgium, Bulgaria, Czechia, Denmark, Finland, France, Ireland, Latvia, Portugal (9 MS)	Bulgaria, Czechia, France, Germany, Hungary, Ireland, Lithuania, Netherlands, Poland, Portugal, Romania (11 MS)	Portugal (1 MS)	
Partially	Croatia, Estonia, Greece, Hungary, Netherlands, Romania, Slovakia, Slovenia, Spain (9 MS)	Belgium, Denmark, Latvia, Luxembourg, Slovenia, Sweden (6 MS)	Greece, Luxembourg (2 MS)	
To a lesser extent	Cyprus, Italy (2 MS)	Estonia (1 MS)	Spain (1 MS)	Finland (1 MS)
Not at all				
No information	Lithuania (1 MS)	Estonia, Croatia, Italy, Slovakia (4 MS)		

Notes: MS, Member State.
Source: Social partner questionnaires completed between May 2025 and December 2025.

the European Semester process is most relevant for trade unions and employer organisations. Subsequently, the social partners were asked about their organisational capacity to contribute to the European Semester process. Follow-up questions were asked about the topics for which more information is needed, and what could be done to improve the organisational capacity to contribute to the European Semester process.

Social partners' views on the design and effectiveness of the European Semester

Based on the trade unions' and employer organisations' most common responses, the following picture appears. Employer organisations raised the issue of a lack of ownership and, linked to this, a limited effectiveness of the European Semester. Greater social partner involvement and more transparency could increase the sense of national ownership and effectiveness. This opinion was expressed by employer organisations in 12 Member States: Belgium, Bulgaria, Denmark, Estonia, Germany, Greece, Luxembourg, Poland, Portugal, Romania, Slovenia and Sweden. Employer organisations in four additional Member States also raised this point without referring explicitly to the effectiveness of the European Semester. Employer organisations in Hungary, Ireland, Malta and Slovenia also pointed out a lack of involvement and consultation, and a lack of feedback on the input provided. This perspective was based on social partners' views and should, according to the European Commission, be complemented by the information that employer organisations are systematically consulted by the Commission during country fact-finding missions, although in some cases social partners do not participate when invited.

For trade unions, the democratisation of the European Semester process was seen as a means to increase its effectiveness. The democratisation of the Semester process was trade unions' first concern in most Member States. Trade unions claimed that the effectiveness is questionable, and if there is an impact it is not perceived as democratically legitimate because of the lack of national ownership among social partner organisations. This was voiced by trade unions in 17 Member States: Bulgaria, Cyprus, Denmark, Estonia, France, Germany, Greece, Hungary, Ireland, Italy, Lithuania, Luxembourg, Malta, Portugal, Slovakia, Slovenia and Spain. Trade unions in Austria and Malta asked for a more balanced approach, looking at the social objectives and social disparity, without referring to the newly established SCF.

Trade unions in Hungary and Ireland stated that the European Semester is, from their point of view ([40]), not comprehensive and inclusive, and is known only to experts and not the wider public. This point was also voiced by employer organisations in the Netherlands and Portugal, which pointed out that fiscal rules – with their many exceptions – are hard to comprehend for most people. A simpler, more transparent approach would help also to increase national ownership and effectiveness, according to these employer organisations.

Most important aspects of the European Semester for social partners

Among the 10 aspects of the European Semester that trade unions and employer organisations cited as the most important, the country reports and CSRs are mentioned most (Table 34). Also frequently mentioned by both trade unions and employer organisations were the effects on labour relations and social policies, structural and labour market reforms and measures regarding skills development. The democratic nature of the European Semester, offering social partners a chance to have an input, was the third most important aspect. This was followed by the fact-finding missions, the European Pillar of Social Rights, and socially responsible fiscal consolidation to ensure economic growth and investment policies.

When asked on which aspects more information is needed, the most common reply was about the methodology used in the European Semester, and how and when this could best allow for the social partners' timely involvement. Trade unions in 13 Member States (Austria, Belgium, Cyprus, Denmark, Estonia, Finland, Greece, Latvia, Malta, Netherlands, Poland, Slovakia and Slovenia) mentioned this. The same point was made by employer organisations in 10 Member States: Bulgaria, Denmark, Estonia, Finland, Greece, Latvia, Lithuania, Malta, Slovenia and Spain. In most cases, this point was formulated in general terms, though sometimes specific aspects were mentioned.

Employer organisations in Czechia, Greece and Romania questioned how their national government designs the MTFSP. Employer organisations in Bulgaria would like more information on the transition from the RRP to the MTFSP. A Belgian trade union asked for information on how the national and regional governments cooperate to make the MTFSP. A trade union in France and an employer organisation in Bulgaria wanted more information about the regional dimension of the Semester. An employer organisation in Cyprus asked

([40]) The European Commission indicates that this statement should be complemented by information for Hungary, because trade unions are systematically being consulted by the Commission during fact-finding missions, and their voices and opinions are therefore heard and valued. The wider public was briefed on the Hungarian country report in 2025 when it was presented by the Commission Representation, and the press also published information about it.

Table 34: European Semester aspects indicated as most important by social partner organisations

Aspects of the European Semester	Trade unions	Employer organisations	Total number
Country reports and CSRs	Austria, Finland, Germany, Greece, Hungary, Italy, Latvia, Netherlands, Poland, Sweden	Belgium, Bulgaria, Germany, Greece, Ireland, Lithuania, Malta, Netherlands, Spain	19
Effects on labour relations and social policies, structural and labour market reforms and measures regarding skills development	Croatia, Malta, Slovenia	Belgium, Czechia, Denmark, Estonia, Finland, Greece, Spain	10
Being consulted, having an input	Estonia, Luxembourg, Slovakia, Spain	Latvia, Luxembourg, Poland	7
Fact-finding missions	Cyprus	Austria, Germany, Greece, Spain, Sweden	6
European Pillar of Social Rights	Bulgaria, Estonia, France, Greece, Ireland		5
Socially responsible fiscal consolidation, ensuring economic growth and investments	Belgium, Denmark, Slovenia	Portugal, Slovenia	5
MTFSP	Finland, Slovakia	Czechia, Romania	4
RRP	Latvia, Slovakia	Czechia, Lithuania,	4
Competitiveness		Bulgaria, Cyprus, Estonia	3
Social scoreboard, SCF	Ireland, Portugal		2

Sources: Social partner questionnaires completed between May 2025 and December 2025.

about the inclusion of energy and the digital transition in the European Semester process. A trade union in Cyprus wanted more information about specific reforms, while trade unions in Latvia and Malta requested more details on the national RRP. A trade union in France sought further information on the SCF. An employer organisation in Luxembourg asked for more information about the impact assessment of the CSRs.

Capacity of social partners to contribute to the European Semester process

Trade unions in 13 Member States and employer organisations in 14 Member States considered their capacity to contribute to the European Semester as moderate (Table 35). This was the reply given most often by both groups.

A high capacity was reported by trade unions in eight Member States and employer organisations in nine Member States. It needs to be noted that, in three Member States, one employer organisation considered their capacity high and another one moderate. This was the case for Greece, Portugal and Spain.

A low capacity to contribute was reported by trade unions in six Member States and employer organisations in three Member States.

The most important question is: 'What could be done to improve the organisation's capacity for contributing to the entire Semester process?' Replies to this question were remarkably similar between trade unions and employer organisations in different Member States.

Table 35: Social partners' assessment of their capacity to contribute to the European Semester process

Capacity to contribute	ETUC members	BusinessEurope members	SMEunited members	SGI Europe members
High	Austria, Bulgaria, Cyprus, Czechia, Italy, Luxembourg, Malta, Poland	Cyprus, Denmark, Germany, Greece, Hungary, Ireland, Sweden	Portugal, Spain	
Moderate	Belgium, Croatia, Denmark, Finland, France, Greece, Hungary, Ireland, Latvia, Netherlands, Romania, Slovenia, Sweden	Bulgaria, Czechia, France, Latvia, Lithuania, Malta, Netherlands, Poland, Portugal, Romania, Spain	Austria, Greece	Finland
Low	Estonia, Germany, Lithuania, Portugal, Slovakia, Spain	Belgium, Estonia, Slovenia		
No reply		Croatia, Italy, Luxembourg, Slovakia		

Sources: Social partner questionnaires completed between May 2025 and December 2025.

The suggestions can be grouped into two categories: the first relates to having more opportunities for involvement and consultation and being better informed and prepared for the consultations; the second relates to capacity building.

Trade unions in Austria, Belgium, Denmark, Finland, Germany, Greece, Italy, Luxembourg, Malta, the Netherlands, Poland, Slovenia and Spain (13 Member States) indicated a need to be informed and meaningfully consulted as part of a more formalised and structured consultation process and given enough preparation time. Rather than general briefings, they proposed engaging in serious consultations before documents are finalised, with draft documents available in advance of meetings and (where possible) feedback on the provided comments, advising if and how they were taken into consideration. This was also requested by employer organisations in Belgium, Cyprus, Hungary, Ireland, Lithuania, Poland, Slovenia and Spain (eight Member States). More fact-finding missions and meetings with Economic Counsellors were mentioned by trade unions from Cyprus and Slovenia and employer organisations from Spain. The Swedish employer organisation pointed out the need for separate fact-finding missions, with them only, conducted separately from the fact-finding meetings with other social partners and stakeholders.

The second group of suggestions is about capacity building. This need was mentioned by trade unions in Bulgaria, Croatia, Estonia, France, Germany, Greece, Ireland, Latvia, Malta, Poland, Slovakia and Slovenia (12 Member States) and employer organisations in Bulgaria, Czechia, Estonia, Greece, Lithuania, Malta, Portugal, Romania and Slovenia (9 Member States).

Table 36 shows the funding available for capacity building projects for social partners included in the European Commission's Kohesio database. This database [41] is publicly available and can be searched by keywords and for projects in a specific country.

The accumulated amount of money for social partner capacity building projects was provided by the F2 Unit of DG Employment, Social Affairs and Inclusion that is managing the European Social Fund Plus (ESF+) funding programme. The cut-off date for the information provided was 23 January 2026. Each Member State, in cooperation with the European Commission, chooses where it wants the ESF+ funding to be directed. Some Member States may also finance social partner capacity building projects directly, outside the ESF+ funding programme. This may explain why there is no information on this in the table for six Member States (Austria, Belgium, Denmark, Ireland, the Netherlands and Sweden). There is also a separate heading detailing funding for capacity building projects for civil society organisations. It is possible that social partner capacity building projects are categorised under this heading for those six Member States. The projects financed under capacity building for social partners alone total EUR 500 million, of which the EU contributed about EUR 360 million. Together with the EUR 642 million for capacity building for civil society organisations, this totals EUR 1 149 million.

Table 36 illustrates that the EU is contributing to the mobilisation of about EUR 500 million for social partner capacity building through ESF+-funded projects. The social partners also suggested measures that would allow them to build up more expertise in terms of stable human resources within their organisation and also through cooperation with external researchers and other experts. Their capacity could also be supported by reducing the complexity of the various European Semester processes or by better explaining and articulating the different process with support documents that facilitate involvement in an inclusive way. Training opportunities and online workshops as a tool to support the expertise of social partner organisations in the European Semester were mentioned several times. Making certain documents available in the native language of the Member State was also mentioned.

(41) https://kohesio.ec.europa.eu/en/.

