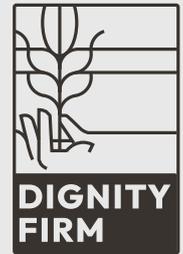


Radboud University



# Temporary Workers, Permanent Dependence?

## The Local Battle over Migrant Labour in the Dutch Agri-Food Sector

National Country Report Netherlands WP5

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## Executive summary

Over the past decades, the dire working and living conditions of predominantly EU mobile workers has repeatedly raised concerns in the Netherlands. This report examines the working and living conditions of EU-mobile migrant workers in the agri-food sector of Greenport Venlo in North Limburg, the Netherlands. Drawing on academic literature, 35 respondents in 24 in-depth interviews, 25 complaint files from the Juridisch Loket, a week long field observations and follow-up shorter visits, local policy analysis, the study explores how employers, migrant workers, state actors, and non-state actors frame and shape the local governance of migrant labour conditions.

### Structural dependence on EU-mobile labour

Greenport Venlo's agro-industrial cluster relies heavily on migrant workers—primarily EU migrants from Poland, Romania and Bulgaria, and increasingly Ukrainian workers—due to chronic labour shortages and low local interest in agricultural and logistics jobs. Migrant workers form the backbone of harvesting, greenhouse production, food processing, and logistics activities in the agri-sector.

### Interlocking dimensions of precariousness

Across five dimensions—migration status, employment insecurity, income inadequacy, weak rights protection, and housing conditions—migrant workers experience mutually reinforcing forms of precarity. Employment insecurity is driven by complex subcontracting chains, hyper-flexible temp agency contracts, and frequent transfers between agencies that prevent workers from gaining stability. Income insecurity persists despite legal minimum wages, due to fluctuating working hours, deductions for housing, and discretionary scheduling by coordinators. Rights and protections are difficult to claim: workers face administrative barriers, lack of information, language obstacles, and weak enforcement mechanisms. Housing is the most critical pressure point. The rise of large-scale short-stay facilities, strict surveillance, and rotation rules create long-term “temporary” living conditions, often with little privacy and, in spite of recent measures, still strong dependence on employers or temp agencies.

### Local governance struggles with scale, impacts, and responsibilities

Municipalities attempt to manage the rapid growth of migrant labour through planning rules, enforcing certification requirements (e.g., SNF, AKF), and supervision plans aimed at preventing nuisance and ensuring minimum quality of housing. However, policies are primarily designed for short-stay mobility, despite a significant number of workers residing in the area for years. Local authorities face community resistance, including NIMBYism and concerns about concentration, safety, and liveability. Moreover, local citizens also voice concerns about the rights of migrant workers and their unequal treatment. Enforcement capacity remains limited, and municipal actions were drawn to focus more on neighbourhood protection than on improving workers' rights.

### Divergent frames shape competing strategies

Each actor group interprets local migrant work through distinct “frames”. Employers rely heavily on the economic need frame, highlighting labour shortages and competitive pressures from supermarkets. Many point to a minority of “cowboy” agencies as the source of abuse, downplaying structural issues. State actors increasingly combine the economic need frame with a security and undesirable concentration frame, balancing economic interests with social cohesion and spatial planning constraints. Non-state actors (NGOs, citizen groups) invoke humanitarian, equal treatment, and integration frames, emphasizing dignity, rights, and long-term inclusion. Migrant workers, when they voice concerns, often describe unfairness as “bad luck” rather than exploitation, and tend to change jobs rather than pursue formal complaints.

### Interactions reinforce, rather than resolve, precariousness

Despite collaborative initiatives, actors operate with conflicting priorities. Employers value flexibility; municipalities prioritise manageability and neighbourhood acceptance; NGOs and legal aid organisations focus on structural rights violations. Migrant workers themselves are largely absent from decision-making processes, limiting their influence.

The dependence on temporary labour, combined with short-stay housing models and complex contracting chains, produces a structural system in which migrant workers remain essential yet disposable—visible as workers but invisible as residents or rights-holders.

## Conclusions

Greenport Venlo's economic vitality relies on a labour system characterised by high flexibility, subcontracting, and short-term accommodation, which entrenches migrant worker precarity. While recent policy initiatives—such as improved housing standards, stricter certification, and

integration pilots—represent meaningful steps, they do not fundamentally alter the underlying economic model.

A shift toward more sustainable and equitable governance would require:

- clearer allocation of responsibilities across the labour chain,
- stronger enforcement and transparency in subcontracting,
- housing models that allow long-term residence and integration,
- accessible rights-claiming mechanisms,
- policies aligned with the reality that many “temporary” EU workers are de facto long-term residents.

Without structural change at the national level—especially regarding temp agency regulation, employer liability, and inclusive housing policy—the local governance efforts in Greenport Venlo will continue to manage symptoms rather than underlying causes.

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## 1. Introduction

Over the past decades, the dire working and living conditions of predominantly EU mobile workers (and before accession to the EU, as irregularly staying migrant workers, Benseddik et al 2004) has repeatedly raised concerns in the Netherlands. Accession to the EU has legalized the Central and Eastern European migration status, as they are now EU citizens engaging their free movement rights. However, their labour largely remains “onzichtbaar” (invisible) as Benseddik et al already noted wrote in 2004. “By invisible hands” is the title of a recent PhD thesis on migrant workers in the Netherlands (Timmerman 2025a). Migrant workers are wanted for their ‘hands’, sometimes called “handjes” (in Dutch) although more inclusive terms like “international colleagues” are also getting in fashion. In more recent reports the intra-EU posting of EU nationals and non-EU nationals has been flagged as worrisome, speaking of second and third-rate “burgers” (citizens, but in the meaning of inhabitants) (Adviesraad Migratie 2024). This report contributes to the existing body of literature on the precariousness of EU mobile workers in the Netherlands (e.g. Benseddik et al 2004; Aanjaagteam Bescherming Arbeidsmigranten 2020; Siegmann et al 2022; Berntsen 2022; Böcker & De Lange 2023; Timmerman 2025a; Mantu et al 2025).

The predicaments of migrant workers have for long been ignored, they are made to live out-of-sight, neglected by the companies hiring them through temp agencies, pushed away by municipalities or locals who see them as ‘a burden’ while agro, meat and logistics companies see the profits but do not take responsibility for their workers outside of the workplace (“wel de lasten niet de lusten” / “all the burdens, non of the benefits”).

The Netherlands, despite its small land area and relatively dense population, has gained recognition as the world’s second-largest agricultural exporter. The sector is known for its many innovations and technological advancements, including various forms of precision farming, state-of-the-art greenhouse systems, and sustainable food production practices. The literature notes four key characteristics of the Dutch agrifood sector:

- (1) the sector operates within the broader context of the Netherlands as one of the world’s largest and most productive agricultural exporters;
- (2) it consists of a complex agro-logistical chain that spans farming, horticulture, industrial-scale processing, packaging, and distribution;

- (3) a small number of powerful purchasers—particularly large supermarket chains—play a major role in driving down prices and wages; and
- (4) low-skilled positions within the sector are predominantly filled by low-wage migrant workers, mostly EU citizens, typically employed through temporary staffing agencies (Timmerman 2025a, p. 178; Siegmann et al 2022).

This report is part of the HorizonEurope DignityFIRM project, and following the project design the concept of precariousness is central to the analysis. Precariousness captures a combination of instability, insecurity, social and economic vulnerability, and lack of protection (Rodgers & Rodgers 1989:5). However, with Siegmann et al (2022) we counter “discourses that depict rights abuses as exceptional and relate them to rogue employers, ... migrant precarity has been legalised in the context of the highly flexibilised Dutch labour market.” The invisibility of migrant workers has become a necessity to the conception of Dutch agriculture. Yet, as their numbers have increased over the years, this report comes at a time when keeping them out of sight is no longer an option in many areas and the question is how many migrant workers (‘hands’) performing low-skilled and low-waged jobs, the country can take.

This report aims to understand this bigger debate by investigating migrant workers’ working and living conditions in a specific locality (Northern Limburg, focussing on Green Port Venlo and municipalities of Venlo and Horst aan de Maas) by focusing on the frames, strategies and interactions of the main actors involved.

Three research questions structure the analysis:

- **Micro level:** What are the working and housing conditions of migrant workers? This question is mainly descriptive and aims to diagnose the problem to be explained;
- **Meso level:** How do the frames, strategies and interactions of the various actors involved, in a context marked by endogenous and exogenous factors, influence the migrant workers’ working and living conditions? This question is explanatory and aims not only to understand the economic and social processes that determine these conditions but also to clarify to what extent these actors have the capacity (or not) to transform them.
- **Macro level:** Are policies and measures (strategies) aimed at improving the working and living conditions of these workers effective? The question is to what extent these measures have represented an improvement and, whether they have or not, why. This question is again explanatory (about the functioning of policies) and seeks to identify the strengths and weaknesses (both in design and implementation) of these policies in order to rethink them.

This will be done by 1) describing migrant workers' labour relations and conditions; 2) describing the frames and strategies of the main actors involved: employers, migrant workers, state actors and non-state actors; and 3) understanding how actors' frames and strategies interact with each other and, by so doing, shape migrant labour conditions.

A **frame** is a way of organizing and interpreting reality that highlights certain aspects of an issue while downplaying or omitting others, thereby shaping how problems, actors, and possible solutions are perceived. Frames operate as interpretive schemata (Goffman, 1974): they provide meaning, orient action, and guide decision-making by specifying what is at stake, who is responsible, and what kinds of responses are desirable. In other words, a frame is an interpretive lens through which social actors make sense of complex issues thereby shaping both public understanding and institutional responses.

**Strategies** are understood as those specific choices and actions taken by actors among different possible alternatives (sometimes related to specific trade-offs) affected by the legal, economic and social context. Strategies are about who does what. After all, employers, migrant workers, state actors and non-state actors are not necessarily groups that pursue consolidated action.

**Interactions** are the dynamic processes through which actors use, contest, negotiate, and respond to frames in practice. Interactions is where frames and strategies come into contact, producing outcomes such as alignment, contestation, compromise, or escalation. In other words, interactions capture what happens when actors with different frames and strategies encounter each other, thereby shaping the trajectories of local battles, negotiations, and policy processes. Interaction can be traced around particular events (e.g. a case of exploitation covered in the media, labour accident, etc), the implementation of a new policy/law, social mobilisation etc. The question is how different actors' strategies and frames interact with each other to promote/impose their particular view on the matter.

The study was carried out based on the analysis of four sources:

1. Academic literature, reports, policy documents and investigative journalism on migrant workers in the Dutch agricultural sector, especially focussing on Northern-Limburg;

2. 4 exploratory interviews followed by 24 in-depth interviews with 31 main stakeholders, representatives of 9 farmers and temp agencies (or their representatives), 2 active neighbours, 2 representatives of a housing company; 9 municipal and national civil servants, 3 people working for national enforcement; 1 NGO's and 2 unionists and 1 legal aid representative and 2 auditors (annex 1). Interviews were either in person or online and were conducted between March 2024 and March 2025.

3. Field observations, constituting a 10 day stay in the local context of Horst aan de Maas, while staying (for free) in a housing park "Californie", where the for-profit housing company Kafra exploits 800 beds (4 per cabin). The park was half rented out to the municipality for housing temporary displaced Ukrainians. The other half was rented out to temp agencies, mainly Otto Work Force. During this period one of us (TdL) joined a regular gathering of a local NGO, bringing together some 10 people (some former Polish migrant workers themselves) discussing how to reach out to the current migrant workers (TdL). MvM and TdL volunteered half a day, harvesting pears with Polish migrant workers, local youth, the farmer and her father; TdL also volunteered harvesting and informally spoke with the initiator of a regenerative farm located in another region. Moreover, we joined street corner workers in Venlo (TdL and SN) during a round, and a field lab in Horst aan de Maas on migrant workers' housing conditions organized by the TRAM Project at Radboud University was joined by TdL. The fieldlab brought together some 30 people (some Dutch and German researchers and mostly representatives of municipalities in the area). The field lab was visiting a cucumber greenhouse, migrant worker dormitories and a policy update from a representative of the Association of Municipalities (VNG). TdL visited the GreenTech trade fair in Amsterdam (June 2025) for information on innovations to improve working conditions (e.g. to bring down the heat in green houses) or potentially reduce the demand for workers.

4. For the migrant perspective we draw on a data set of 25 summaries of complaint files provided to us by a government funded legal aid organisation (Juridisch Loket) offering legal services in the most commonly used languages of the migrant workers (Polish, Romanian, Bulgarian, Italian) (Annex 2); this data set allows us to bring forward the topics of worker complaints when they do come forward. Because the organisation only started in Venlo in March, they also provided data from Noord-Brabant and The Hague. Also, they register the place of residence of the worker, not the place where the work is, making it difficult to isolate people who work in North-Limburg. In the period Aug. 2024-July 2025 they received 2218 complaints. Of these, they registered 185 cases of people working in farm2fork sectors: logistics, horticulture and meat processing, and another 47 in hospitality. Out of the 25 cases,

23 are concerned with labour rights, 8 cases regard a situation where there was an accident at work, and 1 an attack by a co-worker and another a conflict over behavior at work, thus 9 out of 25 cases indicate some kind of unsafe working environment. Out of the 25 cases 5 cases are concerned with the workers' rights in case of sick leave. There 10 cases concerning housing issues. In four cases there is a complaint about near homelessness, in only one case is, after calling the employer, a four-week grace period – in accordance with the CLA – awarded before eviction. Six other cases are concerned with rental issues, such as deduction of rent from salaries, lack of rental contracts or lack of quality. Our interest in their data has helped the Juridisch Loket develop better reporting on the actual advice they give (reference to a lawyer, solving the problem themselves e.g. calling an employer or other actor on behalf of the worker), yet this type information was not yet available for all cases and is thus excluded from our analysis. Thus, these reports are supported by an anecdotal review of published court decisions on similar topics.

In what comes next, we first further introduce our case study (section 2). In section 3, we analyse the precariousness of working and living conditions of migrant workers in Venlo Greenport's agri-food sector. Section 4 discusses the strategies and frames of the local actors, and their interactions. We finish with a conclusion in section 5.

## 2. Case introduction

### 2.1 North Limburg Greenport Venlo case: context and relevance

The case selected is situated in the Dutch Province Limburg (more specifically the northern part Noord-Limburg) where Ontwikkelbedrijf Greenport Venlo (a company for profit) has developed a hub of agri-business venues. For several reasons, the Venlo Greenport presents a compelling case for studying the local battle on migrant working and living conditions in the Dutch farm to fork industry, especially the agro-industry. First, there is a large share of migrant workers in Limburg, which has also rapidly increased, from 39,860 in 2017 to 82,895 in 2022, with projections up to 112,000 by 2030, adding pressure on housing and public services (Gedeputeerde Staten van Limburg, 2024). In fact, between 2017 and 2022, their number has grown by an average of 16% per year, compared to a national growth rate of 10% (van Gent, Cieraad & Visscher, 2024, p. 8-9). A large share of these migrants live and work in the Venlo Greenport area. Second, Greenport Venlo is the second largest horticultural area in the Netherlands; it covers 54 km<sup>2</sup>. Third, Noord-Limburg sits on the border with Germany and is close to Belgium, the case thus also brings forward significant cross-border issues.

Fourth, unlike the biggest horticultural area in the Netherlands, Westland, this area has received far less scholarly attention.

Greenport Venlo is an important regional partnership between the North Limburg municipalities of Venlo, Peel en Maas, Horst aan de Maas and Venray, operating on an area of approximately 5,400 hectares. Of all municipalities in the province of Limburg, Venlo had the highest number of working labour migrants (13,915), followed by Venray (13,635) (Van Gent et al. 2024, p. 12-13). The highest percentage of registered labour migrants relative to the total population was in Venlo (5%), followed by Horst aan de Maas and Peel en Maas (both 4%) (Van Gent et al., p. 30). Horst aan de Maas (where we did field observations) has a size of 43.923 inhabitants on January 2022 (CBS 2024). If you take the estimated number of temporarily staying EU migrant workers instead of registered labour migrants, the estimate is 6.000, which is more than 13% of the total population. The main villages within the municipality are, Horst: 13.374, Sevenum: 6.882, Grubbenvorst 4.854, and America: 2.189. In terms of population, it is the fourth largest municipality in northern Limburg after Venlo, Venray and Peel en Maas.

The Greenport Venlo area is economically strong in agriculture and food processing. It is home to a large agricultural products auction (De ZON). Moreover, Horst aan de Maas houses about 1/3 of the total Dutch mushroom production and mushroom processing, but the area also produces asparagus and blue berries (outdoors) and strawberries, cucumbers and pepper bells, the latter mostly growing in green houses. Horst aan de Maas has one of the largest greenhouse horticultural areas in the Netherlands, with greenhouse area California at its heart. It is in California, that we performed our observation. Horst aan de Maas is also the home of a ‘fresh food factory’ producing (24x7) ready-to-eat chopped vegetables, fruit, fresh packs and complete meal salads, many of which are part of the shift to the supermarkets (and consumers) demand for more ‘healthy’ convenience food, for which retailers united in *the Foodservice Instituut Nederland* expect a growing demand. The province of Limburg is second in producing pears in the Netherlands, it is also second last in biological production of food in the Netherlands.

