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## Policy Brief

# Making Dignity Work in Farm-to-Fork: Closing EU Governance Gaps

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### Introduction

Migrant workers are essential to Europe's agri-food systems, from harvesting and processing to logistics and delivery. Across Farm-to-Fork (F2F) sectors, foreign nationals disproportionately fill physically demanding and low-paid jobs, often under conditions shaped by contractual instability, limited access to services, language barriers and housing insecurity. While risks are often most acute for people in irregular situations, precarity extends beyond legal status and reflects deeper structural dependencies and supply-chain dynamics. This Policy Brief distils the findings from the DignityFIRM EU-level Final Paper. It argues that persistent undignified working and living conditions do not stem from a lack of rules or knowledge. They persist because three dynamics reinforce each other:

1. **Socio-economic pressures:**

workforce composition and occupational preferences as well as supply-chain dynamics;

2. **Political prioritisation and political will;**

3. **The policymaking process:**

structural flaws in how EU policy is designed and executed.

First, labour supply in F2F is constrained by declining participation of native-born workers. This decline is driven by changing expectations and, in some contexts, demographic trends. This makes migrant labour a permanent feature of agri-food systems in Europe. At the same time, supply-chain pressures cascade and compress the margins of smaller actors, weakening incentives and capacity to comply with labour standards. As a result, isolated policy initiatives have limited effect when structural drivers remain untouched.

Second, the persistence of undignified working conditions reflects (lack of) political prioritisation. The current EU migration debate is dominated by irregular migration. Due to its salience and complexity, policymakers frequently prioritise political signalling over evidence-based solutions. However, policymakers retain scope for pragmatic

approaches that benefit workers, employers, economies and society at large.

Third, an interrelated and relatively less examined cause lies in the internal mechanics of EU policymaking. DignityFIRM research indicates that to address working and living conditions in F2F sectors effectively requires moving beyond single-domain explanations and applying a policy-cycle framework and focussing on:

1. Agenda setting: how and why problems are prioritised;

2. Policy formulation: how evidence is filtered and how frames shape policy choices;

3. Implementation: how national practice translates EU frameworks under varying capacities;

4. Monitoring and evaluation: what is measured and how the system learns.

Concerning the first, agenda-setting, the analysis conducted by DignityFIRM shows that while the conditions of F2F workers have repeatedly entered political debate – most visibly during COVID-19 and in response to high-profile exploitation cases – they have rarely become a sustained, cross-cutting priority. Attention has been episodic, and migrant workers, particularly those in irregular situations, remain structurally underrepresented in agenda-setting. In practice, consultation tends to privilege institutionalised actors such as employers, while migrant-led organisations and civil society face structural barriers to participation; this weakens public awareness of existing

problems and narrows the range of ‘thinkable’ solutions.

Second, in policy formulation, tensions between sustainability and competitiveness frames, and between migration control and labour dynamics, shape reforms in areas such as due diligence, agricultural policy and return governance. The social conditionality mechanism in Common Agricultural Policy (CAP) is a useful but limited corrective instrument: it can prevent EU funds from supporting socially harmful practices, but its scope is narrow. At the same time, the analysis shows that agri-food governance

still insufficiently addresses supply-chain pressures, even though these have cascading effects on labour conditions. Meanwhile, return-centred approaches to irregularity risk deepening precarity in sectors structurally reliant on informal labour, while overlooking their negative impact on labour supply.

Third, in implementation, capacity gaps persist, with significant effects on working conditions and the agri-food sector as a whole. Occupational safety and health (OSH) risks persist across agriculture, food processing, and delivery. The enforcement of OSH standards is structurally weakened by fragmented employment relationships and strong dependency on employers or intermediaries. Under the Employers Sanctions Directive, enforcement is weakened by limited inspection capacity and by a “reporting paradox”: workers most exposed to exploitation are often

least able to report it because of fear of immigration consequences.

Where labour enforcement is entangled with immigration control, workers in irregular situations avoid contacting authorities to report abuse or seek access to key services or protection. Information gaps and language barriers further reduce access to remedy even where protections exist on paper, with broader instability and dependencies making it harder to refuse unsafe conditions, or seek help when abuse occurs.

Across the Member States examined in the project, enforcement is more broadly constrained by limited public resources

and administrative systems that do not align with sectoral realities. Illustrating this, businesses struggle to recruit workers due to changing preferences of native-born workers but also due to limited processing and administrative capacity by national authorities. Where labour pathways are slow or unpredictable, reliance on intermediaries and subcontracting chains increases, complicating accountability.

EU-level policy design rarely starts from a systematic assessment of national implementation and enforcement capacity, so obligations are set without a clear map of staffing needs or operational bottlenecks.