Table 36: ESF+ resources dedicated to social partner capacity building projects (EUR)

Member State	Capacity building for social partners		Capacity building for civil society organisations	
	EU amount	Total amount	EU amount	Total amount
Austria			4 841 203	5 096 003
Bulgaria	22 261 794	26 561 413		
Croatia	8 500 000	10 000 000	55 250 000	65 000 000
Cyprus	1 250 000	2 083 333		
Czechia	7 195 478	9 377 049	6 454 284	8 411 134
Estonia	1 330 848	1 903 385	2 178 599	3 115 843
Finland	217 209	543 023	108 604	271 510
France	17 778 136	25 161 328	27 842 450	45 262 603
Germany	500 000	1 250 000		
Greece	44 928 033	52 837 872	14 201 780	17 128 635
Hungary	17 000 000	20 000 000		
Italy	64 282 306	135 422 362	95 373 395	172 671 459
Latvia	1 448 713	1 704 368	5 102 815	6 003 312
Lithuania	1 650 000	2 085 212	5 064 476	6 354 054
Luxembourg	120 490	301 225	120 490	301 225
Malta	1 500 000	2 500 000	900 000	1 500 000
Poland	73 553 644	90 950 462	120 877 365	147 065 326
Portugal	14 150 000	16 647 059	59 795 438	73 975 025
Romania	63 971 028	83 739 553	7 107 152	9 302 008
Slovakia	17 140 000	20 164 706		
Slovenia	1 618 750	2 500 000	13 946 401	20 569 237
Spain	280 500	330 000	51 601 304	60 707 417
Total	**360 676 929**	**506 062 350**	**470 765 756**	**642 734 791**

Sources: Projects co-funded by the EU (see https://kohesio.ec.europa.eu/en/projects), with information provided by DG Employment, Social Affairs and Inclusion (the cut-off date for the information provided was 23 January 2026).

4.2. Social Convergence Framework

When the European Semester was introduced in 2011, the focus was mainly on the macroeconomic weaknesses revealed during the 2008 financial crisis. When the European Pillar of Social Rights was unveiled in November 2017 at the Gothenburg Summit, academic journal articles (42) observed the imbalance between the economic and the social in the European Semester. In April 2024, the European Pillar of Social Rights was explicitly mentioned as being part of the European Semester in Regulation (EU) 2024/1263, Article 3(3)(b), linked to the review of the economic governance framework. About a year earlier, in May 2023, EMCO and the SPC adopted a proposal to introduce a SCF into the European Semester. The SCF was piloted in 2024 and fully implemented in 2025. The SCF is intended to reinforce the social dimension of the European Semester. It aims to identify risks and challenges that hinder upward social convergence and sustainable and inclusive economic growth in Member States. Three areas are considered in the SCF: (1) labour markets; (2) education and skills; and (3) social policies.

In the first stage, the analyses based on specific indicators measured in all 27 Member States on a social scoreboard are included in the yearly publication of the *Joint Employment Report* (43), as part of the European Semester Autumn Package, which is endorsed by the Council of the European Union in the spring of the

(42) An overview of academic articles published from 2018 to 2022 addressing this issue is presented in Elomäk et al. (2022).

(43) See the 2025 report (https://employment-social-affairs.ec.europa.eu/joint-employment-report-2025-0_en) and the associated proposal published in 2025 (https://employment-social-affairs.ec.europa.eu/proposal-joint-employment-report-2026_en).

Table 37: Social partner organisations' familiarity with the SCF

Familiarity with SCF	ETUC members	BusinessEurope members	SMEunited members	SGI Europe members
Fully	Austria, France, Luxembourg, Malta	Denmark, Germany, Greece, Latvia		
To a large extent	Belgium, Bulgaria, Czechia, Finland, Germany, Italy, Latvia, Portugal, Romania	Lithuania, Spain, Sweden		
Partially	Croatia, Denmark, Hungary, Ireland, Netherlands, Slovenia, Spain, Sweden	Bulgaria, Czechia, France, Ireland, Luxembourg, Malta, Romania	Austria, Luxembourg, Portugal	
To a lesser extent	Cyprus, Greece, Poland	Belgium, Cyprus, Estonia, Hungary, Netherlands, Poland, Slovenia		Finland
Not at all	Estonia, Slovakia	Portugal	Greece, Spain	
No reply	Lithuania	Croatia, Italy, Slovakia		

Source: Social partner questionnaires completed between May 2025 and December 2025.

following year. A deeper second-stage analysis is conducted for a number of Member States where potential risks for upward social convergence are identified in that social scoreboard. The 10 Member States for which these second-stage analyses were conducted in 2025 are Bulgaria, Croatia, Estonia, Greece, Hungary, Italy, Lithuania, Luxembourg, Romania and Spain. On 11 April 2025, a Commission staff working document [44] presented the second-stage analysis for those 10 Member States on social convergence in line with the SCF.

Social partners' opinions on the Social Convergence Framework

In the survey of national social partners, a question was included asking how familiar their organisation is with the SCF. The answers are presented in Table 37. They can be compared with the replies, presented in Table 33, to a similar question regarding familiarity with the entire European Semester. Trade unions in 13 Member States and employer organisations in 7 Member States were either fully familiar or to a large extent familiar with the SCF. For the entire European Semester, trade unions from 15 Member States and employer organisations from 15 Member States reported being either fully or largely familiar (Table 33).

Whereas, in the case of the entire European Semester, no organisation reported being 'not at all' familiar, in the case of the SCF, this reply was given by trade unions in Estonia and Slovakia and employer organisations in Greece, Portugal and Spain. Surprisingly, three of these Member States were included in the second-stage analyses in 2025 (Estonia, Greece and Spain).

Taking the 'partially' familiar, 'to a lesser extent' familiar and 'not at all' familiar replies together indicates there is room for improving knowledge of the SCF. These replies were given by trade unions in 13 Member States and employer organisations in 19 Member States.

Involvement of social partners in the Social Convergence Framework

In 10 Member States (Bulgaria, Croatia, Estonia, Greece, Hungary, Italy, Lithuania, Luxembourg, Romania and Spain), second-stage analyses were conducted in 2025 within the SCF. The national social partners in those 10 Member States were invited by the Commission through the respective European social partners. The social partners in all these 10 Member States were offered a one-hour meeting on 7 March 2025 to discuss the perceived challenges in their respective countries. National social partners in all 10 Member States participated in this meeting with the European Commission, together with the European social partners.

The situation and involvement of social partners in those 10 Member States where a second-stage analysis was conducted is thus significantly different. This distinction has not been made when discussing the reported involvement in this section, as national social partners in all Member States were asked the same questions, regardless of whether there was a second-stage analysis for their country or not.

National trade unions and employer organisations were asked whether they had been directly involved by the European Commission or by their government in the SCF. Only four Member States (Belgium, Bulgaria,

(44) Commission Staff Working Document – Second-stage country analysis on social convergence in line with the Social Convergence Framework (SCF), SWD(2025) 95 final of 11 April 2025, https://employment-social-affairs.ec.europa.eu/document/download/a424524e-40a5-4036-9f13-85160612b902_en?filename=SWD%282025%2995_0.pdf.

Lithuania and Netherlands) gave a positive reply. Social partners in the remaining 23 Member States replied negatively: they were not involved or they did not recall any meeting or consultation on the SCF taking place ([45]).

The Belgian social partners gave a positive reply (that they were informed indirectly) via the National Labour Council, stating that they had been informed by the Ministry of Employment on the agenda items for the EMCO and SPC meetings. CITUB in Bulgaria replied that it had participated in a hearing organised by the European Commission; the employer organisation in Bulgaria did not recall this meeting. In Lithuania, a meeting was organised by the European Commission's representative about the SCF. In the Netherlands, according to a trade union respondent from FNV, a meeting was organised about the SCF by the European Commission and the Dutch Ministry for Social Affairs; the Dutch employer organisation did not recall this meeting.

Subsequently, social partners were asked whether the SCF had been discussed in their national social and economic committees or as part of the national cross-industry social dialogue. All together there were five positive replies from Member States: from a trade union in Czechia and Romania and from an employer organisation in Denmark, Latvia and Sweden.

The trade union reply from Czechia indicated that the discussion happened at the working group level, and for Romania there had been a discussion as part of the national cross-sectoral social dialogue on the SCF. The employer organisation in Denmark highlighted a special committee meeting in the Ministry of Employment where social partners and other stakeholders were represented. The employer organisation in Latvia indicated that indirectly such discussion is part of their day-to-day work in the national cross-sectoral social dialogue.

This information could imply that the SCF is not considered a policy priority at national level. This may be because it is new, only implemented in 2025. Trade unions' and employer organisations' familiarity with and involvement in the SCF may increase and develop over the coming years.

The information gathered in 2025 shows that several meetings organised by European social partners, with participation from their national member organisations, included a presentation from the European Commission, specifically from the unit in DG Employment, Social Affairs and Inclusion responsible for the SCF. It was in fact the Commission that offered and organised these meetings, which were held on the Commission's premises on 7 March 2025. The full title of the meeting, which involved the European social partners and the national social partners of the 10 Member States undergoing second-stage analysis, was 'European Semester structured dialogue with the social partners: Exchange of views on countries in stage 2 of the SCF in view of the Commission analysis on the latter and the Semester Spring Package'.

The trade unions in 12 Member States (Austria, Belgium, Bulgaria, Estonia, Finland, France, Hungary, Ireland, Italy, Latvia, Portugal and Slovenia) reported their involvement with the SCF through ETUC. This covered 4 of the 10 Member States included in 2025 in the second-stage analyses (Bulgaria, Estonia, Hungary and Italy). Several respondents refer to a meeting that was held on 7 March 2025. The meetings of ETUC's network of trade union Semester liaison officers are mentioned several times in this context.

Among the employer organisations, involvement in the SCF through BusinessEurope was reported by member organisations in six Member States: Belgium, Bulgaria, Czechia, Lithuania, Malta and Romania. This covers 3 of the 10 Member States included in 2025 in the second-stage analyses (Bulgaria, Lithuania, Romania). The German member organisation pointed out that the invitation to that meeting from BusinessEurope was open, but it did not see this as a priority and subsequently did not participate. The Belgian member of BusinessEurope clarified that:

> *the topic of SCF was discussed during the regular meetings of the BusinessEurope's Social Affairs Committee. From the very beginning BusinessEurope and its members have taken part in all the discussions on the [SCF], including social investment – the ideas proposed by the Belgian and Spanish Presidencies in 2024. They [employer organisations] were advocating for respecting national competences related to social policy, responsible 'spending of public finances and not overburdening national administrations and social partners with additional reporting requirements.*

Most important aspects of the Social Convergence Framework for social partners

The social partners cited the labour market, education and social policies as the three most important policy areas of the SCF. Some trade union respondents found that the SCF is not yet a guarantee of sufficient

([45]) This information from social partners, reporting that discussions with their government or with the European Commission on the SCF were held in only 4 Member States, may seem to contradict the information in Table 37, indicating that trade unions in 13 Member States and employer organisations in 7 Member States reported being fully familiar or largely familiar with the SCF. However, this familiarity is due to meetings regarding the SCF organised by the European social partner organisations to which the trade unions and employer organisations belong, and not because of direct communication with their government on the topic. It needs to be added that, in the meetings on the SCF organised by the European social partner organisations (for their national affiliates), input was provided by the European Commission. It could be the case that respondents did not consider this equivalent to a discussion or consultation on the findings included in the SCF for their specific country.

representation of the social dimension in the European Semester because it is not yet reflected in the CSRs, being neither compulsory nor binding enough. Some respondents considered the SCF to be ineffective in its aim to add a social and labour perspective to the European Semester. According to the European Commission, this contradicts the fact that the SCF is explicitly featured in the country reports' key findings as well as in the recitals of the CSRs for all Member States that are part of the second-stage analysis.

4.3. EU-level social partner involvement in the European Semester

There is a general feeling of not being consulted and involved enough in the European Semester among the national-level social partners' member organisations. As the EU-level organisations represent their member organisations, ETUC, BusinessEurope, SMEunited and SGI Europe echo this sentiment.

In its feedback on this study's interim findings and draft reports of previous studies in the Eurofound series of reports on the European Semester, the European Commission has repeated that it does consult EU-level social partners frequently and at fixed times in the Semester cycle, namely before the publication of the Autumn Package, before the publication of the Spring Package and during the fact-finding missions. In addition, social partners are consulted on matters relevant to them in the context of specific policy initiatives. At the meeting in September, ahead of the new Semester cycle, the European Commission seeks the views and priorities of the European social partners and publishes these views on the Commission website, together with the European Semester Autumn Package.

