



Communication from the EU Commission: SME Relief Package

COM(2023) 535

Executive Summary

The Austrian Federal Chamber of Labour (AK) is opposed to the Commission's „Think Small First“ approach and warns that the interests of SMEs should be given greater consideration in comparison to all other social interests (consumers, employees, climate...). Exemptions and favours for SMEs affect over 99% of companies - which makes it clear that such exemptions pose a real risk of making it more difficult, slower or even impossible to achieve important political goals. In the AK's view, any relief for SMEs must therefore be discussed in detail on a case-by-case basis. Nevertheless, the AK by no means fails to recognise that the present communication also contains various proposals which, in the AK's view, are a step in the right direction. In detail, the AK takes the following positions:

- SMEs will play a key role in the twin transition. The communications clearly fail to address this importance. In order to actively shape the transformation, transformation management and knowledge transfer in and between SME ecosystems must be strengthened.
- The installation of a new SME Envoy directly at the Commission President and the Regulatory Scrutiny Board, who can, in the worst case, prevent legislative proposals on socially relevant problems in advance on the basis of suspected possible negative effects on SMEs, is rejected.
- The proposed directive on the taxation of SMEs according to the country of their main establishment is rejected in this form.
- The creation of an electronic format (e-declaration) in connection with the posting of workers must not lead to a reduction in the information to be reported but, on the contrary, must facilitate control tasks.
- The AK is in favour of identifying and reducing superfluous, duplicate or outdated obligations with inefficient or inadequate collection periods and methods, provided that the political objectives associated with the obligations are also reliably achieved after reduction. The desired steering effects for the economy and society must not be undermined.
- The proposal for a harmonising regulation against late payment should certainly be discussed in more detail, taking into account various aspects (SMEs are not only creditors, but also debtors; special features of business cases...). However, the practical problems (of contract enforcement, which is already possible) usually lie in the costs and duration of the proceedings.
- An expansion of targeted funding for SMEs via the EU funding instrument „STEP“ with the clear funding objective of capacity building in strategically important areas and clear funding guidelines - which must also include social criteria - is to be welcomed. From the AK's point of view, a „golden investment rule“ should be introduced for (co-)financing at national level.
- In order to allow SMEs to participate better in public procurement, the solution proposed in the communication in the direction of standardised regulations and procedures does not go far enough. A more targeted approach would be a general increase in the thresholds above which an EU-wide invitation to tender must be issued.
- A strengthening of the Commission's efforts in relation to skilled labour is welcomed, although much of the responsibility for this issue lies with national governments or companies - where a decline in training activity has been observed for years and decades.
- From the AK's point of view, it would be desirable if the Commission could develop proposals for the Europe-wide recruitment of skilled workers - with corresponding labour and social law standards. Nevertheless, the existing possibilities within the EU should be further utilised. This approach should be favoured over recruitment from third countries.
- An amendment to the SME definition from 2003 should be limited to a moderate adjustment of the values for turnover and balance sheet total and leave the criterion of the number of employees unchanged.

AK's position

Content of the draft

The Commission emphasises once again that, in its view, small and medium-sized enterprises (i.e. under 250 employees) are of central importance to the economic and social fabric of Europe and, at over 99% of all companies, make up the vast majority of businesses. The communication refers to a large number of EU initiatives, regulations, programmes etc. to support SMEs in the past. According to the communication, SMEs have always been an integral part of the Commission's policy, particularly since the implementation of the SME Strategy 2020, and have always been at the centre of its work. The AK has already submitted a detailed statement on this [SME strategy paper](#) and the industrial strategy published at almost the same time (as well as on [important updates](#) and other strategy papers). Despite all its efforts, the Commission nevertheless recognises in this communication that SMEs are still confronted with considerable problems - particularly as a result of recent developments - that make doing business more difficult or prevent SMEs from regularly taking advantage of opportunities arising from the green and digital transitions.

With the proposed package of measures, the Commission wants to remedy the problematic areas for SMEs. According to the Commission, the key issues are: access to finance - via the financial market but also to EU funding -, administrative burden and legislation, access to skilled labour and managers, access to public contracts, the rapid possibility of setting up a company, but also a proposed directive on tax provisions and a proposed regulation against late payments.