Finally, monitoring gaps persist. The absence of comparable indicators make risks look episodic rather than structural. Housing is a major blind spot: tied or informal accommodation is often invisible to standard surveys, and there is no

dedicated EU dataset capturing employer-provided housing conditions for seasonal workers. Monitoring systems also track what is easiest to count – permits issued, inspections conducted, return decisions adopted – rather than outcomes. For example, inspection numbers are recorded, rather than recovered wages, whether complaints are resolved within a reasonable time, or retaliation is prevented. Similarly, counting permits issued does not show how many transform into real work opportunities or whether recruitment channels are timely and predictable enough to match harvest cycles.

From this perspective, undignified working conditions and abuses are not mere deviations but structural outcomes of weak governance architecture which is manifest across all phases of the EU policymaking process.

## Recommendations

Given current geo-economic trends and their impact on supply-chain dynamics as well as occupational preferences, it cannot be ruled out that these challenges will not only remain, but become even more pressing. This does not justify inaction. The EU has the tools to address systemic causes and close policymaking gaps. Although stakeholders often look to national or local solutions, the Union remains well placed to strengthen coherence and shape Europe's food economy. Improving labour conditions would benefit migrant and native workers alike, as well as smaller businesses facing economic pressure and unfair competition.

The recommendations below address these challenges and support progress towards international commitments, including the UN's Sustainable Development Goals:

1) Break status-dependence as a driver of exploitation. When residence and work rights depend on a single employer or short, opaque procedures, bargaining power weakens; irregularity can become a structural condition and labour supply mechanisms. To this end, EU and national authorities should:

☒ Design labour migration instruments that reduce precarity and employer dependency, including stable permits, easier employer change, clear renewal rules, equal treatment and safeguards against abuse;

☒ Upgrade seasonal labour governance to strengthen implementation, reflect actual demand and labour market dynamics, and reduce dependency. The Commission and Parliament should assist Member States in implementing frameworks to meet labour demands, while also ensuring the enforcement of protective measures, with the following priority areas:

- i) further analyse the different residence/migration statuses of 'seasonal' workers in different EU Member States;
- ii) reduce the administrative and procedural barriers to accessing (seasonal) work permits,
- iii) reduce work permit dependency to prevent labour exploitation;
- iii) promote multi-year permits which are not employer-dependent, enable status

change and do not require workers to leave the country for a minimum time period.

☒ Prevent prolonged precarity that fuels exploitation. This is a governance necessity to ensure basic rights in F2F sectors and food security. This does not require a single EU-wide regularisation model. Discretion can be left to national authorities to pursue the most sustainable option. The reform of the return framework should not limit this discretion.

2) **Make intermediaries and liability chains governable.** Responsibility in F2F sectors is increasingly diffused across subcontractors, agencies, posting arrangements and self-employment models, making enforcement and remedies more uncertain even where rules exist. To this end, EU and national authorities should:

☒ Progressively establish EU rules for transparent registration and oversight of intermediaries in high-risk F2F segments, developed through evidence-based, multi-stakeholder processes including migrant worker organisations.

3) **Treat housing and living conditions as a core labour-governance issue.** Housing is a multiplier of dependency and isolation; when tied to employment or controlled by intermediaries, it reduces voice and increases vulnerability. To this end, EU and national authorities should:

☒ Support housing programmes decoupled from employment and migration status, using EU funding streams (e.g., ESF+ and regional

development funds) and clear minimum standards. They should also ensure that funding is appropriately allocated to the same end as part of 2028–2034 EU budget;

- ☒ De-risk and de-couple housing from work and residence permits. Multiple strategies should be pursued, anchoring these in EU initiatives on housing. The former, for example, could include mandatory registries. The latter could involve initiatives ensuring that workers have a rental contract that is distinct from their employment contract;

- ☒ Clarify mandates and coordination for housing oversight (e.g. of labour inspectorates, local authorities, health and safety bodies), so living conditions are not ‘everyone’s issue and no one’s responsibility’;

- ☒ Embed housing indicators into monitoring systems so housing is not treated as anecdotal (see below on monitoring more broadly).

#### 4) **Rebalance incentives in value chains so compliance is not ‘priced out’.**

Producers and SMEs operate under tight margins and asymmetric bargaining power; when compliance is a cost without countervailing leverage, the system encourages ‘selective non-compliance.’ To this end, the European Commission should:

- ☒ Systematically assess supply-chain pressure points in F2F and how they undermine compliance.

- ☒ Pair labour standards with tools that improve producer leverage, including stronger enforcement and awareness of unfair trading practices and the

promotion of competition-law exemptions to promote dignified working conditions.

