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Deutsche Sozialversicherung  
Europavertretung | DSV

## Feedback from German Social Insurance issued 2 September 2025

Call for evidence by the European Commission on a new  
Action Plan to implement the European Pillar of Social  
Rights



## I. Preliminary remarks

The European Commission intends to present a new Action Plan to implement the European Pillar of Social Rights (EPSR) in the fourth quarter of 2025. The German Social Insurance (DSV) welcomes the European Union's (EU) efforts to close remaining gaps with a new Action Plan while also continuing the implementation of measures already launched under the 2021 Action Plan. The retention of the three headline targets for 2030 is likewise supported, as it ensures continuity in delivering the EPSR. In view of the new Action Plan, the DSV highlights a number of cross-cutting themes:

### **Understanding social security as a competitive advantage**

In the current legislative term, the European Commission is prioritising competitiveness and industrial policy. The DSV recognises the relevance of these priorities in light of the changing economic and geopolitical context but underlines that effective social security systems are a basic prerequisite for sustainable growth and European resilience. They strengthen social cohesion, build trust in necessary transformations – for example in the context of digital and demographic change – and help to attract and retain skilled workers. Measures to ensure safe and healthy workplaces are not an obstacle to competitiveness. On the contrary, companies that systematically invest in the safety and health of their employees benefit in the long term from fewer absences, higher productivity and stronger employee retention.

### **Seizing the opportunities of digitalisation and artificial intelligence**

Digitalisation and the use of artificial intelligence (AI) are fundamentally transforming the world of work, social security systems and healthcare. Digital solutions offer significant opportunities – from efficient provision of insurance benefits and modern occupational safety to anticipatory healthcare. The DSV therefore advocates harnessing the potential of digital technologies to strengthen social security and healthcare. To ensure a socially balanced digital transition, digital and AI applications must be user-centred, uphold data protection and fundamental rights, and guarantee non-discrimination, transparency and human final decision-making. Close alignment between different EU initiatives must also be ensured. The Digital Decade policy programme and accompanying legislative acts – for example on the European Digital Identity (EUDI), the Single Digital Gateway and an interoperable Europe – should be developed coherently with sectoral initiatives such as the European Health Data Space (EHDS) and the European Social Security Pass (ESSPASS).



### **Safeguarding free movement through social security coordination**

Free movement of workers is a key achievement of the EU and an important factor for innovation and competition. The EU legal coordination of social security systems ensures that cross-border mobility does not lead to disadvantages in social protection. The coordination rules should be regularly adapted to social and societal developments. The negotiations on revising the coordination regulations, ongoing for almost nine years now, show how difficult agreement in this area is. Some points – such as dealing with cross-border long-term care benefits – have already been agreed. From the DSV's perspective, the reform should therefore be concluded or alternative ways found to create legal certainty.

### **Building resilient health systems**

Europe needs health systems that are crisis-proof and future-ready. To this end, efforts at European level should be usefully pooled and joint potential leveraged, without ignoring the specificities of national systems. This applies, for example, to common standards and health technology assessment of medicinal products and medical devices. Further challenges – such as managing new technologies or addressing shortages of medicinal products and medical devices – can best be tackled jointly. As a first step, this requires transparency and common strategies to secure research, development and prescription of crisis-relevant products. The primary focus must always be the added value for insured persons, needs-based and quality-assured care, and sustainable financing of national health systems. Economic interests must not undermine the financial stability of health systems – affordability must remain central.

### **Ensuring coherence of social policy initiatives**

Finally, the new EPSR Action Plan must be closely aligned with other social policy initiatives – in particular the Quality Jobs Roadmap and the EU Anti-Poverty Strategy. These processes pursue shared goals, such as creating high-quality jobs and combating poverty, and should therefore be developed in a coordinated manner. The new Action Plan should explain how various sectoral and horizontal measures interlock, in order to credibly advance social rights and place economic policy initiatives on a firm social footing.

The following position focuses on those areas that are of particular importance to DSV member institutions. Statutory health and long-term care insurance with 75 million insured persons, statutory pension insurance with 57 million insured persons and statutory accident insurance with more than 70 million insured persons in 5.2 million member companies provide effective protection against major life risks for citizens in Germany. They are a cornerstone of the welfare state and make a substantial contribution to social stability and economic performance.