Of the 50,700 agricultural and horticultural businesses in the Netherlands in 2023, the vast majority – 45,400 – are sole proprietorships and forms of cooperation, such as partnerships and general partnerships. A minority of 5,300 businesses (10%) are legal entities, almost all of which are private limited companies. Legal entities are mainly found in intensive, less land-based sectors, such as (greenhouse) horticulture and intensive livestock farming. Larger

companies opt for this legal form because of liability, taxation and financing options (Jukema et al., 2023, p.172). Company size of farmers in the region (as in the country) differs from small to medium size family farms to larger companies. The smaller farms may only grow and harvest fruits and vegetables and send them off or also sort and crate on the farms' premisses. In contrast, the industrialized and sometimes multinational businesses, are running large scale greenhouses or food processing plants. Sometimes these larger farms/businesses are owned by foreign private equity. Besides having the farm or company, some employers have ventured into setting up their own temp agency to provide themselves with workers through temp contracts. Also, they may have branched out by establishing their own housing company, buying houses to rent out to their workers and to secure that their workers actually have housing.

In general, open-field cultivation is becoming less common in the Netherlands. The country has a high-tech greenhouse sector with over 3.300 greenhouse run by agri- and horticulture companies. Approximately 80 percent of the greenhouses in the Netherlands use substrate for growing plants. This includes growing mats made of rock wool or pots filled with potting soil or coconut fibre. A new development in plant cultivation is growing plants on water (in gutters or basins), which does not require any soil or growing mats (Glastuinbouw Nederland, 2025). However, in some greenhouses, plants still grow in the soil. One reason is that only plants that grow in soil can be labelled as organic (Factsheet PlanetProof 2018). From an occupational safety and health perspective, growing in soil can be less beneficial, as workers have to bend over or sit on their knees. Furthermore, growing food in a greenhouse with substrate can provide year-round employment instead of seasonal employment. An additional benefit of a greenhouse can potentially be that they are less sensitive to weather and climate change compared to open-field cultivation, although they have seen severe damage due to big hail storms. Moreover, with extreme heat – on a warm day the temperature in a greenhouse can reach 50°C – it can hurt crops and can be irresponsible to have workers work long hours or work at all due to health risks the heat poses.

### Certifications

To become and remain a member of a cooperative, to be able to sell to certain retailers, like Ahold Delhaize's Albert Heijn, or receive a loan from a bank e.g., to expand or innovative (DF\_NL24) a farmer is required to obtain certain certifications such as the GLOBAL G.A.P. or On the Way to Planet Proof (biological, but not organic). GLOBAL G.A.P. does have an add-on section on the well-being of workers, which focuses on worker health, safety, and welfare at the farm level, called GRASP. The Integrated Farm Assurance for fruit and

vegetables is another GLOBAL G.A.P. label aligned with the UN Global Compact Food and Agribusiness Principles. On the way to PlanetProof is a European sustainability label that proves more sustainable agricultural production but does not cover the social rights of those working on a farm. Besides these international certifications, Dutch farmers may have to obtain other certifications, such as for example the Fair produce label, especially relevant for the mushroom industry. A certification that is also important is for properly Housing migrant workers (SNF-certificate) set by the Flexible Housing Standards Foundation, particularly for the accommodation of migrant workers. The Agricultural Flexible Housing Quality Mark (AKF) is a certification programme for employers in the agricultural sector who provide housing for their own employees, particularly seasonal workers. The AKF is to guarantee quality and safety of the Housing. It is a private label, initiated by agri- and horticulture branch organisations and labour unions. Fair Produce is another Dutch label that does set social standards in agricultural produce but is, to many in the field just another 'window dresser'.

The current state of affairs of the Dutch agriculture sector has raised the question about the sustainability of the Dutch agricultural sector, especially in light of the Dutch nitrogen crisis (Hulshof, 2024). However, there is also a debate about food security and independence ("sovereignty") in this regard (on which Commission Staff Working Document SWD(2023)4 *Drivers of Food Security*). While at the EU level the availability of workers for the agricultural value chain is a point of worry, in the Dutch context, the debate often concerns the many migrant workers at work in greenhouses, which is largely year-round and not just during the harvesting seasons. There is also growing public concern about greenhouses which profit from migrant labour while society "pays the price." This price being societal costs and experienced hindrance. Thus, closing down the industry will 'solve' the 'problem' societal actors have with migrant labour. These arguments have been brought together to recommend coherent policy decisions about the optimal size of the Dutch industry and agricultural sector (Staatscommissie demografie 2024).

In 2024, the Social Economic Council has been asked to make the recommendations concerning engaging migrant labour more specific, addressing the question if providing food across the world from a relatively small country is feasible. Such uncertainties (and the political instability over the past years, with elections again in two years after a collapse of the extreme right Geert Wilders, PVV government) stop businesses from investing in more sustainable production methods, robotization, or decisions to near- or offshore business (move production to other countries), which could bring down the demand for migrant labour

in the Netherlands, although near- and offshoring doesn't mean the working conditions will improve. The DignityFIRM case-study at hand is exemplary of this bigger ongoing debate in the Netherlands on its economy, food security, societal unrest concerning migration in general, the demand for migrant workers and their precariousness.

## 2.2 Migrant workers in Agriculture and in North-Limburg

Most migrant workers in agriculture in the Netherlands and in North-Limburg are mobile EU workers (EU arbeidsmigranten). Their registered presence in Dutch municipalities has quadrupled since 2006. Most of them come from Eastern European countries and leave the Netherlands again within six years. However, a significant proportion stay longer - some 40 per cent (CBS 2019). Nevertheless, as we will go on to show, in recent legislative initiatives *Wet goed verhuurderschap* a rather narrow definition is developed, as if all mobile EU workers are temporary workers (De Lange et al 2023).

Earlier research (Engbersen et al 2014) categorized mobile EU workers in four groups depending on their relationship with the country of origin and destination: Temporary workers who come ones and return home, transnational workers who come and go regularly, footloose workers who have little ties anywhere, and settlers. Skowronek et al (2023, p. 235) categorize mobile EU workers based on their motivations, economically motivated, coming to make money, family and future oriented, planning to settle, and escapees. Running away from personal failures or looking for new adventures. In our research, we make a distinction based on labour relations, as those define the workers' access to rights and services best, although there is a clear overlap with the categorizations made by Engbersen and by Skowronek et al (See table 1).

**Table 1: Types of Labour Agreements and length**

	Type of Labour Agreement	Length
<b>Temp agency worker</b>	Hyper flex	52 weeks
	Flex (B)	2 years
	Steady (C)	Indefinite
<b>Direct hire</b>	Temporary	Depends
	Permanent	Indefinite
<b>Alternative hire</b>	Contracting /	Depends
	Self-employed	

The agricultural and horticultural businesses in the Netherlands have become increasingly dependent on migrant workers, to meet their staffing needs. In 2019, approximately one third of employees directly employed in the agricultural and horticultural sector were migrant workers, and an estimated 90% of temporary agency workers were migrant workers. Moreover, the percentage of workers in the sector who work via temporary agencies or through other types of non-standard employment has increased (Heyma et al., 2020).

Over the past 5 years, the number of jobs in the North Limburg labour market region has grown by 9,700 (UWV, 2024). Many of these jobs are performed by temporary agency workers, who fill both temporary and structural staff shortages in all sectors. Over the years, the composition of the temporary workforce has changed: in 2015 16% was migrant worker while in 2024 the (registered) share of migrant workers employed in all sectors through temp agencies is 33%. (UWV, 2024).

Note that in the Netherlands, the net labour participation rate of people with a migrant background other than EU migrant workers, remains low; family migrants, refugee status holders is 68.3% in 2023 and lags behind the average. Asylum seekers had limited access to the labour market until late 2023. Since the law on their labour market access changed, their labour market participation has increased (Van Oers, 2025). Asylum seekers are mostly working through temp agencies, which is measured. Displaced people from Ukraine have immediate labour market access and have also been found working predominantly for temp agencies (because of the temporariness of their stay employers don't dare offer them permanent contracts) and – more than asylum seekers – in agriculture. (UWV dashboard)

Moreover, note should be taken from the fact that in the Netherlands no temporary visa for seasonal labour in accordance with the EU Seasonal Workers Directive 2014/66 have been awarded (or applied for, to our knowledge). The available EU mobile workforce has, so far, been sufficient to address the labour demand of the Dutch agricultural sector, although, as we will go on to show, cracks appear in the labour supply after some thirty years of recruitment in Eastern Europe.

### 2.3 Key Actors and initiatives

The governance of agricultural labour in North-Limburg involves a wide range of state and non-state actors, shaping policies and interventions for the decent recruitment, employment and housing of the main group of workers, being EU-mobile workers. At the institutional level, key actors include The Province Limburg, Elderman of the different municipalities in the

North-Limburg region in charge of social affairs, economic affairs and spatial planning, municipal coordinators of labour migration, and inter-municipal cooperative tables, where experiences are shared. There are national as well as local spatial planning inspectors and labour inspectors.

Non-state actors that play a role in the North-Limburg area are civil society organisation that have a national coverage but also service the area such as ngo BARKA, assisting EU mobile workers who want to return. In Horst aan de Maas a local group of volunteers, some once labour migrants from Poland themselves, initiate communal and support activities. Labour unions are however not so visible on the ground in this specific area.

Another type of societal actors is formed by the indigenous local population, the ‘neighbours’ of migrant worker housing facilities and to some extent competitors on the housing market. They are especially active in filing (legal) complaints against housing facilities for migrant workers.

Besides employers, non-state actors that play a role in the Dutch context are the ‘migration industry’. These include temporary work agencies, recruiters, housing agencies, auditors and all kinds of sectoral advisors (from accountants to firms assisting with all formalities concerning housing permit applications). Since the COVID-19 pandemic the ties between employer, temp agency and housing agency had to be cut, legally speaking. However, we still see a extensive industry around the organisation of migrant work and housing.

In 2023 a migrant who lost his job was – commonly – subsequently evicted from his accommodation, often a bed or a shared room in a “Polen Hotel”. With nowhere to go, this migrant went to sleep outdoors in the corn fields. The next morning, he was ran over and killed by a harvesting machine. Due to such accidents, and because of already perceived ‘nuisance’ by migrants who are unemployed, homeless, and possibly with a drinking habit or drugs abuse, municipalities have seriously stepped up their attention for what were deemed “essential migrant workers” during the pandemic. They increasingly negotiated a minimum number of emergency beds to be available in permitted housing facilities to shelter those that lost their work and home. Also, employers and housing agencies are, in principle, obliged to allow the worker to remain living in their room for a remaining four weeks in case of unemployment, (Article 49 Collective Labour Agreement for the temporary employment industry). The worker will have to pay for the rent on a weekly basis, yet without income, many workers move out, moving to other facilities offered by a new temp agency, and if they

do not secure work and housing, some or turn to the streets, or find shelter in tents in the woods. On the final day of our observations in Horst, in August 2024, a news item concerned the death of a migrant worker who had drowned in a water basin at his employers premises. How he ended up there was not said. The fact that no one missed him until he was found a couple of days after his unfortunate death, shows that in the Dutch context, the migration industry is not organized in such a way that anyone would notice a person missing, many workers remain unseen, invisible, “invisibilized.”

Since we started our research, there have been actions taken to address migrant worker precariousness, predominantly by non-state actors (sometimes funded by state actors). To aid migrant workers who lost their work and home, street corner workers and street doctors have come to work in the Venlo area. These non-state actors work on behalf of the municipality under the flag of maintaining public order and public health of the workers and the neighbourhoods in which they live on the streets. Legal aid officers (Juridisch loket – opened office in Venlo in March 2025) are another group of non-state actors assisting workers in claiming their rights, by offering information in multiple languages commonly spoken by the EU mobile workers in the area. They refer the workers to specialized lawyers if they cannot help themselves. As we will show, the legal knowledge, even with experts, on the rights of EU mobile workers are limited, which hinders the claiming of their rights. This DignityFIRM paper flags this gap in legal knowledge, it shows as the migrant workers’ perspective the kind of cases brought forward. Note this is not a legal paper explaining those rights in any detail.

## 2.4 Conclusion

Taken together, the North-Limburg Greenport Venlo case reveals a dense and dynamic governance landscape in which economic expansion, dependence on migrant workers, and social vulnerability intersect. The region’s highly developed agro-industrial cluster relies structurally on EU-mobile workers, yet the institutional, legal and social infrastructures surrounding their recruitment, employment and housing remains fragmented and insufficiently equipped to safeguard their rights. Local authorities, employers, temporary work agencies, civil society actors and residents all play roles in shaping outcomes, but their interventions often remain reactive and uneven. The recent emergence of street-level support initiatives underscores the persistent gaps in oversight and protection, as well as the invisibility that many workers experience in their daily lives. This chapter has outlined the context, actors and pressures that define the Greenport Venlo setting; the following sections will delve deeper into how these dynamics materialize in practice.



### 3. Migrant Workers' Dimensions of Precariousness

In this section, we analyse the precarity of migrant work in Venlo Greenport by looking at 5 dimensions of precariousness: migration status, employment insecurity, income insecurity, rights and protection, and living conditions.

#### 3.1 Migration status

In the Dutch context, the precarious of legal status is a complex one. The migration statuses mentioned by our respondents range from the traditional 'undocumented' to mobile EU citizens. Our respondents do not see many undocumented migrants. By far most migrant workers in Greenport Venlo are EU nationals. Their precarious migration status is largely the result of a precarious employment status (see 3.2). Respondents also mention third country nationals who work through complex legal constructions. The most complex status is the one of third-country nationals who are intra-EU Posted workers in the Netherlands (detaching) or – more common in construction sector than in agriculture – EU nationals working as 'fake' solo-self employed workers (See WP4). All these constructs allow for lower wages, lower taxes or less social security premiums to be paid.

Although EU mobile workers and third country nationals who work through constructions are legally staying in the Netherlands, registered as residents or not, their stay can become irregular when they lose their employment. EU citizens who lose their salaried job or whose self-employment status is deemed fake, can lose their legal status and can eventually be "deported". The latter is illustrated by an increasing body of case-law on EU citizens right to remain, deportation and return (Timmerman, 2025b).

Employers we spoke to (including temp agencies) prefer to work with EU mobile workers, and explicitly not with third-country nationals, including refugee status holders or asylum seekers. This can be explained by the languages spoken at the workforce, which predominantly is Polish. Even foremen on the workforce tend to be (Polish) migrant workers; only management, who work in the office, is usually Dutch-speaking.

However, some indicate that it has increasingly become difficult to recruit from traditional countries such as Poland and Romania. Migrant groups who have been around longer have become more demanding and are better organized. Therefore, nowadays, Ukrainians have also become a popular group:

*“(...)we do notice that there is sufficient demand for Ukrainians. And that [their labour market access] has also solved the shortages in the Agri sector to some extent.” DF-NL14.*

This is illustrated by the map of the country below. The darkest municipality is Horst aan de Maas, reporting 112 agricultural workers (out a total of 5.695, of which 790 in agriculture). Like EU mobile workers, most Ukrainians (51,94%) work through temp agencies. In what industry they will thus be working is not registered (e.g. agriculture, or distribution etc.)



*Source: UWV Dashboard, 16-8-2025 – number of reported Ukrainian workers in June 2025.*

In sum, migrant workers in Greenport Venlo largely have legal stay and are hence not precarious because of their legal status. However, and this is rather unique for the Dutch case, EU citizens can become ‘illegally staying’ migrants in the Netherlands and be forced to return (Timmerman, 2025b). Moreover, people interviewed do report on the increased use of intra-EU posting, also bringing in third-country nationals, whose’ residence could well be irregular if the posting is not in accordance with the rules.

### 3.2 Employment insecurity

Studies have shown the prominence of temp agencies in the agri-food sector in the Netherlands. Offering ‘package deals’ that include work, accommodation, health insurance and transportation, creating a high degree of dependency of migrant workers on those agencies (Siegman et al. 2022). Likewise, we find that many migrant workers in Venlo Greenport area experience employment insecurity. The first reason for this is the dominance of temporary employment agencies. The fact that many migrant workers are employed by a temporary employment agency, or that their work is seasonal, makes that most of them do not have permanent job contracts. Many respondents explain that the work that migrant workers provide is considered temporary or flexible work. Temp agencies make it possible that employers do not have to concern themselves with their employees and can hire extra ‘hands’ when they need them without feeling any responsibility for the workers. They just hire ‘hands’, not people.

This is facilitated by the so called “Phase-A” contracts with temp agencies that may have a “temporary employment clause” meaning the temporary employment contract always ends automatically (by operation of law) when the temporary employment is terminated at the request of the hiring company, when the temporary worker wishes to stop working, or at the end of phase A. As of July 1, 2023, it has been determined that the temporary employment contract will continue until the end date if the temporary worker falls ill. After Phase A the workers should get Phase B contracts, if they stay with the same agency, which offers more protection. This can last three years. Once an employee gets a Phase C contract, a permanent contract, they get more rights (labour protection). However, in practice, respondents see that many migrant workers never reach Phase B or C, but instead shift (or are shifted) to another temp agency. Switching temp agencies largely means back to square one in rights, although the 2025 Collective Labour Agreement (CLA) tries to address this by counting the number of contracts and months in Phase B, irrespective of the number of temp agencies worked for. Only a break of more than 6 months has the worker return to a Phase A contract and subsequent precarity.

One temp agency interviewed in 2024 (so before the new CLA) explains that if the customer is very satisfied, they are prepared to offer a phase C contract (permanent contract). Alternatively, they’ve had workers change into a direct contract (direct hire) with the customer, which occurs more often than that people pass into phase C with them.

