POSITION PAPER November 2026

Making Labour Mobility Work for Hospitality

HOTREC Position on the Fair Labour Mobility Package

Executive Summary

HOTREC welcomes the EU's Fair Labour Mobility Package as an opportunity to **simplify cross-border employment and help address hospitality's labour and skills shortages**.

Measures should remain practical, proportionate and SME-friendly, while respecting Member State competences.

HOTREC calls for action to:

- **Improve skills portability** through interoperable digital tools, building on the European Qualifications Framework (EQF) and Europass, and better information on qualifications, learning outcomes and micro-credentials. Skills acquired through work experience and non-formal and informal learning should also be identified and documented through voluntary, bottom-up approaches, with recognition remaining at national level.
- **Facilitate the recognition of third-country qualifications** through faster, simpler and more predictable procedures, clear guidance and better coordination with legal migration tools.
- **Simplify social security documentation through ESSPASS**, ensuring reliable cross-border verification, interoperable systems and continued access to paper alternatives.
- **Strengthen ELA's role in cross-border cooperation**, improving practical information and guidance while keeping inspections and enforcement under national authorities' responsibility.

The priority should be to make existing systems work better, facilitate fair labour mobility and avoid unnecessary administrative burdens and complexity for hospitality businesses, particularly SMEs and micro-enterprises.

Context

Hospitality is a major source of employment across Europe and continues to face **significant labour and skills shortages**[1]. The sector covers around 2 million businesses and 10 million employees, the vast majority of which are SMEs and micro-enterprises.

As highlighted in HOTREC's **Skills and Labour Shortages in Hospitality – A Roadmap for Action**, the sector is currently missing around **10% of its workforce on average**, with shortages varying considerably across Member States and often becoming more acute during peak tourism periods[2]. Addressing these shortages requires a combination of measures, including making it easier for people to move and work across borders.

Hospitality primarily needs **occupation-specific and technical skills**, such as those required for chefs, kitchen and waiting staff, housekeeping and management. These are increasingly complemented by **digital, green and social and human skills**, reflecting the sector's ongoing transformation and changing customer expectations. Improving access to skills therefore requires not only **training and upskilling**, but also making relevant **qualifications easier to understand, verify and recognise across borders**.

Against this background, **HOTREC welcomes measures that can make labour mobility simpler, more efficient and more accessible**, while respecting Member State competences and keeping procedures practical for SMEs. This position paper sets out HOTREC's views on the main elements of the **EU Fair Labour Mobility Package**.

Skills Portability

The proposed Skills Portability Act aims to make qualifications easier to **understand, compare, verify and transfer across Member States**, through common digital standards and tools for regulated and non-regulated professions. A key element is the use of the European Digital Identity Wallet (EUDI Wallet) for digital qualification attestations.

The proposal also provides **comparable information on qualifications and a free EU qualifications comparison tool** through the Europass platform, drawing on national qualifications databases. Digital qualification attestations are to be issued free of charge to qualification holders. Their **introduction should be gradual**, allowing sufficient time for certification bodies and relevant stakeholders to adapt.

HOTREC welcomes these developments. Making qualifications easier to understand, verify and compare across borders could bring practical benefits to hospitality businesses recruiting workers with qualifications acquired in different Member States. The EUDI Wallet and the EU qualifications comparison tool should facilitate access to reliable information, reduce the need for separate administrative exchanges and help prevent fraud. HOTREC also welcomes that digital qualification attestations would be provided free of charge to qualification holders.

The **European Qualifications Framework (EQF) should continue to play a leading role** in enhancing the transparency, comparability and portability of qualifications, building on the Commission's proposal to strengthen the referencing of national qualifications frameworks to the European level. To make these tools more useful in practice, information on learning outcomes in national qualifications registers should be accessible, understandable and comparable across countries, enabling employers, particularly SMEs and micro-enterprises, to better assess qualifications and skills.

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[1] HOTREC position paper: "*Skills and labour shortages, a roadmap for action*" – January 2026, pages 3-5

[2] HOTREC is the European Association of Hotels, Restaurants, Bars and Cafés, representing 47 national associations in 36 countries.

Education and training **remain Member State competences**, and digital tools should not change the value or status of official qualifications. We agree that the development of digital credentials should build on existing EU tools and systems, including the EQF, Europass and the European Skills, Competences, Qualifications and Occupations (ESCO) classification, avoiding unnecessary duplication.