## II. Position

### 1 \_ More and better jobs

In its Communication on the 2021 Action Plan, the European Commission's first chapter on implementing the EPSR focuses on maintaining and creating high-quality jobs. One emphasis is on labour standards that must be adapted to current developments – such as increasing digitalisation and the rise in telework. This chapter also addresses the resulting demands on occupational safety and health.

Against this backdrop, the 2021 Action Plan included, inter alia, the following measures on which the DSV comments as follows:

#### **Review of the Quality Framework for Traineeships**

Regarding the review of the Quality Framework for Traineeships, the DSV welcomes the package of measures presented to improve traineeships in the EU, which places greater emphasis on social protection compared to the 2014 framework. It remains important that information on social security coverage is easily accessible to trainees and employers – for example via existing online platforms.

#### **Platform work**

The DSV welcomes the Directive on improving working conditions in platform work (Directive (EU) 2024/2831) and supports its objectives. People working through digital platforms should receive the lawful status that corresponds to their actual working conditions. Fairness, transparency and accountability in algorithmic management must also be ensured. Furthermore, it is positive that implementation of the Directive does not impose an EU-wide harmonisation of existing national rules and conditions for a presumption of employment. This allows continued consideration of national provisions, relevant national case law and the interests of the social partners.

#### **Follow-up to the White Paper on Artificial Intelligence**

With the AI Act (Regulation (EU) 2024/1689), the EU has adopted the world's first regulatory framework for AI. The DSV supports the values-based approach and the clear objective of harnessing AI's opportunities while safeguarding European values and fundamental rights. It is also positive that transparency and human final decision-making are required for high-risk applications. At the same time, the DSV sees a need for improvement in the practical implementation of certain requirements. Technical and administrative obligations for high-risk AI in public bodies must be realistically designed and not lead to disproportionate burdens. The DSV therefore



calls for early involvement of social security institutions in implementing and interpreting the framework, for example through implementing acts and European Commission guidance. The European level should actively seek dialogue with affected sectors and take account of sector-specific risks and use cases – particularly in social security and health.

### **New Occupational Safety and Health Strategy**

To modernise already high protection standards for workers and effectively address both traditional and new work-related risks, the measures under the EU Strategic Framework on Health and Safety at Work should continue until 2028, and the shared goal of “Vision Zero” – preventing fatal and serious occupational accidents and diseases – should be pursued. The DSV recommends continuously raising awareness of “Vision Zero” and the economic benefits of effective prevention across all Member States.

At the same time, the DSV sees a need for improvement in delivering certain objectives of the framework. The announced revisions of the Directives on workplaces (Directive 89/654/EEC) and display screen equipment (Directive 90/270/EEC) should proceed swiftly. While the existing framework is in principle flexible enough to respond to new developments in the world of work, new risks arising, for example from mobile and digital forms of work and the increasing use of AI, must be adequately addressed. Adjustments in light of technological progress, digitalisation and changing workplace organisation are therefore essential.

Looking ahead to the expiry of the current strategy in 2027, it is crucial that the European Commission presents a follow-up strategic framework from 2028 in good time. Only through seamless continuity can safe and healthy workplaces in the EU continue to meet the challenges of a rapidly changing world of work.

### **Legal proposals to reduce workers' exposure to hazardous chemicals, including asbestos**

With regard to protection from hazardous substances, the DSV welcomes the high priority accorded to the Asbestos at Work Directive (Directive 2009/148/EC, as amended by Directive (EU) 2023/2668) and the Carcinogens, Mutagens and Reprotoxic Substances Directive (CMRD, Directive 2004/37/EC). The European Commission's July proposal for a 6th amendment of the CMRD underlines the priority given to protection from hazardous substances at work. The DSV also calls for regular further updates of the CMRD. New scientific findings and the use of innovative materials and technologies give rise to potential risks not yet covered by the existing legal framework. Continuous updates are necessary to ensure the



effectiveness of the directives and long-term protection of workers. The DSV will continue to engage constructively with future developments and amendments.