The main provisions of the planned draft

General remarks

As the Commission rightly recognises and states at the beginning of its comments, SMEs are undeniably an important part of our economic system. Among other things, it refers to the fact that over 99% of all companies in the EU can be defined as SMEs. According to the communication, these 99 % of companies generate over 50 % of value added and employ around two thirds of the employed labour force in the private, non-finan-

cial sector of the economy. Conversely, of course, this means that less than one per cent of companies - the large companies - are responsible for almost one third of jobs and this third generates almost 50% of value added. These facts show that Productivity - the key to income opportunities - is therefore far higher in large companies than in SMEs.

Special attention must be paid to the fact that 99% of companies are SMEs. All support and favours, tax advantages and other exceptions to regulations that are created for SMEs thus benefit practically all companies in the EU. General framework conditions of the economic and social area, which were usually adopted after in-depth social and political discussions for good reason and with specific objectives (social, societal, health policy, climate policy, economic, tax policy), are in fact cancelled out by exceptions for 99% of the population.

For many years now, the EU has given disproportionate consideration to the concerns and wishes of SMEs compared to all other socio-political interests (including the protection of employees, consumer protection, environmental policy) as part of the „Better Regulation“ agenda. A high-level group on administrative burdens set up by the European Commission recommends the consistent application of the [„Think Small First“ principle](#). As a result, the Commission has introduced measures that potentially benefit SMEs, but also have a potentially negative impact on society as a whole (including employees and consumers). The AK has issued [several critical statements](#) on this.

From the AK's point of view, it is in no way justified to undermine or even dilute important social concerns and objectives with the slogan „Right of way for SMEs“ alone. It is not acceptable to ward off social concerns in advance under the heading of „SME burden“. The AK therefore also insists that any relief for SMEs be discussed in detail or agreed within the framework of the thematically specified/responsible bodies and with the involvement of all relevant interest groups.

Furthermore, the averaging essentially misses the challenges that the twin transition poses for SMEs. As studies show, only less than 5 % of European companies are taking credible and serious steps to achieve their

corporate [climate targets](#) . For this reason, a communication that aims to address the current challenges for SMEs cannot focus exclusively on possible steps to reduce the burden. On the contrary, the AK believes that greater efforts are needed to guide and support SMEs in building up access to the knowledge required for the transformation. In order to drive the transformation process of SMEs towards a climate-neutral and digital future quickly and effectively, the AK believes that an overarching transformation concept is needed that pursues two central objectives. Firstly, the transformation must be accelerated through regulatory and fiscal policy measures in the regions. This must take place against the background and in consideration of the economic structural conditions and serve the goal of securing a high level of employment. Secondly, the transfer of knowledge between SMEs must be strengthened. This applies in particular to the necessary organisational knowledge about transformation processes, qualification requirements and the necessary knowledge about future technologies and foreseeable shifts in value chains. Supporting the transfer of knowledge helps in particular to remove barriers to entering and switching to new (digital and green) ecosystems and processes and to support SMEs and their employees in the transformation.

Simplifications for SMEs (page 5 ff.)

Re 3.1.1 Simplification of taxes

In the present communication on the SME relief package (COM[2023]535 final of 12 September 2023), the Commission proposes a directive on tax simplification that would tax SMEs in accordance with the rules applicable in the country of their main establishment in order to reduce compliance costs (by 32% or €3.4 billion). In this context, it is incomprehensible why the communication did not explicitly refer to the specific proposal for a directive on such a „Head Office Tax System“ (COM[2023]528 final) published on the same day (!).

Nevertheless, the AK is fundamentally in favour of possible administrative simplifications for SMEs in the tax system. In fact, the AK itself has been calling for a standardisation of corporate taxation (e.g. uniform calculation of the tax base, minimum tax rate) for some time.

According to the Commission’s specific proposal for a directive, it is up to the companies to decide whether they want to calculate profits in accordance with the previous regulations or in accordance with the new regulations - which will naturally only be decided by the companies after a corresponding comparison of advantages.

However, various existing problems are not even addressed in the communication or in the specific proposal for a directive - and therefore remain unresolved. For example, how the various national corporate tax regulations must be taken into account when calculating the result or the difficulty of how the transactions between the parent company and the permanent establishment are to be valued. However, this is the only way to determine which profit or loss is actually attributable to a permanent establishment - i.e. how the result is divided between the permanent establishment and the parent company. Possible solutions such as a profit split based on a formula are not even considered. Unfortunately, the Commission - apparently due to the unanimity principle - currently sees no chance of implementing such far-reaching proposals in advance.