This section provides an overview of the opportunities European-level social partners have to give their input on the European Semester. In some cases, this is only at the European secretariat level of the EU social partner organisations with representatives of EU institutions, while on other occasions their involvement allows them to be accompanied by some of their national member organisations.

In this regard, it is important to mention the **22 October 2024 statement** ([46]) issued by ETUC, SMEunited and SGI Europe, indicating that the involvement of national social partners in the European Semester is key to ensuring national ownership, transparency and inclusive policymaking. References are also made to Council Recommendation 2023/1389 on strengthening social dialogue in the context of the European Semester ([47]), the quadripartite statement for 'a new start for social dialogue' and the EU social partner statement ([48]) related to this.

The 22 October 2024 statement was agreed by ETUC, SMEunited and SGI Europe. BusinessEurope has not co-signed it. The statement came as a reaction to the newly established EU framework for macroeconomic governance in Regulation (EU) 2024/1263 of 29 April 2024, which includes a consultation of national social partners on MTFSPs. This is covered by the first and third of nine points, while point 7 relates to the involvement of social partners in the APR. Points 2, 8 and 9 relate to more fiscal aspects of the European Semester, while points 5 and 6 demand a role for social partners at the national and EU levels in the implementation of the SCF. Point 4 addresses other aspects of the European Semester, such as the Annual Sustainable Growth Survey, the *Joint Employment Report* and the euro area recommendations.

One institutionalised opportunity for social partner involvement is the input given on the Autumn Package ([49]). This happened at the end of October in 2024 ([50]) and 2025 ([51]). These meetings have been held for many years. In 2023, they were held in March; in 2022, they were held in February (for the trade unions) and in June (for the employer organisations).

The 2025 calendar of EU-level social partner meetings on the European Semester process (Table 38) indicates that there was a follow-up meeting to the October 2024 meeting on 23 January 2025. There were also EMCO meetings in March and September, with the EU social partners' participation, and a meeting on 5 June 2025 where the European Commission presented the Spring Package to the European social partners. The tripartite social summit meetings are not directly about the European Semester, though they also offer an opportunity to voice views regarding macroeconomic governance matters.

([46]) https://www.smeunited.eu/publications/statement-of-european-social-partners-calling-for-a-factual-and-material-involvement-of-social-partners-in-the-economic-governance-and-the-eu-semester.

([47]) Council recommendation of 12 June 2023 on strengthening social dialogue in the European Union (OJ C, C/2023/1389, 6.12.2023, ELI: http://data.europa.eu/eli/C/2023/1389/oj).

([48]) https://www.businesseurope.eu/wp-content/uploads/2025/02/2016-06-27_quadri-partite_statement_signed_on_a_new_start_for_social_dialogue-6df-1.pdf.

([49]) https://commission.europa.eu/publications/2025-european-semester-autumn-package_en.

([50]) See the related ETUC priorities (https://commission.europa.eu/publications/2025-european-semester-etuc-priorities-2025-autumn-package_en) and employers' views on the 2025 Annual Sustainable Growth Survey (https://commission.europa.eu/publications/2025-european-semester-employers-views-2025-annual-sustainable-growth-survey_en).

([51]) https://commission.europa.eu/publications/2026-european-semester-autumn-package_en.

Table 38: Calendar of EU social partner meetings and EU-level involvement in the European Semester

Date	Activity
23 January 2025	Discussion on upcoming structural elements of the 2025 European Semester Autumn Package
11–12 March 2025	Tripartite EMCO Policy Analysis Group to discuss the questionnaire on the implementation of the action plan on labour and skills shortages ([a])
19 March 2025	Tripartite social summit
11 April 2025	ETUC's input on the SCF ([b])
5 June 2025	EU social partner meeting where the European Commission presented its 2025 European Semester Spring Package
25–26 September 2025	Informal tripartite EMCO meeting in Copenhagen
30 September 2025	Meeting organised by DG Employment, Social Affairs and Inclusion in Brussels with ETUC, BusinessEurope, SMEunited and SGI Europe, with the option for their national member organisations to join online
10 October 2025	Social partner input from ETUC ([c]) and EU employers ([d]) on the Autumn Package ([e])
22 October 2025	Tripartite social summit
27 November 2025	Joint session of EMCO and the SPC in Brussels to exchange views on the 2026 European Semester Autumn Package

([a]) https://ec.europa.eu/commission/presscorner/detail/en/ip_24_1507.

([b]) https://employment-social-affairs.ec.europa.eu/news/commission-analyses-social-convergence-10-eu-countries-2025-04-11_en.

([c]) https://commission.europa.eu/publications/2025-european-semester-etuc-priorities-2025-autumn-package_en.

([d]) https://www.businesseurope.eu/wp-content/uploads/2025/10/2025-10-10-Joint-employers-contribution-ahead-of-2026-Semester-Autumn-Package_October-2025.pdf.

([e]) https://commission.europa.eu/publications/2026-european-semester-autumn-package_en.

Sources: Expert interviews with European social partner organisations and policy officers from the European Commission.

There is a specific ETUC web page about the Semester called 'Semester Toolkit', which is publicly available. For ETUC, their direct involvement and coordinating role in the European Semester is very important, because:

> *European countries are economically interdependent and the European semester cycle coordinates their fiscal, economic and social policies. This is based on an intergovernmental approach creating a worrying democratic deficit. A unified and coordinated trade union response is necessary to make workers' voices heard at both European and national level. The ETUC and its affiliates are stepping up their joint efforts to strengthen their involvement in this policy-making process so as to promote workers' interests. Used in the past to impose failed austerity measures, the Semester should now boost economic recovery and relaunch the European social model. The European Semester needs to become a driver for fairer economic and social governance of the EMU [European Monetary Union]* ([52]).

ETUC has also provided specific trade union input ([53]) for the Member States involved in the second-stage analyses of the SCF.

For **BusinessEurope**, the European Semester's macroeconomic governance currently takes place in a more complicated context. Increasing geopolitical uncertainty; challenges related to trade relations; reduced fiscal space; and the need for strategic investments, notably in security and defence, require conditions to be created that foster growth and strengthen Europe's capacity to sustain both economic resilience and social cohesion. For European employers, the best way to ensure mutual economic and social progression is to create conditions for a simultaneous increase in productivity and employment. It is a persisting challenge: for decades, Member States have not been able to increase both productivity and employment at the same time. Europe's productivity lag reflects deeper structural imbalances, including limited innovation and digital uptake as well as underinvestment in key services and infrastructure that

([52]) https://www.etuc.org/en/issue/european-semester.

([53]) https://employment-social-affairs.ec.europa.eu/document/download/5c55ef83-3ac7-4eb1-bf79-1cd7f1828a77_en?filename=250403%20TU%20inputs%20SCF%202025%20-%20final%20report.pdf.

underpins investment. For BusinessEurope, it is important to ensure that productivity and employment growth happen simultaneously in the European Semester, as this is also the best way to maximise the capacity to create quality jobs in Europe (BusinessEurope, 2025).

Online seminars were organised in March 2025 for both ETUC and BusinessEurope. These included inputs from DG Employment, Social Affairs and Inclusion on the SCF and on the entire European Semester process. For SMEunited, this happened on 6 February 2025.

SMEunited ([54]) organised a workshop on 6 February 2025 to engage with the European Commission on the 2025 European Semester cycle. This event provided an opportunity for SMEunited members to gain insights into the latest Semester developments, including the new economic governance framework and the SCF. The discussion also focused on how social partners can play a more integral role in the various stages of the European Semester, at both the European and national levels. Through this exchange, participants were able to better understand the implications of these changes and how they can actively contribute to shaping policies that support small and medium-sized enterprises.

SGI Europe published a specific guide ([55]) in 2023 to help its members involve themselves more effectively in the European Semester. This was the result of a 2021–2022 project, in which SGI Europe appointed one national Semester contact point for each national section, to reinforce its members' participation in the Semester and improve coherence between the EU and national levels. Within the project, SGI Europe organised a series of training sessions to help the national Semester contact points become more knowledgeable and aware of the European Semester process (see SGI Europe's website ([56])).

BusinessEurope, SMEunited, SGI Europe and ETUC each have a specific Semester expert network within their organisation to gather the European Semester experts of their member organisations. Within ETUC, this is called the Trade Unions Semester Liaison Officers (TULSO). SMEunited's 6 February online meeting was a meeting of the SMEunited member organisations' Semester experts.

4.4. EESC activities related to the European Semester

Important work on the involvement of social partners is conducted by the EESC's ESG ([57]) (established in 2017) and the EESC network of NESCs. The ESG is a horizontal body of 34 EESC members, which reinforces and supports the work carried out in the EESC sections. It examines proposals from European civil society organisations on economic, fiscal, employment and social policies, thereby ensuring a continuous EESC contribution to the annual European Semester cycle. Regular meetings of the ESG are held with ESG members. Representatives of the NESCs are also invited to take part on a very regular basis. Numerous speakers from different organisations are invited to discuss various topics relevant to the European Semester. Once a year, the ESG holds a conference, which is broadcast online and is accessible to interested stakeholders. The European Commission usually attends some of the sessions of the ESG to present Semester developments or products and provide clarifications or comments on draft EESC opinions in those meetings and also in writing.

Every year, the EESC publishes a report on the point of view and involvement of social partners and civil society organisations in the various aspects of the European Semester. National contributions are collected either by obtaining a joint response to a questionnaire (from the national representatives of employers, workers, NESCs and civil society) or by holding a round table, organised by the EESC to directly meet with national stakeholders and listen to their recommendations. In general, there are five round tables per year. This report is entitled *Reform and investment proposals and their implementation in the Member States – What is the opinion of organised civil society?* and takes into account the current European Semester cycle. The previous documents were adopted in April 2024 ([58]) and April 2025 ([59]). The reports are accompanied by an appendix ([60]), containing more detailed information on

([54]) https://www.smeunited.eu/news/european-semester-2025-sme-employers-organisations-exchange-with-the-commission.

([55]) https://sgieurope.org/files/FINAL-Semester-report.pdf.

([56]) https://sgieurope.org/news/appointment-of-national-semester-contact-points-as-part-of-the-project-involving-sgis-in-the-european-semester/.

([57]) https://www.eesc.europa.eu/en/sections-other-bodies/other/permanent-group-european-semester.

([58]) https://www.eesc.europa.eu/en/our-work/opinions-information-reports/opinions/reform-and-investment-proposals-and-their-implementation-memberstates-what-opinion-organised-civil-society-2023-2024.

([59]) https://www.eesc.europa.eu/en/our-work/opinions-information-reports/information-reports/point-view-organised-civil-society-eu-member-states-national-reform-and-investment-proposals-and-their-implementation.

([60]) See the 2024 appendix (https://www.eesc.europa.eu/sites/default/files/2024-04/appendix_to_the_opinion_on_reform_and_investment_proposals_and_their_implementation_in_the_member_states.pdf) and the 2025 appendix (https://www.eesc.europa.eu/sites/default/files/2025-04/EESC-2024-03288-00-00-ANN-EDI_FINAL-to-UPLOAD.pdf).

the responses from each Member State. It should be noted that, if the workers' representatives and employers have differing views, these are reflected in the appendices. In 2025, the EESC also adopted an opinion incorporating its own recommendations regarding the involvement of social partners in the Semester ([61]).

Table 39 provides an overview of the round tables organised at national level by the ESG ([62]). Links to the summary of discussions for each round table (in the native language and in English) are provided in the table. These constitute the contribution of the Member State visited in the ongoing consultation exercise (in this case, there is no response to the questionnaire for this Member State but simply this summary). Therefore, reference links to the round-table reports are added to the table. These round tables are organised in cooperation with the EESC's NESC network. The NESC network is part of the D5 section of the EESC, called Relations with National Economic and Social Councils and Civil Society ([63]).

Between January and March 2026, a new EESC survey was conducted based on responses to a questionnaire and five country visits. The resulting findings will feed into a report, bringing together national stakeholders' views, accompanied by an appendix and an own-initiative opinion presenting the EESC's conclusions and policy proposals. These documents were adopted, as a package, at the EESC plenary session in June 2026. The 2026 EESC survey focuses on the following topics:

- reform and investment measures in Member States, particularly those based on the 2025 CSRs and their implementation,
- the completion of the implementation of the national RRPs,
- the implementation and monitoring of the MTFSPs,
- the link between the multiannual financial framework and the European Semester.

