

Migrant labour in Farm-to-Fork: Fixing governance gaps, putting dignity at work

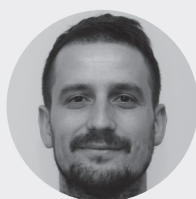
Alberto-Horst Neidhardt



Table of contents

Executive summary	2
Introduction	4
1. Agenda setting: why visibility does not produce durable priorities	5
2. Policy formulation: how frames narrow options and outcomes	10
3. Implementation: capacity, incentives, and enforcement in practice	15
4. Monitoring and evaluation: what do current indicators tell us, and what do they miss?	20
Conclusion and recommendations	24
Endnotes	27

ABOUT THE AUTHOR



Alberto-Horst Neidhardt is Senior Policy Analyst and Head of the European Migration and Diversity programme at the European Policy Centre.

ACKNOWLEDGEMENTS / DISCLAIMER

The author would like to thank Annalisa Buscaini for her valuable contributions to earlier drafts of this Discussion Paper. Gratitude is also extended to the reviewers and colleagues who provided comments and inputs at different stages of the research and drafting process, including Tesseltje de Lange, Hanane Darhour, Pawel Kaczmarczyk, Blanca Garcés-Mascareñas, Irene Ponzio, Imanol Legarda Díaz-Aguado and Lilana Keith. Their reflections and expertise have helped strengthen the analysis.

The support the European Policy Centre receives for its ongoing operations, or specifically for its publications, does not constitute an endorsement of their contents, which reflect the views of the author only. The views expressed in this Paper do not necessarily represent the positions of the DignityFIRM consortium partners and their affiliated institutions. Supporters and partners cannot be held responsible for any use that may be made of the information contained therein.

Executive summary

Migrant workers play an essential role in agrifood systems, from harvesting and food processing to logistics and delivery. Across countries and Farm-to-Fork (F2F) sectors, foreign nationals disproportionately fill physically demanding and low-paid roles, often under conditions marked by contractual insecurity, limited access to services, language barriers and employer-linked housing. While these situations typically affect those in an irregular situation, precarity extends beyond migration status and reflects deeper structural dependencies.

At the same time, many F2F sectors face chronic difficulties in recruiting domestic workers. Demographic trends, changing occupational preferences and tight profit margins intensify reliance on migrant labour, including seasonal and temporary workers. These dynamics are well documented. Yet undignified working and living conditions persist.

This Paper argues that this issue cannot be explained by a lack of EU rules or knowledge. Rather, it reflects three interrelated dynamics: (1) sustained supply-chain pressures with cascading effects on working conditions; (2) political prioritisation and will; and (3) weaknesses in the policymaking process itself. EU action affecting migrant workers in F2F sectors is shaped by siloed rationales (competitiveness, migration control, food security and social protection), stakeholder power asymmetries, uneven enforcement and limited monitoring and feedback loops. Under these conditions, exploitation is not an anomaly but a structural feature indicative of weak governance.

The Discussion Paper, which also constitutes the Final Report of the Horizon Europe project DignityFIRM, applies a policy-cycle lens to examine these dynamics across four phases: agenda setting, policy formulation, implementation, and monitoring and evaluation.

Exploitation is not an anomaly but a structural feature indicative of weak governance.

First, it shows that while the conditions of F2F workers have repeatedly entered the political debate – most visibly during COVID-19 and in response to high-profile exploitation cases – they have rarely become a sustained, cross-cutting priority. Attention has been episodic, and migrant workers, particularly those in irregular or dependent situations, remain structurally underrepresented in agenda setting.

Second, in policy formulation, tensions between sustainability and competitiveness frames, and between migration control and labour dynamics, shape reforms in areas such as due diligence, agricultural policy and migration governance. Despite the stated goal to reduce the administrative burden arising from social sustainability rules, small businesses in F2F remain subject to significant supply pressures. Meanwhile, return-centred approaches to irregularity risk deepening precarity in sectors structurally reliant on informal labour, while overlooking their impact on labour supply.

Third, in implementation, the Paper highlights persistent capacity gaps with significant effects on working conditions and the agri-food sector as a whole. The enforcement of health and labour standards, but also of the Employers' Sanctions and Seasonal Workers directives, is constrained by limited resources, employer dependency and administrative systems that do not align with sectoral realities. Across the member states examined in the project, businesses struggle to recruit workers. Where labour pathways are slow or unpredictable, reliance on intermediaries and subcontracting chains increases, complicating accountability.

Finally, monitoring systems remain fragmented and output focused. Data gaps, underreporting and siloed indicators obscure systemic trends and weaken feedback loops into policymaking.

The Discussion Paper develops recommendations focusing on addressing the structural drivers of vulnerability and correcting governance shortcomings. These include:

- ▶ Reducing status-based dependency in labour migration frameworks;
- ▶ Making intermediation chains governable;
- ▶ Treating housing as a core labour issue;
- ▶ Strengthening safe reporting and access to remedies;
- ▶ Rebalancing value-chain incentives, and;
- ▶ Investing in outcome-based monitoring and implementation capacity.

Taken together, these measures aim to move from episodic responses to a more coherent, systemic approach, putting dignity at work in F2F sectors.

Introduction

Undignified working and living conditions for migrant workers are not a marginal anomaly in Farm-to-Fork (F2F) sectors; they are a structural feature of production models defined by seasonal peaks, tight profit margins and supply-chain pressures. Across the European Union (EU), migrant workers sustain essential activities – from harvesting to delivery – and fill roles that are physically demanding, time-pressured and hazardous. Many face low pay, long hours and limited access to services. Precarious residence status increases vulnerability to abuse. While risks vary by migration status, precarity is a shared reality, affecting both non-EU nationals and EU citizens (see Box 1).

Undignified working and living conditions for migrant workers are not a marginal anomaly in Farm-to-Fork sectors; they are a structural feature of production models defined by seasonal peaks, tight profit margins and supply-chain pressures.