In order to prevent tax avoidance practices, the AK believes that it should be stipulated that sales in foreign permanent establishments may not be higher than sales in the country of domicile (Commission proposal: twice as high as in the country of domicile) if the proposed new regulation is to be utilised. Due to the aforementioned complexity, the problems and the gaps in the proposal, it is therefore questionable whether the stated savings would actually be achieved.

In the opinion of the AK, it is in any case essential to carry out an impact assessment in advance with regard to possible annual follow-up costs in the form of a reduction in tax revenue. Proposals for compensating for such losses - overall or in individual member states - are missing from the proposal. The AK also points out the risk of a „run-to-the-bottom“ by tax-optimising SMEs that exploit tax advantages in certain member states. Furthermore, difficulties for the tax authorities in checking compliance with tax regulations in other countries are also foreseeable.

Re 3.1.2 Better legislation for SMEs

As already explained at the beginning, it is not surprising that 80 % of all EU legislative initiatives (page 6) are relevant for SMEs - as practically all companies are SMEs. Rather, it is surprising that the proportion is not higher. Of course, regulations and the resulting costs for individual companies, institutions and people are always a burden to a certain extent - as can be seen in Figure 1, page 4 and the accompanying text.

Nevertheless, it must be recognised and taken into account that regulations and administrative provisions have always been implemented on the basis of certain political objectives. These societal and political bene-

fits must therefore be compared with any costs incurred by companies and equally taken into account. It is unacceptable that important political objectives are not achieved simply because possible minor burdens for some SMEs result in exemptions for practically all companies. SMEs should not be regarded as worthy of protection per se, regardless of the risk propensity of their respective sector!

The new Commission communication is now set to grant SMEs even more significant privileges: Chapter 3.1.2 „Better regulation for SMEs“ states that an SME test will be used to examine whether or not new EU laws are proportionate in terms of their impact on SMEs. In addition, a dedicated SME Envoy is to be installed who will report directly to the President of the Commission. The commissioner should be able to attend meetings of the Regulatory Scrutiny Committee and have the opportunity to raise issues relating to the potential negative impact of new legislative proposals on SMEs.

The AK rejects such plans in the strongest possible terms:

Firstly, the AK reiterates its criticism of the fact that the „right of way for SMEs“ principle is still being applied. This momentum alone represents gross inequality compared to all other interests.

Secondly, a separate SME representative with the task of „comprehensive representation of interests“ internally and externally as well as participation in hearings of the Regulatory Scrutiny Board (RSB) should be strictly rejected. According to its own statements, the RSB acts independently; with the inclusion of an SME representative in the committee, this independence is firstly no longer given, and secondly this initiative means that a balance between the different interests at EU level is no longer given. The AK also considers the RSB body to be highly problematic in terms of democratic policy: it introduces a body into the legislative process that is upstream of the legislative bodies of the Council and the European Parliament and can change, delay or, in extreme cases, even prevent the legislative process altogether. This problem was described in detail in [a separate study commissioned by the Vienna Chamber of Labour](#). With the planned integration of an SME representative, this problem is now being taken to the extreme: The intervention of an interest group will thus not only be institutionalised, but even placed at the very beginning of the legislative process, even before the European Parliament and the Council are even aware of the planned EU legislation. The „one-in-one-out“ principle - which is also taken into account in the Regulatory Scrutiny Committee - is even more problematic than before from the AK's per-

spective in light of the Commission's new proposals. Even in the past, not enough attention was always paid to the extent to which this principle could lead to a reduction in protective provisions for employees (e.g. health and safety at work) or to a reduction in environmental protection and fire regulations - to name just a few examples. In the majority of cases, regulations serve to ensure quality in the broadest sense and should therefore also be assessed from this perspective. The calculation that points to net savings of € 7.3 billion as justification is therefore questionable, as these savings are not offset by the costs of increased risks and accidents.

The announced promotion of the implementation of so-called real-world laboratories for start-ups in various innovative areas should be examined in more detail before implementation. In any case, it must be carefully weighed up which regulatory provisions remain unapplied in each case and to what extent other protected goods (such as environmental protection, animal welfare) are impaired as a result.

As a result of the large number of objections, the AK is extremely critical of the projects described in the „Better regulation for SMEs“ section and the package of measures presented.