#### 5) **Strengthen reporting safeguards and support access to reliable information.**

If reporting abuses and seeking remedies increases deportation or retaliation risk, workers will not report; enforcement of standards becomes punitive and displacement-driven rather than protective and preventive. To this end, EU and national authorities should:

- ☒ Adopt binding firewalls separating labour and immigration enforcement so workers can report without risking retaliation, detention or removal. Support for the reporting of abuses will also help improve data on non-fatal accidents (see below on monitoring);

- ☒ Ensure effective access to remedies, including wage recovery, timely complaint handling, translation and protection against retaliation (including dismissal/deactivation where relevant). Access to remedies for those subject to detention pending deportation, where they had previously engaged in work, should be maintained;

- ☒ Improve access to independent information and support services, including through EU funding for migrant workers throughout the recruitment process and once in employment.

#### 6) **Measure what matters and create feedback loops.**

When systems measure only outputs, policies do not evolve. To this end, EU and national authorities should:

- ☒ Invest in EU-wide monitoring of working and living conditions to inform priorities. As part of these efforts, authorities should also ensure better data

collection, striving to close gaps and achieve comparability across Member States;

- ☒ Ensure an effective EU monitoring framework by adding key indicators. These indicators should be able to monitor outcomes, including quality of employment (e.g. effective earnings, working time, contract type), the outcomes of complaint, controls, and additional policy initiatives (e.g. wage recovery, resolution, regularisation);

- ☒ Pursue a more comprehensive monitoring of dynamics of irregularity, including its causes and pathways in and out of irregularity in all Member States, rather than relying solely on return rates as a metric for the effectiveness of policy on irregular migration;

- ☒ Carry out systematic assessments of policy reforms transcending formal policy boundaries. The impacts of return policies on labour governance should also be analysed;

- ☒ Complement quantitative data with qualitative national-level and sector-specific insights, including on culture and approaches to safety and health. This should integrate different data sources, including that collected by civil society and via participatory research;

- ☒ Use monitoring to create feedback loops. Evaluation findings should trigger the review of implementation and, where needed, adjustment of policy design across relevant policy fields, rather than leading to siloed reporting and revisions.

**7) Make the monitoring and assessment of implementation capacity a key governance goal** – not an afterthought.

Even well-designed rules fail when Member States lack capacity, coordination or political support to implement them. The goal should be to ensure a level-playing field and legal certainty. To this end, the European Commission, in coordination with Member States and EU agencies, should:

- ☒ Systematically assess national implementation capacity, particularly in high-risk, high-pressure sectors such as F2F, to identify where EU-level operational support and financial assistance are needed. The assessment should cover labour pathways, migrant workers' rights across policy areas such as employment, migration, victims' rights, data protection, Seasonal Workers' and Employers' Sanctions directives as well as relevant sectoral legislation. Clear benchmarks should be set to compare and assess administrative, operational and enforcement capacity.

- ☒ Link EU funding incentives to real-world implementation where feasible and proportionate. Among others, the EU should carry out a systematic cost-benefit analysis of the size of farms to be covered by the social conditionality mechanism, while also ensuring adequate support for farmers falling within its scope. In addition, the European Commission should set a deadline for carrying out a further assessment of potential additional frameworks to be covered by the CAP social conditionality mechanism, particularly minimum wage and seasonal work protections.

**8) Institutionalise co-creation so policy problems and solutions are jointly defined with those affected.** Siloed

agendas persist when affected stakeholders, including workers, are absent from policymaking. To this end, EU and national authorities should:

☒ Meaningfully include migrant populations and workers, alongside employers, civil society and unions in dialogues concerning the future of F2F sectors.

These recommendations cannot resolve broader economic shifts but offer a pathway to more coherent EU policymaking aligned with international commitments. These include the United Nations' Sustainable Development Goals and the goals set by the Global Compact on Migration. The recommendations and

project's findings also highlight research gaps and invite reflection on policy issues and questions beyond the scope of DignityFIRM. For example, which are the crops are currently produced under the least socially sustainable conditions? Should their production be discontinued, as some argue should be the case for environmentally unsustainable crops? Or are investments in automation warranted to improve food production and delivery processes while also reducing dependence on migrant workers who could continue to be exploited, due to structural reasons? While this project sought to provide some answers and fill knowledge gaps, more can and should be done to make dignity work in Farm-to-Fork.

## Deliverable information

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### **About DignityFIRM**

Towards becoming sustainable and resilient societies we must address the structural contradictions between our societies' exclusion of migrant workers and their substantive role in producing our food.

**[www.dignityfirm.eu](http://www.dignityfirm.eu)**



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