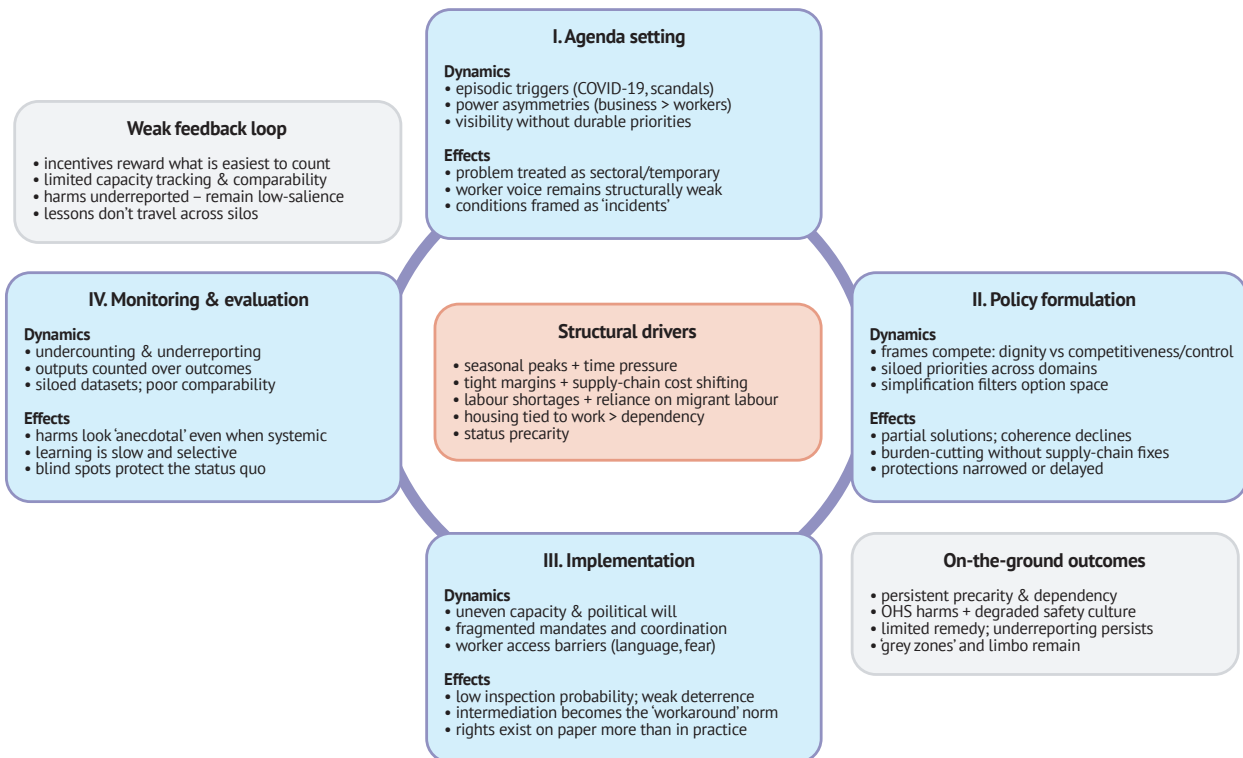
Drawing on insights from the Horizon Project DignityFIRM,¹ this Discussion Paper argues that the persistence of these conditions does not stem from a lack of EU-level policies or knowledge. Numerous reports have already mapped existing rules and proposed correctives.² Instead, this Paper suggests that the problem persists due to three interrelated dynamics:

1. **Socio-economic pressures:** workforce composition and occupational preferences as well as supply-chain dynamics;
2. Political prioritisation and **political will**;
3. **The policymaking process:** structural flaws in how EU policy is designed and executed (see Figure 1).

First, labour supply in F2F sectors is constrained by declining participation among native-born workers, driven by changing expectations and demographic trends. This has made **migrant labour an essential and permanent feature of EU agri-food sectors**. While mechanisation can address some bottlenecks, manual labour remains integral to large parts of agri-food production in many member states. Simultaneously, the treatment of these workers shows the cascading effects of **supply-chain pressures**. Food industries often impose unfair prices upstream, particularly on producers, who may then reduce labour standards to compress costs.

Figure 1

GOVERNANCE GAPS IN FARM-TO-FORK SECTORS



Consumer demand for low-priced, year-round fresh produce further amplifies these pressures, as retailers respond to customer expectations by pushing prices and risks upstream. **These systemic drivers limit the impact of isolated initiatives.**

Second, persistence reflects **political prioritisation**. The current EU migration debate is dominated by irregular migration. Due to its salience and complexity, policymakers frequently prioritise political signalling over evidence-based solutions. Yet policymakers retain scope for pragmatic approaches that benefit workers, employers, economies and society at large.

This Paper focuses on a third, interrelated and relatively less examined cause: the internal mechanics of EU policymaking. EU action is shaped by power asymmetries, siloed policymaking, uneven implementation and weak monitoring. This creates fragmentation and blind spots that reinforce exploitation. From this perspective, abuses are not mere deviations but structural outcomes of **weak governance architecture**.³ Addressing working and living conditions in F2F sectors thus requires moving beyond single-domain explanations.

To this end, the Paper applies a policy-cycle framework across four phases:⁴

1. **Agenda setting**: how and why problems are prioritised;
2. **Policy formulation**: how evidence is filtered and how frames shape policy choices;
3. **Implementation**: how national practice translates EU frameworks under varying capacities;
4. **Monitoring and evaluation**: what is measured and how the system learns.

The analysis focuses on **agriculture and food delivery**, with some reference to **food processing**. It draws primarily on evidence from **Italy, the Netherlands, Poland, Spain and Germany**, with additional reflections from **Ukraine and Morocco**. Using a ‘regulatory infrastructure’ approach, it examines policies related to migration, labour, agriculture and business responsibility.⁵ The Paper covers developments from 2020 to early 2026 without attempting to map all initiatives exhaustively. Instead, it uses selected examples to illustrate recurring policymaking patterns and their implications for F2F

workers. While irregularly staying migrants (also referred to as ‘undocumented’) are central to DignityFIRM, this Paper understands irregularity broadly, also covering migrant workers with regular residence permits who work in informal or atypical employment.

Finally, the Paper offers policy recommendations aimed at reducing policy fragmentation, strengthening the governance of F2F sectors and improving working conditions in agri-food sectors, including for people in an irregular situation. The recommendations suggest ways to:

- ▶ Enhance **recruitment** of migrant workers to address growing **labour supply challenges** while **ensuring robust labour and social protections**;
- ▶ Address **upstream pressures in food supply chains** that ‘price out’ compliance while strengthening producers’ leverage, with positive spillover effects for working conditions;
- ▶ **Make implementation capacity a governance priority** by establishing benchmarks and systematically assessing member state capacity;
- ▶ Make **safe reporting and remedy real** by promoting binding firewalls that separate labour enforcement from immigration control;
- ▶ Reduce **vulnerabilities by ‘de-risking’ and ‘de-coupling’ housing** from employment;
- ▶ Build EU-wide monitoring systems that track the **quality of work and living conditions**;
- ▶ Embed **structured participation of migrant workers**, alongside unions, civil society organisations (CSOs) and employers in dedicated F2F dialogues to strengthen policymaking effectiveness.

These recommendations cannot resolve broader economic shifts but offer a pathway to more coherent EU policymaking aligned with international commitments. These include the United Nations’ Sustainable Development Goals⁶ and the goals set by the Global Compact on Migration.⁷ The Paper’s recommendations and findings also highlight research gaps and invite reflection on issues beyond the scope of DignityFIRM, including which crops are currently produced under the least socially sustainable conditions.⁸

1. Agenda setting: why visibility does not produce durable priorities

This section examines how the conditions of migrant workers in F2F sectors entered – and exited – EU-level policy agendas between 2020 and 2025. Agenda setting refers to the processes through which political

attention is triggered and actors are recognised as legitimate stakeholders in defining what constitutes a policy issue. The starting point for this analysis is 2020, as the outbreak of COVID-19⁹ and the publication of

the EU Farm to Fork Strategy¹⁰ that year brought the sustainability and resilience of food systems – and the role of essential workers within them – to the fore. In parallel, this period also marked an intensified EU-level regulatory agenda regarding corporate social responsibility (see Section 2.1).