*“So if an employee is taken over by the customer, then he is offered a cake. Because then we have done a good job. Because then the customer has been very satisfied with the first four years that he has worked for the company as a temporary employee with his firm. So that is worth a cake.”*  
DF-NL14

However, temp agencies also play a prominent role, according to our respondents, in setting up what are often called ‘constructions’, as explained by an NGO assisting migrant workers, which is the second reason for job insecurity:

*“complicated constructions are being made, whereby people are put to work from a Polish employment agency, via a Dutch employment agency, to another Dutch employment agency. And then they do not know who their employer is (...)”* (DF-NL01)

For the past 4 years the Dutch government has been trying to address the issue of employment insecurity through trying to set up a certification and later registration system for temporary employment agencies (proposal for an Act on temporary work agencies, Wettelijk Toelatingsstelsel Terbeschikkingstelling van Arbeid (WTTA). This initiative has led to a new law in January 2025. According to some of our respondents, this new law will create a surge of new ‘constructions’, potentially with even a higher level of employment insecurity and potential migration status insecurity. Others are hopeful the ‘cowboys’ in the industry will be put out of business, for instance because of the bank guarantee of EURO 100.000 that will be due to become a registered temp agency. Smaller temp agencies might not be able to reserve this kind of money and revert to e.g., contracting, also known as pay-rolling as alternative service. Other laws on curbing bogus-self-employment, mainly through increased enforcement are already being circumvented through such another construct, that of contracting out of whole production lines, which would entail intra-EU posting based on a contract, not based on temp-agency work. Such constructions do not only cause employment insecurity, but can also be the cause of income insecurity.

### 3.3 Income inadequacy

In general, most EU mobile workers earn in accordance with the Dutch minimum wage or collective labour agreements (CLA) of the temp-agency (as of recent equalling the sectoral pay levels) or a sector specific CLA. Despite this, many migrant workers suffer from income inadequacy. The first reason for this is that some cannot work enough hours to earn a sufficient income. Workers do not always have a guaranteed number of hours, or a relatively low number of weekly hours in their contract. To address this, social partners have in 2024

agreed to incorporate in the temp agency work CLA an income guarantee for workers who come to the Netherlands for the first time for the first two months after arrival, regardless of the length of the contract or agreed working hours. The guarantee is for at least the full-time minimum (youth) wage. After these first two months, the temp agency does not have to guarantee a certain number of working hours. This means that this new law will change income inadequacy for first arrivals but not for migrant workers who stay longer. After these initial two months, income can be instable depending on availability of assignments to the temp agency. This has people change temp agencies and, with each agency, start at the bottom ranks with high employment insecurity, and no guarantee of sufficient and stable earnings. In this way, income inadequacy and employment insecurity are linked.

Furthermore, Timmerman (2025a) explains that there is 'asymmetrical flexibilization', where employers benefit from flexibilization by using temp agencies, whereas the migrant workers face greater insecurity and volatility. Through a process of 'hyperflexibilised recruitment, agricultural producers are able to draw 'on a seemingly endless reserve of disposable, low-skilled migrant workers' while the workers themselves face high degrees of employment insecurity (Timmerman 2025a, p. 206). Timmerman (2025a) found income security is primarily mediated through informal social dynamics on the production floor and are shaped by conflict and competition among workers. Being able to work extra to earn enough income is influenced by factors such as skill level, language proficiency, nationality, gender, and frequently by favouritism or the discretion of those in higher positions. As Timmerman did ethnographic work in the workplace, he found that in particular, temp agency coordinators play a key role in determining which workers receive greater stability or more favourable working conditions.

As indicated, some of the interviewed temp agencies do offer EU-mobile workers permanent contracts and full-time work or the agreed part time hours of work and inform them of their rights. Also, some of the interviewed farmers hire their staff directly without the interference of a third party. Again, the direct hiring farmers represent the exception, but their ways of hiring and paying people do not always foster employment or income insecurity. Businesses in the F2F industries (agro, meat, logistics) are also hiring migrant workers directly, if they have their own accommodation. However, this remains the exception as long as temp agency work on a large scale (and not just in case of incidental higher demands (piek en ziek) temp agencies monopolize the market of migrant worker recruitment and accommodations (see also Siegmann et al 2022).

### 3.4 Lack of rights and protection

This section looks into the enforcement of the migrant workers' rights, with a focus on Occupational Safety and Health rights (OSH rights), which include proper salaries as well as help in case of accidents/death at work and exploitative practices.

Although all migrant workers in Venlo Greenport have rights, these can be difficult to claim in practice. As migrant workers at Venlo Greenport are employed and housed temporarily by alternate employers, and their formal employer is often not the farmer where they work but a temp agency, a system is been created where there is a serious risk nobody feels responsible for health issues of the workers. Therefore, there are many reports of accidents and injuries where migrant workers do not receive proper care, reported by investigative journalists. Such findings also came to the fore in our interviews, especially in the accounts of NGOs who fill the void:

*"We are assisting someone who really had a serious accident. Of course the employer says "that it was a self-employed person, not my business." And the labour inspectorate has said, "yes, okay, apparently this is a self-employed person construction, we can't do anything with this." And because of that, the man can't even continue with his case via his personal injury lawyer, because that lawyer says, "we need a report from the Labour Inspectorate (NLA)"" (DF-NL 01)*

According to the NGO, the Inspectorate failed to interview their client properly. They say there are also multiple witnesses, and they were also not heard properly. The NGO found that the Labour Inspectorate gives up very quickly, which the respondents to the investigative journalism platform also found, questioning if the Labour Inspectorate is up for the task at all. In addition, some workers may hide their work injuries out of fear of losing their job (Timmerman 2025a).

There is also an issue with the burden of proof. Workers as well as the Labour Inspectorate are having a hard time proving the extent to which someone was properly paid or not.

*if there is no administration, then they cannot calculate with the WML [minimum wage] and therefore also cannot impose a wage claim. Or we cannot demand that the employer [client of the agency] pays. So I think that is immediately a very clear obstacle as to why it is so difficult to claim their right. (DF-NL 01)*

The consequence of the lack of proof became evident from a 2024 ruling from the Dutch Supreme Court (Hoge Raad). The Court did not follow the irregularly employed migrant workers' statement on the number of hours worked, but stuck to the hours reported by the employer on the salary slips. Thus, the Court neglected that those salary slips might be mustered up fraudulently.

However, in another case, the Court found the lending company liable to pay the salary when the temp agency didn't, which was a victory for the NGO. This is the most important NGO in the field of labour market abuse (Fairwork), located in Amsterdam and therefore, although also approachable online and by phone, difficult to access for migrant workers in Venlo Greenport. Moreover, they specialise in the dealing with the most severe forms of labour exploitation, which is not the bulk of what we have seen and heard about at Venlo Greenport.

Migrant workers can also go to Venlo for the nearest location of free legal counselling offered by Juridisch Loket. According to respondents, many migrant workers already perceive that as too far away. The labour inspectorate is also a party that migrants can turn to for help in case of violation of their labour rights, but they do not have an office where workers can go to in the region. Help and legal assistance does not seem to be generally offered by the employer, except for in one case we encountered. One of the employment agencies interviewed opens their office on Monday and Thursday evening for complaints and questions raised by their EU mobile workers and third-country nationals. Moreover, they have the option of hiring a lawyer on their own, which is not likely something most migrant workers do on their own initiative. Furthermore, being in a foreign country, it can be difficult to know which lawyers have the appropriate expertise. Moreover, some respondents are worried about the knowledge of the workers as well as the lawyers involved in claiming migrant workers' rights:

*“that is also a major concern. (...) recently we had a case and that lawyer also had no idea that you could claim material damage, or wages. So he only talked about immaterial damages. I did point it out to him “you also have to look at the wages, especially with labour exploitation, you can use a collective labour agreement provision, you can use everything, just the calculations from the criminal investigations. And then it worked!” (DF-NL 01)*

As this example shows, in this case the NGO worker (not a trained lawyer) pushed the lawyer, but if this knowledge is not common, the chances of success are random. So even if there is regulatory support from policies, standards and workplace rights (such as protection against

unfair dismissal or the ability to demand better working conditions), knowing about these rights and claiming these rights is yet another thing. This is an obvious example of the difference between law in the books (formal rights) and what happens in practice (de facto rights). The Legal Aid organisation with recently opened offices in Venlo has had disappointing experiences with lawyers who did not have the necessary expertise to assist this specific group of workers with claiming their rights. At a public event, their representative interviewed earlier (DF-NL15) said that lawyers and judges cannot begin to imagine the legal constructions created to make some extra money over the backs of EU mobile workers (...) “this is truly the next-next level of abuse.” More information on the pursuits of migrant workers in accessing justice can be found in section 4.3.

### 3.5 Living conditions

In this part, we focus on housing of migrant workers as this proves to be a major dimension in fostering precariousness. We first want to flag the legal foundation of the right to housing for mobile EU workers. Article 3 of the Treaty on European Union mandates the Union to combat social exclusion and promote economic, social, and territorial cohesion. Moreover, the European Pillar of Social Rights article 19 declares that “Everyone has the right to a good-quality, affordable place to live.” President Ursula von der Leyen on 10 September 2025 said: “Housing is about dignity. It is about fairness. And it is about Europe's future. Eight years ago, the European Pillar of Social Rights made housing a social right in Europe. It's time to turn this promise into reality.” However, the EU has no competence to legislate on housing (Kramer, 2023). Legal protection of renters, the conditions for public investments in social housing, or policies to tackle concrete problems (e.g. homelessness, lack of adequate housing) depend on the national context.

Housing policies do fall under the EU’s anti-discrimination legislation. The Racial Equality Directive prohibits discrimination based on racial and ethnic origin in several areas, including employment, social security and healthcare, and access to housing. Noteworthy is that the EU Seasonal Workers Directive (which applies to TCN only) states that If accommodation is arranged by the employer, it must be adequate and affordable and meet health and safety standards. Also, the EU has shaped and supported national policies through soft law initiatives only: action plans, communications and other instruments that are not strictly binding but serve to coordinate actions between member states and social partners (Carta & Neidhardt 2022). However, during our research, adequate housing is still a national task, and as we will show, with a key role for local authorities.

According to Timmerman (2025a) migrant workers in the Netherlands face significant barriers to accessing high-quality rental housing that go well beyond the cost of rent alone. Securing a decent place in the private rental market typically requires paying a substantial deposit (often at least one month's rent), attending multiple viewings, usually scheduled during the day and conducted in Dutch, and providing extensive documentation. This documentation may include a landlord reference letter, proof of a permanent employment contract, recent payslips, and evidence of a monthly income that is three to four times the rent. As a result, high-quality rental housing remains largely out of reach for most migrant workers. This lack of access often leaves them with limited alternatives: many are forced to rely on employment agencies for accommodation or turn to substandard private rentals, informal arrangements, or other precarious housing solutions.

Historically, employers (including temp agencies) have therefore provided housing for migrant workers in agriculture. The rent would be deducted from their wage. However, labor and housing rights reforms have reduced the possibilities for employers to control housing. To avoid multi-dependency, housing and work now generally need to be separated and can only be combined under specific conditions. The government enforces housing standards, and municipalities regulate employer-linked accommodations. Overall, Dutch legislation has shifted toward greater tenant independence, fairer housing rights, and improved conditions for workers reliant on employer-arranged housing.

However, some of our respondents argue that this separation along with the extremely tight housing market in the Netherlands, has actually created a market for temporary migrant housing, on which huge profits are made off the backs of the migrants. Actors within the municipalities, private individuals as well as NGOs point to certain entrepreneurs who have 'invented' the profit model of housing EU mobile workers. Such entrepreneurs have made a business model out of making money off migrant workers by providing flexible short-stay 'beds' in large-scale housing facilities. During our fieldwork we stayed at one of these (completely certified) housing facilities owned by Kafra, a company started by former Otto Workforce owner Frank van Gool. According to our respondents, the insecurity / flexibility paradigm is what "The Frank van Gools of this world" (making him in a persona, after arguing that his company might not treat workers so bad) have built their imperium on. His housing company offers housing of relatively high quality and completely certified. But as he is now among the richest 500 people in the Netherlands it testifies to the money that can be made as a temp agency and in the housing of migrant workers. According to our respondents, people like Frank van Gool have a lot of power in the region (see section 4.8

where the shadow-power frame is elaborated upon). Nevertheless, his company also need years before they get planning permits (DF\_NL47). It took about three years and a lot of modifications and negotiations to get the permit for the California park at which we stayed. Getting a planning permit is time consuming because local citizens object to the opening of new housing facilities in the area through all kinds of legal procedures. These legal procedures co-create the way that the housing facilities are built and organized. Dutch neighbours for example demand that natural walls are put up around the facility so that they do not have to see the migrants (see section 4.8 for more detail on the out of sight frame). Less often is there a legal discussion on the actual living conditions, which are standardized through the already mentioned private certificate SNF or AKF for agriculture (discussed below).

Although housing facilities for migrants such as those offered by Kafra are certified and therefore most likely by the rules, the rules are made for temporary housing facilities. All migrant worker housing ‘parks’ are temporary facilities. To secure the availability of housing stock for inhabitants of the Netherlands, municipalities with high numbers of migrant workers have come to commonly allow housing companies to build and offer “short stay” accommodation (minimum 7 days, maximum 6 months) to migrant workers. As a result, migrant worker ‘parks’ have mushroomed in the area. The regulation of short stay can differ per municipality, and even within a municipality, per neighbourhood, the rules may differ depending e.g. on planning zones. As migrant workers have to move out of their housing facilities every 6 months, only to move to another short-term facility, migrant workers stay in different short stay locations long-term, which is a practice we call “short stay sedentarism”. This becomes problematic as, according to Dutch standards, these are not places built to serve a level of housing quality suitable for anyone to reside long-term. The accommodation where we stayed was a newly constructed facility, which looked like a holiday park with 200 small ‘chalets’. Each chalet houses 4 people who each pay 125 euro per week per bed (so 2.000 a month per chalet, making it profitable to construct the park). Each chalet comes with their own outdoor picknick table, the greens between the chalets have fruit trees from a local grower. People sharing a chalet do not necessarily know each other, while every bedroom has two beds meaning you can share a room with somebody you do not know. The park is camera-surveilled and inhabitants are subjected to weekly unannounced cleaning inspections. We’ve been told this also happens when residents are not present, which is an infringement of their privacy. While there are proper washing machines, recreational areas, a gym and a small supermarket, the lack of privacy and the short-stay character of the facilities is evident. Yet, the inhabitants we spoke to indicated that they preferred the spacious set up of the park over (illegal and/or overcrowded) housing facilities in town houses.

Since the enactment of the *Wet Goed verhuurderschap* housing companies are supposed to offer migrant workers a rental contract independent of their job contract with the temp agencies, which often were the same entities in the past (De Lange et al 2023). Yet, some of our respondents say that this division is only a paper reality. In practice, there are still close ties between temp agencies and housing companies. According to one local respondent, it also happens that if migrants do not pass the cleaning inspection, the housing company calls the temp agency and subsequently the migrant worker loses both the job and the housing. If a migrant worker is dismissed from the job, a recently implemented rule is that they can stay in the housing facility for another 4 weeks (if they can pay the rent). One temp agency interviewed admits that the 4 weeks is not always granted in practice though:

*"(...) it depends on what kind of people they are. If someone is constantly bothering other people here and using drugs and so on, then we are not going to continue to mess with them for four weeks. Then we will say that you can find your own housing and it has to be arranged within a week. That is a different situation than if you have someone for whom work ends, for example. They can stay there for four weeks, no problem. But the biggest problem is people who cannot behave."* (DF-NL 14)

Because EU mobile workers who have, for example, drinking problems quickly end up without housing and as EU citizens do not always have access to homeless shelters (Kramer, 2023), the Venlo-Greenport area increasingly must deal with the problem of homeless mobile EU citizens. The Podcast series *Zwermelingen* talks about homeless Polish migrants who sleep in the woods. The incident in the corn fields mentioned earlier has created local awareness that employers (lenders nor temp agencies) do not take responsibility for their migrant workers who move to the area in response to the demand for work that their businesses create. Only one employer we interviewed indicated that, instead of leaving them on the streets, his company arranges for the worker to be brought back to their home country.

Alternatively, municipalities like Horst aan de Maas have agreed with housing agencies that they have a few emergency beds available in case the municipality finds somebody out on the streets. Since the start of our research in 2024, we also see more designated civil servants team up with temp agencies trying to find a new workplace for people – depending on their ability to work (not alcoholic or on drugs); or municipalities assist with their return calling for the help of NGO BARKA.

Whereas the bulk of hiring companies do not take much responsibility for the people who work in their greenhouses, food processing facilities, or on their land, there are certainly also exceptions. Such employers are probably overrepresented in the sample of employers we spoke to as they were eager to tell about how they have arranged things, and because they suffer from the bad image that the sector has. “Decent employers; that’s where it starts or ends”, says the representative of the fruit farmers cooperative interviewed. Their branch of business has a bad name because of such malpractices, she said. They have deliberately chosen to do it differently and take responsibility for the people they work with:

*“You have to guide workers, be able to offer more. For example: offer guidance, language lessons, thinking about each other, establish shared norms and values.” (DF-NL 24)*

This is not unique at the local level, however, such employers’ experience obfuscation (e.g., in getting planning permits for on-premises housing). There are farmers who have housing on their own premises; tiny-houses and shared dining rooms/kitchens, which is, according to this respondent “well organised” (DF-NL 24).