Re 3.1.3 Use of digital technologies to reduce stress and improve resilience

It is basically to be welcomed that the Commission is taking initiatives to utilise digital opportunities to facilitate economic activity in the single market, especially for SMEs. As has already been emphasised and explained several times in other parts of this opinion, it must always be borne in mind that existing regulations have been set on the basis of specific objectives and that these should also be achieved following digitalisation measures.

For example, the Commission plans to create an electronic format (e-declaration) for employers' declarations on the posting of workers „by enabling them to use a streamlined declaration in a standardised format in their language in all participating Member States“. This measure is intended to significantly reduce the administrative burden and compliance costs for employers. However, information on the place of employment, the level of remuneration or the type of activity is essential for targeted monitoring. Providing this information does not represent any additional effort for employers. This is because the planned place of work and the type of activity are known to employers anyway and the amount of the correct remuneration at the place of work must be determined in any case. Omitting this information from the declaration

would only make monitoring more difficult, would be counterproductive and therefore not useful.

Insofar as the intention is therefore - and in particular through the adjective „streamlined“ - to reduce the information to be reported during a posting, this plan is rejected. This is because the use of digital options must not jeopardise the achievement of political objectives. On the contrary, attempts should be made to ensure that these objectives are achieved and monitored more effectively using digital options.

Re 3.1.4 Simplification of administrative processes and reporting obligations and 3.4.2 Allowing companies to grow

The AK welcomes measure 9, which provides for a rationalisation of reporting obligations in order to achieve the goal of reducing reporting obligations by 25%. This also includes measures such as a simple and standardised methodology for reporting on ESG issues (environmental, social and governance issues) to reduce the reporting burden and facilitate access to sustainable finance. See the explanations under point 3.2.4.

The AK also believes that the extension of the deadline for the adoption of the sectoral European standards for sustainability reporting and the adjustment of the thresholds for the definition of an SME under the Accounting Directive, which currently fall within the scope of application of the sustainability reporting requirements under the Corporate Sustainability Reporting Directive (CSRD) and the Taxonomy Regulation, are measures that can prevent the market from becoming narrower and financing for SMEs more difficult.

It is of course appropriate for the Commission to work with EU regulations to reconsider superfluous, duplicate or outdated obligations, which are also carried out with inefficient frequency and inadequate collection methods. Such obligations generally result in costs, which are of course much more significant for smaller companies than for large companies. In any case, it must be ensured that the original objectives associated with the reporting obligations etc. are not undermined and must be achieved in any case. For this reason, each individual measure and simplification must be widely discussed, including with the involvement of employee representatives and other stakeholders, and a monitoring system must be established to track the effects of simplifications on the respective political objectives.

Improving liquidity and access to funds (page 13 ff.)

Re 3.2.1: Measures against late payments

Late payment is not only a major nuisance for SMEs, but certainly a serious liquidity and financing problem - to the point of threatening their existence. However, a corresponding reform of late payment via a regulation to standardise and shorten deadlines should be discussed in detail from various perspectives in order to ultimately achieve an actual improvement in payment flows.

The Commission's proposal on payment terms strongly interferes with the contractual autonomy of business partners. However, longer payment terms are sometimes due to the special nature of the underlying transactions and make sense for both parties. As SMEs are not only affected by the proposal as creditors/suppliers, but naturally also as debtors/borrowers, a shift in liquidity (and the associated financing costs) in favour of creditors always has a negative impact on SMEs.

It is already possible to take legal action against unfair trading practices. From the AK's point of view, this is exactly where we need to start. The major and decisive problem is the cost and duration of legal enforcement. In this respect, the competent enforcement authorities (or courts) need to be better equipped. And measures are needed to speed up procedures - without implementing alternative dispute resolution mechanisms that are questionable in terms of the rule of law. The problem is exacerbated for SMEs in cross-border business transactions, as the language problem is added to the different procedures and court and authority competences. Standardisation and harmonisation as far as EU jurisdiction goes would therefore be welcome.