While these events affected migrants in F2F sectors, their working conditions did not enter the EU and national agendas in a sustained or cross-cutting way. This is because the triggers activated competing rationales rather than a shared problem definition, while asymmetries in agenda-setting power between stakeholders overshadowed the interests and voices of migrant workers.

1.1 AGENDA TRIGGERS AND COMPETING FRAMES

Trigger A: COVID-19. ‘Essential workers’ and resilience of food systems without a protection turn

The COVID-19 pandemic and its public health and economic consequences amplified the visibility of ‘essential workers’¹¹ across agriculture, food processing and delivery, alongside sectors such as logistics and retail. This opened a policy window in which worker conditions could have been treated as integral to the F2F sectors, reflecting their economic role and the need to improve fairness and sustainability.

Even in member states where resilience featured prominently, dignified working conditions rarely emerged as an overarching objective. Instead, targeted measures were prioritised in high-risk segments.

This was also reflected in EU initiatives. For example, the Commission’s contingency plans for ensuring food supply in times of crisis pointed to **migration and labour** as “factors of productions [sic.]” that “**may threaten the functioning of the food supply chain**”.¹² Where policy action followed, it was often limited to addressing acute disruption risks at European and national levels, such as when labour shortages, bottlenecks or outbreaks directly threatened food security.¹³

The dominant framing focused on resilience and continuity of production. Working conditions remained ancillary in the agenda, treated instrumentally as a way to stabilise supply chains.¹⁴ Even in member states where resilience featured prominently, dignified working conditions rarely emerged as an overarching objective. Instead, targeted measures were prioritised in high-risk segments.

Germany’s meat sector illustrates this pattern.

Following COVID-19 outbreaks in processing plants, the Health and Safety Control Act (ASKG) was introduced at the end of 2020.¹⁵ The ASKG banned subcontracting in the ‘core business’ of the meat industry (i.e., slaughtering, deboning and cutting), stipulated the electronic recording of working hours and increased the frequency of inspections and employer fines. The initiative shows how context-specific alignment among stakeholders can reshape workers’ living and working conditions (see Section 2 on policy formulation and Box 2).¹⁶

Yet this initiative did not lead to lasting effects. COVID-19 outbreaks functioned as a trigger for targeted changes rather than a paradigm shift. An *ad hoc* coalition addressed a narrow sectoral problem without embedding it in a broader F2F labour strategy.¹⁷

The **Italian** regularisation for non-EU nationals employed in agriculture, forestry and domestic sectors, launched in 2020, provides another example of a partial policy change in time and scope in response to increased awareness of the key role of migrant workers in F2F sectors. Proposed after farmers’ organisations sounded the alarm about labour shortages, it functioned as a short-term labour supply fix rather than a long-term solution to exploitation (see Section 2.3).¹⁸

Policymakers in other European countries acted pragmatically during the pandemic, implementing measures to facilitate **access to the labour market for non-EU nationals** already residing in their territory – as well as for EU citizens – in order to address labour shortages, especially in seasonal activities.¹⁹ The main aim was to secure a stable source of labour rather than to improve workers’ living and working conditions.

Overall, COVID-19 legitimised labour conditions as a policy concern in some contexts, but the agenda-setting effect was uneven and short-lived. As the pandemic receded, attention to the working and living conditions of foreign workers largely faded, despite broad recognition that these conditions represent a systemic vulnerability of EU labour markets.²⁰ The issue virtually disappeared from the EU’s agenda, as reflected in post-COVID food security and preparedness reports.²¹

Overall, COVID-19 legitimised labour conditions as a policy concern in some contexts, but the agenda-setting effect was uneven and short-lived.

This forms the backdrop to policymaking in F2F sectors across virtually all member states today.

BOX 1. STRUCTURAL PRESSURES AND DEPENDENCY DYNAMICS IN FARM-TO-FORK SECTORS

Farm-to-Fork (F2F) sectors concentrate multiple, reinforcing pressures and dependencies. These include seasonality and demand peaks, especially in agriculture, the need for rapid recruitment at scale, tight margins and persistent supply-chain pressures. These conditions incentivise flexible and low-cost labour sourcing. In this context, foreign workers face systemic risks linked to precarious residence status and employer dependency, which can increase acceptance of unsafe or exploitative conditions. Seasonal workers are particularly exposed where permits are tied to specific employers, bargaining power is limited and income insecurity is common.

Labour intermediation systems can further entrench dependency when access to work, permits, housing or transport is mediated by private actors, sometimes

reducing net earnings below minimum wage. Weak enforcement of occupational safety and health standards intersects with language barriers and limited access to information and union representation. Living conditions can further intensify dependencies and vulnerabilities. Foreign workers may experience overcrowding, discrimination in access to rental markets and social isolation. Where housing is tied – formally or in practice – to employment, dependence deepens and the cost of job loss increases.

In food delivery, risks stem from dispersed workplaces, algorithmic management and atypical contractual arrangements. Outsourcing and self-employment models can blur responsibility and weaken accountability for working conditions and unpaid time.

Trigger B: Exploitation and accidents. Episodic attention, limited spillover

The DignityFIRM project did not systematically monitor the media landscape across member states. It accordingly did not attempt to track severe exploitation, extreme living conditions and fatal accidents in F2F sectors reported by the news at national and local levels. Still, its analysis of policy interventions at the country level shows that incidents tend to draw some media attention and sometimes prompt protests. However, they typically produce narrow, sector-specific responses with limited spillover. When such events reach policy agendas, they tend to be processed through domain-specific lenses such as crime control or compliance failures. This fragmentation is visible across national contexts:²²

- ▶ In **Spain**, serious accidents and public attention to abusive work have repeatedly raised questions about crime and labour standards, alongside the situation of undocumented workers. Yet this has not produced a stable cross-domain agenda linking migration and labour enforcement.
- ▶ In the **Netherlands**, attention often centres on complex responsibility chains and intermediated work rather than wider debate about the structural reasons for dependency and the (ab)use of intermediaries.
- ▶ In **Poland**, agenda setting is politically anchored in security narratives, prioritising the policing of irregular residents even when the underlying governance problem is labour-market irregularity. This framing shapes which **solutions are considered ‘thinkable’ and which are deprioritised.**²³

Prior to the period monitored by DignityFIRM, notable initiatives were taken in connection to public campaigns and media coverage. For example, **Italy** introduced in 2016 a law against labour exploitation in agriculture

and ‘gangmastering’ (*caporalato*) by imposing strict criminal and administrative penalties on both exploiting gangmasters and employers. This initiative has been linked to the rising salience of labour exploitation in agriculture in Italian public debate.²⁴ Although the law is a step forward, the caporalato system persists due to supply-chain pressures, housing and transport dependencies, and inconsistent enforcement, pointing to the limits of agenda setting and policy initiatives without attention to implementation (see Section 3).²⁵

A related complication is **systematic underreporting**. Where workers face risks linked to status, retaliation or removal, they are less likely to report exploitation. Undignified work thus appears episodic rather than endemic under certain sectoral and regulatory conditions.

