

EASPD's contribution to the Proposal for a Regulation of The European Parliament and of The Council on Establishing The European Competitiveness Fund ('ECF')

European Commission Public Consultation

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The [European Association of Service providers for Persons with Disabilities](https://www.easpd.eu) (EASPD) is the leading voice of disability services across Europe. Representing over 20,000 services in 50 different countries, we promote human rights and equal opportunities for people with disabilities through effective and high-quality support. Our work focuses on key areas essential to quality support provision. This includes inclusive living, employment, education, early childhood intervention, person-centred technology, workforce development and human resources, arts, culture & sport, and policy impact.

We welcome the opportunity to contribute to the consultation on the proposed European Competitiveness Fund (ECF) Regulation, which presents an opportunity to develop a competitiveness model that is inclusive, sustainable, and resilient. To achieve this, the Fund must explicitly recognise and support the role of the social economy, including social service and disability support providers, as strategic actors contributing to innovation, quality employment, and territorial cohesion.

EASPD calls for:

- **Embedding the social economy and disability services as strategic sectors within the ECF**, recognising their role in creating quality jobs, fostering innovation, and strengthening territorial cohesion.
- **Addressing the skills gap and promoting inclusive skills development for workers in social and disability services, as well as for persons with disabilities**, to ensure their full participation in the labour market and the twin transition.
- **Ensuring civil society participation, transparency, and access to finance** by guaranteeing meaningful involvement of social economy organisations in the ECF's governance and improving the accessibility of the InvestEU Instrument.

By embedding the social economy as a cross-cutting dimension of the ECF, the EU can lay the foundations for a competitiveness model that is not only technologically advanced and globally resilient, but also socially just and locally rooted. EASPD stands ready to support the European institutions in making this vision a reality.

1. Embedding the social economy and disability services as strategic sectors

We welcome **Recital 21**, which acknowledges that: “The Competitiveness Compass identifies promoting skills and quality jobs as a horizontal enabler. [...] in line with the European Pillar of Social Rights and its Action Plan.” This is a strong and welcome reference to Social Europe. However, we recommend strengthening this recital by **explicitly referencing the Social Economy Action Plan and the role of social services in delivering quality jobs and inclusive growth**. This would align the ECF with the EU’s broader social objectives and ensure that competitiveness is pursued in a way that is inclusive and socially sustainable. We thus suggest the following amendment to the recital.

Proposed Amendment:

- **Recital (21)**

The Competitiveness Compass identifies promoting skills and quality jobs as a horizontal enabler, in line with the European Pillar of Social Rights and its Action Plan. ***In addition, the Fund should contribute to the objectives of the Social Economy Action Plan and recognise the role of social services and the social economy in delivering quality jobs, inclusive growth and social innovation, ensuring that competitiveness is pursued in a socially sustainable manner.***

It is in the articles that obligations for Member States are defined; therefore, particular attention should be given to Article 3 on the Fund’s objectives. To ensure that the European Competitiveness Fund (ECF) delivers on the EU’s commitment to inclusive and socially sustainable competitiveness, it is essential to explicitly recognise the role of **social services, including those supporting persons with disabilities**, as well as the **social economy**. These sectors are critical for creating quality jobs, addressing skills shortages, and fostering innovation in care and support systems. By embedding these priorities in the operative provisions of the Regulation—not only in recitals—the ECF can strengthen social infrastructure, promote community-based models, and support workforce development in disability and social services.

Proposed Amendments:

- **Article 3(1)(f):** "...as well as social infrastructure ***and services that support inclusive labour markets and healthcare systems.***"
- **Article 3(1)(g):** "...including private investment, microfinance and support to ***social economy organisations and*** enterprises as facilitating access to Union funding, through faster, simplified and harmonised procedures..."

- **3(1)(l) (new)** Supporting the development of the social economy and social services as key drivers of quality jobs, inclusion and competitiveness, in line with the Social Economy Action Plan and the European Pillar of Social Rights and its Action Plan.
- **Article 3(2)(e) (new):** For support to inclusive social infrastructure and services, the specific objectives of strengthening the capacity, innovation and resilience of social and disability support services, including through digitalisation, workforce development, and community-based service models.
- **Article 4(2):** Include a dedicated budget line for the new objective under Article 3(2)(e).