Eurofound and the EESC team (in particular the ESG secretariat) are committed to developing further cooperation in their respective work on the involvement of social partners in the European Semester.

Table 39: Overview of the 2024–2026 round-table events organised by the EESC in the Member States

2024	2025	2026
13 round tables in 2024	**4 round tables in 2025**	**5 round tables in 2026**
1. Italy – 13 December 2024 (ECO/651)	1. Malta – 7 February 2025 (ECO/651)	1. Romania – 3 February 2026 (ECO/691)
2. Poland – 13 December 2024 (ECO/651)	2. Spain – 28 January 2025 (ECO/651)	2. Cyprus – 4 February 2026 (ECO/691)
3. Hungary – 6 December 2024 (ECO/651)	3. Latvia – 20 January 2025 (ECO/651)	3. Estonia – 9 February 2026 (ECO/691)
4. Finland – 28 November 2024 (ECO/651)	4. Ireland – 16 January 2025 (ECO/651)	4. Austria – 24 February 2026 (ECO/691)
5. Lithuania – 12 March 2024 (ECO/631)		5. France – 2 March 2026 (ECO/691)
6. Cyprus – 11 March 2024 (ECO/631)		
7. Romania – 16 February 2024 (ECO/631)		
8. Greece – 16 February 2024 (ECO/631)		
9. Portugal – 8 February 2024 (ECO/631)		
10. Finland – 7 February 2024 (ECO/631)		
11. Poland – 24 January 2024 (ECO/631)		
12. Slovenia – 12 January 2024 (ECO/631)		
13. Slovakia – 11 January 2024 (ECO/631)		

Note: ECO, Economic and Monetary Union, Economic and Social Cohesion (Section C1 of the EESC).
Sources: Colombe Grégoire and Anna Pantazi (EESC).

(61) https://www.eesc.europa.eu/en/our-work/opinions-information-reports/opinions/eescs-recommendations-reform-and-investment-proposals-formulated-part-2024-2025-european-semester-cycle.

(62) See also the EESC's web page on documents related to the ESG (https://www.eesc.europa.eu/en/sections-other-bodies/other/european-semester-group/documents).

(63) https://www.eesc.europa.eu/en/about/administrative-organisation/organisation-chart-administrative.

5 Summary and conclusions

This report aimed to answer a number of research questions: how did employer organisations and trade unions perceive their involvement in different aspects of the European Semester process in 2024 and 2025?; how can variations in perceptions be explained and how can this lead to suggestions for improved involvement that can help to strengthen the perceived ownership and effectiveness of European Semester processes? The report aimed to answer these questions by providing a comprehensive picture, based on information that covers different angles and is collected from multiple sources, and by enabling comparisons of practices.

5.1. New insights on the involvement of social partners in the European Semester

In 2025, the only information publicly available about the involvement of social partners in MTFSPs was the information included in the MTFSP itself and in the standard analyses of the MTFSP (included in Table 1). As regards social partner involvement in the 2025 APRs, the only publicly available source was the APR itself. However, only 11 of them are available in English, and the variations in size, structure and content of the 2025 APRs make it difficult to analyse the involvement of social partners or to draw conclusions. As for social partner involvement in fact-finding missions in 2024–2025, no data on country reports, CSRs or the SCF were available anywhere else at the time of writing. This report reveals information that has not been collected before, in a way that it can be compared.

In terms of social partner involvement in the MTFSPs, Chapter 1 complemented the information included in the standard analyses with views from the government perspective and with information on social partners' perceptions. The same approach was taken in Chapter 2 when assessing social partner involvement in the 2025 APRs. The 15 Member States that indicated in their MTFSP that a consultation had taken place reflect very different situations. This report has illustrated what happened in all Member States, including in the seven for which no information was available in the MTFSP and in the five that reported in the MTFSP that no consultation had taken place.

The different chapters in this report have shown that the involvement of social partners varies, depending on the different aspects of the European Semester, the factors considered in data collection and the source of information. The findings also vary between different Member States, and in some cases also between trade unions and employer organisations. Some variation may also be due to the level of knowledge of the respondents who provided answers to the questionnaire for this study and their awareness of the contacts and consultations that had taken place.

The overall involvement of social partners is, by far, the highest for the fact-finding missions. Employer organisations appear to be more involved than trade unions in consultations on the country reports and CSRs. Social partner involvement in the 2024 MTFSPs and in the 2025 APRs leaves the most room for improvement. Not all social partners are yet familiar with the SCF, which was implemented for the first time in 2025. MTFSPs were also submitted by governments for the first time at the end of 2024, and the APRs were first carried out in the spring of 2025.

The details of these variations in involvement are presented using a country-by-country approach in specific country fiches in Annex 3. An overview of the variations (without details or context) is presented in Table 40. A summary of the detailed findings on the MTFSPs and the 2025 APRs is presented at the end of each of the first two chapters. At the end of the third chapter, and at the end of Section 4.1 on the capacity of social partners, some suggestions for improvement that were made by social partners in the survey are included. In this chapter, we draw some deductions from the variations in the different settings and return to the initial research questions, to see if and how the findings in this report answer them.

Table 40: Overview of social partner involvement based on the country fiches

Member State	MTFSP		2025 APR		Fact-finding missions	Country report and CSRs		Capacity		Familiarity with SCF		2nd stage
	TU	EO	TU	EO		TU	EO	TU	EO	TU	EO	
Austria								High	Moderate	Fully	Partially	
Belgium								Moderate	Low	Largely	Less	
Bulgaria								High	Moderate	Largely	Partially	
Croatia								Moderate	No reply	Partially	No reply	
Cyprus								High	High	Less	Less	
Czechia								High	Moderate	Largely	Partially	
Denmark								Moderate	High	Partially	Fully	
Estonia								Low	Low	Not	Less	
Finland								Moderate	Moderate	Largely	Less	
France								Moderate	Moderate	Fully	Partially	
Germany								Low	High	Largely	Fully	
Greece								Moderate	Moderate High	Less	Fully Not	
Hungary								Moderate	High	Partially	Less	
Ireland								Moderate	High	Partially	Partially	
Italy								High	No reply	Largely	No reply	
Latvia								Moderate	Moderate	Largely	Fully	
Lithuania					January 2026			Low	Moderate	No reply	Largely	
Luxembourg								High	No reply	Fully	Partially	
Malta								High	Moderate	Fully	Partially	

Member State	MTFSP		2025 APR		Fact-finding missions	Country report and CSRs		Capacity		Familiarity with SCF		2nd stage
	TU	EO	TU	EO		TU	EO	TU	EO	TU	EO	
Netherlands								Moderate	Moderate	Partially	Less	
Poland								High	Moderate	Less	Less	
Portugal								Low	Moderate	Largely	Partially	
Romania			No APR					Moderate	Moderate	Largely	Partially	
Slovakia								Low	No reply	Not	No reply	
Slovenia								Moderate	Low	Partially	Less	
Spain								Low	Moderate High	Partially	Largely Not	
Sweden								Moderate	High	Partially	Largely	
EU-27												
	1	4	1	3	22	12	21	8	6	14	7	10
	12	9	13	13	—	7	4	6	3	4	10	

Notes: EO, employer organisation; TU, trade union. In the final column on the right ('2nd stage'), black shading denotes the 10 Member States for which a second-stage analysis was conducted in 2025 in the context of the SCF for Member States where potential risks for upward social convergence were identified. In 2025, only social partners in those 10 Member States that were included in the second-stage analysis of the procedure were included in the consultation. The European Commission indicated that 17 others were not directly consulted, as no risks were identified. The answers reflected on the right of the table are an indication of how familiar social partners are with the SCF rather than whether they were consulted.

The green cells in the columns addressing meaningful social partner involvement in the MTFSPs, APRs, fact-finding missions, country reports and CSRs indicate where social partners reported positively on the given issue; orange indicates responses where dissatisfaction was expressed; and white indicates where the response was somewhere in between. Grey cells indicate that there was no reply. In Lithuania, there was no involvement in fact-finding missions in 2024 and 2025 and no reply for either year due to organisational capacity issues. Nevertheless, trade union respondents reported that they had been invited to participate in the January 2026 fact-finding missions. Totals are given in green and orange at the bottom of the table. European Commission feedback indicated that trade unions and employer organisations in all Member States were invited to get involved in the fact-finding missions of 2025.

On the right of the table, other colours are used to indicate social partners' assessment of their capacity and their familiarity with the SCF.
In the column relating to self-assessed capacity to contribute to the European Semester:

- blue indicates a high capacity to contribute;
- orange indicates a low capacity to contribute;
- white indicates a moderate capacity to contribute;
- grey indicates that we did not get a reply.

In the column related to familiarity with the SCF:

- blue indicates fully or largely familiar;
- orange indicates less or not at all familiar;
- white indicates partially familiar;
- grey indicates that we did not get a reply.

Source: Information compiled from Tables 28, 30, 32, 35 and 37.

5.2. Measuring and analysing social partner involvement is complex

Lessons learned from previous Eurofound reports on the involvement of social partners in the European Semester (Eurofound, 2025) have indicated that measuring social partner involvement is not easy. Recognising the complexity involved in measuring social partner involvement objectively allows us to conclude that there are some limitations in the analyses in this report. In agreement with European social partner organisation experts, specific questions that were designed to clarify different practical aspects of their involvement were added to the national social partner questionnaire. The responses are included in Tables 10 to 15 on social partner involvement in the MTFSPs, and in Tables 21 to 26 on their involvement in the 2025 APRs. This factual information was designed to counterbalance the more subjective assessments made by social partners, presented in Tables 16 and 27. The variation in the direction of the replies from the same respondent to different questions on the same aspect leaves room for interpretation. Some inconsistencies are apparent. For example, an organisation may report that a meeting took place in reply to one question but in reply to another question state that there was no interaction on the MTFSPs. A degree of subjectivity in relation to the answers remains. This is linked to the fact that the social partner respondent is replying to the question based on their expectations and how they cooperate with others playing a role in other aspects of the European Semester. Comparing the findings in this report with the information provided by the EESC reports, which are based on a different methodology, would show even more blurred reflections of the reality. Even in this report, the replies from trade union respondents and employer organisation respondents often vary. In some of these cases, this may point to the organisation being treated differently, while in other cases it reflects different assessments of the same practice. To explore these inconsistencies, respondents would have to be asked to provide explanations for the answers that they gave in an additional data collection round. This was not possible within the timeline and context of this report.

There are not only limitations when measuring social partner involvement, but also limitations when analysing and comparing their involvement. Three examples serve to illustrate the difficulty of analysing social partners' perception of their involvement. The multilayered consultation process reported by government sources in Finland and Czechia is the first example. In Finland, the trade union respondent saw this as information sharing only, while the reply from the employer organisation affiliated to SGI Europe reported that there was no consultation at all, or at least that their organisation was not involved in it. The Finnish member organisation of BusinessEurope did not participate in the survey. A similar multilayered consultation approach in Czechia was received more positively by social partners. A second example is the situation in Germany, where the consultation on the MTFSP was reported to have taken place during a discussion at the meeting of the Macroeconomic Dialogue. German social partners have clarified that only information was given and that no consultation took place. There was a similar situation in Austria, where elections and the subsequent government formation interfered with the drafting of the MTFSP. The 2025 APR was given a more positive assessment, because social partners drafted a joint text that was annexed to it. A third example is the meeting of the NESC in the Netherlands, which is included in Table 8, but which all sources agree cannot be considered a consultation on the MTFSP. Combining the information provided by the government with the assessment of social partners did not give the full picture in this case, as the standard questionnaire indicated that there was a meeting in the Dutch NESC, but it could not be determined whether this was a consultation on the MTFSP or not. This was only possible thanks to having the access and opportunity to cross-check this directly with the Dutch NESC. As a result, it could be determined that the meeting had indeed taken place, but that it cannot be considered a consultation on the MTFSP. The conclusion from these three examples is that the more sources of information on the reality analysed here, the clearer the analysis becomes, enabling different subjective views from different perspectives to be explained.