Across domains, the result is an agenda that recognises problems intermittently and fails to consolidate them into a sustained, cross-cutting approach. This is also reflected in the narrow framing through which EU-level debate addresses exploitation of irregular migrant workers today. While this is among the Commission’s priorities for the 2024–2029 political cycle,²⁶ EU initiatives appear primarily geared towards containment and return measures, at the risk of sidelining or even exacerbating the structural drivers of undignified conditions (See Section 2.3).

EU initiatives appear primarily geared towards containment and return measures, at the risk of sidelining or even exacerbating the structural drivers of undignified conditions.

*Trigger C: Farmers' protests and simplification.
Competitiveness crowding out protections*

Against the backdrop of economic and geopolitical turbulence, the European Commission has placed simplification and competitiveness at the centre of the 2024–2029 cycle (see Section 2).²⁷ This agenda aims to strengthen Europe's industrial position in relation to major global competitors. It has been driven by geopolitical tensions, including Russia's war against Ukraine, and their economic effects. It also followed large-scale farmers' protests in Brussels and across several member states between late 2023 and 2025.

Unlike COVID-19, which temporarily widened the space to link labour protection to resilience, these events activated a broader programme focused on regulatory simplification. The Commission launched initiatives to revise or roll back planned and adopted measures across policy areas, with the stated objective of reducing administrative burden, including for small and medium-sized enterprises.²⁸ Agriculture has received special attention in this context. Burden reduction and competitiveness emerged as dominant priorities, often framed as in tension with environmental and social objectives (See Section 2).

Simplification efforts have not been consistently underpinned by large-scale impact assessments or robust consultation strategies. This suggests that EU policy initiatives have been mainly driven by short-term political considerations rather than a solid understanding of sectoral needs.

This shift has two implications for migrant workers in F2F sectors. First, it has narrowed the range of 'acceptable' reforms, privileging measures framed as easing constraints on producers and EU-based businesses. Second, it has further sidelined migrant workers' conditions in the political debate, despite agri-food sectors' structural reliance on migrant labour.

However, simplification efforts have not been consistently underpinned by large-scale impact assessments or robust consultation strategies. This suggests that EU policy initiatives have been mainly driven by short-term political considerations rather than a solid understanding of sectoral needs.

Notably, the simplification turn also appears to have had limited impact on the opening or promoting of labour pathways into F2F labour markets, despite this being a key element of both food security and EU competitiveness. Initiatives such as the 2024 revision of the Single Permit

Directive and the 2025 Talent Pool²⁹ may only have limited effects on F2F sectors, particularly agriculture, leaving labour supply pressures in place. This reflects selective agendas and siloed policymaking (see Section 2).

1.2 STAKEHOLDER REPRESENTATION: WHO SETS THE AGENDA?

Across countries, agenda setting is shaped by power asymmetries. Three groups illustrate the sources and effects of these imbalances: 1) **employers** and sector organisations; 2) **trade unions and civil society organisations (CSOs)**; and 3) **migrant-led organisations and initiatives**.

Employers: institutional access and agenda influence

At EU and national levels, business representatives in F2F sectors – including farmers, platforms and retailers – benefit from strong institutional access. They are recognised as legitimate and can mobilise politically to advance sectoral agendas. Recent farmers' protests illustrate this: their presence ahead of the 2024 European Parliament elections made responding to their needs a political imperative, framing the agenda around flexibility and burden reduction while treating labour conditions as secondary.

These dynamics are also visible at the national level. In **Poland**, for example, farmers have successfully lobbied throughout the years for specific arrangements like the Harvest Help contract to meet agricultural labour needs.³⁰

Privileged access does not automatically translate into improved structural conditions for smaller enterprises, however, nor agendas that are unequivocally perceived in their favour. This is illustrated by the EU-Mercosur Partnership Agreement that, it is argued, will increase pressure on farmers in Europe.³¹ Rather, it influences which problems are seen as urgent and which instruments are considered acceptable.

Unions and CSOs: frontline protection, uneven influence

While CSOs and trade unions differ in their influence, especially where social dialogue is present, both play a similar and central role in identifying abuses, supporting workers and facilitating access to remedy. DignityFIRM shows that, in **Italy** and **Spain**, unions frequently provide legal assistance, including filing complaints on workers' behalf and, in some cases, representing workers in court.³² In Italy, unions have also supported worker mobilisation, including strikes that have contributed to improvements in pay and working conditions.

In some countries, CSOs have helped make exploitation visible and pushed for stronger protections, as in **the Netherlands**, with mixed results.³³ In others, their role is constrained by competing priorities and stronger voices. Some collective initiatives have also emerged – such as Spain's 'Mensakas' and 'Som Ecològística' in the **delivery sector**, which have promoted formal contracts, social protection and pathways to regularisation.³⁴ Without

public support, such initiatives typically face scalability challenges and financial constraints (see Section 3.2).

CSO involvement is often weakly institutionalised, context-specific and politically contingent. Alongside Unions, CSOs contribute most directly to protections on the ground. Structurally, however, they are also often weaker than business actors in setting EU agendas.

Recent agri-food initiatives, for example, simplification efforts, have involved limited meaningful engagement between EU institutions and unions, CSOs or migrant workers. Illustrating this is the Strategic Dialogue on the Future of EU Agriculture, which served as the foundational input for the Vision for Agriculture and Food (see Section 2.2) and was steered by the Directorate-General for Agriculture and Rural Development. Despite its emphasis on working conditions,³⁵ the Dialogue reportedly only involved one organisation focusing on workers in food supply chains.³⁶ Following the Vision's launch, the Commission established the European Board on Agriculture and Food (EBAF) to institutionalise the dialogue and support implementation. These gaps persist, with some CSOs arguing that EBAF shifted power further toward industry.³⁷

EBAF thus reflects a deeper malaise about the lack of sustained consultations and inclusive agenda-setting power, which resonates with the challenges that initiatives outside the Union also face (see Box 2).

Multi-stakeholder approaches could reduce power asymmetries, promote coherence between migration policy and labour policy and reinforce the commitment of state, non-state, national and international actors in a coordinated, convergent and integrated manner. However, at EU and national levels, initiatives remain haphazard and short-lived.

BOX 2: MIGRATION GOVERNANCE AND SOCIAL DIALOGUE IN MOROCCO

In 2013, Morocco adopted the National Immigration and Asylum Strategy (SNIA). The SNIA culminated in two large scale regularisation campaigns, and the launch of a dedicated social dialogue.³⁸ In March 2022, with the support of the International Labour Organization (ILO), workers' and employers' organisations signed a Joint Charter for the Protection of the Rights of Migrant, Refugee Workers and their Family Members. The Charter promoted a tripartite dialogue involving the government, employers and workers. This has enabled consultations and awareness campaigns on working conditions (including for irregular migrants) and risks of exploitation and trafficking, often with national and international partners. However, the extent to which the dialogue affects labour conditions on the ground remains subject to discussion, particularly as key policy initiatives, such as the reform of Moroccan immigration law and enforcement of asylum provisions, remain pending.