In addition to the Fund's objectives, the ECF should also reflect these priorities within its specific activities. Including social and disability support services under Article 37 ensures that the European Competitiveness Fund addresses sectors critical for inclusive growth and social sustainability. These services—such as community-based care, personal assistance, and co-housing models—are essential for implementing the UN Convention on the Rights of Persons with Disabilities (UN CRPD) and for creating quality jobs in the social economy. By supporting innovation and digitalisation in these areas, the ECF will not only strengthen competitiveness but also contribute to the European Pillar of Social Rights and the Social Economy Action Plan, ensuring that technological and economic progress benefits all citizens.

Proposed Amendment:

- **Article 37 (Specific Activities – Health, Biotech, Agriculture and Bioeconomy):** "(i) (new) Supporting the development, innovation and digitalisation of social and disability support services, including community-based care, personal assistance, and co-housing models, in line with the UN Convention on the Rights of Persons with Disabilities (UN CRPD)."

Beyond objectives and activities, it is equally important that the ECF promotes territorial cohesion and regional development through the social economy. Social economy organisations are deeply rooted in local and regional ecosystems, particularly in rural, remote, and less developed areas. The ECF should explicitly recognise their role in promoting territorial cohesion and resilience. We thus propose to amend Article 10 on EU Preference to ensure social economy organisations are recognised and actively supported as key contributors to local and regional development, resilience, and inclusive competitiveness. The ECF's current policy windows do not explicitly include social or disability services, despite their strategic importance for resilience, inclusion, and employment.

Proposed Amendment:

- **Article 10(3a) (new):** In implementing the EU Preference, the Fund shall promote territorial cohesion and recognise the role of social economy organisations and enterprises as key actors in strengthening local and regional competitiveness and resilience. Particular attention shall be given to ensuring Social Economy’s participation in projects and investments that contribute to sustainable development, quality employment, and social innovation in rural, remote, and less developed regions, including the Union’s outermost regions.

The ECF’s unified architecture offers a unique opportunity to foster synergies across sectors. Social economy organisations can bridge economic, social, and environmental objectives and should be enabled to participate in partnerships and value chains across all policy windows. We propose this amendment to encourage partnerships that generate competitive and socially inclusive innovation.

Proposed Amendment:

- **Article 28(i) (new):** "The Fund shall promote cross-sectoral collaboration and the integration of social economy organisations and enterprises into industrial value chains across all policy windows of the European Competitiveness Fund."

2. Addressing the skills gap and promoting inclusive skills development

The social services and disability support sectors are facing a critical and growing skills shortage, exacerbated by demographic change, increasing demand for care, and the digital and green transitions. These sectors are also key employers of women and provide essential services that enable labour market participation for persons with disabilities and other vulnerable groups.

EASPD welcomes the recognition in **Recital 21** of the importance of human capital and inclusive growth as enablers of competitiveness. In particular, we support the statement that: "The Competitiveness Compass identifies promoting skills and quality jobs as a horizontal enabler. The European Council Conclusions highlight that 'following the Commission communication of 5 March 2025 on a Union of Skills, further efforts should be made to enhance the acquisition, recognition and retention of skills across the EU, from the building of basic skills to engaging in life-long learning, reskilling and upskilling, in line with the European Pillar of Social Rights and its Action Plan."

This recognition of the role of skills, quality jobs, and social rights as foundational to competitiveness is a welcome step. However, to fully realise this vision, the ECF must go further

in enabling **cross-sectoral collaboration** that includes social economy actors—particularly those in the social and disability services sectors—as full partners in industrial value chains and innovation ecosystems.

This approach is strongly aligned with the recommendations of EASPD’s position paper on the Union of Skills, which calls for a Union of Skills that recognises the social services sector as a strategic sector for the future of Europe, and supports the development of inclusive, person-centred, and rights-based services through investment in workforce development, cross-sectoral partnerships, and skills intelligence.

In line with this, EASPD calls for the ECF to also support the **skills development of persons with disabilities**, ensuring their full participation in the labour market and in the green and digital transitions. This includes investment in accessible training, inclusive education pathways, and support for employment in emerging sectors. Strengthening the skills of persons with disabilities is not only a matter of rights and inclusion—it is also a strategic investment in Europe’s human capital and productivity.

By creating mechanisms that allow social economy organisations and social services to participate in partnerships, consortia, and value chains alongside traditional industries, research entities, and public authorities, the ECF can foster innovation that is both competitive and inclusive. Enabling such collaboration would ensure that the Fund’s investments contribute not only to technological and industrial advancement but also to quality employment, social cohesion, and the just transition. To translate this vision into concrete measures, EASPD proposes the following amendments.