Re 3.2.2 Exploiting the full potential of EU programmes for SMEs

The targeted promotion of SMEs using the possibilities offered by the Strategic Technologies for Europe Platform (STEP) instrument with the aim of building capacities in the areas of clean technology (cleantech), life sciences and digital transformation as well as supporting social entrepreneurship is welcomed. However, the AK points out that clear funding criteria are necessary for successful implementation in the interests of society as a whole, as well as the close involvement of social partners in the financing and implementation of projects. In any case, social criteria (transformation

plans of the companies with regard to production methods and the necessary qualification requirements, location and employment guarantees, etc.) must also be provided for and monitored in these funding criteria for the transformation of production.

According to the Commission's proposals, the financial resources for the new platform are to come primarily from other funds such as the Cohesion Fund, InvestEU, the Recovery and Resilience Facility and the EU Defence Fund. In addition to the resources that will be reallocated from these funds, €10bn is also to come from an increase in the EU budget. The European Commission hopes that these funds will have a leverage effect and generate up to 160 billion euros in new investments as part of STEP. Despite the Commission's commitment, it can be assumed that a large proportion of the planned funding will come from the budgets of the EU member states. The AK is therefore calling for the introduction of a golden investment rule for STEP so that the planned platform does not fail due to restrictive fiscal rules.

Re 3.2.3 Public procurement

The fundamental problem of the complexity of public procurement procedures is correctly addressed here, as both small contracting authorities (such as municipalities) and small contractors (SMEs) are overwhelmed by the density of European and national regulations. This narrows the bidding market, as many SMEs do not submit a bid. However, the proposed solution (measure 13) - recommending or promoting the use of standardised regulations and procedures - falls short. In the AK's view, one solution would be to raise the threshold values above which an obligatory EU-wide invitation to tender must be issued and also to valorise them in line with inflation. In practice, this would benefit regionally orientated small and medium-sized enterprises in particular. In this way, they would be invited to bid directly for smaller contracts without having to take part in a complex (EU-wide) tendering procedure beforehand. This leads to the preservation of regional jobs.

The simplifications in the implementation of procurement procedures associated with increased threshold values would make a significant contribution to strengthening the economy and securing jobs. In addition, the direct awarding of small contracts in particular guarantees a positive ecological footprint. In contrast to invitations to tender, regionality and the direct call-off of services can often avoid a negative environmental footprint, as shown by the case of cross-border organic waste tourism between Vorarlberg and Baden-Württemberg, which generates 155 tonnes of CO₂ with over 2000 overlapping disposal

trips. Of course, the basic principles of equal treatment of all applicants and bidders, non-discrimination, proportionality, transparency and free and fair competition under public procurement law would also have to be observed with higher European thresholds. The objectives of public procurement law, namely transparency and the best possible use of taxpayers' money, would therefore still be guaranteed.

Re 3.2.4 Easier access to sustainable financing for SMEs

A simple and standardised framework for reporting on environmental, social and corporate governance aspects is to be developed to make it easier for SMEs to access financing for the transition to a sustainable business through a financial institution, as the Commission believes that financial institutions often overstep the mark in their requirements for SMEs with regard to reporting on sustainability.

Simplifications and standardisations of reports are desirable in principle, provided that they do not jeopardise social objectives. Since - as already mentioned - SMEs not only represent the largest group of companies within the European Union, but almost all companies are to be categorised as SMEs, care must be taken to ensure that simplifications and reduced standards in sustainability reporting do not undermine the desired steering effects for the economy as a whole.

Access to skilled labour (page 20 ff.)

Re 3.3 Creating access to skilled labour

A well-trained workforce with the necessary skills will be crucial for SMEs to play a central role in managing the socio-ecological transformation. We therefore welcome the fact that the EU Commission is expanding its activities in the area of education and training, as training also represents a benefit for employees. It is also positive to support SMEs in finding qualified labour by intensifying existing EU training initiatives. At the same time, however, SMEs must also fulfil their responsibility in the area of vocational education and training. Particularly in the traditional sectors and professions in which SMEs play a key role („apprentices“), there are complaints about a shortage of skilled labour, while at the same time there has been a decline in training activity for years or even decades - despite extensive state funding.

The proportion of companies and employees active in continuing education and training who participate in in-company training is also falling. In addition to EU activities, it is therefore also important to create a regulatory framework at national level and to intensify or

create new instruments that promote cooperation between SMEs in the area of in-company initial and continuing training or also support strategic personnel and continuing training planning. This applies in particular when SMEs are not in a position to cover all areas of qualification themselves. In the German federal state of Bremen, for example, a training and further training fund has been set up into which all companies pay and which takes over the fair distribution of costs for training and further training. SMEs must also be encouraged and supported in maintaining the employability of their workforce - in terms of further training, but also in terms of health promotion measures. Here, too, it is important to promote cooperative approaches between SMEs.