An opening may emerge from another social dialogue launched by the European Commission in late 2025 under the direction of its Directorate-General for Employment, Social Affairs and Inclusion.³⁹ While this could transcend sectoral boundaries and lead to a more coherent approach (also feeding future initiatives such as the Quality Jobs Act), the fact that several tracks and dialogues exist within the Commission raises questions surrounding leadership, coherence and added value.

Migrant workers: structural exclusion from agenda setting

Migrant workers – particularly those in irregular situations – have the weakest representation and agenda-setting power among stakeholders. This is paradoxical, given the growing share of migrant workers in F2F sectors (see Section 4.1) and that meaningful involvement could make policymaking more effective. Their absence from political discourse is shaped by legal and practical barriers, including the constraints posed by their migration status. Fear of retaliation or removal can also reduce visible participation in advocacy and policy debate.

Beyond irregular status, excessive working hours and livelihood pressures reduce the capacity for sustained engagement. Many migrant workers prefer to avoid the spotlight – not only due to fear of law enforcement but also word-of-mouth among employers, which could mean losing access to job opportunities in other sectors. In addition, many lack trust in existing institutional mechanisms, reinforcing the perception that active engagement will not improve their living and working conditions.

Language barriers further reduce migrant workers' ability to influence agendas.⁴⁰ The economic geography of F2F sectors also limits collective organisation – in agriculture through **physical isolation**, remote workplaces and tied accommodation, and in delivery through **dispersed work patterns**.

Alternatives exist, however. Participatory approaches can support more inclusive agenda setting. They also enable the systematic involvement of migrant workers in assessing and co-designing policies (see Box 3), strengthening migration and labour governance.

Developments across agriculture, social policy and business responsibility are better understood as a set of interacting rationales that repeatedly privilege one priority or interest, reinforcing domain-specific dynamics and stakeholder hierarchies.

BOX 3. PARTICIPATORY ACTION RESEARCH: FROM LIVED EXPERIENCE TO POLICY CO-DESIGN AND IMPLEMENTATION

DignityFIRM included a Participatory Action Research (PAR) component in Spain, Poland and the Netherlands, enabling migrant workers to lead **peer-to-peer focus groups**. Their experiences reinforced the project's findings and helped identify practical policy options through lived experience. Participants identified **migration status** as a central driver of vulnerability and a barrier to reporting abuse. They stressed the need for accessible regularisation pathways as well as longer and more secure residence and work permits.

They highlighted that effective reporting mechanisms require operational firewalls between labour inspection and immigration enforcement, combined with real access to remedy. Participants also observed that many migrant workers are penalised for irregular work without fully understanding their status. In their view, the presence of exploitative intermediation practices underscores the need for clearer information and accountability mechanisms.

Taken together, agenda-setting between 2020 and 2025 can be read as a 'silo factory'. Developments across agriculture, social policy and business responsibility are

better understood as a set of interacting rationales that repeatedly privilege one priority or interest, reinforcing domain-specific dynamics and stakeholder hierarchies.

2. Policy formulation: how frames narrow options and outcomes

This section examines how dominant frames shape EU policy formulation and current reforms affecting F2F sectors across different domains. Three areas are chosen: simplification and its implications for (1) **due diligence obligations**, (2) the **social conditionality mechanism** in Common Agricultural Policy (CAP) as well as (3) **return governance**. These show how sustainability is giving way to a competitiveness imperative, with consequences for agri-food governance.

Overall, a trade-off has emerged between sustainability and competitiveness. Instead of identifying ways to ensure policy coherence, this contraposition generates inconsistent signals about what is truly prioritised and why, risking a weakening of trust in EU-level policies. Re-opening scope, timelines or key definitions shortly after adoption not only risks producing protection gaps; it also penalises early compliance. Nor does it necessarily guarantee greater competitiveness, as weak evidence uptake combined with limited consultation (see Section 1) makes targeted and impactful changes less likely. Sectoral realities and implementation constraints (see Section 3) would only surface long after reforms are applied, shifting uncertainty in the immediate term and pressure downstream to producers and workers, thus repeating past mistakes.

Meanwhile, a lack of coherence and systemic thinking in the policy formulation process also generates blind spots, as illustrated by the reform of the return framework. While this responds to political priorities in the EU migration agenda, the reform will have significant implications for labour supply dynamics in sectors that structurally depend on irregularly staying migrant

workers. The rules which are close to being finalised could also generate more precarity and abuse, despite the Commission's stated commitment to eradicate labour exploitation among irregularly staying migrants. Yet the prioritisation of the irregular migration frame over broader socio-economic considerations means that these contradictions have been overlooked.

While these shortcomings in the policymaking process may widen protection gaps for F2F workers, alternative framings and policy approaches remain possible. This points to continued scope for political will and leadership.

2.1 BUSINESS RESPONSIBILITY: THE NARROWING OF DUE DILIGENCE AMBITIONS

Amid geopolitical tensions and fiscal constraints,⁴¹ simplification has become a central EU priority.⁴² In a push to boost competitiveness and economic growth, the Commission launched an 'Omnibus' agenda in February 2025 to reduce administrative burdens across policy areas.⁴³ Following the 2024 European Parliament elections, this competitiveness-first narrative gained further momentum, with additional reform proposals tabled by the Commission and sustainability increasingly framed as secondary to economic performance and investment attractiveness.

The dominance of simplification frames and their implications for food governance is visible in the evolution of EU due diligence rules. The Commission proposed a Corporate Sustainability Due Diligence Directive (CSDDD) in February 2022. The proposal

required companies to conduct human rights due diligence across value chains, including identifying, preventing and mitigating adverse impacts. The original scope covered large companies with more than 500 employees and a net turnover of over €150 million. The proposal also identified high-risk sectors, including agriculture and the manufacture of food products, lowering the threshold for these sectors to companies with 250 employees and €40 million in turnover.

The Commission's impact assessment for the CSDDD indicated that social sustainability could improve financial performance, strengthen productivity and operational efficiency, and generate cost savings, alongside reputational gains, talent attraction, innovation and first-mover advantages in global markets.⁴⁴ Comprehensive studies confirm these benefits, including in the agri-food sector.⁴⁵

The CSDDD was adopted in June 2024 and entered into force in July 2024. However, the adopted Directive significantly narrowed the scope compared to the Commission's original proposal. Instead of the initial threshold of 500 employees and €150 million turnover, the final agreement increased this to 1,000 employees and €450 million turnover, covering only the largest companies. The separate category and lower threshold for high-impact sectors was also removed.

Despite this narrowing, the CSDDD still requires in-scope companies to move beyond simple reporting towards the active mitigation of adverse impacts, including through support for living incomes and wages. To improve living conditions, companies are expected to adapt their purchasing and pricing practices. This includes avoiding unsustainable behaviours such as late payments or prices that fall below production costs. These measures aim to strengthen the position of weaker actors in supply chains.