## **2 \_ Skills and equality**

The second chapter of the Communication on implementing the EPSR addresses, inter alia, building a Union of Equality in which the creation of equal opportunities and the fight against stereotypes and discrimination in employment, training, education, social protection, housing and health are prioritised. One focus is on people with disabilities.

Against this backdrop, the 2021 Action Plan included the following measure on which the DSV comments as follows:

### **New Strategy for the Rights of Persons with Disabilities**

The Strategy for the Rights of Persons with Disabilities 2021–2030 provides an important framework, supported by the DSV, to ensure non-discriminatory social and economic participation of persons with disabilities with full respect for their rights. The right to work plays a central role by enabling self-determination and broad social and professional participation.

The DSV notes that measures for 2025–2030 are missing. Furthermore, implementation and uptake of the measures planned by 2024 should be tracked systematically. Although the European Commission has presented a package to improve labour market opportunities for persons with disabilities, it remains unclear whether and how the measures are being applied by Member States. The DSV also calls for improvements in data collection and reporting in order to adequately assess progress in implementing the strategy and achieving its objectives.

## **3 \_ Social protection and inclusion**

The third chapter of the Communication on implementing the EPSR concerns social protection and inclusion. This includes combating poverty as well as ensuring the resilience, accessibility and effectiveness of health and long-term care systems. It also concerns the future of social protection, which must be adapted in light of digitalisation and cross-border labour mobility.

Against this backdrop, the 2021 Action Plan included, inter alia, the following measures on which the DSV comments as follows:



### **Guidance on public procurement of innovation and on socially responsible public procurement**

The DSV welcomes the greater clarity provided by the European Commission's Guidance Notices on complex EU public procurement rules. With a view to the reform of public procurement planned for 2026 and the related discussion on taking into account non-price criteria – such as social and environmental aspects of service delivery as well as supply security and stability of supply chains – the DSV points out that practical application of such criteria requires framework conditions and certification tools enabling more flexible and legally sound decisions. Cost-driving mandatory requirements that reduce the number of bidders must be avoided in order to prevent additional expenditure for social security systems.

### **Initiative on long-term care**

With the European Care Strategy presented by the European Commission in September 2022 and the Council Recommendation on access to affordable high-quality long-term care, the EU has for the first time established a strategic framework to improve access to affordable, high-quality and community-based care in Europe. Objectives include ensuring care quality, securing the workforce, supporting informal carers, digitalisation and long-term financial sustainability of systems. From the DSV's perspective, this is an important step towards addressing growing care needs in Europe in a structured manner. However, implementation remains fragmented. There is a lack of robust European indicators, a coherent monitoring system and legal clarity for cross-border use of long-term care benefits.

### **New tools and indicators on access to healthcare**

The European Commission aims to assess access to healthcare more systematically and make it measurable through new tools and indicators. This is intended to identify barriers and gaps more effectively and address them through policy. To date, however, these efforts fall short of expectations. From the DSV's perspective, developing and applying clear, comparable indicators on access to healthcare remains a structural gap at EU level. This is particularly evident in long-term care, but also affects general healthcare, where existing data collections are insufficient to thoroughly evaluate social policy objectives. The DSV therefore supports coherent, EU-wide data collection on access to health and long-term care services. In line with the 2021 Action Plan's objectives, this would better capture health inequalities and strengthen the patient perspective to improve access, especially for the most vulnerable.

### **European Health Data Space**

With the European Health Data Space (EHDS), the European Commission intends to make a targeted push towards cross-border digitalisation of Member States' health



systems. Health data are to be made systematically usable for care, research, policy and innovation. The DSV expressly supports this initiative. The EHDS offers an opportunity to improve quality of care, reduce health inequalities and shape data-driven innovation in the public interest. The focus now is on implementation. Numerous implementing acts must be presented by 2027 at the latest. These will be decisive for clarifying responsibilities, setting uniform standards, ensuring interoperability and safeguarding data protection. In the DSV's view, data use must primarily serve patients' interests and strengthen public social and health systems. It must be clearly tied to public-interest purposes, in particular improving care, quality assurance and prevention. National competences must be preserved. Binding and early involvement of social security institutions is likewise necessary. Transparent procedures for regulating access rights – especially for secondary use by research and industry – and confidence-building measures for insured persons and healthcare providers are indispensable. The DSV will continue to support the implementation of the EHDS constructively.