The proposal also recognises the growing importance of **micro-credentials in certain EU Member States** for upskilling and reskilling. It provides for national qualifications frameworks to cover all qualifications awarded in each Member State and to be kept up to date. **Micro-credentials should be included in these frameworks where possible**, helping to make them easier to understand and compare across countries. The proposal also encourages alignment with the **2022 Council Recommendation on a European approach to micro-credentials**. HOTREC welcomes this approach, which can support the portability of micro-credentials across borders and sectors, while respecting national education and training systems. But the value of micro-credentials should be supported by clear learning outcomes, reliable assessment and quality assurance, with employers and sector organisations involved ensuring their labour market relevance.

While the proposed Act establishes common tools for the portability and digital verification of qualifications, further attention should be given to the identification and documentation of skills acquired through professional experience and non-formal and informal learning within the EU. These skills are particularly relevant in sectors such as hospitality, where practical experience and workplace learning play an important role in developing occupational competences. **HOTREC therefore supports voluntary, bottom-up approaches to identifying and documenting these skills**, involving employers and sector organisations and building on existing national arrangements. This would help make individuals' actual skills and competences more visible and understandable to employers, while leaving their recognition to voluntary initiatives developed at national level. These may include practical, technical and supervisory skills developed through day-to-day work and workplace training, which are particularly relevant to hospitality occupations.

Proposed Action

- **Improve the practical usability of qualification information for employers:** Ensure that the Europass comparison tool and national qualifications registers provide accessible, understandable and comparable descriptions of learning outcomes, including for SMEs and micro-enterprises.
- **Encourage the inclusion and practical use of micro-credentials:** Support the inclusion of micro-credentials in national qualifications frameworks to the extent possible, as provided for in the proposal, and promote their transparency and comparability so that employers, particularly SMEs, can better understand their value.
- **Support the visibility and documentation of skills:** Promote practical, voluntary and bottom-up approaches to identifying and documenting skills acquired through work experience and non-formal and informal learning, involving employers and sector organisations and building on existing national arrangements.

Recognition of Qualifications of Third-Country Nationals

The proposed Directive establishes common minimum requirements for recognising qualifications held by third-country nationals where: recognition is required for access to a regulated profession; or recognition forms part of a long-stay visa or residence permit procedure for work purposes. It aims to make procedures **faster, clearer and more predictable through common procedural requirements, including deadlines**. The proposal also provides for automatic recognition in certain regulated professions, subject to the conditions set out in the Directive.

HOTREC is aware of only a limited number of professions within the hospitality sector that are regulated at national level. The proposal is therefore **likely to have limited direct relevance to the sector**, except where a profession is regulated under national law or where qualification recognition forms part of a migration procedure for work purposes. More generally, facilitating the recognition of qualifications and the validation of skills acquired outside the EU can help employers identify suitable candidates and improve skills matching, benefiting both workers and businesses.

HOTREC welcomes efforts to make relevant recognition procedures more efficient and less burdensome. According to the European Commission, recognition procedures for third-country nationals currently take **14.2 months on average and cost approximately €1,500 per application**[3]. The Commission's proposal aims to reduce the duration of these procedures to **four months**[4] and estimates that the new framework could cut employers' administrative costs by **up to 50%**[5]. HOTREC welcomes these approaches.

The proposal also provides for qualification assessments to be **integrated into migration procedures** where possible, avoiding unnecessary duplication. For non-regulated professions, it favours transparency and comparability tools, such as the European Qualifications Framework (EQF) and Europass, over unnecessary formal recognition requirements.

Overall, implementation should remain practical and proportionate for businesses, particularly SMEs and micro-enterprises. The implementation of the Directive should also be coherent with existing EU legal migration pathways and instruments, including the EU Talent Pool, Talent Partnerships and the Single Permit Directive, to support clear and predictable recruitment procedures. Recognition of qualifications should remain **distinct from decisions on admission, residence and work authorisation**, in respect of Member States' competences.

Proposed Action

- **Ensure practical and SME-friendly implementation:** Procedures should be clear, manageable and proportionate for applicants, employers and authorities, avoiding unnecessary administrative burdens and costs for hospitality businesses, particularly SMEs and micro-enterprises.
- **Explore ways to facilitate labour market access during recognition procedures:** Where appropriate and in accordance with applicable national rules, the possibility for third-country nationals to undertake **temporary wor**k while recognition procedures are ongoing could be explored, subject to relevant safeguards.