However, as simplification emerged as an overriding priority, further changes were introduced before the ink had dried. In 2026, the scope was further narrowed to companies with 5,000 employees and €1.5 billion

turnover. EU co-legislators claim these companies have the greatest influence over value chains and are best equipped to absorb compliance costs.⁴⁶

Notably, these simplification reforms were advanced under strong political pressure, limiting the scope for fresh impact assessment and broad consultation. Trade unions, CSOs and key F2F industry actors were not meaningfully consulted. This lack of consultation risks failing to address broader economic pressures or improving outcomes for smaller actors, who are often most exposed to supply-chain pressures, with negative effects on working conditions.

Administrative burden reduction has been framed as a precondition for maintaining investment and competitiveness: less reporting, narrower scope and simpler duties are treated as key to improving the business environment. While these simplification efforts are meant to help smaller businesses, it is not clear how small businesses like family-run farms would directly benefit, particularly as supply chain pressures remain unchanged.

These simplification reforms were advanced under strong political time pressure, limiting the scope for fresh impact assessment and broad consultation.

The revision of the Unfair Trading Practices (UTP), the Common Organisation of Agricultural Markets (CMO) frameworks, and related initiatives that aim to improve purchasing and pricing practices offer a telling contrast (see Box 4). Rather than cutting obligations, these initiatives aim to redistribute pressure along value chains so that compliance is not priced out.

BOX 4: HOW UTP AND CMO RULES COULD ADDRESS SUPPLY CHAIN PRESSURES AND CREATE SPACE FOR DIGNIFIED WORKING CONDITIONS

The Unfair Trading Practices (UTP) Directive prohibits late payments, unilateral contract changes and last-minute cancellations that undermine producers' liquidity and planning capacity. By restricting such practices, it limits the ability of stronger buyers to shift risk onto weaker suppliers and reduces pressure to cut labour costs. A forthcoming revision of the UTP Directive seeks to tackle the systemic issue of selling below production costs. The revision is an opportunity to ensure that **'sustainable costs' of production**, which should include fair wages, are protected within the price structure rather than being treated as negotiable overhead. The Common

Organisation of Agricultural Markets (CMO) framework governs the production and trade of agricultural products, seeking to act as a safety net to stabilise markets and support farmers' income. Amendments proposed in 2024 would allow labour costs to be explicitly considered in price negotiations and enable **voluntary schemes with social criteria without breaching competition rules**. As shown by DignityFIRM, **persistent constraints and power asymmetries** between large retail groups and smaller producers can undermine effective enforcement and weaken current and future initiatives.⁴⁷

This suggests a pro-competitiveness pathway that is neither deregulatory nor zero-sum. It also indicates that it is possible to build bridges across policy fields, going beyond formal consultations.

2.2 CAP SOCIAL CONDITIONALITY: UNFULFILLED POTENTIAL?

The **social conditionality mechanism** links CAP income support to compliance with selected EU labour and occupational safety and health standards. This became mandatory across the EU in 2025, having been already voluntarily applied by some countries before (including Italy, from 2023, and Spain, from 2024). National authorities are required to impose payment reductions if a farmer does not respect such standards. Income support is conditional on respecting three EU frameworks: on **transparent and predictable working** conditions, measures to improve workers' **safety and health**, and minimum safety and health requirements for the use of work equipment. Although it creates no new rights, the mechanism ensures EU funds do not support socially harmful practices and unfair competition.

While this is a welcome, incentive-based approach toward protecting workers, it has been limited in nature from the outset. First, labour standards than the three above-mentioned frameworks are excluded. Second, the mechanism is constrained by its payment-conditionality design: it only bites where an employer receives CAP funds. This does not automatically exclude labour-intensive sectors like horticulture, but it can create blind spots where such businesses are not CAP beneficiaries. Third, social conditionality can only be as effective as the monitoring and enforcement capacity of existing national labour inspection systems. If violations go undetected, the mechanism cannot be triggered, limiting its deterrent function.

Although it is too early to draw conclusions, DignityFIRM research confirms **limited inspection capacity** (see Section 3) and that **awareness** of the mechanism **varies considerably between and within member states**, with monitoring of its implementation presenting similar challenges as other policy instruments (see Section 4). These include gaps in the information collected and inconsistent metrics.⁴⁸

Yet for the purpose of the analysis in this Section, what matters is that the mechanism has also been caught in the **crossfire of simplification debates**, despite its early structural limitations. This is reflected in the 2025 'Vision for Agriculture and Food' which articulates the Commission's strategic direction for the EU's agri-food sector and was developed following widespread farmer protests and the launch of the 'Strategic Dialogue on the Future of EU Agriculture' (see Section 1). The Vision prioritises competitiveness and administrative relief for farmers, while placing less emphasis on sustainability considerations that fed the mechanism's adoption.

In line with recommendations put forward in the Vision, the Commission proposed a major simplification of the CAP framework in force until 2027, as well as a post-2027 CAP proposal aimed at easing administrative obligations for farmers. These could carry effects for both the potential expansion of the mechanism's scope and the introduction of broader exceptions.

The Commission's proposal for the post-2027 CAP largely preserves both the existing area-based allocation model and the current design of social conditionality. However, its negotiation could result in looser controls or even exemptions for small farms.⁴⁹ This would be in line with demands by farmers' organisations who view the mechanism as a 'double penalty' on a sector already under financial strain. Notably, according to Eurostat data, around two-thirds of the EU's farms are small, being of less than five hectares in the latest recorded period (2020).⁵⁰ Looser controls would thus risk hollowing out the mechanism.

In the long-term, the broader structural limits will likely also remain, further limiting the mechanism's impact. This is illustrated by discussions about its scope. As seen, the mechanism does not cover all obligations and frameworks that are relevant in the agricultural sectors. Frameworks that are especially relevant for ensuring protections for migrant workers – including **minimum wage** or those concerning seasonal work – are not embedded as conditionality requirements. Respect for **minimum housing standards** are not a condition either, despite the prevalence of tied and makeshift farm accommodation (see Box 5 and Section 4.1).

In 2025, the Commission has only considered but did not go ahead with widening the scope to non-discrimination provisions. Notably, arguments put forward against such expansion cited administrative burden for national authorities, including training and staffing needs, rather than costs for farmers as such.⁵¹ Internal documentation within the Commission suggests that the extension of the mechanism's scope to minimum wage requirements is considered so divisive in simplification debates that it has not even been officially assessed. Given the ascendancy of the simplification frame and the real financial pressures faced by farmers, it can be doubted that such extension will be recommended any time soon.

While debates focus on the mechanics and scope of social conditionality, a key blind spot is that retailers and other downstream actors are not held accountable for the labour conditions at the bottom of the chain.