### **Pharmaceutical Strategy**

Under the Pharmaceutical Strategy, the European Commission has presented far-reaching measures. At its core is the proposal of 26 April 2023 to reform EU pharmaceutical legislation. The DSV welcomes the aim of improving access to medicinal products, ensuring their availability and affordability for patients in all Member States. It sees this as an opportunity to make the supply of established and innovative medicines more equitable and to strengthen the resilience of health systems. Since the strategy's publication, supply security has moved increasingly centre stage. On 11 March 2024, a separate proposal for a regulation on critical medicinal products followed. The objective of the so-called Critical Medicines Act is to prevent shortages and strengthen European production capacity. The DSV recognises the industrial and healthcare policy significance of this initiative but warns against losing sight of social considerations. Affordability and access to medicinal products are central components of social justice. A future-proof European pharmaceutical policy must consistently link economic and social objectives. From the DSV's perspective, this requires transparent public investment, targeted use of public funds and a clear added value for patients. Social objectives such as affordability must be systematically integrated across EU pharmaceutical measures.

### **Europe's Beating Cancer Plan**

Three years after the publication of the Beating Cancer Plan in 2021, the DSV observes a mixed picture. With the Cancer Inequalities Registry, a data-based instrument has been created that highlights differences in cancer care and defines political priorities. This provides a solid basis for targeted measures and national strategies. The DSV also supports the objective of an EU-wide network of cancer





centres. However, its implementation has not yet been comprehensive. Furthermore, the realignment of cancer screening in 2022 is evaluated positively, as it aims to ensure access to screening offers for breast, cervical and colorectal cancer for at least 90 per cent of the target population by 2025, as well as the planned extension to additional types of cancer such as lung, prostate and gastric cancer. The 2024 recommendation to strengthen HPV and HBV vaccination is equally welcomed. Nevertheless, central measures to prevent alcohol and tobacco consumption still lag behind political ambitions.

### **Green Paper on Ageing**

The Green Paper on Ageing proposed linking the statutory retirement age with increasing life expectancy. However, the DSV stresses that questions of financing and the concrete design of pension systems clearly fall within national competences and must be decided democratically within each Member State. By contrast, it positively highlights that the debate has generated new ideas for strategies that support citizens in voluntarily remaining in employment for longer. The DSV supports this approach, which is also reflected in the Council Conclusions of 19 June on supporting older people in reaching their full potential in the labour market and in society.

Beyond that, the Green Paper has also provided important impetus. The DSV particularly welcomes the life-course approach pursued therein, which the High-Level Expert Group on the Future of Social Protection and of the Welfare State has further developed into a life-course perspective. The DSV also values the fact that the Green Paper identified long-term care as a central field of action in demographic change and thereby decisively triggered the report on long-term care and support for older people.

### **Report of the High-Level Expert Group on access to adequate and sustainable social protection**

The report of the High-Level Expert Group contains important recommendations for designing future-proof and resilient social protection in Europe. The DSV particularly welcomes that the final report places the life-course perspective at the centre of its social policy reflections. It differentiates between various population groups at different stages of life. This enables tailored combinations of social services, income support and accompanying measures to ensure social protection and prosperity throughout the entire life course.

The DSV also welcomes the report's emphasis on the relevance of social investment for future-proof and resilient social protection systems. In the view of the DSV, such investment is not only socially necessary but also a key factor in Europe's economic



success. The DSV therefore advocates working intensively within the newly established Knowledge Hub on joint methods to measure its economic return. In the long term, social investment should be placed on an equal footing with investment in physical capital within the framework of the European Semester in order to highlight its importance for prosperity and competitiveness.