Proposed Amendments:

Article 28 (Business Support)

- **(h)** promoting entrepreneurship, including women, youth, persons with disabilities, and social entrepreneurship and the acquisition of entrepreneurial and business skills.
- **(i) (new)** The Fund shall promote cross-sectoral collaboration and the integration of social economy organisations and enterprises into industrial value chains across all policy windows of the European Competitiveness Fund.
- **(j) (new)** The Fund shall support the development of skills for persons with disabilities, including through inclusive training programmes, accessible digital learning tools, and partnerships with social service providers, in line with the Union of Skills initiative and the European Pillar of Social Rights.

- **Article 30 (Support for Skills Development):** "...This shall include support for strategic sectors for the single market resilience and convergence, such as the proximity and social economy ecosystem, ensuring their full embedment into the single market value chains. Particular attention shall be given to the skills development of persons with disabilities, including through inclusive and accessible training programmes, digital learning tools, and partnerships with social service providers, in line with the Union of Skills initiative and the European Pillar of Social Rights."

You can find more on the EASPD vision on skills in the [Position Paper](#) Skills for all: EASPD Position Paper Bridging economic growth with social inclusion through the Union of Skills.

3. Ensuring civil society participation, transparency, and access to finance

We share the [Civil Society Europe](#)'s concern on the lack of involvement of civil society in the design and implementation of the Competitiveness Fund. While we acknowledge the possibility for individuals from civil society to participate in the Stakeholder Board, we call for broader, organisational representation of civil society within the Board, as well as their involvement in the Committees linked to the Competitiveness Fund.

To ensure inclusive governance, it is essential that the social economy be represented in the ECF's monitoring and advisory structures. We therefore propose the following amendments to strengthen civil society participation. EASPD recommends ensuring social economy representation in the overarching ECF General Committee to prevent siloing its role. Amending Article 14 would ensure that civil society participation is not limited to individuals but includes organisational representation, enabling structured input from actors with broad constituencies and expertise.

Proposed Amendment:

- **Article 14(2a) (new):** "The composition of the ECF Strategic Stakeholder Board shall ensure the structured and balanced representation of civil society organisations, including umbrella organisations representing social economy actors, social service providers, and other relevant non-profit stakeholders. At least one-third of the Board's members shall be nominated by European-level civil society networks."

We propose the following amendment to ensure that civil society actors are not only consulted but actively involved in shaping and monitoring the implementation of the Fund, in line with principles of participatory governance and transparency.

Proposed Amendments:

Article 83 (Committee Procedure)

- **(1a) (new):** “The Commission shall ensure the participation of civil society organisations in the relevant committee configurations, particularly in discussions related to social cohesion, skills development, and inclusive competitiveness.”
- **(1)(g) (new)** Social Economy Committee for matters concerning specific objectives set out in Article 3(1)(g).”
- **(1)(h) (new):** “Civil Society Committee for matters concerning the cross-cutting objectives of the Fund, including social cohesion, inclusive competitiveness, and stakeholder engagement.”

The ECF builds on the InvestEU model. However, social economy actors have faced challenges in accessing InvestEU due to complex procedures and lack of transparency. We propose an amendment that would enhance transparency, accountability, and accessibility within the ECF InvestEU Instrument. Harmonised reporting requirements to ensure that operations, beneficiaries, and intermediaries are publicly visible, fostering trust and effective monitoring of funded projects. Defining clear mechanisms to improve access to microfinance and support for social economy enterprises (5c) removes barriers for social economy actors, enabling them to scale, innovate, and contribute fully to Europe’s inclusive, sustainable, and territorially balanced competitiveness.

Proposed Amendments:

Article 21 (General Framework):

- 5(b) (new): "The investment guidelines shall include harmonised and transparent reporting requirements outlining operations approved, beneficiaries, and intermediaries involved under the ECF InvestEU Instrument. This shall be publicly available through the Union funding portal."
- 5(c) (new): "The investment guidelines shall define in detail the means to enhance accessibility for microfinance and support of social economy enterprises and organisations."

Conclusions

The European Competitiveness Fund represents a unique opportunity to align Europe's competitiveness with social inclusion, territorial cohesion, and sustainability. By embedding the social economy as a cross-cutting dimension, explicitly including social and disability services, fostering cross-sectoral collaboration, supporting inclusive skills development, and enhancing access to finance, the ECF can promote an economy that is innovative, resilient, and socially just. EASPD stands ready to support the European institutions in implementing these proposals to ensure the Fund delivers meaningful, inclusive, and long-term impact for all citizens.