[3] Commission Impact Assessment – SWD(2026) 990 final – page 40 + page 85.
[4] European Commission, news article, 15 September 2026
[5] Commission Impact Assessment – SWD(2026) 990 final – page 41.

Nota bene – Revision of the Professional Qualifications Directive

As far as HOTREC is aware, only a limited number of professions within the hospitality sector are regulated at national level. For example, in France, certain activities require specific qualifications, including those of pastry chefs and artisanal ice cream makers working in restaurants. The revised rules would therefore apply where a profession is regulated at national level or where recognition of qualifications forms part of national migration procedures.

The revision also aims to **digitalise and simplify procedures**, including through a single European Digital Recognition Solution, AI-assisted workflows and real-time verification. **HOTREC supports these efforts to facilitate the recognition of qualifications**, provided that procedures remain practical, proportionate and respectful of Member State competences.

European Social Security Pass (ESSPASS)

The **European Social Security Pass (ESSPASS)** aims to make it easier to access and verify social security documents when people work or move across borders. The proposal establishes a digital solution based on the European Digital Identity Wallet (EUDI Wallet), supporting the secure electronic request, issuance and cross-border verification of social security documents.

HOTREC **strongly welcomes the initiative**. Digitalising social security documents can make cross-border employment simpler for both employers and employees. For employers, reliable and verifiable information can provide greater clarity when employing people who have worked or are insured in another Member State. For employees, secure digital access can make it easier to prove their social security rights when working or moving within the EU.

The proposal already provides for **interoperable digital solutions, binding time limits for issuing documents, the reuse of information through the once-only principle[6] and the continued availability of paper alternatives**. It also aims to simplify administrative procedures and improve the reliability of cross-border verification. HOTREC welcomes these provisions, which can help reduce administrative burdens, facilitate compliance and support the smooth functioning of the Single Market.

To deliver these benefits in practice, implementation **should ensure that the system works effectively across Member States and is accessible to businesses of different sizes**. Information should be **reliable and up to date**, and the digital process should be **straightforward for employers and workers**, including those with limited experience of digital tools. The system should also build on existing national arrangements and avoid unnecessary duplication.

ESSPASS should remain strictly focused on social security documents and information, without extending its scope to other employment-related information.

[6] The **"once-only" principle** allows information already available to public authorities to be reused across relevant procedures, rather than requiring businesses and workers to provide the same information repeatedly.

Proposed Action

- **Ensure practical implementation for businesses:** Ensure that ESSPASS is straightforward for employers, particularly SMEs and micro-enterprises, to use in practice, with clear guidance on how to access and verify social security documents across borders.
- **Keep ESSPASS focused on its core purpose:** Maintain a clear and limited scope centred on social security documents and information.

Strengthening the European Labour Authority

The proposed Regulation would strengthen the role of the **European Labour Authority (ELA)** in supporting Member States with the enforcement of EU labour mobility rules, notably through improved cooperation and information sharing, risk analysis, digitalisation and coordinated enforcement.

HOTREC welcomes stronger cooperation between national authorities. Making full use of ELA's existing mandate and tools can help address genuine cross-border challenges and support the effective enforcement of existing rules. Improving access to practical information and guidance on cross-border employment could also help businesses, particularly SMEs, navigate the relevant rules and procedures.

At the same time, **national authorities must remain responsible for labour inspections and enforcement**. HOTREC welcomes that the proposal does not give ELA autonomous inspection powers and that joint and concerted inspections remain subject to the consent of the Member States concerned. **ELA should remain a facilitator and coordinator, rather than develop into an EU-level labour inspectorate.** Better implementation and enforcement of existing rules should remain a priority before considering additional regulatory requirements. HOTREC also supports stronger cooperation on **third-country nationals and undeclared work**, where cross-border coordination can bring clear added value.

Proposed Action

- **Keep ELA's role focused on cooperation and coordination:** ELA should support cooperation between national authorities, while Member States remain responsible for labour inspections and enforcement. Joint and concerted inspections should continue to require the consent of the Member States concerned.
- **Improve practical information and guidance on cross-border employment:** Make it easier for businesses and workers to find clear information about the applicable rules and procedures, including through national information sources.
- **Focus on enforcing existing rules**: Prioritise better implementation and enforcement of current rules, particularly in cases involving cross-border challenges, undeclared work and third-country nationals, before introducing additional regulatory requirements.

To support the timely adoption and effective implementation of the Package, employers should be provided with clear, **practical guidance from the outset**, enabling them to understand and prepare for the new requirements. This is particularly important for SMEs and micro-enterprises.