The centres of vocational excellence mentioned by the Commission in the communication, from which local „competence ecosystems“ are to develop, are welcomed by the AK in terms of their approach. However, they have unfortunately had little broad impact to date - at least in Austria - and tend to lead a shadowy existence.

The AK also welcomes the initiative announced under Action 16 to improve the recognition of qualifications and skills of third-country nationals and the proposal to set up an EU talent pool. It would be highly desirable if the Commission were to put forward proposals on how the recruitment of skilled labour can be achieved jointly for the whole of Europe. On the one hand, in order to at least steer the competition between member states for skilled workers in the right direction and, on the other, to achieve common labour and social standards for the whole of Europe for newly qualified skilled workers. This also applies in the context of the currently emerging global „war for talent“, which is leading to confusion and uncertainty for interested skilled workers as well as for the host companies and member states and is further intensifying different approaches and standards.

In this context, it should also be pointed out from a consumer perspective that the „EU Professional Qualifications Directive“ and the system for recognising qualifications from self-employed work (under trade law) should also be redesigned or adapted with regard to recognition. The current standards and regulatory instruments for maintaining a certain level of qualification in sensitive and regulated professions must not be abandoned or weakened.

In the view of the AK, notwithstanding all efforts to recruit skilled labour from third countries, the existing opportunities within the EU's free movement of wor-

kers should be further exploited. The EURES network and cooperation between national PES at European level should be mentioned here in particular. In the view of the AK, these opportunities - coupled with an intensification of qualification initiatives - should be favoured over recruitment from third countries. This applies all the more as there is no full employment across the EU and the labour markets of the EU member states hold a great deal of potential that could be better exploited by expanding active labour market policy.

Essentially, labour market and education policy agendas are largely the responsibility of the EU Member States. For the AK, therefore, one focus of the Commission's work would be to support and monitor the Member States in drawing up corresponding strategies and to act as a hub for mutual learning. The social partners - in particular employee representatives - should be centrally involved in all relevant committees on the demand for skilled labour, both at EU and national level.

Supporting SMEs throughout their entire business life cycle

Re 3.4.2 Growing the company

The AK takes a differentiated view of the Commission's plan to adapt the SME definition in force since 2003 following an analysis.

Firstly, the current SME definition from 2003 is based on nominal values for turnover and total assets. In fact, there are some arguments in favour of moderately adjusting these values after 20 years (see also the comments on 3.1.4.). In any case, it should also be borne in mind that many companies will gain SME status as a result and therefore also no longer have obligations that affect other interests (e.g. creditor interests). The AK is opposed to the plan to change the other criterion, the number of employees. Since well over 99% of all companies already fulfil this criterion of an SME (less than 250 employees), an extension of this criterion would also lead to absurd results - only a few companies would remain to be defined as large companies. The AK expects the Commission to discuss such a project - or the establishment of other categories relevant to state aid issues, such as mid caps - in detail with the interest groups before implementation.

Re 3.4.3 Transferring companies, preventing insolvencies and giving entrepreneurs a second chance

The AK supports the Commission's plan to create a favourable framework for the social economy sector in order to facilitate the transfer of businesses to emplo-

yees and the establishment of employee cooperatives.

With regard to the implementation of the Commission's considerations and proposals in the „SME Relief Package“ communication, the AK requests that the arguments, positions and concerns presented be taken into account accordingly.



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About us

The Austrian Federal Chamber of Labour (AK) is by law representing the interests of about 3.8 million employees and consumers in Austria. It acts for the interests of its members in fields of social-, educational-, economical-, and consumer issues both on the national and on the EU-level in Brussels. Furthermore, the Austrian Federal Chamber of Labour is a part of the Austrian social partnership. The Austrian Federal Chamber of Labour is registered at the EU Transparency Register under the number 23869471911-54.

The main objectives of the 1991 established AK EUROPA Office in Brussels are the representation of AK vis-à-vis the European Institutions and interest groups, the monitoring of EU policies and to transfer relevant Information from Brussels to Austria, as well as to lobby the in Austria developed expertise and positions of the Austrian Federal Chamber of Labour in Brussels.