Recognising these limitations, the triangulation used by combining the government perspective and the social partner assessment from both trade unions' and employer organisations' perspectives on their involvement in the MTFSPs and the 2025 APRs is innovative, as it provides a more complete picture and enables the identification of interesting practices relating to social partner involvement. The interviews with Economic Counsellors, in combination with the views of social partners on their involvement in fact-finding missions, the country reports and the CSRs, provided some suggestions at the end of Chapter 3 on how fact-finding missions could be improved further. Opportunities to increase social partners' capacity to get involved are presented in Chapter 4.

5.3. Factors explaining the variation in social partner involvement

Identifying explanatory factors for the levels of involvement of stakeholders in governance requires starting hypotheses that use different axes and approaches. Verdun and Zeitlin (2018) distinguish between economic–social, supranational–(inter)governmental, and technocratic–democratic axes. Applying these more theoretical axes, the MTFSP framework can be considered as more economic, governmental and technocratic, while the SCF as a governance framework is more social, supranational and – as social partners' limited familiarity with it has indicated – rather technocratic. The fact that the MTFSP and the SCF are both new and have only been applied for the first time is also a contributing factor. Further conceptual comparison with, for example, the RRF and the economic governance framework, of which the Semester and the CSRs are a part, can help to identify other axes or factors to be explored and compared in the search for factors that explain variations and provide guidance for improving ownership and effectiveness for social and economic governance.

The factors considered in this report as starting hypotheses are the length (number of pages) of the MTFSP and the 2025 APR; the government ministry that took the lead in drafting them; the role of the ministry of labour and social affairs in the drafting process; the duration of the drafting period; and the effects of any elections or government formations on the drafting process. In terms of the consultation process, a number of aspects were taken into consideration in the questionnaires used to collect information: whether there was a single consultation or a multilayered one; the format of the consultation (e.g. email exchange, online meeting, individual meeting, consultative committee, public consultation); the timing of the consultation; whether there were documents available in advance allowing stakeholders to prepare; the level of the interlocutors involved; whether it was possible to provide input; whether feedback was given on the social partner input; and whether the feedback was actually included in the plan or report.

Other issues became apparent from the replies, even if they were initially not expected and not directly addressed. One example is the conclusion that, in some countries, there was no consultation on the MTFSP or on the 2025 APR, but that these documents included measures on which separate consultations had taken place before. Another example is the distinction between using existing consultation or social dialogue structures for consultations on the MTFSP, applying an ad hoc approach, or extending an intergovernmental consultation process to social partners and other stakeholders.

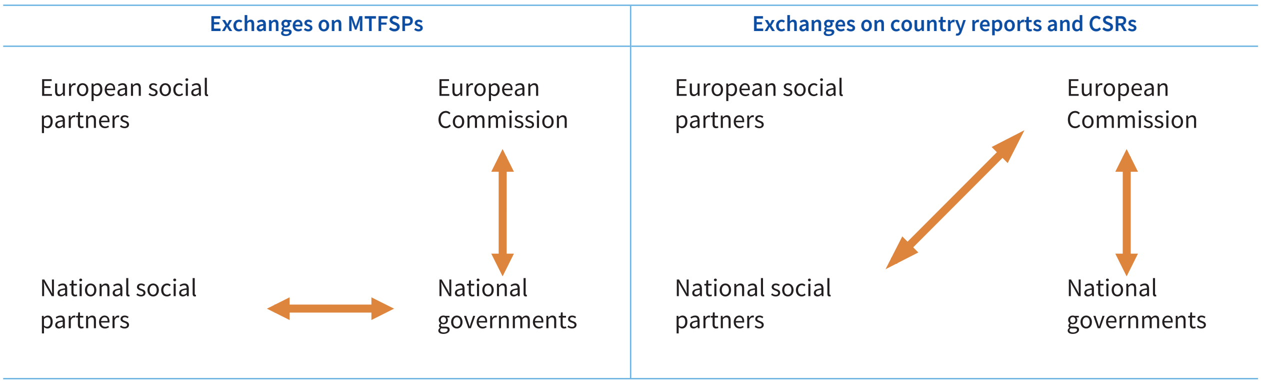
These aspects were included as questions in the questionnaire, based on the assumption that they could be a factor in the involvement of social partners in the European Semester. The analyses examined how social partner involvement in the Member States varies in relation to each factor. Initially, the factors that influenced social partner involvement were expected to vary most between Member States. Having gathered and compared all data, the comparison between the different social economic governance approaches is, however, more revealing. The difference in outcomes on the MTFSP and APR on the one hand, and the fact-finding missions on the other hand, therefore, deserves further reflection here.

5.4. Comparing social partner involvement in producing MTFSPs and in conducting fact-finding missions

Social partners' assessment of their involvement in the fact-finding missions is strikingly positive in contrast to the more disappointing assessment of their involvement in the MTFSPs. In the fact-finding missions, the European Commission country team drafting the country reports and CSRs offers, with the help of the Economic Counsellors, an opportunity for social partners to prepare their input. This is realised in the fact-finding mission meeting, and, if necessary, social partners also have the opportunity to provide further input or clarifications after the meeting.

On the whole, social partners are generally positive about this practice, even if they wished for some more feedback on what was done with their input or why it was not considered. The Commission officers interviewed pointed to the need for contributions from social partners that fit easily into the structure of the country report. Social partners expressed concerns arising from a practice related to the MTFSPs, where in Regulation (EU) 2024/1263 a provision is made requiring governments to consult social partners; however, at the same time, the regulation provides for a derogation for the first MTFSP, and failure to consult social partners is not included in the items that can lead to non-compliance with the regulation. In the MTFSPs and in the 2025 APRs, the involvement of national social

Figure 1: Illustration of exchanges on MTFSPs, country reports and CSRs



Sources: Author.

partners depends on the opportunities provided by the government of each Member State (Figure 1) ([64]). Even if the consultation of social partners on the MTFSPs is a condition set in the EU regulation, the consultation itself only can happen at national level, between national government authorities and national social partners. There is no such prescription in EU legislation for such involvement in country reports and CSRs; it is a practice developed directly by European Commission services to ensure that social partners are involved.

The MTFSPs and the country reports and CSRs are handled in the fact-finding missions in a similar way in that the consultation and exchanges between the European Commission and the government are kept separate from the exchanges between the European Commission and social partners and other stakeholders.

As regards the handling of the country reports and the CSRs, social partners pointed out a lack of clarity about when the time is right for them to voice their views. This may be due to the change that was made some years ago to the time of publication in the Semester cycle. Some respondents in employer organisations and trade unions also raised concerns about a lack of feedback regarding what is done with their input ([65]). There is, however, a strong appreciation of the exchanges that take place in the fact-finding missions. The situation is different when it comes to the consultations on the MTFSPs. This is because – as the EU institutions point out – it is the government that needs to consult social partners directly, without any involvement of or contributions from Commission officials, as is the case with the country reports and the CSRs in the fact-finding mission setting. In the case of the MTFSPs, government authorities decide whether social partners are involved or not. In the case of the country reports and the CSRs, on the other hand, there is a responsibility in the fact-finding missions to ensure that some consultations take place, and this is directly undertaken by the European Commission. Undertaking this direct role in involving social partners in fact-finding missions clearly leads to different outcomes in the way that social partners assess their involvement.

5.5. Opportunities and suggestions for improving social partner involvement

The overall setting of social and economic governance has changed over time and will continue to change. Social partners can anticipate these changes, and open discussions with government authorities on how social partner involvement can be organised in the future. The RRP and RRF process is coming to an end in 2026. This offers an opportunity to redesign the remaining proceedings for the country reports and CSRs in the fact-finding missions. Reflections based on a comparison of the different findings in this study may inspire policymakers and social partners in the shaping or proactive reshaping of future processes in the European Semester to seek increased ownership and effectiveness, within the limits of the mandate given to the European Commission in the relevant regulation.

Suggestions for improvements as gathered from social partners are presented in Chapters 3 and 4. They include separating the publication of the draft country reports from the CSRs and allowing more time for

([64]) The involvement of social partners at national level is considered a national competence, that is, the European Commission has no mandate to enforce it. The basis for the involvement of national social partners in the European Semester is the Council recommendation of 12 June 2023 on strengthening social dialogue in the European Union.

([65]) The European Commission reports that it considers multiple sources to draw a full picture: input provided is considered not on its own but alongside other information from different sources. It should be noted that space in the report is extremely limited. Social partners would welcome direct feedback on how their input is handled in a more informal way, outside country reports.

discussions on the country report by moving fact-finding missions earlier to November or December. Social partners indicated that online training seminars could be helpful for them to understand better when and how they can best provide input in the given processes. In the case of consultations, having the documents in advance and clear guidance on what is expected allows social partners to prepare their input accordingly and have meaningful involvement. When they provide input, it would be helpful for them if they got more feedback on what is done with this input and why suggestions were not taken into consideration. Some social partner responses indicated that more meetings with European Commission officials would be helpful. The practice of presenting the country report and proposed CSRs in June or July, reported by 12 Member States, is much appreciated.

5.6. Nuance is required to guide improvements

Besides the opportunities and suggestions mentioned above, there are also limitations that need to be considered. A more nuanced picture is needed to ensure realisable improvements. The evidence provided in this report shows that social partners are somewhat involved, even if there is some room for improvement. The limits of what is and what is not possible within the given macroeconomic governance framework may not be clear to social partners. Some guidance on what is possible and when and how it is possible within the mandate given to the European Commission, and the management of expectations, may help them to understand what is feasible in specific situations in the Member States and why some expectations cannot be met.

Given that the MTFSPs, the 2025 APRs and the SCF were not the subject of extensive public debate, knowledge about these governance processes is limited to a small number of experts. The processes remain complex and are not easy to explain. However, raising public awareness and providing some understanding of their objectives and methods to a wider audience could also contribute to increased ownership and democratisation. In the case of social partners in particular, new colleagues in social partner organisations could also be reached through specific in-depth European Commission training that could be organised at the start of each Semester.

A limited number of people in social partner organisations have expertise in relation to the European Semester and there are indeed limitations in the capacity of national social partner organisations. This is obvious from comments made by some social partner organisations stating that, despite there being an opportunity for providing input, some did not consider this a priority or did not manage it with the given capacity they had to formulate effective input.

While they may have different motivations, most trade unions and employer organisations clearly expect to be more involved in the European Semester. A 2020 European Parliament report questioned how the European Semester could become more effective (Leino-Sandberg et al., 2020). Employers tend to emphasise that they want the European Semester to be more effective as a driver of certain reforms and macroeconomic governance that supports sustainable economic growth. Some employers argue that its effectiveness would be increased if there was a stronger feeling of ownership, which would require better social partner involvement. For trade unions, their concern is that the effectiveness of the European Semester can only be legitimised with meaningful social partner involvement. Social partner involvement is seen by trade unions as a precondition for legitimising the effectiveness and by employers as a factor in enhancing the effectiveness of economic governance in the European Semester. Both perceptions may reinforce each other in a circular way. There is a common understanding in the academic literature on macroeconomic governance that better involvement of social partners can increase the ownership and legitimacy of and support for more effective implementation of the European Semester. At the same time, the settings and effectiveness of the governance framework in the European Semester have been found to determine to a large extent the involvement of social partners, as has been shown in the findings of this report.

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Annexes

Annex 1: List of interviews

Table A1: Dates of interviews with Economic Counsellors

Member State	Date of interview	Member State	Date of interview
Austria	23 June 2025	**Italy**	n/a
Belgium	24 June 2025	**Latvia**	13 June 2025
Bulgaria	n/a	**Lithuania**	n/a
Croatia	10 July 2025	**Luxembourg**	13 June 2025
Cyprus	11 June 2025	**Malta**	8 July 2025
Czechia	23 June 2025	**Netherlands**	20 June 2025
Denmark	n/a	**Poland**	2 July 2025
Estonia	11 July 2025	**Portugal**	8 July 2025
Finland	n/a	**Romania**	n/a
France	27 June 2025	**Slovakia**	1 July 2025
Germany	11 July 2025	**Slovenia**	2 July 2025
Greece	25 June 2025	**Spain**	8 July 2025
Hungary	20 June 2025	**Sweden**	n/a
Ireland	16 April 2025		

Note: n/a, not applicable.