Yet, it seems that the bulk of migrant workers in Venlo-Greenport area live in short-stay facilities for a mid- or long-term period. It is not just that the ‘migrant work industry’ created around them primarily sees them as anonymous ‘hands’ (Timmerman, 2025a), the people living in the area hardly see them as neighbours, there is – although efforts are being made – little interaction.

### 3.6 Conclusion

Across the five dimensions examined – migration status, employment insecurity, income inadequacy, rights and protection, and living conditions – this chapter shows how precariousness for migrant workers in Greenport Venlo is not the result of a single factor, but of a dense web of interlocking vulnerabilities. Although most workers hold a legal right to stay, their status is tightly bound to unstable forms of employment, making lawful residence itself fragile. Temp agencies, contractual constructions, and a segmented labour market intensify both employment and income insecurity, while the practical enforceability of rights remains limited by weak oversight, administrative gaps, and uneven access to legal support. Housing emerges as a central amplifier of precarity: the dominance of short-stay, employer-linked accommodation creates cycles of displacement, limited privacy, and ongoing dependence. Most hiring companies do not take responsibility for the ‘hands’ that work for them, with municipalities and NGOs stepping in only at the margins. At the same time, some

employers and hiring companies demonstrate that more responsible practices are possible, even if structurally discouraged. Overall, the chapter highlights a system in which migrant workers remain essential yet expendable. They are highly visible as workers, but largely invisible as residents and rights-holders, setting the stage for the deeper governance analysis that follows.

## 4. Actors Strategies and Frames

In this section we turn to the key actors' strategies and frames in the 'local battle' over the large influx of EU mobile workers in Northern Limburg and the strategies engaged by these actors: employers, state actors, other actors and migrants, in shaping the F2F industry in the region and, with it, the local society. Importantly, when analysing these frames, our aim is not to determine which perspective is 'right' or 'wrong'. Rather, we seek to illuminate how different actors perceive the situation, and how these perceptions co-create local realities by informing the strategies they pursue.

### 4.1 Employer Strategies

In this section, we analyze the strategies adopted by employers regarding the following aspects: recruitment, contracting and employment relations, housing, and relationships within the supply chain.

#### Recruitment Strategies

As in other agricultural areas in the Netherlands, recruitment is generally not done by the farmers / industry themselves, but is placed in the hands of temp agencies. Only a few agri-businesses recruit their workers themselves. Increasingly, temp agencies say they experience difficulty in recruiting workers through their traditional partners in Poland or Romania. It also depends what kind of work they are recruiting for. One agency says that the success of the recruitment also depends on the activities to be performed: *for harvesting asparagus EU mobile workers are no longer interested. (DF\_NL14).*

Another agency (Int 41) explained how they have a network of recruiters in Poland and regularly visit them to discuss the capabilities required of the workers. They had to dismiss agencies that no longer delivered people fit to work (after for instance recruiting someone with a drinking problem). Yet other temp agencies have their own offices in Eastern European countries, and recruit through those.

The farmers and food processing companies who recruit themselves have different strategies which appear to depend on their size. The small family farm we visited and volunteered with harvesting pears had one Polish employee who has been with them for years. During the harvesting season he invites friends and family to come and work on the farm. His sister is a regular for instance. She has a regular job in Poland. In summer she comes to visit her brother and works in the fields to earn some extra income. The farm owners hardly need to invest in recruitment. This was the only farm where we saw local workers harvest as well: the teenage friends of the children of the farmer had their part-time summer job in the fields, much like the Polish sister.

Medium to large size farms interviewed, all running green houses, do the recruiting by themselves, or recruit through a legally linked temp agency, which works like an externalized HR department. Others recruit through one or several temp agencies with whom they have built a relationship of trust. Depending on the state of the crops they place an order for workers to come harvest, or for other work. As the demand for workers is highly flexible (also due to varying demands from supermarkets) temp agencies are known to recruit workers from other temp agencies to be able to deliver workers. In an effort to offer maximum flexibility to their clients, temp agencies compete directly with other agencies, and to maintain a competitive edge, they often rely on secondary subcontracting agencies to ensure a continuous supply of labour. These practices have given rise to a highly fragmented labour supply chain, characterized by multiple layers of intermediation (Timmerman, 2025a). The temp agencies do not mention competition as a problem per se. They do however complain about the image of their sector. This image is hurt by the so called 'cowboys', temp agencies proprietors that do not live up to any applicable standards, easily go bankrupt without properly paying and starting all over again.

The large food processing business interviewed has 600/800 people working around the clock. They have diversified their recruitment strategy through several temp agencies and also have a few intra-EU posted workers. The representative interviewed did not think these were third-country nationals, but rather Polish workers posted from Poland (Int 20).

The recruitment strategy often appears to include a country-of-origin preference or certain presumptions. A cucumber farm visited explained they only recruit from Poland, so the working language is Polish. They pride themselves in the fact that there is a waiting list of people who want to come and work for them. The owners even received an commemorative medal from a Polish town because so many people from that region were working at the

company for many years. Asked if they would consider recruiting beneficiaries of refugee protection (statushouders), the answer was negative, for, among others, language reasons and the fact that the Polish people on the waiting list would come first. Apart from language there are also other reasons why employers prefer not to work with beneficiaries. Böcker & De Lange (2021) found that in agriculture, employers do not engage other categories of workers because training them was too expensive and time consuming. The absence of public transport would be another reason why others do not easily do this work. The cucumber farm did hire temporary protected Ukrainians, housed nearby. Other employers also said to be hiring Ukrainians living in the area.

### Contracting and employment relations

By outsourcing recruitment and supervision to agencies, Dutch firms become distanced from the conditions of their workers, enabling a form of ‘strategic ignorance’ (Timmerman, 2025a). This layered intermediation obscures the employment relationship, limiting firms’ visibility and responsibility over issues like housing, wages, and working conditions. The benefit of not hiring people directly into the farm is related to the applicable and rather complex rules on contracting and temp agency work. Among these rules is the provision that SNA certified temp agencies were/are allowed to deduct rental costs before the salary is paid. In addition, the voluntary SNA certification system reduces employer's legal liability for tax and labour violations committed by intermediaries. Since 2012, firms hiring SNA-certified agencies are generally exempt from such liability. Certification thus plays an essential role with respect to the liability of agricultural businesses for potential labour violations and abuses within their supply chains. Although originally focused on fiscal compliance, SNA's scope has expanded to include wage standards and worker identity checks. While technically voluntary, the certification has become de facto mandatory in the sector, with over 4,800 certified agencies. Compliance is monitored through biannual administrative audits by private inspection bodies, which do not involve workplace inspections and allow agencies time to address any issues found (Timmerman, 2025a). This goes to a general discussion on regulating temp agencies, which legislation (WTTA) is underway, and is therefore not discussed any further here.

A cooperative interviewed, who takes care of sorting, packaging, transport and the sorts, have their own employees and works with one temp agency for flexible workers. They made an arrangement with the employment agency that they would provide language lessons. Initially, Dutch was taught, but now they teach them English. Learning Dutch was considered

“impossible” because it is not used in the workplace, and it is difficult to teach to Romanians and Bulgarians, who do not speak English either (DF-NL 24).

During the COVID-19 pandemic, it was highly problematic that EU mobile workers were not registered with the municipality and could thus not be contacted (Böcker, 2023). Currently, registration is the sole responsibility of the mobile EU worker. Not facilitating the municipal registration of their workers, is an interesting strategy of the employer in trying to flexibilize the relationship further. An example where a worker did go to court gives an interesting insight into how the temp agency employer tried to deny the worker access to work and outstanding wages because the worker did not register with the municipality. The employer tried to argue that the temporary employment contract ended because the worker would not register with the municipality, although repeatedly asked to do so. According to the court:

*The fact that [the worker] is not registered as a resident [with the municipality] is not a reason for [employer] to refuse [the worker] access to the work. After all, the obligation to register as a resident does not extend to the relationship between the employee and the employer. As a Union citizen, [the worker] did not need a work permit. Moreover, the rules invoked by [the employer] relate to obligations of [the worker] towards the Dutch government, not to obligations towards the employer. Rechtbank Limburg 4 May 2023, ECLI:NL:RBLIM:2023:3041*

This case is also an interesting example of what the DignityFIRM project calls the ‘regulatory infrastructure’ of labour migration, where different legal domains are at play, in this case to flexibilize the labour relationship. At the national level, upcoming legislation (WTTA) aims to make registration part of the duty of care of temporary employment agencies (as employers) (*Kamerbrief zorgplicht werkgevers bij registratie arbeidsmigranten, 21-2-2025*).

## Housing

Housing is key to the recruitment of international staff in any trade. The Netherlands also faces a considerable shortage of housing, with waiting lists for social housing running up to 10 years or more. As explained before, it is extremely difficult for migrant workers to find housing on their own. Finding housing for EU mobile workers should thus be any employers first priority, even if – legally speaking (but for non-EU seasonal workers) – not their responsibility. A representative of a cooperation explains well the strategies with respect to the organization of housing that employers follow:

*“In principle, employees must arrange their own accommodation (although workers are sometimes assisted), but accommodation is arranged for people working for temporary employment agencies. Some farmers also provide accommodation on their own premises, such as tiny-houses with shared dining rooms and kitchens.”(DF-NL 24)*

For years now, the dominant narrative in the Netherlands is that there is a lot amiss with migrant workers’ housing. Especially housing as part of the labour contract was deemed problematic for the dual dependency it creates. According to a representative of a private auditing agency in charge of the certification audits of temp agencies this actually has negative consequences:

*“So they find other ways. They still arrange accommodation, but you no longer see the payment going to this specific temporary employment agency.(...) All the abuses we saw on the pay slips before are no longer visible. But there still are migrant workers who need housing. That costs money. It's just that it's arranged differently now.” (DF-NL 22)*

The quote shows the high level of ‘obfuscating’, making invisible of abusive practices. And the quote also shows the little trust of this auditor in the willingness of temp agencies to give up abusive practices relating to housing.

From an informal conversation with an HR manager of a distribution centre in the area we know that it is still impossible for them to rent housing from housing companies linked to a temp agency without using the services of the temp agency. He would like to hire his workers directly and help them with housing, but is forced to provide housing further away, or hire workers through the temp agency.

Finally, one of the largest housing and temporary agencies has developed a platform [lento.eu](#) to rent out houses. So far, only to employers and not directly to workers, although it suggests this will be a service they want to provide in the future. That would seriously change the game, especially if, as we will go on to show further on, workers will have rental protection. An obstacle is, according to our assessment, planning law. Municipal planning law demands that migrant worker housing facilities are offered for ‘short-stay’, for temporary living only. Mobile EU workers wanting to settle would be renting these rooms for longer stays, thus renting out to them would conflict with the restrictive planning conditions.

All in all, employer's strategies regarding housing are twofold. Some of them take care of (some of the) housing themselves, if permitted and possible, this is on their premises. Most of them though leave it to the temp agencies and their housing agencies to deal with, placing the responsibility for the living conditions of their workers at a distance, and out of sight.

### Supply chain strategies

Farmers either sell their crops directly to (local) supermarkets or through cooperatives (producer groups). They may choose to work independently when they feel the fee they have to pay the cooperative does not add up (DF-NL 24/ TRAM Fieldlab 2025). The benefit of the collective is that the collective can also lessen the administrative burden through, for instance, receiving EU Common Agricultural Policy subsidies and doing the obligatory administration for it. The subsidies are invested in collective assets, such as innovations and automation. Such collectives include de ZON, the Greenery, Oxin-Growers and Fruitmasters.

Note that greenhouses are not eligible for EU CAP subsidies due to the definition of 'farmer' in the CAP – (DF\_NL\_WP4 workshop on CAP, 28 May 2025). Depending on the sales model chosen, the farmer directly negotiates a price with clients, mostly supermarkets or restaurants (or a local patisserie), or the negotiations for what one hopes to be a fair price are done by the cooperative, who then bill and cash the payments and subsequently pay the farmer (Oxin-Growers website, 2025). According to the smaller farmers among our respondents, retailers dominate the price (see also Siegmann et al 2022; DF-NL 60). Yet, although farmers also say they can deal with retailers in case of, for instance, overproduction due to the weather. "Two for the price of one" is not by definition the result of a retailer negotiating low prices (TRAM Fieldlab 2025). The retail market for agricultural products in the Netherlands is highly concentrated, with major supermarket chains such as Albert Heijn, Jumbo, Lidl, and Aldi, and a single dominant wholesale purchasing consortium, Superunie, controlling most of the sector (Franck, 2018). According to Grijpstra et al., (2021), sectoral dynamics cannot be fully understood in isolation from the broader agro-logistics supply chain, in which supermarkets in particular play a pivotal role as primary purchasers, exerting direct pressure on wholesalers within the sector and creating downstream pressure on producers in a 'race to the bottom'.

## 4.2 Employer Frames

Based on our analysis we uncovered four frames among employers (this includes farmers, temp agencies, and housing agencies): the economic need frame, the 'a few bad apples or

cowboy' frame, a bad politics frame, a security frame and, on a more positive note yet very exceptional, an integration frame.

First the economic need frame (typical neoliberal perspective), that emphasizes that migrant workers fill an important economic need, is very dominant, among all different types of employers:

*“If you just consider that we have 400,000 vacancies in the Netherlands. And 300,000 unemployed. It's tight everywhere. So, if we were to just imagine sending away a million migrant workers, the chaos would be unimaginable.” (DF-NL14)*

Employers do not only mention that the economy needs to keep going but stress the consequences for the entire food supply in the Netherlands if there were no migrant workers:

*“if you stop migrant workers, the entire food industry will simply grind to a halt. Not only that, but in two days, there will be nothing left in the supermarkets.” (DF-NL41)*

The economic need frame also stresses that the need is there because Dutch people do not want to do this type of work, and that because of this, they really need migrant workers:

*“with all due respect to Dutch employees, they want to work from Monday morning—and I'm exaggerating a bit and generalizing enormously (...) They want to work from 8:30 Monday morning to 3:00 Friday afternoon.” (DF-NL20)*

Other employers also indicate that they have tried to recruit Dutch people, but that this just did not work out:

*“I've also had periods where we were open to hiring Dutch people. Well, that often lasts for a short time. Because they're not interested in the work at all. They don't want to be on a sorting belt or anything like that, so that quickly comes to an end.” (DF-NL41)*

In other words, employers perceive they have no other choice but to work with migrant workers. They also emphasized that alternatives, such as robotization, were too costly, not fast or precise enough (yet).

The second frame that was very dominant among the employers we interviewed was the ‘a few bad apples’ or ‘cowboy’ frame. Temp agencies representatives argued that the temporary agency sector has an ‘image’ problem, due to the “bad apples” or so called “cowboys”:

*“we're inspected four times a year. Twice by the NEN and twice by the SNF. And those other 13,000, whatever you want, aren't inspected at all. I find that truly admirable. And if you were to tackle those 13,000, you'd have solved your entire problem. (...) Those legal certificates won't solve anything. Absolutely nothing. Zero. Nada, Zero, nothing. (...) You have to tackle those 13,000 illegal businesses. And then you'll make progress. The rest won't solve anything. Checking those 4,000 exceptions every year, even if they have a certificate, is pointless. You really have to look at what's wrong, where the cowboys are, there's a cowboy there, that's what you have to address. Then you put the labor inspectorate on it. (DF-NL14)*

The rogue employers are blamed for abusive practices. Moreover, this quote illustrates that it is not actually considered to be just a few bad apples, but quite a lot of them, so a structural failure of the economic level-playing field in the sector. At the same time employers indicate how incredibly tough the competition is on the market due to other players in the supply chain. It can be hard to resist the market pressures for the cheapest possible option and hence understandable that some ‘cowboys’ cut corners:

*“I wish products were sold in supermarkets at a fair price. I wish I had more leeway to reward people better. We already pay more than minimum wage, but you know how much you have to fight with your customers, and that simply stems from the pressure from supermarkets. And when you sometimes see the prices being offered... Yes, they're below cost price. That's unacceptable. And who pays for it? The chain pays for it. Not the supermarket; they always take the margin, and they also get a cut of the low supplier price. And we could make significant progress in that area, so that supermarkets also take responsibility for the entire supply chain. (DF-NL41)*

So economic factors such as rogue employers and temp agencies, “cowboys” that distort the level-playing field, as well as harsh competition due to players with considerable market power, e.g., supermarkets, are pointed towards to explain practices that cause employment and income insecurity for migrant workers. At the same time, this frame does not place the

blame on themselves or perceive it as a problem of the whole sector, but it is perceived as a structural problem of a large part of the sector.

