



## Comments on the latest positions of the European Parliament on Labour Migration in view of the Trilogues

Single Permit Directive (recast) – COM/2022/ 655 final

Long-term Residence Directive (recast)- COM/2022/650 final

Our organisations represent Churches throughout Europe – Anglican, Orthodox, Protestant and Catholic – as well as Christian agencies particularly concerned with migrants, refugees, and asylum seekers. As Christian organisations, we are deeply committed to the inviolable dignity of the human person created in the image of God, as well as to the concepts of the common good, global solidarity and the promotion of a society that welcomes strangers and values freedom, security and justice in policy and practice.

As the European Parliament and Council are working to reach a compromise on two labour migration directives (Single Permit (SP) and Long Term Residence (LTR)), we would like to underline our hope for enhanced mobility and rights for third-country nationals, the prospects for efficient procedures and a broader inclusivity, which would signal a proactive stride towards reinforcing the EU's commitment to equal treatment and integration. The forthcoming interinstitutional negotiations will hopefully work to harmonize regulatory frameworks while further advancing the interests of both member states and third-country nationals alike.

In many of the recent discussions surrounding the SPD, a significant emphasis has been placed on the need to address structural labor shortages and enhance the rights and protection of third-country nationals (TCNs) working in European Union (EU) member states. As Christians, we welcome legislative initiatives that guarantee the fair and equal treatment of strangers, and that will result in supporting humans - irrespective of their nationality -to live a life in freedom and dignity.

Taking into consideration the recent endorsement of the reform (recast) of the 2011 SPD and recast of the LTR and the proposed amendments by the EU Parliament, we consider this development to be a positive stride forward. The initial proposal together with amendments proposed by the European Parliament mark a significant step in the right direction.

A welcoming atmosphere for TCN within the EU is vital for a functioning labour driven migration. Hence, the member states and the Commission should be cautious and aware of the fact that any discrimination against TCN discourage people to migrate to Europe. Thus, an effort is needed to change discriminatory rhetoric towards migrants in general to keep Europe attractive to migrants.

### Recast of the Single Permit Directive

Regarding the SPD , we support the intention to accelerate the application procedures for third-country nationals seeking legal residence and employment opportunities in EU member states. It is a

notably commendable move to proactively approach in addressing various concerns, including the exploitation of TCN. Enabling in-country applications in this context is an important and promising proposal. Other measures prioritizing the protection of migrant workers' rights and ensuring fair treatment are most welcome.

The European Parliament's position to support the right to change employers is welcome. However, the proposed mandatory notification procedure raises administrative concerns, as it entails potential retention of labour market checks when a worker transitions between sectors, potentially hindering seamless job shifts. The Parliament's inclusion of a nine-month period for unemployed workers to seek alternative employment underscores a commitment to preventing exploitation. A significant step forward is the notion of a transitional permit, allowing workers subjected to labour exploitation to retain their permit for up to 12 months while seeking new job opportunities. Both proposals are most welcome.

However, we would like to strongly encourage the European legislators to explicitly address entry conditions for low and medium-skilled migrant workers, as per the suggestions in the Pact on Migration and Asylum. In this context, also a facilitated access to the labour market for applicants of international protection should be considered. As long as these important areas of labour migration are not addressed, either in a stand-alone instrument or – preferably – a cross-cutting directive for all labour migration into the EU, the approach will fall short of its ambitions and remain a piecemeal endeavour ignoring pressing challenges in the EU.

#### Recast long-term residence Directive

Regarding the LTR proposal we welcome provisions to encompass dependent children, who are deemed eligible for the long-term permit, provided their primary caregiver already possesses the same status. The provision allowing beneficiaries to temporarily depart from EU territory for up to 24 consecutive months without jeopardizing their granted status is most welcome and could be one of the few feasible instruments to allow for circular or pendular mobility. Additionally, we support the notion of accumulation of residence periods, as this enhances the mobility of TCNs.

We welcome the position of the European Parliament to extend the scope of application to seasonal workers and those who have been granted temporary protection, affording them access to both the single and long-term permit frameworks. This comprehensive inclusionary stance seeks to address diverse facets of labor mobility and protection for TCN . We also consider the proposed shortening of the period from 5 to 3 years before an application can be made to be positive, , though we are of the opinion that the period could be shortened even further.

In conclusion, the proposed reforms to the SPD and the LTR directive are pivotal step toward addressing structural labour shortages, enhancing worker protections, and promoting equal treatment in the European Union. It is our hope that the measures combining simplification, strengthening of rights and protection of labour migrants included in the European Commission's proposals and the European Parliament's amendments will receive positive reactions by the council in the near future.

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- Caritas Europa, [www.caritas.eu](http://www.caritas.eu)
  - CCME – Churches' Commission for Migrants in Europe, [www.ccme.eu](http://www.ccme.eu)
  - COMECE Secretariat, <https://www.comece.eu/comece/>
  - Don Bosco International, [www.donboscointernational.eu](http://www.donboscointernational.eu)
  - Eurodiaconia, [www.eurodiaconia.org](http://www.eurodiaconia.org)
  - ICMC – International Catholic Migration Commission, [www.icmc.net/europe/](http://www.icmc.net/europe/)
  - Protestant Church in Germany – EKD, <https://www.ekd.de/en/EU-office-brussels-274.htm>