BOX 5. REDUCING DEPENDENCY THROUGH HOUSING ARRANGEMENTS

Housing arrangements are central to dependency in F2F sectors, particularly where seasonal workers rely on employer-provided accommodation. Where housing is tied to employment, job loss can trigger immediate eviction, raising the cost of exiting abusive work. Several strategies could be pursued, combining ‘**de-risking**’ and ‘**de-coupling**’ approaches. Under de-risking, member states could introduce **mandatory housing registries** requiring employers (or agencies) to register the address and basic conditions of worker accommodation, also enabling more targeted inspections.⁵² A complementary

option is a **standardised housing suitability certificate**, issued by local authorities or accredited bodies, confirming minimum standards (e.g. space per person, sanitation, safety). Under de-coupling, **independent rental agreements**, legally distinct from employment contracts, would reduce the risk of automatic termination when work ends. **Rent deduction safeguards** could also require a separate written agreement and clear payslips showing exactly how much is taken for housing, or deductions could be capped at a defined share of wages to prevent inflated charges.

Taken together, these examples indicate that simplification increasingly shapes how problems are defined and policy options are prioritised across agriculture, labour enforcement, and business responsibility.

In the post-2027 CAP debate, this is likely to reinforce a framing contrast: farmers’ associations stressing red tape reduction and viability, and worker organisations warning that exemptions weaken protection precisely where enforcement is already difficult. Both frames risk deflecting attention from supply-chain dynamics that expose producers to pressure, with cascading effects on labour conditions, and from measures needed to reduce those pressures. Illustrating this risk, while debates focus on the mechanics and scope of social conditionality, a key blind spot is that retailers and other downstream actors are not held accountable for the labour conditions at the bottom of the chain.⁵³ In addition, extending exceptions to smaller farms does not in of itself reduce the administrative burden, as in many cases these have no dedicated human re-sources or accounting departments, with farm managers handling all labour law administrative tasks themselves, which becomes particularly burdensome and complex during the harvesting season.⁵⁴ To address the root of the problem, this would require tailored support for farmers, other than information campaigns.

2.3 RETURN GOVERNANCE: BINARY FRAMES AND LABOUR-MARKET VULNERABILITY

That policy formulation is the result of dominant frames together with political choices is also evident in the EU framework governing the return of “illegally staying” non-EU nationals, and its reform under the proposed Return Regulation.⁵⁵ Although seemingly remote from agri-food policy, return policy has significant implications for F2F sectors, also providing a telling illustration of how current priorities and the policymaking process could reinforce vulnerabilities.

At the outset of the 2024-2029 cycle, the European Commission pledged to deliver a “new common approach on the return of irregular migrants” within the first 100 days of its mandate. Adding further pressure, the

European Council called on the Commission to put forward “as a matter of urgency” measures to “facilitate, increase and speed up returns”.⁵⁶ In March 2025, the Commission proposed a reform in the shape of a Regulation. Notably, the Commission connects the reform to the prevention of exploitation of migrant workers, a commitment President Ursula von der Leyen highlighted in her Political Guidelines.⁵⁷

Negotiations on the reform are at their final stages, with the possibility that the European Parliament and Council reach an agreement as this Paper is being finalised. While the final output remains uncertain, the reform is likely to reinforce the **obligation to issue a return decision** for any person found to be irregularly staying on EU territory. Member states would be required to issue a return decision without delay and together with any decision ending a person’s “legal stay”. The reform will also remove certain technical and legal obstacles to issuing orders and widen the definition of countries non-EU nationals can be ‘returned’ to.

However, **non-returnable situations will persist** even after the reform. Remaining obstacles will include legal barriers, technical constraints, and limited co-operation by third countries.

Further aspects should be considered, in this context. While the reform will not formally regulate how to deal with non-returnable situations, the co-legislators will likely introduce penalties for non-compliance with return decisions, intended to incentivise voluntary departure through negative levers. These may include withdrawal of work permits, limiting access to benefits, and restricting services.

Considering the widely recognised **reliance of several sectors on irregular migrants**, including F2F segments,⁵⁸ these measures, if adopted, will have an inevitable impact on labour supply and demand.⁵⁹ Yet concerns have mostly focused on the **lack of a dedicated impact assessment** and the reforms’ human rights implications. The Commission’s absence of consideration for labour dynamics in sectors with a large presence of undocumented workers went relatively unnoticed, although irregularity sustains some of them.⁶⁰

Three aspects appear particularly relevant for agri-food sectors.

First, a strict approach that overlooks the complex dynamics of irregularity risks reinforcing vulnerabilities. Rather than incentivising persons subject to a return order to leave, being subject to a return order and, simultaneously, to the withdrawal of a work permit will, for example, make it much harder for irregularly staying migrants to refuse dangerous or high-risk working conditions. Also considering the scale of non-returnable situations, obstacles to earning a living will raise power asymmetries and reduce the capacity to exit abusive conditions.⁶¹

Relatedly, further concerns regarding wages and access to entitlements can be identified: many irregularly staying persons are not able **retrieve wages** or claim benefits if they are identified for immigration enforcement, especially if they are detained for the purpose of removal - a prospect the return framework makes more likely, given the proposed extensions to detention under negotiation.⁶² The proposal also significantly expands non-custodial measures that greatly restrict mobility (such as electronic tags and reporting requirements) in a way that could have broad reach and impact on workers, with specific challenges foreseeable for agricultural workers.

More broadly, according to some commentators and CSOs, the detection measures being discussed, if adopted, would potentially transform public services into tools of immigration control, profoundly affecting the everyday lives of all workers coming into suspicion.

Risks for migrant workers will be sharper where there are no parallel measures that increase safe access to remedies, including robust firewalls. Connected to this, and moving to the second point, the Commission's proposal and amendments being discussed are not clear on how to deal with non-returnable situations in practice. Some argue that the reform could make it harder to pursue pragmatic solutions.⁶³

By contrast, under the current framework, member states have adopted a wide range of approaches, from temporary permits to pathways towards more stable residence. In recent years, several governments - **across the political spectrum, and not only in Europe** - have also pursued **larger-scale regularisation programmes**.⁶⁴ These are sometimes presented as a response to acute labour shortages or widespread informality.⁶⁵ Other times, they are presented as effective ways to enhance social protections.

Spain provides the most recent example. In January 2026, the Spanish government announced a large-scale initiative providing a pathway to residence for irregularly staying migrants meeting basic criteria.⁶⁶

While such initiatives can improve conditions for some, they do not address the structural drivers of dependence on precarious labour in F2F sectors either. They also do

not altogether eliminate uncertainty for employers or remove administrative barriers that constrain recruitment. That said, so far, national discretion has enabled *ad hoc* solutions to be found in line with reality on the ground. In contrast, the reform to the return framework could make this both politically and legally harder.

Among others, the reform could block access to residence and work permit pathways that currently exist on national level, making more people undocumented and unable to regularise their stay. If the negotiations were to **narrow national discretion on how to deal with non-returnable scenarios** while leaving situations of people in limbo largely unmanaged, this will make the risks of exploitation higher, including for those seeking to make a living in agri-food sectors that rely on informal and undeclared work.

While the Commission has pledged to prevent migrants from being exploited in the labour market, a return-centred approach that only focuses on the divides between regular and irregular status tends to obscure the different forms and structural causes of precarity.