Third, some employers also frame local municipalities and their policies as the cause of the precarious position of workers. They indicate that municipalities do too much to please their voters, and that they lack a coherent collaboration between municipalities, thus introducing a ‘bad politics frame’:

*“So everyone preaches for their own parish. And Venlo thinks differently. And Peel en Maas thinks differently. Even though they both form Greenport. So they need to be united on many issues. But that cooperation is hard to come by. Because we listen more to the citizens than to each other’s municipalities. If you talk about environmental visions now, you name it. What the citizens say is sacred. (DF-NL14)*

Some blame the bad politics on the wish to get re-elected:

*“What I’ve also realized, is that if an alderman stands behind me instead of against me, they know one thing, and then they’re no longer an alderman for the next round. (...) I do believe that in this form of democracy, democracy simply doesn’t work. You can’t make good policy here if you can be punished every four years for your actions, because this is about long-term visions.” (DF-NL20)*

Others think that there could also be other motives at play, especially when it comes to the topic of housing:

*“It’s clear that the municipality is actually more of a hindrance than a help, and that has to do with the sheer volume of housing available. And demand is high. The municipality primarily considers its own residents, and they actually find migrant workers—and I’m putting it mildly—a bit of a nuisance. So if they [the agribusiness and the migrant workers] were to leave, housing would become available to solve that problem.”(DF\_NL41)*

Fourthly, we want to highlight the use of what we will call a security frame among some of the employers interviewed. This frame has employers blame migrants for ending up on the streets, getting fired or being treated poorly. These employers regarded the workers with distrust:

*"If someone here is constantly bothering other people, using drugs, and so on, we're not going to continue to put up with them for four weeks. We'll tell them, "You can find your own housing, and it has to be arranged within a week." That's a different situation than, for example, someone whose work is stopping. They can stay there for four weeks and it's no problem. But the biggest problem then is purely people who can't behave. (...) Behavior and attitude aren't something you can't predict beforehand. They're inherent in human nature. But every now and then, there's someone who doesn't behave. And then we try to let them go. Because here, they're a nuisance, not just to us, but to everyone. (DF-NL14)*

As is evident from the quote above, employers see two types of workers, the bad and the good. Part of their job is predicting the chances of a worker falling in either category, and recruiting the right ones. All kinds of stereotypes are used to make such judgements:

*"And that also has to do with the quality of the people you get who say, yeah... They're adventurers, either in Poland or somewhere else... In Poland, it's the worst. Other countries often have slightly better people who are more motivated to work for you for a longer period. But in Poland, especially in the last two years, it's... (DF\_NL41)*

It becomes clear from the quote this employer talks in stereotypes of the people working for him, but also refers to the typical 'footloose' type of workers; These employers do not seem to relate possible bad behaviour of workers to the precarious employment and income position they are in:

*"they get a schedule every day. (...) everyone is informed by WhatsApp or text message what time they have to work the next day and where. (...) sometimes this also has to do with your client. But... Yes, ultimately at 8 p.m. (DF-NL 41)*

This employer does not consider that the Polish workers leaving after six weeks could be a consequence of the extreme job insecurity they face. After all, many only find out if and when they will work the next day the evening before. When workers do not show up for work the next day, they interpret this as part of their 'bad nature' or 'culture'. They do not interpret this as a sign of feeling completely disposable and replaceable, giving their employers a taste of their own medicine.

Of course, not all employers see their workers this way. Others emphasize that it is important to show trust in your workers and to not assume the worst. They call their workers their most important ‘means of production’ and stress the importance of treating them well (DF-NL45).

Another employer indicated that it is very important to distinguish between migrants who want to stay and those who want to return, thus between settlers and the temporary or transnational workers:

*“Look, in agriculture, you often deal with seasonal workers. So what you see is that they’re here for five or six months. Then they go back, and the next year they come again. So yes, I understand why you do that in such a large-scale housing facility. But people who have been working for a client for three years, for example. And we say, “Hey, go look for a house yourself.” And that’s difficult, of course, I know. And we try to guide them a bit. But it’s obviously not good if someone just stays here for three years in their short-stay accommodation. Then they should actually live on their own. That’s easier said than done though”.* (DF-NL14)

Employers who emphasize the need to differentiate between long stay (the more settler type) and short stay (the seasonal worker or transnational) also emphasize that they have a duty to help integrate those who want to stay through an integration frame. Some employers indicate that they help such migrants to find a place to learn Dutch and to find a place to stay, that is, in a normal house instead of in a short stay facility. The integration frame is exceptional amongst employers, and it is not only considered good for the migrant workers involved but also for the companies that hire them:

*“One of the biggest misconceptions I hear all the time in politics is that they think it’s a KPI to have those migrant workers here for as short a time as possible. Rotate them as quickly as possible. And that’s so wrong. It’s the exact opposite. We set up all these programs to ensure these guys stay with us as long as possible. It’s simple: we have to train them every time. And it doesn’t benefit us if they come to us for three months and then leave again. It doesn’t benefit us, isn’t it, but it just costs us time. Economically, that’s simply the dumbest thing you can do.”.* (DF-NL2)

It must be noted that the integration frame seems to be exceptional among employers. As indicated before, our sample of employers is also likely to be biased towards employers with who treat their employees a bit better than what is regular in the sector. As we shall see in the

coming sections, most other actors in fact blame employers for not taking any responsibility for their workers outside the workplace, including in the area of local social integration. Furthermore, there are no legal measures that will force employers to take such responsibility in the near future: in the 2025 CLA facilitating language training is mentioned as an intention, but not as an obligation for employers.

### 4.3 Migrant workers' strategies

In a recent project (Skowronek et al 2023) 35 EU mobile workers were interviewed, all employed in the Farm2Fork sector and distribution sector in Northern Limburg and neighbouring areas. Instead of over burdening the field with repeating this, we draw on these interviews and a unique source, 25 reports of complaints received by the Juridisch Loket (JL). The reason for not conducting additional interviews was that interviewing migrant workers requires building relationships of trust, for which language barriers stood in the way. We therefore chose to deduce their frames and strategies from these unique reports on their help-seeking efforts at the legal aid organisation Juridisch Loket.

#### Workers' Seeking assistance

In seeking access to social rights, migrant workers seek help from others. Migrant workers can turn to trade unions, the labour inspectorate, NGOs, or community organizations for assistance to improve their working and housing conditions.

In a case before the court, not specifically from our local battle ground, a migrant worker is Bulgarian, and only has command of the Turkish language. She fell ill and was in need of an operation, for which she travelled to Bulgaria. During the court hearing, she explained - through an interpreter - that her employer had helped her apply for social benefits during her sick leave and that he was the one who filled in the form for her. The employer's private address was entered as the address, because he was better able to keep track of the correspondence due to language problems. Thus, she filled in the necessary forms applying for social benefits during sick leave. However, the employer failed to inform her further on the procedure and consequently she was late with filing the relevant documents and the benefit was denied. Through the help of a Turkish speaking intermediary who sent an email to the court by way of going to court (rather informal, but accepted), she won her case in court; the late submissions were not held against her because:

*"the failure to meet the deadline cannot be attributed to the applicant. (...) failure to meet the deadline is the result of special circumstances affecting*

*the applicant. These include, for example, personal circumstances on the part of the applicant, but also external circumstances that cause the applicant to be overburdened or stressed.” (Rechtbank Midden-Nederland 18 July 2024, ECLI:NL:RBMNE:2024:4321)*

The case illustrates the need to have access legal aid in a language of the migrant, which is as of recent, provided through the government funded Juridisch Loket. In March 2025 it opened an office in Venlo, yet to scale. According to the representative interviewed, the level of rights abuse of EU mobile workers in the Netherlands has reached ‘a next-next level one cannot imagine’ (DF\_NL15 and follow-up communication).

The problem is also knowing who to ask for assistance, to know there is a Juridisch Loket where you can get information. We found that civil servants at work in municipalities are not always aware of the right to equal treatment of EU mobile workers. For example, a Spanish migrant worker who turned out to be pregnant was fired by her temp agency because the work would be too heavy for her. She subsequently had to leave her housing. All these actions were a clear infringement of her rights as a pregnant EU mobile worker. Yet, with good intentions the municipal social workers started to arrange her return to Spain. Upon talking to us, we suggested the civil servants instead assist her in claiming her rights. For instance, she was entitled to keep her job, pregnancy not being a ground for dismissal. She was also entitled to benefits during maternity leave to which she, also as a temporary agency worker, was equally entitled.

As Mantu et al (2025) explain, to access health care related Dutch social services registration with a local municipality is often required; because of language barriers and unfamiliarity with the Dutch institutional system migrants rely on help (from employers or friends/acquaintances) to arrange registration. However, in 2022, 30 per cent of the migrants surveyed who resided longer than six months in the Netherlands were not registered with a Dutch municipality (Berntsen 2022: 44) and thus likely faced difficulties in claiming social services or social rights if necessary. In an another study migrant workers mentioned a lack of knowledge and information about access to and functioning of the Dutch health-care system and migrants’ insurance as important barriers to health care (Mantu et al 2025).

From our observations we’ve learned of the major improvement since is the growing awareness of the presence of a GP Healthcare for Internationals in Venlo where the medical staff helps workers in several native languages, such as Polish and Romanian. This GP does not just serve workers in the region of North Limburg, but people from other provinces also go

there for help. The strategy used by migrant workers to actually get health care, is, as in the case discussed above, to go home for treatment. Mantu et al (2025) also report this strategy. In their interviews,

*“workers mentioned not being granted sick leave by the temporary agency firm when they needed it, not even after having an accident at work. Instead, some were forced to take (mostly unpaid) holidays, which they used to seek self-paid treatment in their home countries, despite being insured in the Netherlands.” (Mantu et al 2025)*

Migrants thus rely on municipalities and employers’ goodwill for access to social rights in general, and to health care more specifically. In the local context we observed increased attention from departments of some municipalities trying to assist but this assistance remains rather arbitrary (Berntsen et al 2023). We did not find health insurance companies to play a significant role, because the workers would need to be able to reach them.

### **Workers claiming labour rights**

Timmerman (2025a) notes that the most common strategy among most migrant workers who experienced problems at work was to ‘simply move on’, that is quit and look for other work. Doing so they would often forfeit their rights with respect to unpaid wages, unfair dismissal, improved contracts, and so on. Others returned to their country of origin or found themselves in ‘a state of paralysis’ or inertia, hoping their situation would eventually improve. Only some turn to official organisations such as Juridisch Loket for help.

Because we have analysed a data set of 25 summaries of complaint files provided to us by a government funded legal aid organisation (Juridisch Loket) offering legal services in the most commonly used languages of the migrant workers (Polish, Romanian, Bulgarian, Spanish), we focus our analysis on the strategies that come to the fore in these cases. Strategies in this context should hence be understood as the type of legal problems migrants seek help for and the ways in which they do that.

First, several cases concern the rights of workers in case of injuries at work or other health issues. A Romanian worker with a temporary employment contract with a temp agency had an accident at the assigned workplace where he was an order picker. He reported the accident to the temp agency, and he was sent to a GP who said he needed to take time to recover. Without consulting him, a week later, he was called back to work, while he had not fully recovered. Also, the temp agency refused to pay his wages for the first week of him

being ill, because the agency claimed the worker could not be reached. The worker says he had not received email or a phone call. In response, the JL sent him to see a lawyer (JL case 1503). Based on the current collective labour agreement he should receive pay for the first four weeks of illness, which could be a straight-forward phone call from the lawyer to the temp agency to explain to them their legal obligations. A worker with less agency might have been pressured to return to work, saving the agency the sick pay and risking the injury to linger.

A Polish worker, also under contract with a temp agency, also had an accident at work. Subsequently the lender ended the contract, and the temp agency took that as a right to stop the temp agency contract and tell him to leave his accommodation. This used to be permitted, but as said, the new CLA prohibits ending the contract in case of illness and the decoupling of the work and living contract should imply he has to get four weeks to leave the accommodation. The report notes this temp agency is not connected to one of the employer unions. This could mean it's the 'cowboy type'. In this case, the JL contacted the temp agency and subsequently the worker received four weeks' time before eviction (JL case 1519). The case illustrates that in practice working and living contracts are still linked, maybe not legally, but practically.

Another Polish worker was a direct hire with a logistics and distribution company. After working 1,5 yrs with this company, he has an accident at work. He reports sick and must undergo an operation and later another one. He fears his health and wants to claim damages from his employer. Here the JL (JL case 1535) recommends him to go to a lawyer. A case like this would also have to be reported to the Labour Inspectorate by the employer, and the Inspectorate should investigate which could be helpful for his claim. If this was done, the report doesn't say. Unlike similar cases, this worker had independent housing, so he did not have to also fear losing a roof over his head.

One case of a Polish worker does not concern a conflict with his employer, but with the government over his sickness benefits. He went to Poland for his medical treatment and return is apparently not possible. The benefit was stopped because he had not responded to the employers' attempts to contact him and because of his absence. His strategy was to initiate an administrative appeal procedure and the JL asked a lawyer to assist him supplement the appeal and submit a claim with the employer (JL case 2025).

The practice to go home for treatment is common. Another Polish worker went home to revalidate after being injured at work. He held an indefinite contract so the law requires that

he eventually reintegrates, and the government imposes strict obligations on employers in this respect. He called the JL to know if the employer could demand of him to come from Poland for a meeting at the office with only a few days' notice, which probably is allowed. The employer had offered to end the contract, which he had refused. He was advised to go talk to the employer again (JL case 2095). The law that employers must pay directly hired workers who fall ill (for two years) is feared by employers and one possible reason why businesses try to avoid becoming responsible for their workers.

Second, workers who approached the JL had issues with their contracts, pay or payslips. Several workers ask questions trying to understand their pay slip pay (JL case 11524), or about sums withheld from their salary. For instance, an Italian quality control worker in agricultural received only half of his salary because the rest was withheld to pay rent, said the employer. But there was no contract on this, nor could he see this on his pay slip (JL case 11523). A Romanian man also saw rent deducted while he had never signed a rental contract (JL case 1727). Noteworthy is that this automatic deduction is soon no longer permitted by law. This worker also did not receive his holiday allowance, so he set out to claim those. A Polish truck driver had started working for a company and when he was due to receive his salary and didn't receive it, checked up on the company online. It had bad reviews, some said it did not actually exist. While he was still working, he also feared he would not get paid. He was advised by the JL (JL case 1803). A Romanian agricultural worker received a very low travel allowance and wondered if this was correct and also wasn't always called to work and receive pay for the 40 hours in his contract (JL case 2555).

More complaints concern surprise over the contracts or working hours offered. A Polish man working in distribution had a Phase B contract with a temp agency for 40 hours. Upon its extension, this changed into 32 hours without consulting him, on which the JL advised him (JL case 1996), that this is not allowed. A Hungarian worker was surprised to see that the company he had worked for as a truck driver since 2021 while promising him a permanent contract, offered another temporary contract from another legal entity. Although that contract had expired by the time he went to the JL, he had not received another contract, he never received pay slips yet he did receive pay (JL case 1596). Obviously, the shift to another legal entity was an attempt to avoid giving him a permanent contract with stronger rights. He could have complained back then, but apparently did not.

As we did not come across irregularly staying non-EU nationals at work in the Venlo Greenport area, there is no evidence of migrants' strategies engaging the Employer Sanctions Directive and its option to claim outstanding wages. However, legal representatives

did state that it would be highly problematic to make a claim – and maybe use the legal presumption of six months (in Dutch law, 3 months minimum according to the Directive) because the workers would still need to prove the employment relationship. This burden of proof appeared to also be an issue for EU mobile workers, where employers denied having ever seen them. The workers are thus recommended, as a proving strategy, to take pictures of themselves at work, with co-workers, with company logo's on clothing etc. (22 May 2025, presentation Juridisch Loket).

### Workers' Housing Strategies

We find there are six types of housing available for migrant workers in the Netherlands. Housing can be a short-stay on the farm where they work, a larger short-stay facility (like a former hotel or office building, or specifically constructed facility like Californië where we stayed), it can be a company rental in a family house, or an independent rental of such a house or workers buy their own house. Those who fail to secure any such housing may end on the streets or in one of the few shelters, mainly available only in the bigger cities.

On housing, as the examples already presented show, the workers remain highly dependent on the temp agencies employing them. For example, a Hungarian man working in logistics was forced by his temp agency to move from a place close to his work to a smaller apartment in a small town far away. He has never seen a rental contract (JL case 2006). This randomly moving people around is quite common and taking 'ownership' of ones living conditions appears to be highly uncommon – and very difficult due to the Dutch housing crisis.

An interesting example of the exercise of agency with regard to housing comes from an eviction case. The landlord wants the worker to leave his room in a cabin located in a recreational park. He argued that the lease was “by its nature of short duration” and that the lease agreement automatically ended upon termination of the employment contract. The court ruled that there were insufficient grounds in these summary proceedings to establish that the lease agreement was “short-term in nature” within the meaning of Section 7:232(2) of the Dutch Civil Code. The court found that although the lease agreement was formally separate from the employment contract, it was in fact entirely linked to the working relationship with the temporary employment agency. For example, the rent was deducted from the wages by the temporary employment agency, house rules were enforced and inspections were carried out by employees of the temporary employment agency, and the management of the residential location was also in the hands of the employer. The housing provider was also represented by employees of the temporary employment agency during the hearing. The court considered this intertwining of employer and housing provider to be

problematic and contrary to the purpose of the Wet Goed Verhuurderschap (Good Landlord Act), which aims to reduce the dependence of migrant workers on their employers. The worker, after his employment ended, asked the landlord to give him a bank account number so he could pay the rent himself. The landlord said no, which the court thought was contrary to good landlordship. The housing wasn't necessarily temporary because the worker worked at two different Jumbo locations during a period of six months, while he was housed at four different residential locations. This indicates a system of flexible housing rather than deliberate temporary rental, says the court. So the court awarded the worker at least temporary rental protection.