Moreover, the report emphasises the importance of access to social protection for all citizens. Although EU Member States have agreed to formulate and evaluate national targets on access to social protection, and these are part of monitoring within the European Semester as well as of the Annual Report of the Social Protection Committee on the Social Situation and Developments in Social Protection Policies, common European targets are still lacking. From the DSV's perspective, access to social protection is a key principle of the European Pillar of Social Rights that must be further developed. The further development of the existing monitoring framework is therefore expressly welcomed.

### **Digital Decade**

As part of the Digital Decade Policy Programme, the objective was set to provide essential public services digitally by 2030. From the DSV's perspective, however, digitalisation will only unfold its full potential if the administrative burden for insured persons, administrations and employers is significantly reduced by legal provisions. In this context, the implementation of the Electronic Exchange of Social Security Information (EESSI) system is particularly noteworthy. EESSI already involves several thousand social security institutions in 32 countries. It demonstrates that complex, long-term digital projects can be successfully realised and beneficial for both insured persons and social security institutions. At the same time, the experience with EESSI clearly shows that digitalisation involves complex issues linked to high demands on technical, legal and organisational implementation processes. The DSV once again calls for making use of practical expertise and for the early and comprehensive involvement of social security institutions in the development of digital initiatives, in order to ensure workable solutions.

### **European Social Security Pass**

With the European Social Security Pass (ESSPASS), a key initiative has been launched to improve the coordination and traceability of social security rights in the EU. The DSV explicitly welcomes the fact that the objectives of the originally planned European Social Security Card have been taken up and further developed through ESSPASS. Its goal is to facilitate access to benefits and simplify procedures, in particular in the context of cross-border labour mobility. Initial pilot projects on the automated verification and validation of the Portable Document A1 have been completed. The DSV supports the initiative but emphasises that its implementation

must consistently follow a user-oriented approach and be geared to the needs of insured persons.

### **A trusted and secure European Digital Identity**

A central prerequisite for the success of ESSPASS is its linkage to a trusted European Digital Identity (EUDI), which is to become operational step by step from 2026 onwards. In this context, the planned introduction of a European Digital Identity Wallet (EUDI Wallet) is also an important component. It is intended to enable citizens to prove their identity across the EU and use it for digital administrative processes – for example, to verify relevant documents across borders. From the DSV's perspective, consistent implementation is essential to achieve progress in the digital coordination of social security systems. At the same time, the DSV underlines that digitalisation processes are complex undertakings that require the early and comprehensive involvement of social security institutions.

## **4 \_ Joining forces to deliver**

Another chapter of the 2021 Action Plan Communication was dedicated to cooperation between the EU institutions, national, regional and local authorities, the social partners and civil society, all of whom play a role in implementing the European Pillar of Social Rights within their respective competences.

Against this background, the 2021 Action Plan included, among others, the following measure, on which the DSV comments as follows:

### **Proposal for a revision of the Social Scoreboard**

The revision of the Social Scoreboard has helped to better reflect the individual principles of the European Pillar of Social Rights. However, the principles are still not equally covered. Some areas – such as Principle 18 on long-term care – are neither taken into account by a primary nor by a secondary indicator and therefore do not feed into quantitative monitoring. This gap should be closed. The DSV therefore advocates that the European Commission, together with the Social Protection Committee (SPC) and the Employment Committee (EMCO), establish a specific indicator for Principle 18 in the Scoreboard.



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## About us

The German Federal Pension Insurance (DRV Bund), the German Social Accident Insurance (DGUV), the National Association of Statutory Health Insurance Funds (GKV-Spitzenverband), the national associations for statutory health and long-term care insurance funds at the federal level and the Social Insurance for Agriculture, Forestry and Horticulture (SVLFG) have joined forces to form the "German Social Insurance - Working Group Europe" (Deutsche Sozialversicherung Arbeitsgemeinschaft Europa e. V.) with a view to their common European policy interests. The association represents the interests of its members vis-à-vis the bodies of the European Union (EU) as well as other European institutions and advises the relevant stakeholders in the context of current legislative projects and initiatives. As part of the statutory insurance system in Germany, health and long-term care insurance with 75 million insured persons, pension insurance with 57 million insured persons and accident insurance with more than 70 million insured persons in 5.2 million member companies offer effective protection against the consequences of major risks of life.