Annex 2: Network of Eurofound Correspondents

Table A2: National correspondents who contributed to the research

Member State	Correspondent(s)	Organisation
Austria	Bernadette Allinger	FORBA Working Life Research Centre
Belgium	Noah Vangeel	HIVA – Research Institute for Work and Society, KU Leuven
Bulgaria	Ekaterina Markova	Institute of Philosophy and Sociology at the Bulgarian Academy of Sciences (IPS-BAS)
Croatia	Predrag Bejakovic	Faculty of Economics, Business, and Tourism, University of Split
Cyprus	Loucas Antoniou	Cyprus Labour Institute (INEK-PEO)
Czechia	Aleš Kroupa	Research Institute for Labour and Social Affairs
Denmark	Christoffer Madsen	Moos-Bjerre A/S
Estonia	Miriam Lehari	Praxis
Finland	Elina Härmä	Oxford Research
France	Frédéric Turlan	IR Share
Germany	Sandra Vogel	German Economic Institute (IW)
	Thilo Janssen	Institute of Economic and Social Research (WSI), Hans Böckler Foundation
Greece	Penny Georgiadou	Labour Institute of the Greek General Confederation of Labour (INE GSEE)
Hungary	Nóra Krokovay	Kopint-Tárki Institute for Economic Research
Ireland	Andy Prendergast	IRN Publishing
Italy	Alessandro Smilari and Michele Faioli	Fondazione Giacomo Brodolini
Latvia	Krišs Karnītis	EPC Ltd
Lithuania	Inga Blažienė	Lithuanian Centre for Social Sciences
Luxembourg	Franz Clément	Luxembourg Institute of Socio-Economic Research (LISER)
Malta	Luke A. Fiorini	Centre for Labour Studies, University of Malta
Netherlands	Thomas de Winter	Panteia
Poland	Maciej Michalik	Polityka Insight
Portugal	Reinhard Naumann	Centre for Studies for Social Intervention (CESIS)
Romania	Nicoleta Voicu	Center for Public Innovation
Slovakia	Rastislav Bednárik	Institute for Labour and Family Research (IVPR)
Slovenia	Andreja Poje	University of Ljubljana
Spain	Juan Arasanz Díaz	Notus
Sweden	Vera Lindström	Oxford Research

Annex 3: Country fiches

A fiche was made for each of the 27 Member States, gathering the most important information from this report. This enabled, in a way, a secondary analysis of the key information in the four main chapters of this report. Bringing together the findings from each chapter helps interpret the meaning of results for individual states. It also enables comparisons between the different parts of the European Semester, analysed in the different chapters, and between Member States.

Table A3: How the four parts of the country fiches relate to the chapters of this report

Chapter 1 – MTFSPs	Chapter 2 – 2025 APRs
Chapter 3 – fact-finding missions, country reports and CSRs	Chapter 4 – the entire European Semester and the SCF

The country fiches also provide the dates on which MTFSPs were submitted (see Table 1), the drafting periods (see Table 6) and the number of pages the MTFSPs have (see the section ‘Length of the MTFSPs’). Information regarding the consultation of social partners based on standard Commission analyses (see Table 1) is included, along with information reported by government officials contacted by Eurofound national correspondents (see the section ‘Information from governments on the drafting of the MTFSPs’). In addition, the fiches specify whether the Eurofound national correspondents reported that NESCs or national social dialogue discussed governments’ presentation of MTFSPs, as included in Tables 7 and 8. The country fiches also include social partners’ assessment of their involvement. First, the fiches specify whether social partners were consulted once, multiple times or not at all. Then, they provide the format of interactions on MTFSPs, and the timing of social partners’ consultation and how their consultation is categorised by trade unions and employer organisations. The same information is given for the 2025 APRs.

Table A4: Template for the country fiches, with reference to tables in the current report

<table>
<tr><td></td><td>Country
Date of MTFSP submission</td><td colspan="2">Drafting period of the MTFSP
Number of pages of the MTFSP</td><td>2025 APR</td><td>Drafting period of the APR
Number of pages of the 2025 APR</td></tr>
<tr><td colspan="2">Standard analysis of the MTFSP</td><td colspan="2">Table 1</td><td></td><td>Date the APR was submitted (Table 18)</td></tr>
<tr><td colspan="2">Government perspective (information provided by Eurofound national correspondents)</td><td colspan="2">Tables 7 and 17</td><td></td><td>Consultation on the APR (Table 20)</td></tr>
<tr><td colspan="2">Discussion in NESC or social dialogue</td><td colspan="2">Table 8</td><td></td><td></td></tr>
<tr><td colspan="2"></td><td>Trade union</td><td>Employer organisation</td><td>Trade union</td><td>Employer organisation</td></tr>
<tr><td colspan="2">Consultation</td><td>Table 10</td><td>Table 10</td><td>Table 21</td><td>Table 21</td></tr>
<tr><td colspan="2">Format of interaction</td><td>Table 11</td><td>Table 11</td><td>Table 22</td><td>Table 22</td></tr>
<tr><td colspan="2">Timing</td><td>Table 12</td><td>Table 12</td><td>Table 23</td><td>Table 23</td></tr>
<tr><td colspan="2">Social partner assessment</td><td>Tables 16 and 17</td><td>Tables 16 and 17</td><td>Tables 27 and 28</td><td>Tables 27 and 28</td></tr>
<tr><td colspan="2">Fact-finding mission</td><td>Table 30</td><td>Table 30</td><td colspan="2">Familiarity with European Semester process (Table 33)</td></tr>
<tr><td colspan="2">Country report</td><td>Table 32</td><td>Table 32</td><td colspan="2">Capacity to contribute to the European Semester process (Table 35)</td></tr>
<tr><td colspan="2">CSR</td><td>Table 32</td><td>Table 32</td><td colspan="2">Familiarity with the SCF (Table 37)</td></tr>
</table>

Towards the bottom of the fiches, the involvement of trade unions and employer organisations in fact-finding missions in 2024 and 2025 is included, as presented in Table 30. And further below, information on whether the social partners were consulted on the country reports and CSRs is included, based on Table 32.

On the right, the fiches specify how familiar social partners are with the European Semester process (Table 33), how they assess their capacity to contribute (Table 35) and how familiar they are with the SCF (Table 37).

As a visual aid, where social partners are properly involved, good practices with regard to MTFSPs and APRs are marked in green. When it comes to the information on fact-finding missions, country reports and CSRs, along with the European Semester as a whole and the SCF, good practices are marked in blue. Red font indicates that there has been no consultation with regard to the analysis of the MTFSP, no consultation from a government perspective and no consultation according to the social partner assessment. Red font also indicates that there has been no consultation with regard to fact-finding missions, country reports or CSRs or that capacity or familiarity in relation to these aspects is low.

Austria **13 May 2025**		2- to 3-month drafting period 68 pages	**2025** **APR**	Around a 2-month drafting period 46 pages
Standard analysis of the MTFSP		Consulted as in Article 11(3)		Submitted on 13 May 2025
Government perspective		Ad hoc approach		Coordination meeting on 18 March 2025, social partner text annexed
Discussion in NESC or social dialogue		No		
	Trade union	**Employer organisation**	**Trade union**	**Employer organisation**
Consultation	Once	Multiple times	Once	Multiple times
Format of interaction	Email exchange, public consultation	Email exchange	Email exchange, public consultation	Email exchange, conference/round table
Timing	2–4 weeks before	More than a month before	2–4 weeks before	More than a month before
Social partner assessment	Formality	Meaningful involvement / possibility of proposing changes	Formality	Meaningful involvement / possibility of proposing changes
Fact-finding mission	Trade union involved in 2024 and 2025	Employer organisation involved in 2024 and 2025	Fully familiar with the European Semester process	Fully familiar with the European Semester process
Country report	Trade union consulted	Employer organisation consulted	High capacity to contribute	Moderate capacity to contribute
CSR	Trade union consulted	Employer organisation consulted	Fully familiar with the SCF	Partially familiar with the SCF

Belgium 18 March 2025	6-week drafting period 70 pages		**2025 APR**	Around a 2-month drafting period (T20) 58 pages
Standard analysis of the MTFSP	No information in the MTFSP			Submitted on 30 April 2025
Government perspective	No consultation			No discussion or consultation
Discussion in NESC or social dialogue	No			
	Trade union	**Employer organisation**	**Trade union**	**Employer organisation**
Consultation	No	No	No	No
Format of interaction	No interaction	No interaction	No interaction	No interaction
Timing				
Social partner assessment	No interaction	No interaction	No interaction	No interaction
Fact-finding mission	Trade union involved in 2024 and 2025	Employer organisation involved in 2024 and 2025	Largely familiar with the European Semester process	Partially familiar with the European Semester process
Country report	Trade union consulted	Employer organisation consulted	Moderate capacity to contribute	Low capacity to contribute
CSR	Trade union consulted	Employer organisation consulted	Largely familiar with the SCF	Less familiar with the SCF

Bulgaria 27 February 2025	4- to 5-month drafting period 111 pages		**2025 APR**	No information on the drafting period 139 pages
Standard analysis of the MTFSP	Consulted as in Article 11(3)			Submitted on 2 May 2025
Government perspective	Multilayered consultation in Working Groups Nos 11 and 31			Multilayered consultation, discussion in specific structures (Working Groups No 11 and 31).
Discussion in NESC or social dialogue	No			
	Trade union	**Employer organisation**	**Trade union**	**Employer organisation**
Consultation	No	Once	No	Once
Format of interaction	No interaction	Email exchange	No interaction	Email exchange
Timing		2–4 weeks before		2–4 weeks before
Social partner assessment	No interaction	Meaningful involvement / possibility of proposing changes	No interaction	Information sharing
Fact-finding mission	No	Employer organisation only involved in 2025	Largely familiar with the European Semester process	Largely familiar with the European Semester process
Country report	No	No	High capacity to contribute	Moderate capacity to contribute
CSR	No	No	Largely familiar with the SCF	Partially familiar with the SCF

Croatia 14 November 2024		2- to 3-month drafting period 110 pages	2025 APR	Around a 2-month drafting period 124 pages
Standard analysis of the MTFSP	Consulted as in Article 11(3)			Submitted on 22 May 2025
Government perspective	On parts or measures only			No discussion or consultation
Discussion in NESC or social dialogue	On 12 November 2024			
	Trade union	**No response from employer organisation**	**Trade union**	**No response from employer organisation**
Consultation	Once		No	
Format of interaction	Consultative committee		No interaction	
Timing	1 week before			
Social partner assessment	Formality		No interaction	
Fact-finding mission	Trade union involved in 2024 and 2025	**No response from employer organisation**	Partially familiar with European Semester process	**No response from employer organisation**
Country report	Trade union consulted	Economic Counsellor indicated that there was a meeting at the request of the Croatian Employers' Association	Moderate capacity to contribute	
CSR			Partially familiar with the SCF	

Cyprus 15 October 2024		Around a 2-week drafting period 80 pages	2025 APR	Around a 2-week drafting period 275 pages
Standard analysis of the MTFSP	No consultation			Submitted on 14 May 2025
Government perspective	No consultation			No discussion or consultation
Discussion in NESC or social dialogue	No			
	Trade union	**Employer organisation**	**Trade union**	**Employer organisation**
Consultation	No	No	No	No
Format of interaction	No interaction	Specific format (not specified)	No interaction	No interaction
Timing		More than a month before		
Social partner assessment	No interaction	Information sharing	No interaction	Information sharing
Fact-finding mission	Trade union report not being involved	Employer organisation involved in 2024 and 2025	Less familiar with the European Semester process	Fully familiar with the European Semester process
Country report	Trade union consulted	Employer organisation consulted	High capacity to contribute	High capacity to contribute
CSR		Employer organisation consulted	Less familiar with the SCF	Less familiar with the SCF