With this judgement, the Court and the worker together cracked down on the short-stay construction between landlord and temp agency in case of longer stays. Interestingly, here the plan of the worker to settle and the possibility of rental protection intersects with planning laws, which would only allow for temporary stay in such a place. Thus, this case illuminates that there are at least three types of temporariness/permanence: of stay of the worker-renter; of the permission to live in a place; and of the duration the place may exist.

Apart from assistance with health, employment and housing issues, migrants also approached the JL with other questions and concerns. For example, of a somewhat different nature is the complaint of a Romanian worker (JL case 1645) who said he was attacked by a colleague at work. He got fired after the incident and went to the police to report the assault. In response, the police referred him to the Juridisch Loket, where he received legal advice. Although assistance with violence was an exception in the cases analysed, violence between migrant workers does not appear exceptional. In 2023, news media reported on several serious incidents of violence between migrant workers. This sparked a public and parliamentary debate that linked it to the problematic living and working conditions of migrant workers, that resulted in Parliament commissioning research on this topic.

The strategies presented here are individual, aimed at securing the individuals rights through an individual complaint procedure that some easily initiate while others might not take this path (depending on individual capabilities, gender, origin, education level, and luck). There does not seem to be a logic that those who claim their rights then either stay on the job or leave, although those who succeed might feel reassured to move on to better jobs. Those who don't, stay in the bad jobs. Collective strategies to improve their working and living conditions are few, even when non-state actors are involved, as we will see in section 4.5. Migrant workers are also hardly unionized (see also Timmerman 2025a). Nevertheless, some court

cases may have an impact on other individuals by setting a precedent. The example above where the Courts crack down on the short-stay construction can be seen as a collective action because it can have an impact on other cases.

#### 4.4 Migrant workers' Frames

We cannot distil frames from this material, as framing is a strategic, actor-centred process of meaning-making, and the legal case files are formalized texts that are selective, and constrained by legal discourse. We therefore draw on multiple recent studies (Berntsen 2022, Seidler et al. 2024, Timmerman 2025a) to conclude that migrant workers see themselves as providing essential yet disposable labour. In other words, they recognize the indispensable role they play in agriculture, but feel devalued and replaceable. Moreover, Timmerman (2025a) notes that although workers 'possess a very real sense and acute understanding of the kinds of unfair treatment, inequities, and harmful practices' they face, such experiences are rarely framed in terms of exploitation but more in terms of bad luck or 'feeling fucked'. Likewise, Tielbaard et al. (2016) found that victims of labour exploitation preferred to discuss their harmful experiences as 'discrimination' rather than as 'exploitation'.

Berntsen (2022) conducted a survey among 153 Polish and Romanian workers in part the same area, focusing on workers in meat processing and distribution. Two thirds of the Romanian respondents in this study was in the Netherlands for two years or less while more than half of the Polish workers had been in the Netherlands for more than three years. Of those, 21 workers had already lived in the Netherlands between 5 to 10 years, clearly settling. The majority (85%) was at work through a temp agency contract, working for a manifold of temp agencies. Also, most had worked on various temp agency contracts over the years. Berntsen found that about a third of her respondents did not know their rights with regard to the termination of their contract, a third knew the contract could be terminated within a day. A fifth of the respondents did not know if they would receive pay in case they fell ill.

Half of this group of respondents had their own housing, while the other half relied on housing provided by the employers. In the event of a forced eviction of employer housing due to loss of work, most responded they would either try to find another job in the Netherlands (and again have employer-organized housing) or would return to Poland or Romania. Others said they would ask friends or family for help or look for a job in another country. Challenging the eviction and claiming housing rights, as was the strategy deployed by a migrant worker in 2025, was not mentioned as an option in 2021. Indeed, under the then prevailing laws, this would have been highly unlikely strategy to pursue. Berntsen (2022, 2023) found that in the

event the migrant workers would not receive their (proper) pay most (43) would turn to the temp agency to ask for the outstanding pay. However, many would go to the contracting company (23). As we've learned from case law, the contracting company can be held accountable (De Lange 2025). 30 of the respondents in the study by Berntsen would consult a lawyer, while 15 would turn to labour unions. Few (7) would contact the labour inspection in case of non- or underpayment (Berntsen 2023, table 57 , p. 227). The strategy to rely on the employer potentially leaves the worker in a highly vulnerable position as they are likely not properly informed of their rights.

Skowronek et al (2023) found that among the 35 interviewed mobile EU workers many faced a lack of trust and social support within the Polish migrant worker community. One of her respondents complained:

*"there are no people who are helpful, in any way. They are talking about everyones back, especially the ones in management. I am of course making reference to the Polish, I have nothing to say about the Dutch."*  
(Skowronek et al 2023, p. 249).

Thus, asking for help within the migrant community was found to be less useful.

#### 4.5 State actors strategies

In the next section we focus on the strategies of the municipality Horst aan de Maas, and to a lesser extent, its neighbouring municipalities in North-Limburg, which shape the Greenport Venlo area. This section draws on interviews with state actors as well as policy documents. As the focus of this report is on the local battle we have not included an analysis of national actors such as Parliament, Ministries or the Labour Inspectorate.

#### Legal and Policy Strategies

The first 'strategy' of municipalities is to put in place a policy framework and a legal framework – within the boundaries of their competencies vis-à-vis provincial and national competencies. During our research, Horst aan de Maas for instance developed plans to change its policy on housing and social integration of the EU mobile workers (labour migrants) living in the municipality. The Municipality of Venlo expanded in its policy on migrant housing the number of years for which a permit for temporary housing can be granted from 10 to 25 years.

With regard to housing, the municipal planning rules may for instance, regulate:

- A. Whether structural accommodation of agricultural migrant workers in agricultural buildings is permitted, which it is provided that, amongst others, this does not disproportionately affect traffic safety. Such condition does not however, concern the living conditions of the migrant workers. For that purpose, the municipality can demand that the applicant needs to comply with the AKF norms that set housing standards in the agricultural sector;
- B. Limiting the number of people living in a certain place or area. For example, in Peel en Maas the “Policy on housing migrant workers 2021” stipulates that municipal cooperation for a planning permit will only be provided for initiatives if at least 75% of the workers to be housed are employed by the company housing them, for at least four months. In Venlo, cited below, in principle no more than 100 migrant workers can be housed in one facility in the city centre;
- C. Considering its forthcoming more restrictive planning policy, so called preparatory decisions have been taken by Horst to prevent initiatives from being implemented that are permitted under the current planning regulations but are not in line with future policy. This is a cap on expanding housing facilities any further. It is unclear how these strategies concerning planning also improve the living conditions of migrant workers.

Furthermore, the idea of quota or volumes per street or neighbourhood sits uncomfortable with EU law. In 2020 then Minister of Social Affairs said:

*“Setting quotas specifically for this group is at odds with the free movement of Union citizens, which does not allow discrimination on the basis of nationality. In addition, an employee who is a national of a Member State and is employed in the territory of another Member State enjoys all the rights and benefits granted to national employees in terms of housing.”*

Indeed, this follows from EU Directive 2014/54 on measures facilitating the exercise of rights conferred on workers in the context of freedom of movement for workers, which has received little attention so far in the Dutch context (Minderhoud 2019). Nevertheless, more municipalities implement microlevel quota to restrict housing of migrant workers from their town centres. For example in Peel en Maas the municipality has a quota whereby the number of licensed beds for migrant workers may not exceed 10% of the number of inhabitants of Peel en Maas (Peel en Maas, 2021).

Apart from quota some municipalities also designate certain areas within the municipality as suitable for migrant housing. According to the municipal rules in Venlo, concerning the number of people living in a facility and the interests of the surrounding population:

*“A good living environment must be guaranteed at all times. (...)principles of careful use of space and environmental standards remains necessary. This prevents different rules applying to international workers than to our own residents. (...) Naturally, the residential and living environment of local residents must also be taken into account. Temporary accommodation on industrial estates is possible, provided that the above can be guaranteed and that surrounding businesses are not restricted in their current operations. (...)Preference should be given to locations (and real estate) on industrial estates that are in need of transformation.”*

The nature and location of a site determine whether a housing initiative can be realised and also determine the number of international employees that can be accommodated. A large site on the outskirts of the city can often accommodate more than a site in the middle of a residential area.

Thus, a complex set of norms and values is designed per municipality to define what is acceptable – volume and location wise – and what not. To bring the multiple positions to the table, municipalities prescribe “omgevingsdialogen” – dialogues with the neighbours of potential housing facilities. If agreements are reached in a co-creation style, this can prevent court cases. Migrant worker voices are not actively heard in this dialogue. If agreement is not reached and parties go to court, we find that in many of the court cases analysed, the court approves the municipality decision to grant a building permit for migrant housing. Yet with procedures taking up to three or four years, the housing of migrant workers at contested facilities remains on hold.

Restrictions in accordance with, or incorporated in municipal planning laws, or timewise during court cases, mean less housing will be available for migrant workers. Without changes in the demand for migrant workers this means they will live in other municipalities (waterbed-effect), have increased traveling time and less time for integration or private activities, or live in illegal dwellings and/or across the border in Germany. Potential future strategies suggested in legal scholarship – potentially to be developed at the national level - include the option of expediting legal procedures on housing projects by skipping an instance and directly appealing to the highest administrative court (Marseille et al 2022).

### Supervision and Enforcement strategies

The municipality can demand that there will be a supervision and management plan for each housing facility (beheersplan) stipulating what measures are to be taken to avoid, in short, nuisance for the neighbours. If the facility does not live up to these, this opens the opportunity for the municipality for enforcement. These plans often have to demonstrate a high level of control over the living quarters of migrant workers that largely places them out of sight (Baalbergen 2024), outside of the local society, as invisible as possible (surrounding the premisses with high ‘natural’ walls) and where the workers’ actions are controlled through camera surveillance and restrictions on where (not) to bbq, smoke, sit etc. In some cases the setup called out as good management actually make the accommodation sound like an encampment.

### Stakeholder engagement

As described, e.g., in the municipal dialogues, engage local citizens, the neighbours of housing facilities, in the decision-taking process. The voices of migrant workers are seldomly heard because the dialogues need to be organized by the developer or the housing company, who are doing this for the housing company or temp agency, but the actual migrant workers who will be living there are not part of the engagement. This kind of stakeholder involvement can lead to very detailed housing supervision plans, contributing to making the workers ‘invisible’ for the neighbours and society as a whole. However, we want to also flag another and very different strategy towards stakeholder engagement, which is through social activities organized by municipalities for migrant workers and citizens alike, to lower the threshold to community building and to live together.

### Employer responsibility for social effects

At several gatherings on the topic, Greenport representatives as well as representatives of the Association of Dutch Municipalities, explain the functioning of a new tool towards stimulating employers to take responsibility for the social effects of their business, including the housing of their workers. (TRAM fieldlab 11 June 2024; TRAM fieldlab 20 May 2025). This was to have a social Impact Assessment, also one of the suggestions from Roemers’ Aanjaagteam Bescherming Arbeidsmigranten (De Lange et al 2023). Participants expressed hesitations about making such an Impact Assessment reporting obligatory, as this would hinder the freedom of establishment, protected by EU law. In a workshop we attended on the topic (SZW May 2024, Hilversum), VNG representatives presented soft tools for municipalities to ignite a conversation on employer responsibilities in the process of establishing or

expanding a business. However, their legal advisors argued there was no legal opportunity to implement an obligatory social effect reporting. It is unclear whether or not such reporting can be made obligatory. Furthermore, the question remains what effect it will have. It could for example be that a service industry will pick up the reporting duty and that within the companies it concerns, the necessary change of mindset is not forged.

Unlike the VNG, Horst aan de Maas has been piloting and is more progressive in their attitude towards obliging employers to take the lead on social integration of migration workers (De Lange et al 2023). They want to include an “Participating Plan Labour migrants” (which includes language training) as part of the requirements for granting a business permission (exploitatievergunning). To be effective, it would also need to cover temp agency workers and not just those with a steady contract with the actual employer.

### Talent development

Briefly, we flag that there is hardly a decently developed strategy to investment in talent development of mobile EU workers – neither by state actors nor by employers or housing companies (Fieldlab 11 June 2024; DF-NL 23). There have been a few attempts by state actors to offer mobile EU workers training to transition into care work, a sector faced by considerable labour shortages. However, such initiatives have not had any result, for one because of the lack of language skills of the workers. Under the current conditions, talent development is likely not a strategy deployed to improve the career options, and thus living and working conditions of EU mobile workers.

All, in all, state actors adopt several strategies. What is striking is that most of these strategies are aimed at ‘new cases’. It is about how to deal with potential new applications for housing facilities, and how to assess the arrival of new businesses; the presumption is very much that the workers are temporary workers, or transnational commuters at best. Regarding the migrant workers who are already living in the area, who have settled, not much seems to have been developed. For both categories, some language classes for commuters, and proper language and integration policies (talent development) for settlers could help improve their access to better working and living conditions and avoid their dependency on the scarce facilities for homeless migrant workers.

## 4.6 State Actors’ Frames

Among state actors we see that the following frames are used: the economic need frame, the security frame, the a few bad apples/cowboy frame, and the integration frame.

In the past, local state actors predominantly saw labour migration as an economic necessity for which they needed to cater:

*'Yes, we believe that if we are in an economic situation where we are creating jobs, then there is a duty to also provide decent housing. (DF-NL23).*

According to this Economic Need Frame migrant workers are needed to do important work for the local economy:

*'If the 32.000 labour migrants at work in the largest tuinbouw area in NL/ EUREGIO wouldn't come, our economy would collapse' (Notes fieldlab 11 June 2024).*

However, more recently, this way of looking at migrant work is starting to shift:

*'So, I think we're coming from an economic perspective where the focus has mainly been on enabling as much production and activity as possible. But it's getting out of hand. We no longer have space for that in our spatial planning. I've placed the emphasis differently. Of course, there's still room for economic development, but with a lower priority'. (DF-NL 23)*

As there has been so much economic development, state actors perceive the region to be rather full. This makes it important to think about the kind of economic activity they want to stimulate in the region. Instead of ad hoc decisions, they have made long term future plans and want to see if new economic activity fits within those plans:

*'For a long time, the attitude in our region has been to accommodate whatever the existing entrepreneur wants, including any expansion plans. Instead of saying, 'No, we only have this plot of land to allocate once, and we will give it to someone who fits with our vision for 2040 and beyond.' (DF-NL 23)*

Whereas the economic need frame is becoming less central, other frames are gaining in importance. Next to the land being 'full' with businesses, there is a growing realization, that the increase in economic activity has gone hand in hand with an increase in labour migrants, and that this is putting pressure on the local social system and local communities. Local municipalities such as Horst aan de Maas and Venray have therefore recently revised their policies and regulations concerning labour migrants due to the changing dynamics and

growing presence of labour migrants in the region. Although the economic need frame has not disappeared, it is now accompanied by other frames as is evident from this policy document quote:

*"The municipality of Horst aan de Maas is committed to improving the way things are organized so that labour migrants can live and work in decent conditions, residents can enjoy a pleasant and safe living environment, and (local) entrepreneurs can do business. To achieve this, this principles memorandum sets out a series of agreements aimed at balancing these interests, with the goal of creating greater social impact. This need arises from shifting societal dynamics and the growing presence of labour migrants in the region." (...) "At the heart of this is a careful consideration of the interests of three key groups: labour migrants, local residents, and entrepreneurs." (Gemeente Horst aan de Maas, 2025)*

We gather from this quote that they aim to balance the interest of three groups: labour migrants, local residents and entrepreneurs. Considerations to serve the interests of the second group, the local residents, are driven by two frames frames: the unwanted accumulation frame and the security frame. First, the unwanted accumulation frame emphasizes that the region is overcrowded and the liveability is under pressure as a result of the influx of migrant workers in certain areas, which has resulted in what they label 'undesirable concentration':

*"In various areas of our municipality, a large number of labour migrants reside, both in small- and large-scale housing locations. We observe that in some neighborhoods and streets, liveability is under pressure because the number of permitted beds is not in balance with what the area can reasonably support. This results in undesirable concentration in certain areas. New housing requests are already being assessed for such undesirable concentration. Factors considered include traffic movements, routes to town centers, the availability of recreational facilities, building density, and pressure on open spaces. Concentration is deemed undesirable when these factors are not in balance." (Gemeente Horst aan de Maas, 2025)*

Second, the security frame is emphasized when the needs of local residents are discussed. This frame perceives migrant workers as something local residents fear for reasons of alleged crime or nuisance that they bring:

*They [the migrants] are not allowed to smoke on the property, and they lack privacy. So if someone wants to make a phone call, they have to step away. You're not going to stay right on the property every time. So people step off-site. They walk around wearing a dark hoodie and a hat, for example. That, understandably, can contribute to a feeling of insecurity. And when people have been working hard all day, they go shopping together as a group. On their way back, they walk along that same bike path, because there's no sidewalk, and suddenly you have ten people walking together. If you're a 15-year-old girl biking by, that can feel intimidating. (Intdignity\_23\_Mix)*

Furthermore, the security frame is also downplayed a lot by state actors. State actors emphasize that people fear and panic over nothing and are just not well informed. They have become inspired too much by anti-immigration discourse, which is not justified at all in their view:

*"Almost everyone agrees that we should treat the people who contribute to our economy with decency. But when housing is located right around the corner, it often evokes a sense of discomfort. This is partly because media coverage tends to focus on negative stories. Rarely do we hear about the vast majority of the more than half a million labour migrants in the Netherlands, or the 6,000 in Venray, who work hard and lead ordinary lives." (Gemeente Venray, 2024)*

What is emphasized in municipal policy documents on housing is that protecting the workers is best done first through regulation (for example through certified housing), second through integration:

*"For labour migrants, we are taking steps toward greater protection, better integration, and more opportunities for development. By requiring SNF+ certified housing—which meets higher quality standards—and by reserving emergency beds for urgent cases, we are working to improve housing conditions. Through the Participation Plan, we also encourage active involvement in society, with specific attention to integration, language acquisition, and talent development—so that labour migrants are not only doing temporary work, but can also build a future with perspective." (Gemeente Horst aan de Maas, 2025)*

Most state actors prefer to work with players who are certified and play according to the rules. In their view, such large players are not the ones causing any problems:

*"It's also noticeable that much of the housing emerges informally within neighborhoods, while larger housing facilities tend to face strong opposition. Yet it is often these larger, well-managed locations with proper amenities that cause little to no nuisance, and across the country, there are many good examples of this." (Gemeente Venray, 2024)*

In other words, they see regulation and certification as a viable solution to the problems with housing faced by migrant workers. On top of the regular certification requirements, they have added a few additional ones, such as that workers should have their own private room (except for couples). This is no surprise as state actors frame exploitative practices as a problem of what Timmerman (2025a) calls: 'a few bad apples':

*"Unfortunately, we also know that a small number of residents and businesses do not comply with the rules. This comes at the expense of others: the worker who is kept in a dependent position, the neighbours who experience nuisance, and the competitors who do follow the rules. That is why we are working toward a level playing field for businesses, with monitoring and enforcement where necessary, while maintaining our focus on adequate, quality housing and constructive cooperation." (Gemeente Venray, 2024)*

In other words, the situation is framed as if there is nothing inherently wrong with the way the sector is organized, but exploitative excesses need to be combated:

*"And I think the most important thing in our current situation is that we must also say: there are companies where things are not properly arranged, and we need to intervene there. We need to say that exploitation is unacceptable. (...) Make sure that the abuses in horticulture are cleaned up as much as possible by establishing systems that allow us to keep control. And make a real choice to put those who cause chaos on a blacklist." (DF-NL 23)*

This 'a few bad apples' frame (or the 'cowboys' frame) makes state actors call for increased enforcement, regulation, certification and control, including the use of criminal law instruments to combat the – in their view – only few employers that cross the line. Those who follow the rules and have certification are good cooperation partners.

