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Deutsche Sozialversicherung
Europavertretung | DSV

Feedback from German Social Insurance issued 15 December 2025

in the context of the European Commission's call for
evidence for a Construction Services Act



I. Preliminary remark

The European Commission plans to present a proposal for a legal act for construction services in the fourth quarter of 2026. The German Social Insurance (DSV) in principle supports measures that contribute to strengthening the internal market and thus also facilitate the free movement of construction and installation services. In order to ensure that aspects relevant to occupational safety and health are given appropriate consideration during the preparatory process for the legal act, the DSV calls for its inclusion in any planned targeted consultation and public hearing.

II. Opinion

1 _ Mutual recognition of national authorisations, certificates, and proof of competence in the field of occupational safety and health

The Framework Directive on occupational safety and health¹ lays down EU-wide minimum standards and explicitly allows the Member States to adopt more far-reaching protective provisions. Differences in authorisations, certificates, and proof of competence in the field of occupational safety and health are therefore a direct consequence of national implementation. Against this background, further harmonisation through a legal act for construction services would be difficult to implement in practice. From the perspective of the DSV, the legal act for construction services should therefore support the mutual recognition of national authorisations, certificates, and proofs of competence.

2 _ Challenges in accessing national construction site cards

Only around one-third of the Member States that use construction site cards also use them as proof of occupational safety and health qualifications. From the DSV's perspective, the challenges identified by the European Commission regarding access to national construction site cards for monitoring compliance with health and safety regulations, such as participation in mandatory training in this area, are therefore not comprehensible. As a rule, the Member States pursue the objective of combating

¹ [Council Directive of 12 June 1989 on the introduction of measures to encourage improvements in the safety and health of workers at work \(consolidated text\)](#)



undeclared work and illegal employment in the construction sector when introducing construction site cards. In the view of the DSV, the existing national systems for construction site cards are already capable of making a reliable contribution to this objective. While the report on the analysis of social identity cards in construction (SIDE-CIC) shows that the Member States with construction site cards do pursue different objectives, the clear focus is nevertheless on combating undeclared work and illegal employment.

In addition, the DSV emphasises that, in deciding whether to pursue a uniform European system of construction site cards or an interoperable approach building on national systems, existing findings of the Directorate-General for Employment, Social Affairs and Inclusion (EMPL) regarding practical feasibility and actual benefits must be appropriately taken into account. Requirements under occupational safety and health law must be preserved, in particular the responsibility of employers to assess and ensure the necessary qualifications and competences of their employees in the field of occupational safety and health. In this respect, close coordination between the Directorate-General for Internal Market, Industry, Entrepreneurship and SMEs (GROW) and the Directorate-General EMPL is particularly important.

3 _ Restrictions on professional mobility

The DSV welcomes the European Commission's objective of also improving labour mobility within the internal market through the legal act for construction services and thus further reducing existing obstacles to the mutual recognition of professional qualifications. At the same time, however, it points to key framework conditions that must be taken into account when recognising professional qualifications. The Member States have different traditions, quality requirements, and organisational forms in their systems of professional qualifications. They are therefore best placed to develop appropriate mechanisms for training, competence, and proof of qualifications within their respective national structures. This is in line with European provisions on the recognition of professional qualifications and is particularly relevant for ensuring high and sustainable quality standards.

With regard to the proposal announced by the Commission and the possible development of harmonised European standards for competence, training, and qualification in connection with the use or installation of machinery, equipment, and products, the DSV would like to draw attention to an important principle: requirements relating to the safety and health protection of employees must not be laid down in service standards. Unlike product legislation, occupational safety and health law does not provide for statutory requirements to be further specified or



developed through standards. The protection of employees is ensured by the relevant occupational safety and health regulations, with which service providers must comply without restriction. This area is therefore deliberately kept outside the scope of standardisation processes.

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.