Czechia 16 October 2024	Around a 6-month drafting period 44 pages		2025 APR	Around a 2-month drafting period 20 pages
Standard analysis of the MTFSP	Consulted as in Article 11(3)			Submitted on 30 April 2025
Government perspective	Multilayered consultation in specific structures			Multilayered consultation with interdepartmental commenting procedure including social partners
Discussion in NESC or social dialogue	On 10 October 2024			
	Trade union	**Employer organisation**	**Trade union**	**Employer organisation**
Consultation	Multiple times	Once	No	Multiple times
Format of interaction	Email exchange and online meeting	Email exchange and specific format (not specified)	No interaction	Conference / round table
Timing	More than a month before	2–4 weeks before		2–4 weeks before
Social partner assessment	Formality	Meaningful involvement / possibility of proposing changes	Formality	Meaningful involvement / possibility of proposing changes
Fact-finding mission	Trade union involved in 2024 and 2025	Employer organisation involved in 2024 and 2025	Largely familiar with the European Semester process	Largely familiar with the European Semester process
Country report	Trade union consulted	Employer organisation consulted	High capacity to contribute	Moderate capacity to contribute
CSR	Trade union consulted	Employer organisation consulted	Largely familiar with the SCF	Partially familiar with the SCF

Denmark 20 September 2024	Around a 6-month drafting period 57 pages		2025 APR	Drafting period of more than 4 months 64 pages
Standard analysis of the MTFSP	No consultation			Submitted on 30 April 2025
Government perspective	No discussion or consultation			No discussion or consultation
Discussion in NESC or social dialogue	No			
	Trade union	**Employer organisation**	**Trade union**	**Employer organisation**
Consultation	No	No	No	Once
Format of interaction	No interaction	No interaction	No interaction	No interaction
Timing				
Social partner assessment	No interaction	No interaction	No interaction	No interaction
Fact-finding mission	Trade union involved only in 2025	No employer organisation involvement	Largely familiar with the European Semester process	Partially familiar with the European Semester process
Country report	No direct consultation with social partners but discussed in a special committee of the Ministry of Employment		Moderate capacity to contribute	High capacity to contribute
CSR			Partially familiar with the SCF	Fully familiar with the SCF

Estonia **11 October 2024**	5-week drafting period 36 pages		**2025** **APR**	Around a 6-week drafting period 66 pages
Standard analyses MTFSP	No information in the MTFSP			Submitted on 29 April 2025
Government perspective	No consultation			No discussion or consultation
Discussion in NESC or social dialogue	No			
	Trade union	**Employer organisation**	**Trade union**	**No response from employer organisation**
Consultation	No	No	No	No
Format of interaction	No interaction	No interaction	No interaction	No interaction
Timing				
Social partner assessment	No interaction	No interaction	No interaction	No interaction
Fact-finding mission	Trade union involved in 2024 and 2025	Employer organisation involved in 2024 and 2025	Partially familiar with the European Semester process	Less familiar with the European Semester process
Country report	Not consulted	Not consulted	Low capacity to contribute	Low capacity to contribute
CSR	Not consulted	Not consulted	Not familiar with the SCF	Less familiar with the SCF

Finland **10 October 2024**	Around a 6-month drafting period 70 pages		**2025** **APR**	3- to 4-month drafting period 205 pages
Standard analysis of the MTFSP	Consulted as in Article 11(3)			Submitted on 30 April 2025
Government perspective	Multilayered consultation through EU cooperation body in Ministry of Finance and open consultation			Discussed in specific structures
Discussion in NESC or social dialogue	Yes, in Economic Council			
	Trade union	**Employer organisation** (reply from KT, a member of SGI Europe)	**Trade union**	**Employer organisation** (KT = SGI Europe member)
Consultation	Once	No (SGI Europe member)	No	No
Format of interaction	Consultative committee (NESC)	No interaction other than through NESC	No interaction	No interaction
Timing	After submission			
Social partner assessment	Information sharing	No interaction	No interaction	No interaction
Fact-finding mission	Trade union involved in 2024 and 2025	Employer organisation involved in 2024 and 2025	Largely familiar with the European Semester process	Less familiar with the European Semester process
Country report	Trade union consulted	Employer organisation consulted	Moderate capacity to contribute	Moderate capacity to contribute
CSR	Not consulted ([a])	Employer organisation consulted	Largely familiar with the SCF	Less familiar with the SCF

([a]) This could be interpreted differently. There had been a change in Economic Counsellors in Helsinki since the 2025 cycle. Feedback indicated that it is unlikely that employers were consulted but trade unions were not.

France 31 October 2024	Around a 6-month drafting period 206 pages		2025 APR	3- to 4-month drafting period 146 pages
Standard analysis of the MTFSP	No information in the MTFSP			Submitted on 30 April 2025
Government perspective	In NESC			In NESC (CDSEI)
Discussion in NESC or social dialogue	Yes, in CDSEI			
	Trade union	**Employer organisation**	**Trade union**	**Employer organisation**
Consultation	Once	Once	Once	Once
Format of interaction	Consultative committee and online meeting	Consultative committee	Consultative committee	Consultative committee and online meeting
Timing	After submission	A few days / up to 1 week before	A few days / up to 1 week before	A few days / up to 1 week before
Social partner assessment	Formality	Meaningful involvement / possibility of proposing changes	Formality	Meaningful involvement / possibility of proposing changes
Fact-finding mission	Trade union involved in 2024 and 2025	Employer organisation involved in 2024 and 2025	Largely familiar with the European Semester process	Largely familiar with the European Semester process
Country report	Trade union consulted	Employer organisation consulted	Moderate capacity to contribute	Moderate capacity to contribute
CSR		Employer organisation consulted	Fully familiar with the SCF	Partially familiar with the SCF

Germany 16 July 2025	No information on the drafting period 107 pages		2025 APR	Before the MTFSP was submitted 80 pages
Standard analysis of the MTFSP	Consulted as in Article 11(3)			Submitted on 23 April 2025
Government perspective	Discussed in Macroeconomic Dialogue meeting			Only information
Discussion in NESC or social dialogue	No			
	Trade union	**Employer organisation**	**Trade union**	**Employer organisation**
Consultation	Once	No	No	No
Format of interaction	Individual meeting	No interaction	No interaction	Email exchange
Timing	A few days / up to 1 week before			A few days / up to 1 week before
Social partner assessment	Information sharing	No consultation	Information sharing	Information sharing
Fact-finding mission	Trade union involved in 2024 and 2025	Employer organisation involved in 2024 and 2025	Fully familiar with the European Semester process	Largely familiar with the European Semester process
Country report	Trade union consulted	Employer organisation consulted	Low capacity to contribute	High capacity to contribute
CSR	Trade union consulted	Employer organisation consulted	Largely familiar with the SCF	Fully familiar with the SCF

Greece **7 October 2024**	4- to 5-month drafting period 36 pages, or 150 with annexes		**2025** **APR**	No information on the drafting period 128 pages
Standard analysis of the MTFSP	No information in the MTFSP			Submitted on 30 April 2025
Government perspective	No consultation			No discussion or consultation
Discussion in NESC or social dialogue	No			
	Trade union	**Employer organisation**	**Trade union**	**No response from employer organisation**
Consultation	No	No	No	No
Format of interaction	No interaction	No interaction	No interaction	No interaction
Timing				
Social partner assessment	No interaction	No interaction	No interaction	No interaction
Fact-finding mission	Trade union involved in 2024 and 2025	Employer organisation involved in 2024 and 2025	Partially familiar with the European Semester process	1 employer organisation fully familiar 1 employer organisation partially familiar
Country report	Trade union consulted	Employer organisation consulted	Moderate capacity to contribute	1 employer organisation with high capacity to contribute 1 employer organisation with moderate capacity to contribute
CSR	Trade union consulted	Employer organisation consulted	Largely familiar with the SCF	1 employer organisation fully familiar with the SCF 1 employer organisation not at all familiar with the SCF

Hungary 4 November 2024	No information on the drafting period 40 pages		2025 APR	Around a 2-month drafting period 55 pages
Standard analysis of the MTFSP	No information in the MTFSP			Submitted on 30 April 2025
Government perspective	No consultation			No discussion or consultation
Discussion in NESC or social dialogue	No			
	Trade union	**Employer organisation**	**Trade union**	**Employer organisation**
Consultation	No	No	No	No
Format of interaction	No interaction	No interaction	No interaction	No interaction
Timing				
Social partner assessment	No interaction	No interaction	No interaction	No interaction
Fact-finding mission	Trade union involved in 2024 and 2025	Employer organisation involved in 2024 and 2025	Partially familiar with the European Semester process	Largely familiar with the European Semester process
Country report	Not consulted	Employer organisation consulted	Moderate capacity to contribute	High capacity to contribute
CSR	Not consulted	Employer organisation consulted	Partially familiar with the SCF	Less familiar with the SCF

Ireland 15 October 2024	2- to 3-month drafting period 40 pages		2025 APR	Around a 2-month drafting period 44 pages
Standard analysis of the MTFSP	Consulted as in Article 11(3)			Submitted on 6 May 2025 and resubmitted on 12 January 2026
Government perspective	In the National Economic Dialogue			No discussion or consultation
Discussion in NESC or social dialogue	In May 2024			
	Trade union	**Employer organisation**	**Trade union**	**Employer organisation**
Consultation	No	No	No	No
Format of interaction	No interaction	No interaction	No interaction	No interaction
Timing				
Social partner assessment	No interaction	No interaction	No interaction	No interaction
Fact-finding mission	Trade union involved in 2024 and 2025	Employer organisation involved in 2024 and 2025	Largely familiar with the European Semester process	Largely familiar with the European Semester process
Country report	Trade union consulted	Employer organisation consulted	Moderate capacity to contribute	High capacity to contribute
CSR	Trade union consulted	Employer organisation consulted	Partially familiar with the SCF	Partially familiar with the SCF

Italy **15 October 2024**	No information on the drafting period 223 pages (includes annexes)		**2025 APR**	Around a 2-weeks drafting period 235 pages
Standard analysis of the MTFSP	Consulted as in Article 11(3)			Submitted on 30 April 2025
Government perspective	Information in the MTFSP on consultation has not been confirmed (no information)			No information
Discussion in NESC or social dialogue	No			
	Trade union	**No response from employer organisation**	**Trade union**	**No response from employer organisation**
Consultation	Once		Once	
Format of interaction	Public consultation		Public consultation	
Timing	2–4 weeks before		2–4 weeks before	
Social partner assessment	Formality		Formality	
Fact-finding mission	Trade union involved in 2024 and 2025		Less familiar with the European Semester process	
Country report	Provided input on country report, but was not involved in its presentation		High capacity to contribute	
CSR	Partial involvement in surveillance committees of the Cohesion Fund		Largely familiar with the SCF	

Latvia **15 October 2024**	Around a 6-month drafting period 200 pages		**2025 APR**	Drafting period of more than 4 months 239 pages
Standard analysis of the MTFSP	Consulted as in Article 11(3)			Submitted on 29 April 2025
Government perspective	On parts or measures only			Only information (no discussion or consultation)
Discussion in NESC or social dialogue	No			
	Trade union	**Employer organisation**	**Trade union**	**No response from employer organisation**
Consultation	Once	Multiple times	Multiple times	Once
Format of interaction	Consultative committee	Public consultation, email exchange	Email exchange	Online meeting
Timing	More than a month before	2–4 weeks before, and after submission	2–4 weeks before	2–4 weeks before
Social partner assessment	Information sharing	Formality	Formality	Formality
Fact-finding mission	Trade union involved in 2024 and 2025	Employer organisation involved in 2024 and 2025	Largely familiar with the European Semester process	Partially familiar with the European Semester process
Country report	Trade union consulted	Employer organisation consulted	Moderate capacity to contribute	Moderate capacity to contribute
CSR	Trade union consulted	Employer organisation consulted	Largely familiar with the SCF	Fully familiar with the SCF