This means that local state actors envision that they protect migrant workers by increasing enforcement targeting the ‘cowboys’ in the field. At the same time, they develop partnerships with the larger housing players in the field who can offer housing facilities that are according to the rules. However, as indicated in section 3, the rules and certifications are generally aimed at short-stay, while we have learned that many migrant workers de facto reside in short-stay facilities on a long-term basis.

Another frame, that is slowly gaining traction, is seen in how municipalities increasingly recognize that many migrant workers reside long-term or are there to stay and that it is important to invest in their social integration, for example by learning the Dutch language. In line with this social integration frame, all kinds of initiatives are being set up for this. This implies that local state actors are increasingly seeing migrant workers as people, as local citizens, and less as ‘hands’ for which ‘beds’ are needed. At the same time, it is also evident that local state actors have not completely abandoned such ways of discussing the problems of the people who engage in low-skilled labour:

*"the municipality of Venray wants to enable several large, well-maintained campuses with between 100 and 750 beds [our emphasis] in the coming years." (Gemeente Venray, 2024)*

From the municipality of Horst aan de Maas, on the topic:

*"We see that in some neighbourhoods and streets, quality of life is under pressure because the number of licensed beds is not in balance with what the area can support. This leads to undesirable accumulation in these areas. New applications are already being assessed to determine whether there is undesirable accumulation." (Gemeente Horst aan de Maas 2025)*

Needless to say it is not the number of beds that causes trouble, but it is, presumably, the people that will sleep in them. The narrative is dehumanizing, implicitly emphasizing the temporariness of those who sleep in the beds; it is still a common way of discussing the topic of migrant workers – to speak of beds and hands, not of people.

Another important observation is that municipalities have not abandoned the distinction between short-stay and long-stay facilities, meaning that ‘beds’ continue to be created for people who (supposedly) stay only short-term. This implies that local state actors continue to frame migrant workers through a frame of temporariness, while simultaneously recognizing that this does not apply to all (as visible in their integration policies). We do note, that the

focus on temporary housing can also be explained by considering the general trends in the construction of flexible housing. This is a quick way to address the housing shortages, and it offers housing for e.g., young-adult refugees and students.

Another narrative change in some of the policy documents is that migrant workers are no longer referred to as labour migrants, but as ‘international employees’, terminology copied from employers who use it to avoid the by now somewhat stigmatized term of *arbeidsmigrant*. With this term, policymakers want to denote both low-skilled labour migrants but also high-skilled labour migration (‘knowledge workers’, also identified as ‘expats’). In practice though, the term international employees largely concerns low-waged EU mobile workers. The policy documents are also primarily targeting low-waged EU migrants (see for example, Gemeente Venray 2024). This re-framing of the policy in seemingly more neutral terms, to avoid the negative connotation with problems surrounding low-waged migration.

As indicated, protecting the interests of migrant workers living and working in their municipality is increasingly a key concern of local state actors. To this end, the regional Zorg-en Veiligheidshuis Noord-Limburg (Care and Security ‘home’ North-Limburg) was assigned to also work on EU mobile workers’ cases. Its work combines the frame of security and, an additional frame, (health) care for better living and working conditions of migrant workers. It is a partnership between municipalities in the region, the regional Public Prosecution Service, police and various institutions in the field of care, safety and welfare. The collaboration is build on the notion that “complex cases require a cross policy domain approach in order to achieve a breakthrough”, a de-silofication of policy domains that can be seen as a best practice in the field. They work on cases brought to them by professionals through their online portal. These can concern, amongst others, unsafe housing conditions or migrant workers living on the streets as well as health issues or unjust treatment of workers by their employer or hiring company. They have a team of street corner-workers speaking the languages of labour migrants (Polish, Romanian) and try to come up with practical solutions, e.g. arrange access to health care where needed, mediate re-integration in the labour market and consequently housing if people are fit to work, or facilitate return to of the worker to the country of origin (DF-NL 61). During our participant observation of their street-corner work the problem of homelessness, substance abuse, and the difficulty to approach migrant workers, was evidently a situation requiring care but also a security challenge.

Interestingly, at municipal level actors find it is not so smart to separate housing and employment, as vulnerable people are unable to find proper housing themselves, easily at risk of abusive housing contracts for premises not fit for housing. Yet, employers – and temp agencies – have legal obligations to provide certified facilities, and risk sanctions if they don't, which would be preferred. “If living and working is untied, these incentives evaporate and it will be less efficient for the employer, the worker and for enforcement” (Fieldlab 11 June 2024, DF-NL 61). If anything, from our interview with the Zorg- en Veiligheidshuis Noord-Limburg and the Juridisch Loket case files on worker complaints, we draw that the (legal and practical) position of migrant workers is often unclear and complex, which makes the separation of the contracts not per se effective method of curbing their precariousness. In this respect we noted a shift from the frame of economic needs of employers to one of a duty of care.

#### 4.7 Non-state actors' strategies

Non-state actors consist of individual local citizens, citizen initiatives, but also of more formally organised NGOs.

Local citizens are active players in the local context, using among others stakeholder engagement opportunities to voice their discontent. According to Braun & Busuic (2020) “stakeholder engagement is on the rise in regulatory governance. This raises an important question regarding implications for regulatory legitimacy. Engagement mechanisms are not by default legitimizing: Even when initiated to tap into an array of ‘benevolent’ desiderata, unless carefully balanced and built-for-purpose, they can become conduits for de-legitimation”.

The Working Group Housing labour Migrants (Werkgroep Huisvesting Arbeidsmigranten) in Horst is an example of a citizen initiative, linked to the work of Socialist Party members. Another example is the Stichting Bewonersbelangen Arbeidsmigratie, an initiative that connects multiple citizen groups in the area. The locals' strategies include sharing information on research and media concerning labour migration in general but also on the (supposed) wrongdoings of employers and municipalities. To this end, email newsletters or social media is used. They will also join local stakeholder engagement opportunities, such as public hearings organized by the municipality or by businesses that on new initiatives to build or exploit housing facilities.

Some citizen initiatives step up their game by going to court. These will usually be cases on municipal planning policies or individual permits. For instance, the Vereniging Behoud de

Parel went to court to challenge the plans of a large Distribution centre planning to house 600 migrant workers on Greenport Venlo, next to a “truck parking area”. The initiative claimed the migrants would be living in an area where “the mostly foreign drivers would have to stay in their own trucks at night and on weekends”. According to the municipality of Venlo the association should not have standing in court because its statute does not include that it advocates for the well-being of migrant workers. The court decision is still pending.

Another group of local complaints came from the neighbouring municipality Venray, which used to have more pigs than people. To lessen the nitrogen levels caused by pig farms, farmers are stimulated to stop, and indeed some 90 pig farms are closing. The neighbours fear that the farm buildings will be bought by real estate developers who will then build short-stay facilities for migrant workers instead. At a protest event, one of those present remarked that “the large-scale pig farms that had existed in Venray are being replaced by “human farms”.” They felt, according to an investigative media report, that the entrepreneur and the Elderman were not listening to their arguments and were proceeding as planned, making the municipalities’ stakeholder engagement into a non-legitimizing event.

Individual citizens also co-create the way that the housing facilities are built and organized. Dutch neighbours for example demand that natural walls are put up around the facility so that they do not have to see the migrants. This is done through the “omgevingsdialogen” – that the municipalities organise: dialogues between the municipality and neighbours of potential housing facilities. If agreements are reached in a co-creation style, this can prevent court cases. But sometimes individual citizens may still go to court.

### **Migrant worker Support groups**

One of us was cordially invited to join a regular meeting of a working group within a support foundation by former Polish migrant workers [the ARKA foundation]. They introduced the group to us in a WhatsApp message as “consisting of people with a Polish background, all of whom are well integrated and committed to the welfare of migrant workers. We meet in Dutch, so there will be no language barrier.” One of the strategies of the group is to inform – until recently only Polish – migrant workers. Part of the meeting was about the diversification of the migrant population and their difficulty to reach the non-Polish speaking workers. They had been providing this information through, among others, an annual festival, with information stands from the police, decent employers, other NGO’s and more local actors. Of course, there was food and music. It used to be a large event, but participation rates were slowing. Besides the language barrier with the non-Polish migrants, they assume workers

checked the internet if they need information, they feared their festival, which had been a success for years, would become redundant. (21 August 2024).

### Trade Unions

According to Mantu et al (2025) occupational health and safety has always been a fundamental issue for the trade union movement (Johansson and Partanen, 2002), yet in the Dutch context public Health of EU Mobile workers is not central to the trade union agenda. Trade Unions in the Netherlands predominantly act on behalf of their members, which most migrant workers are not. Moreover, actions are very sector specific and in the investigated region or sector, we did not come across active trade unionists. This lack of activity is due to a lack of resources, said a trade unionist who mainly focusses on policy, and not on the ground actions. However, another explanation is that there are no active unionist at the work floor at all: large greenhouses and distribution centres have an all-migrant worker/temp worker staff, except for the management. When trade union actions were initiated covering migrant worker rights, it was in workplaces that had a share of both national and migrant workers. Trade unions might also be considerate of the consequences of their actions for workers: “For temp agency workers it is risky to go on strike. According to the FNV labour Union many people who recently went on strike will not be given any work by their temp agencies. Many of them are labour migrants” (Volkskrant 20 juli 2025).

### Fair Work and Legal aid

FairWork is a national organisation dedicated to support victims of labour exploitation in the Netherlands. FairWork also wants to improve aid to victims of human trafficking. Partly subsidized by the government, their strategy is one of complaints and litigation (Legal strategy). In 2023 they sent a complaint to the Labour Inspectorate on abuses taking place at a certain temp agency operating from Limburg. The temp agency sent Ukrainian workers elsewhere in the country to work. It is unclear what happened with the filed complaint and when media followed up, the Labour Inspectorate did not comment (Follow the Money, 2024). At FairWork, they think that if the Labour Inspectorate had taken action earlier, the Polish owner of the temp agency might still have been in the Netherlands and could be held liable. “But when nothing happens with a complaint for such a long time, the Inspectorate is lagging. (...)”, says a FairWork Representative. Subsequently the question pops up: “what is the point of reporting it?” (Follow the Money, 2024). This was also a question that came up during the May 22 2025 WP4 workshop, where one of the participants noted that 50% of the complaints received are not followed up by the labour inspectorate.

In the same case FairWork also cooperates with the Juridisch Loket, legal aid (also government funded) that opened their multilingual doors in Venlo early 2024. Together they developed a legal strategy. FairWork successfully assisted Ukrainian workers to file for bankruptcy of the temp agency (Rechtbank Limburg 13 August 2024, C/03/24/191F, np). Next they went after the company that actually employed the workers, so higher up in the chain in a civil liability law suit over the wages the temp agency had failed to pay the migrant workers. On 27 March 2025, the Rotterdam District Court ruled that the employer must pay the temporary workers their outstanding wages. The total amount of outstanding wages is 15,103 euros net. The subdistrict court ruled that the contractor was the company that employed the temporary workers and that the contractor had taken insufficient measures, both before and after the fact, to prevent the non-payment of wages by the temp agency. The legal strategy thus led to a shift in liability. The court find that measures such as checking whether the temporary employment agency had the quality certification (SNA keurmerk) and was registered in the Waadi register (register of temp agencies), whether it had a G account and whether the rate against which he hired the workers was in line with market conditions, to be insufficient to absolve it of liability.

According to the Court, the company should have drawn up a written agreement with the temporary employment agency with provisions on compliance with employment conditions. In addition, the hiring company could also have checked whether the temporary employment agency charged VAT. Furthermore, the hiring company did not conduct any further investigation into complaints from the temporary workers about the non-payment of wages. The subdistrict court considered this important, especially since the temporary workers did not speak Dutch or English and were therefore less able to express their views. The hiring company should have requested information from the temporary employment agency when these signals arose. For example, they could have asked whether the applicable terms and conditions of employment were being applied, whether wages were being paid and, as evidence, requested copies of payslips or proof of payment. Thus, the legal strategy had a good legal result, but the societal awareness and potential impact on others was difficult to generate.

#### 4.8 Non-state actors' frames

We can distinguish several frames among non-state actors: a humanitarian frame, the integration frame, the 'not in my backyard' frame, and the shadow power frame.

First, the human rights frame is very prominent among non-state actors. It is used by local citizens, their citizen initiatives, as well as by NGOs. These actors believe migrants have an equal right to proper housing, and should not be staying in short-stay facilities that are being erected all over the area. This frame is used by the foundation of former Polish migrants as well as local citizens with a strong voice in the local public debate. “We live in houses, they live in the barn...” (DF\_NL44) This respondent showed outrage on social media on the ways of local politicians, when, for example, a municipal Eldermen reluctantly “approved of a housing facility under wind energy turbines, on an industrial estate, alongside the railway and rail terminal: ‘They are only short-stayers.’” It is argued that migrant workers should have the same rights as Dutch citizens and not be treated as second class citizens. Interestingly, locals argue migrant workers are equally entitled to decent housing (and not just a bed). If migrant workers cannot pay for such housing with their insecure and no more than minimum wage income, then *that* is the issue to be solved. NGOs and legal aid workers also very much perceive the local situation as a problem of a lack of rights that migrant workers have. That is what migrant workers are entitled to when it comes to wages and housing. According to them, decent work means employers, temp agencies or hiring entities, pay in accordance with the rules.

The second frame that is quite dominant among non-state actors is the integration frame. From our observations, it became clear that former Polish workers, now Dutch citizens and running an ngo in Horst aan de Maas engage with the topic from an integration frame, they want to organize community activities, be sure that the newly arriving workers are properly informed and satisfied with their living and working situation, like they were themselves when they decided to stay in the Netherlands. They realize their approach might be outdated as the diversity of the migrant population demands a different approach than one for Polish workers only. They found it hard to find enthusiasm for their initiative. At the same time EU mobile workers had earlier told Skowronek et al (2023) that a social network was missing. Both feel a need, look for inclusion, but find it hard to achieve. The integration frame is also actively voiced by the local citizen’s initiatives. They feel that migrant workers should not only have the same rights as any other citizen, but that they should also live in regular houses amongst local citizens in the municipalities, and not in segregated short-stay facilities.

Whereas the citizen initiatives such as the Werkgroep Huisvesting Arbeidsmigranten advocate for integration, other locals sometimes engage in the third frame we found, the “Not In My Backyard” (NIMBY) frame. This frame refers to a specific way local opposition is socially and politically constructed: people may accept migrant workers in principle, but resist

its local presence near their own homes or community. It concerns local citizens who do not oppose migration per se, yet mobilize against facilities for migrant workers in their immediate neighbourhood. Because they are not necessarily apposed to the arrival of migrant workers perse, this frame often goes hand in hand with other frames, such as the humanitarian frame. In addition, some locals use the argument of a societal disbalance, when there are more migrant workers living in their area than locals. Being outnumbered while there is no integration, makes them feel insecure. For example, a case concerned a claimant arguing that the municipality had not taken sufficient account of the living environment and the interests of local residents, because accommodating 150 migrant workers was not appropriate in a small village with approximately 145 inhabitants, which is not always a legally relevant argument. Another Nimby case was initiated by a company running a holiday camp site near the premises of a to be housing facility. The case was won for technical reasons, not because of the feared nuisance.

Relatedly, we see NimbY framing in case-law on the demand made by locals of housing facilities. Locals (who complain, the locals who are okay with migrant workers coming are less vocal) literally don't want to see their migrant worker neighbours' and municipalities and courts cater to this demand through the building and management requirements set in planning and exploitation permits (such as the green wall around housing parks we mentioned earlier).

We coined the fourth frame we uncovered among some of the interviews non-state actors the 'Shadow-power' frame. The actors use the term to describe groups or organisations that influence political decision-making behind the scenes. Some respondents, such as locals, as well as (former) politicians, and employers outside the inner circle of local power-players, feel that local politicians are under the influence of a few successful local entrepreneurs who have made a considerable fortune in the 'business' of labour migration, in recruitment as well as housing. Such feelings may be fed by the fact that one of the local entrepreneurs was sponsoring the campaign of the ruling Liberal Party (VVD) for the 2023 national elections. Although these powerful actors are mentioned in many of the interviews, our aim is not, and it would be hard to prove actual shadow-power. It is however, a rather common way in which the local battle is perceived among non-state actors, and therefore an important frame.

#### 4.9 Interactions among the main actors

This section synthesizes how the frames and strategies described above intersect in practice – where they align, where they partially overlap, and where they directly conflict. Overall, the

Greenport Venlo arena is marked by partial consensus on ends (keeping the regional F2F economy running, minimizing disorder, and avoiding abuses) but sustained conflict on the means (who bears responsibility, how to regulate, and whether migrant workers are temporary “hands” or long-term residents).

Employers, state actors, and even some local citizens implicitly accept the economic need frame: EU-mobile workers are essential to the continuity of agri-food production and logistics. This shared baseline legitimates continued inflows and the maintenance of flexible labour channels. Furthermore, actors recognize that housing is a bottleneck: without (affordable) accommodation, recruitment fails. Employers and municipalities thus accept the need for dedicated migrant housing.

Employers and municipalities both invoke a cowboys/bad apples frame, calling for more enforcement and certification to restore a level playing field and curb abuses. This justifies local permitting conditions, and reliance on large certified players. Municipalities and large housing operators emphasize management, surveillance, and “neighbourhood comfort” (green walls, cameras, inspection regimes) to prevent nuisance and maintain public order. Employers accept campus rules as a recruitment enabler.

Beyond that point of consensus, however, strategies and understandings diverge sharply. Employers and municipalities often rely on certification, audits, and policing “cowboys” as the main solution to labour abuses, whereas NGOs, local citizen initiatives, migrant support groups, and recent court rulings point to structural vulnerabilities created by subcontracting chains, income instability, and the tight coupling of work and housing. Likewise, municipalities increasingly invest in integration initiatives yet continue to expand short-stay campuses that presume workers are temporary. Housing is where these contradictions become most visible. For employers and some residents, large, well-managed short-stay facilities are a practical necessity; for NGOs and integration-minded citizens, they institutionalise separation and precariousness. At the same time, NIMBY concerns about safety and “undesirable concentration” contrast with humanitarian frames that emphasise dignity and equal access to housing.

There are a lot of collaborations and local partnerships between different types of actors. All actors we’ve interviewed consider collaboration important and are happy with the initiatives that have been developed. However, they also complain that it is sometimes difficult to get all relevant actors around the table. Some municipalities, some employers etc. are less

cooperative than others. On a critical note, the idea that exploitative practices are a matter of ‘a few bad apples’ or ‘cowboys’ obscures the fact that the practices of the ‘mainstream’ players can also foster precariousness for migrant workers. It is here, that the frames of non-state actors collide with the frames used by employers and state-actors. Non-state actors emphasize that the ways in which the sector is organized around short-stay facilities is what fosters precariousness, and not just a few ‘cowboys’. The model of short-stay housing, an economic model is challenged for its link to not so short employment contracts.

Furthermore, the response is largely to develop more rules giving municipalities more authority to act towards housing agents, businesses, temp agencies. These rules, such as the size of a room, small scale or large scale facilities, short-term or long-term, the 24/7 monitoring, registration with the municipality are assumed to be in the interest of migrant workers, and to combat the ‘cowboys of the sector. However, migrant workers are generally not participating in local collaborations and dialogues implementing these rules in practice, they do not (yet) have voting rights. It is NGO's who advocate on their behalf. This seems to have translated into housing certification and partnerships with certified housing corporations and sometimes increased rules on top of the certification rules. How such rules are perceived by migrant workers – and their interest in affordable housing so they can save earnings has been researched repeatedly (Berntsen 2022, Skowronek et al 2023; Seidler et al. 2024; Timmerman 2025a). However, their perception is not something that is considered by state actors when drafting policies or granting or denying housing permits. Certified yet “temporary” or so called short-stay housing facilities, or targeted housing policies for migrant workers (SER 2025), are still seen by most actors as a better option compared to either handing them over to the ‘cowboys’ in the housing industry that might only offer beds or even shared mattresses.

Between rights, income, and justice: To earn enough income or secure certain privileges at work, workers often end up ‘accepting’ unfair conditions, which also means tacitly – because not aware of their rights – ‘accepting’ violations of e.g., labour laws, the collective labour agreement. For example, a migrant worker might agree to work 60 hours a week, even though Dutch law limits working hours and requires overtime pay. The worker may believe this is the only way to make a decent income or to stay in good standing with the employment agency. Because they don’t know that these conditions breach the collective labour agreement (cao), they tacitly “accept” a situation that violates labour law. When workers ask information about their rights, they turn to their employers and temp agencies, suggesting they have no clue where else to go. Yet others do turn to lawyers, like the ones who asked help

from the Juridisch Loket. This highlights how the sector depends—not occasionally but structurally—on the availability of subordinated labour.

In response, driven by the need to maintain in a job and housing migrant workers either accept less rights, exit the industry or go looking for other work, or voice their concerns: the truck driver not being paid at all comes forward because of his basic need to have an income; this can also be said for the man injured fearing for his health and future capacity to work and make a living, thus coming forward to claim damages. Because the workers in this case-study are EU citizens, they do not fear their legal residence in the Netherlands – which would be another reason for subordination were they third-country nationals dependent on the employers for their legal stay.

#### 4.10 Conclusion

Taken together, the strategies and frames of employers, migrant workers, state actors and non-state actors reveal a local governance landscape in which partial consensus coexists with deep and persistent tensions. All actors acknowledge that EU-mobile workers are indispensable to the regional farm-to-fork economy. This shared economic-need baseline legitimises ongoing inflows of migrant labour and an infrastructure built around flexible recruitment, temporary employment contracts and dedicated migrant housing. It also underpins broad support for certification, regulation and more robust enforcement aimed at curbing the “cowboys” of the sector.

Beyond this common ground, however, understandings diverge. Employers and municipalities tend to frame problems as the result of a minority of non-compliant actors, whereas NGOs, migrant-support organisations and emerging court rulings point to structural vulnerabilities embedded in the supply chain: multilayer subcontracting, income volatility, and the functional coupling of housing and employment. These structural dynamics shape workers’ own strategies, which frequently revolve around moving on, seeking ad hoc assistance, or pursuing individual legal claims rather than collective action.

Housing is the arena where these contradictions appear in their starkest form. While employers and municipalities view large, regulated short-stay facilities as a practical necessity, many non-state actors argue that such arrangements institutionalise dependency and long-term precarity, especially when workers remain for years in accommodation designed for rotation. At the same time, NIMBY concerns among some residents sit uneasily alongside humanitarian and integration frames that demand equal treatment, privacy, and the right to settle. Municipalities increasingly recognise the presence of long-term residents

and experiment with integration initiatives yet continue to expand short-stay capacity and frame migrant workers primarily as temporary “beds” rather than future citizens.

Collaboration across actors exists, of which the Zorg and Veiligheidshuis Noord-Limburg is a good example. Collaboration can also reproduce rather than resolves tensions. Migrant workers themselves remain largely absent from local governance dialogues, and their lived realities—of wanting stability, affordable housing, or straightforward access to rights—rarely shape policy choices although the lengthier periods of ‘short-stay’ housing in the municipality of Venlo are hopeful. It remains a fact that in this system, accepting exploitative or insecure conditions becomes a rational strategy simply to maintain work and shelter.

In sum, while the region shares an interest in economic continuity and the reduction of blatant abuses, the assumptions and practices of its core institutions often reinforce the very precariousness they seek to manage. The clash between frames of temporariness and settlement, between compliance and substantive responsibility, and between visibility and invisibility will continue to shape the possibilities for more equitable and sustainable governance of migrant labour in Greenport Venlo.

## 5. Conclusion

The case of Greenport Venlo illustrates with sharp clarity the tensions, contradictions, and vulnerabilities at the heart of the Netherlands’ agro-industrial success. The region’s economic prosperity in agriculture and food processing is built upon the labour of ten thousands of predominantly EU mobile workers, who face ongoing precariousness in both employment and housing, as in access to rights. While local and national actors have introduced policies and practices aimed at improving conditions, the structural dependence on temporary agency work, complex subcontracting arrangements, and tightly regulated but commercially driven housing systems reveals that significant vulnerabilities remain.

A key insight of this study is the fragmented and highly intermediated nature of employment in the region. Migrant workers are often recruited through layered and opaque agency networks, which obscure contracts and make it difficult for workers to know their rights, and claim them. Employment insecurity is not simply the result of individual employer misconduct but is embedded in broader systemic dynamics, including flexibilized labour markets and supermarket-driven cost pressures. These conditions foster a hyper-flexibilized system in which employers enjoy maximum adaptability while workers face minimum protection.

Three research questions structured the analysis:

- Micro level: What are the working and housing conditions of migrant workers? This question is mainly descriptive and aims to diagnose the problem to be explained;
- Meso level: How do the frames, strategies and interactions of the various actors involved, in a context marked by endogenous and exogenous factors, influence the migrant workers' working and living conditions? This question is explanatory and aims not only to understand the economic and social processes that determine these conditions but also to clarify to what extent these actors have the capacity (or not) to transform them.
- Macro level: Are policies and measures (strategies) aimed at improving the working and living conditions of these workers effective? The question is to what extent these measures have represented an improvement and, whether they have or not, why. This question is again explanatory (about the functioning of policies) and seeks to identify the strengths and weaknesses (both in design and implementation) of these policies in order to rethink them.

Housing, similarly, remains a central battleground. Although municipalities have implemented planning regulations and certification regimes to improve housing quality, these same policies have created a booming market for short-stay facilities that treat workers as temporary, interchangeable, invisible, "hands" and "beds" rather than as residents or rights-bearing individuals. The widespread use of temporary housing parks, governed by strict surveillance and short-term leases, reflects a broader governance approach that seeks to manage, rather than integrate, the migrant workforce. The separation of employment and housing relationships—intended to reduce dependency—has at times unintentionally increased vulnerability, particularly in cases of job loss or eviction. A single win in Court is welcomed but does not overthrow the system.

The region's governance strategies—whether through municipal planning, certification regimes, and collaborations with NGOs are caught between competing imperatives: economic development, spatial constraints, labour rights, and social cohesion. While some local actors are taking steps toward more inclusive approaches—such as integration policies, language programs, and participatory frameworks—these remain partial and often fragile. The dominant frames in local policy still revolve around managing "beds" and "hands" rather than recognizing and supporting the social lives and long-term presence of migrant workers.

Ultimately, the Greenport Venlo case exemplifies a broader dilemma in contemporary European labour migration governance: how to reconcile the economic demand for flexible, low-cost labour with normative commitments to decent work, social inclusion, and human dignity. Without a fundamental rethinking of the economic and institutional models that sustain precarious work, particularly the central role of temporary work agencies and the outsourcing of employer responsibilities, migrant workers will remain exposed to cycles of insecurity. Future interventions must not only address regulatory gaps and enforcement failures but also challenge the underlying economic logics that prioritize profit over people. However, this is not a matter to be solved at the local battlefield, but rather at the national level.

In the meantime, the rules on short-stay housing of the Venlo municipality changed (from 10 years to 25, Venlo 2024) which opens new opportunities for more long-term housing projects, while the national parliament raises the quality standards. Earlier, the Parliament had voted in favour of fast tracking the obligation for all workers to be offered a private room, which would mean that present housing facilities would need to be adjusted.

We close this report noting that weeks before the right-wing government collapsed the national parliament agreed on a motion to ban large scale housing facilities, all together. The local battle in Noord-Limburg thus reached national politics. The motion, tabled by the Socialist Party read:

*“Considering that in Horst aan de Maas, (...) and other locations, large-scale projects are in preparation in which migrant workers will be housed in cramped conditions in exchange for lodging; Considering that more housing locations will lead to more migrant workers; Declares that this development is highly undesirable and must be stopped; requests the government to come up with an action plan to prevent the construction of large-scale locations (...)”*

The targeted large scale of housing is not common to greenhouse agricultural businesses, where premises are more commonly offering rooms to some 80-150 migrants. Turning to smaller scale housing facilities requires more feet on the ground to inspect the quality yet it could also offer ground for integration in local communities for those migrant workers willing to settle in. However, integration was not the frame engaged with to argue for a ban on large scale facilities. The frame is an economic one, challenging the systemic dependency of the Dutch farm2fork sector on migrant workers who are not by definition temporary workers.



The newly appointed government must try to strike a better balance from early 2026 onwards.



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**Annex I: List of interviewees**

**24 WP5 DF-NL Interviews, held with 31 respondents**

Code	Organization	Sector
DF-NL 1	NGO	Civil Society
DF-NL 2	Workers Cooperation	Civil Society
DF-NL 9	Business Association	Civil Society
DF-NL 10	State Actor	Government
DF-NL 11	Local Administration	Government
DF-NL 14	Temp Agency	Industry
DF-NL 15	Legal Aid	Civil Society
DF-NL 18	Union	Civil Society
DF-NL 19	Advisor	Civil Society
DF-NL 20	Food Processor	Industry
DF-NL 22	Auditors	Industry
DF-NL 23	Local Administration	Government
DF-NL 24	Fruit Farmers Cooperation	Industry
DF-NL 31	Public Prosecutor	Government
DF-NL 38	Labour Inspector	Government
DF-NL 40	Local DF-NLerest group	Civil Society
DF-NL 41	Temp Agency	Industry
DF-NL 42	Temp Agency	Industry
DF-NL 43	Advisor	Civil Society
DF-NL 45	Farmer	Industry
DF-NL 46	Local Administration	Government
DF-NL 47	Housing Agency	Industry
DF-NL 60	Farmer	Industry
DF-NL 61	Local Administration	Government



## Annex 2: List of legal aid Cases

Code	Nationality Claimant	Gender	Legal Domain	Type of complaint
JL 1409	Hungarian	M	Mixed	Labour contract not extended, no income, risk of homelessness
JL 1503	Romanian	M	Labour	Accident at work, forced to return to work while still recovering, unpaid wages
JL 1519	Polish	M	Labour	Accident at work, unpaid wages; threat of forced eviction by police, 4 weeks accommodation if rent is paid awarded
JL 1535	Polish	M	Labour	Accident at work, damages
JL 1596	Hungarian	M	Labour	Permanent job contract but no pay slips, uncertainty over rights
JL 1600	Romanian	M	Labour	Terminated labour contract, rent for accommodation, homelessness
JL 1645	Romanian	M	Criminal	Attacked by a co-worker, reporting to the police
JL 1724	Romanian	M	Labour / Social Security	Sick leave, re-integration
JL 1727	Romanian	M	Mixed	No rental agreement, rent deducted from salary, no holiday allowance
JL 1803	Polish	M	Labour	Unpaid Wages
JL 1996	Polish	M	Labour	Cut in working hours
JL 2006	Hungary	M	Mixed	Living conditions accommodation, working hours
JL 2025	Polish	M	Labour / Social Security	Unpaid wages; Sick leave, treatment in Poland, inability to travel, benefits denied
JL 2077	Hungarian	F	Labour	Sick Leave, end of labour contract
JL 2095	Polish	M	Labour	Accident at Work
JL 2245	Polish	M	Administrative	Went home to recuperate from illness, municipality plans to deregister him, which he contests, planning to return
JL 2555	Hungary	M	Labour	Travel allowance; irregular working hours, reduction of holidays
JL 11520	Hungary	3xM	Labour	Recruited via Facebook, at work without labour contracts, lengthy working days, no pay, homelessness
JL 11521	Hungary	F	Social Security	Length of benefit following accident at work; Employer offered reintegration program and provided accommodation
JL 11522	Hungary	M	Labour	Accident at work, sick leave, end of labour contract
JL 11523	Chili/Italy	M	Mix	Rent deducted from salary (50%), working more hours than agreed
JL 11524	Polish	M	Labour	Assistance with understanding payslip
JL 11525	Romanian	M	Labour	Conflict over behaviour on work floor (using of phone)
JL 11526	Polish	M	Mixed	Rent deduction, Accident at work, labour rights
JL 11527	Polish	M	Labour	End labour contract reporting in sick
JL 11528	Romanian	F	Labour	Accident at work, labour contract terminated; no payment

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# Temporary Workers, Permanent Dependence?

## The Local Battle over Migrant Labour in the Dutch Agri-Food Sector

### **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.

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