Lithuania 30 April 2025	4- to 5-month drafting period 57 pages		2025 APR	3- to 4-month drafting period 46 pages	
Standard analysis of the MTFSP	Consulted as in Article 11(3)			Submitted on 30 April 2025	
Government perspective	On parts or measures only			No discussion or consultation	
Discussion in NESC or social dialogue	No				
	No response from trade union	**Employer organisation**		**No response from trade union**	**Employer organisation**
Consultation		No			No
Format of interaction		No interaction			No interaction
Timing					
Social partner assessment		No interaction			No interaction
Fact-finding mission		Employer organisation involved in 2024 and 2025			Largely familiar with the European Semester process
Country report		Employer organisation consulted			Moderate capacity to contribute
CSR		Employer organisation consulted			Largely familiar with the SCF

Luxembourg 15 October 2024	2- to 3-month drafting period 41 pages		2025 APR	Drafting period of more than 4 months 76 pages	
Standard analysis of the MTFSP	Consulted as in Article 11(3)			Submitted on 25 April 2025	
Government perspective	On parts or measures only			On parts or measures only	
Discussion in NESC or social dialogue	No				
	Trade union	**Employer organisation**	**Trade union**		**Employer organisation**
Consultation	No	No	Once		Once
Format of interaction	No interaction	No interaction	Conference / round table		Conference / round table
Timing			2–4 weeks before		2–4 weeks before
Social partner assessment	No interaction	Information sharing	Formality		Formality
Fact-finding mission	Trade union involved in 2024 and 2025	Employer organisation involved in 2024 and 2025	Fully familiar with the European Semester process		Partially familiar with the European Semester process
Country report	Not consulted	Employer organisation consulted	High capacity to contribute		No response from employer organisation
CSR	Not consulted	Employer organisation consulted	Fully familiar with the SCF		Partially familiar with the SCF

Malta **20 September 2024**	2- to 3-month drafting period 90 pages		**2025 APR**	Around a 2-month drafting period 204 pages
Standard analysis of the MTFSP	Consulted as in Article 11(3)			Submitted on 30 April 2025
Government perspective	In NESC (MCESD)			In MCESD
Discussion in NESC or social dialogue	On 4 July 2024			
	Trade union	**Employer organisation**	**Trade union**	**Employer organisation**
Consultation	Multiple times	Once	Multiple times	Once
Format of interaction	Individual meeting and consultative committee	No real interaction	Individual meeting and consultative committee	No real interaction
Timing	More than a month before		More than a month before	
Social partner assessment	Meaningful involvement / possibility of proposing changes	Information sharing	Meaningful involvement / possibility of proposing changes	Information sharing
Fact-finding mission	Trade union involved only in 2025	Employer organisation involved only in 2025	Fully familiar with the European Semester process	Fully familiar with the European Semester process
Country report	Trade union consulted	Employer organisation consulted	High capacity to contribute	Moderate capacity to contribute
CSR	Trade union consulted	Employer organisation consulted	Fully familiar with the SCF	Partially familiar with the SCF

Netherlands **15 October 2024**	Around a 6-month drafting period 71 pages		**2025 APR**	3- to 4-month drafting period 54 pages
Standard analysis of the MTFSP	No consultation			Submitted on 29 April 2025
Government perspective	On parts only			On parts or measures only, not on APR
Discussion in NESC or social dialogue	No			
	Trade union	**Employer organisation**	**Trade union**	**No response from employer organisation**
Consultation	No	Multiple times	No	No
Format of interaction	No interaction	Online meeting	No interaction	No interaction
Timing		More than a month before		
Social partner assessment	No interaction	Information sharing	No interaction	No interaction
Fact-finding mission	Trade union involved in 2024 and 2025	Employer organisation involved in 2024 and 2025	Partially familiar with the European Semester process	Largely familiar with the European Semester process
Country report	Trade union consulted	Employer organisation consulted	Moderate capacity to contribute	Moderate capacity to contribute
CSR	Trade union consulted	Employer organisation consulted	Partially familiar with the SCF	Less familiar with the SCF

Poland 9 October 2024		4- to 5-month drafting period 59 pages	2025 APR	3- to 4-month drafting period 78 pages
Standard analysis of the MTFSP		No consultation but discussion		Submitted on 30 April 2025
Government perspective		Discussed in a specific structure (Semester Group Poland)		Discussed in a specific structure (Semester Group Poland)
Discussion in NESC or social dialogue		No		
	Trade union	**Employer organisation**	**Trade union**	**Employer organisation**
Consultation	No	No	Once	Once
Format of interaction	No interaction	Email exchange	Email exchange, public consultation	Email exchange, conference / round table
Timing	A few days before	A few days before	A few days before	A few days before
Social partner assessment	No real interaction	Information sharing	Information sharing	No interaction
Fact-finding mission	Trade union involved in 2024 and 2025	Employer organisation involved in 2024 and 2025	Fully familiar with the European Semester process	Largely familiar with the European Semester process
Country report	Trade union consulted	Employer organisation consulted	High capacity to contribute	Moderate capacity to contribute
CSR	Not consulted	Employer organisation consulted	Less familiar with the SCF	Less familiar with the SCF

Portugal 11 October 2024		Around a 6-month drafting period 17 pages	2025 APR	Around a 3- to 4-month drafting period 26 pages
Standard analysis of the MTFSP		No consultation		Submitted on 30 April 2025
Government perspective		On the 2024–2028 Law on Major Options but not on the MTFSP		On the 2024–2028 Law on Major Options but not on the APR (there is overlap)
Discussion in NESC or social dialogue		No		
	Trade union	**Employer organisation**	**Trade union**	**Employer organisation**
Consultation	No	No	No	No
Format of interaction	No interaction	Consultative committee	No interaction	No interaction
Timing		More than a month before		
Social partner assessment	No interaction	Information sharing	No interaction	No interaction/ formality
Fact-finding mission	Trade union involved only in 2024	Employer organisation involved in 2024 and 2025	Largely familiar with the European Semester process	Largely familiar with the European Semester process
Country Report	Trade union consulted	Employer organisation consulted	Low capacity to contribute	Moderate capacity to contribute
CSR	Not consulted	Employer organisation consulted	Largely familiar with the SCF	Not familiar with the SCF

Romania 25 October 2024		Around a 6-month drafting period 121 pages	2025 APR	No APR for 2025
Standard analysis of the MTFSP		Consulted as in Article 11(3)		
Government perspective		In national tripartite council for social dialogue (NESC)		
Discussion in NESC or social dialogue		On 16 October 2024		
	Trade union	Employer organisation	Trade union	Employer organisation
Consultation	No	Once	No APR for 2025	
Format of interaction	No interaction	Public consultation in an ad hoc format		
Timing		After submission		
Social partner assessment	No interaction	Formality		
Fact-finding mission	Trade union involved in 2024 and 2025	Employer organisation involved in 2024 and 2025	Partially familiar with the European Semester process	Largely familiar with the European Semester process
Country report	Trade union consulted	Employer organisation consulted	Moderate capacity to contribute	Moderate capacity to contribute
CSR	Not consulted	Employer organisation consulted	Largely familiar with the SCF	Partially familiar with the SCF

Slovakia 15 October 2024		2- to 3-month drafting period 41 pages	2025 APR	3- to 4-month drafting period 124 pages
Standard analysis of the MTFSP		Consulted as in Article 11(3)		Submitted on 30 April 2025
Government perspective		In tripartite body for interdepartmental social dialogue (NESC)		No consultation
Discussion in NESC or social dialogue		On 14 October 2024		
	Trade union	No response from employer organisation	Trade union	No response from employer organisation
Consultation	Once		No	
Format of interaction	Consultative committee		No interaction	
Timing	A day before			
Social partner assessment	Formality		Information sharing	
Fact-finding mission	No trade union involvement		Partially familiar with the European Semester process	
Country report	No consultation		Low capacity to contribute	
CSR	No consultation		Not familiar with the SCF	

Slovenia 15 October 2025	4- to 5-month drafting period 46 pages		2025 APR	3- to 4-month drafting period 47 pages
Standard analysis of the MTFSP	Consulted as in Article 11(3)			Submitted on 28 April 2025
Government perspective	In NESC (Economic and Social Council)			In NESC at the end of April 2025
Discussion in NESC or social dialogue	On 2 October 2024			
	Trade union	**Employer organisation**	**Trade union**	**Employer organisation**
Consultation	No	Once	Once	Once
Format of interaction	Consultative committee (NESC)	Consultative committee (NESC)	Consultative committee (NESC)	Consultative committee (NESC)
Timing	2 weeks before	2 weeks before	1 week before	1 week before
Social partner assessment	Formality	Formality	Information sharing	Information sharing
Fact-finding mission	Trade union involved in 2024 and 2025	Employer organisation involved in 2024 and 2025	Partially familiar with the European Semester process	Partially familiar with the European Semester process
Country report	No consultation	No consultation	Moderate capacity to contribute	Low capacity to contribute
CSR	No consultation	No consultation	Partially familiar with the SCF	Less familiar with the SCF

Spain 15 October 2024	No information on the drafting period 65 pages		2025 APR	No information on the drafting period 36 pages
Standard analysis of the MTFSP	No information in the MTFSP			Submitted on 30 April 2025
Government perspective	No consultation			No discussion or consultation
Discussion in NESC or social dialogue	No			
	Trade union	**Employer organisation**	**Trade union**	**Employer organisation**
Consultation	Once	No	No	No
Format of interaction	Online meeting	Individual meeting	No interaction	No interaction
Timing	1 week before			
Social partner assessment	Information sharing	No interaction	No interaction	No interaction
Fact-finding mission	Trade union involved in 2024 and 2025	Employer organisation involved in 2024 and 2025	Partially familiar with the European Semester process	1 employer organisation largely familiar with the European Semester process 1 employer organisation less familiar with the European Semester process
Country report	Trade union consulted	Employer organisation consulted	Low capacity to contribute	1 employer organisation with high capacity to contribute 1 employer organisation with moderate capacity to contribute
CSR	Trade union consulted	Employer organisation consulted	Partially familiar with the SCF	1 employer organisation largely familiar with the SCF 1 employer organisation not familiar with the SCF

Sweden **11 November 2024**	Around a 6-month drafting period 47 pages		**2025 APR**	Around a 2-month drafting period 171 pages
Standard analysis of the MTFSP	No information in the MTFSP			Submitted on 30 April 2025
Government perspective	On parts and measures only			Two forum meetings held in March 2025 where peak-level social partners were invited to contribute
Discussion in NESC or social dialogue	No			
	Trade union	**Employer organisation**	**Trade union**	**Employer organisation**
Consultation	Once	Once	Once	Once
Format of interaction	Specific format	No interaction	Conference / round table	Consultative committee
Timing	More than a month before	2–4 weeks before	2–4 weeks before	More than a month before
Social partner assessment	Formality	Information sharing	Formality	Information sharing
Fact-finding mission	Trade union involved in 2024 and 2025	Employer organisation involved in 2024 and 2025	Fully familiar with the European Semester process	Partially familiar with the European Semester process
Country report	No consultation	No consultation	Moderate capacity to contribute	High capacity to contribute
CSR	No consultation	No consultation	Partially familiar with the SCF	Largely familiar with the SCF

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This report looks at how national employer organisations and trade unions were involved in different aspects of the European Semester from 2024 to 2025. It considers whether they were consulted or informed by their national governments on the medium-term fiscal-structural plans (MTFSPs) submitted at the end of 2024. A similar analysis is conducted for the 2025 annual progress reports on the implementation of MTFSPs. The findings indicate that the involvement of social partners in MTFSPs and the 2025 annual progress reports is perceived to be limited. This stands in marked contrast with the fact-finding missions organised by the European Commission, in which national social partner organisations reported more substantial involvement. This report also considers the priorities and capacities of national social partner organisations to contribute to the overall European Semester process, alongside the involvement of European-level social partners. Methodological considerations regarding how information was collected help with the interpretation of findings presented.

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