Third, while the Commission has pledged to prevent migrants from being exploited in the labour market, a return-centred approach that only focuses on the divides between regular and irregular status tends to obscure the different forms and structural causes of precarity.⁶⁷ More specifically, it overlooks how many migrants are excluded from formal employment even when they hold regular status. In fact, where they are in temporary or conditional stay, they are especially at risk of being pushed into precarious work. At the same time, it makes it harder to more effectively counter abuses. DignityFIRM research illustrates this risk:

- ▶ In **Italy** and **Spain**, mismatches between recruitment and permit procedures and the tempo of seasonal labour demand have historically contributed to grey zones in which people work while waiting for permit decisions or cycle between short permits and irregularity.
- ▶ In **Poland**, by contrast, precarity is often produced through labour-market arrangements rather than irregular residence, thus showing that any attempt to fight exploitation by means of punitive measures alone may miss the target.⁶⁸ While the Polish debate focuses on 'illegal migration,' irregular residence is quantitatively marginal, whereas vulnerability is tied to unstable contracts (including commonly used civil law based contracts) and *ad hoc* work arrangements.

Overall, when looking at policy design and formulation in the current policy cycle, what becomes apparent is that the focus on irregular migration in the EU's political agenda could exacerbate misalignments with labour-market realities in F2F sectors. While in itself illustrative

of lack of policy coherence, and strategic direction, this, combined with simplification efforts focused on scaling back social commitments and overlooking broader supply chain dynamics, would further narrow down the policy space for protective measures.

3. Implementation: capacity, incentives, and enforcement in practice

This section discusses the implementation of relevant F2F frameworks in the countries examined by the DignityFIRM project. Implementation refers to how national practices translate EU policies under varying conditions. Even well-designed rules can fail where national authorities lack enforcement capacity or political will. Complications are thus likely to arise when obligations are set without a realistic map of administrative capacity.

Weak enforcement may also reflect strategic or economic considerations, not only capacity gaps. In this sense, implementation is where contradictions, conflicting interests, and lack of policy coherence become operational.

Implementation also reflects differences in priorities between national and EU levels. DignityFIRM research indicates that the EU-level framework often matters less, politically and operationally, to national stakeholders than is assumed in Brussels.⁶⁹ This suggests that the growing tendency to shift responsibility to the national level in migration policy and beyond is not without systemic consequences.⁷⁰ Four policy areas and their intersections are considered in this section, illustrating these dynamics: **occupational safety and health, employers' sanctions, seasonal work, and labour intermediation.**

3.1 OCCUPATIONAL SAFETY AND HEALTH. IMPLEMENTATION GAPS OUT OF SIGHT

DignityFIRM shows that migrant workers in F2F sectors face recurrent OSH risks.⁷¹ Across F2F sectors, OSH risks cluster around predictable patterns: physically demanding work, exposure to heat or chemicals, and time pressure. These can lead to serious and even fatal injuries, as well as chronic illnesses such as respiratory conditions, dermatitis, and cancers linked to hazardous work or exposure to toxins. In the different countries and sectors monitored by DignityFIRM, OSH threats are most visible where seasonality and long working hours converge:

- In **Italy, Poland, and Spain**, OSH risks in agriculture are strongly associated with peak-season work and the intensity of harvesting and packing.⁷² Workers face strenuous tasks, **long shifts, extreme temperatures**, and limited access to rest, hydration, and safe transport.⁷³ Risks increase with limited training,

inadequate protective equipment, and inability to refuse unsafe tasks. These risks often coincide with poor living conditions, which can exacerbate health risks and undermine recovery from injury, exhaustion, or illness. Where intermediaries are involved, another layer of risk is introduced, by blurring the lines of responsibility.

- In **German meat processing**, threats to health and safety are associated with **high work intensity** and demanding production rhythms. In such environments, hazards become more likely where physically demanding tasks combine with strong pressure to maintain speed.⁷⁴

- **Platform-based food delivery** presents a different, but comparably serious, OSH profile. Core risks include exposure to the elements and external hazards while on the move: **road accidents**, adverse weather, fatigue, and **time pressure** linked to earning models and delivery targets. These risks can be heightened by income insecurity (which incentivises longer hours) and by performance management systems that indirectly encourage speed or discourage breaks.

These risks are sustained by precarity and power asymmetries.⁷⁵ Even where rights exist on paper, workers may comply with extra demands (e.g. six-day weeks, longer shifts) because they feel unable to refuse due to economic and status dependence, information gaps, or communication barriers.⁷⁶

Even though OSH obligations are generally applicable to all workers regardless of residence status, challenges are greater for those in an irregular situation. Effective prevention and accountability depend on whether workers can report hazards and incidents without retaliation. This cannot be safeguarded when authorities are required or incentivised to report irregular migrants to immigration bodies (see Section 3.2).⁷⁷

Yet the issue extends beyond residence status. In agriculture, for example, health hazards intersect with broader dependency dynamics. Workers may not report injuries if it risks **losing employment, housing or future work opportunities**, even where they are in a regular situation. In **food delivery**, the parallel deterrent is often deactivation risk and opaque management practices that make workers hesitant to challenge unsafe conditions.

More broadly, risks are amplified by a low safety climate and lax enforcement of OSH protocols, underlining the importance of a strong safety culture if standards are to apply in practice. Language barriers further amplify risks.

OSH illustrates the implementation gap clearly, because results depend less on formal commitments and more on what happens in practice: prevention, training, employer capacity and workers' ability to refuse unsafe work without fear of losing income, housing or status.

Across settings, underreporting weakens prevention and reinforces the gap between formal protections and actual safety outcomes. OSH illustrates the implementation gap clearly, because results depend less on formal commitments and more on what happens in practice: prevention, training, employer capacity and workers' ability to refuse unsafe work without fear of losing income, housing or status.

3.2 EMPLOYERS' SANCTIONS: ENFORCEMENT LIMITS AND REPORTING RISK

The current situation regarding risks of abuse at work, and the practical barriers that foreign workers face in challenging exploitative practices, raises the question of how the EU can strengthen enforcement of rights and deter abuse.

The Employers' Sanctions Directive (ESD) is the key instrument to address this question. The primary objective of the ESD is to combat the employment of "illegally staying third-country nationals" through **disuasive sanctions on employers**. At the same time, it includes some protective provisions for affected workers. The current framework requires national authorities to ensure that effective mechanisms and procedures are in place for irregularly staying workers to lodge complaints and introduce claims for outstanding remuneration. It also makes it possible to issue residence permits to victims.

While problems of legal transposition of the ESD have long been known,⁷⁸ DignityFIRM research confirms that in some member states these persist, undermining the operationalisation of several of its key features.⁷⁹ Capacity constraints also remain. **Labour inspectorates across EU countries** monitored in the project **lack adequate resources** to tackle labour exploitation and conduct effective inspections. For example:

- ▶ In **Poland**, enforcement gaps are tied to the limited capacity of inspectorates, combined with weak

awareness of applicable rules. It is also telling that businesses and stakeholders are reported to have "hardly ever heard of" EU-level obligations, partly because small farmers are not considered employers and are therefore not subject to labour inspections.⁸⁰

- ▶ In **Spain**, capacity limitations are exacerbated by counterproductive practices, with inspections frequently announced in advance.⁸¹
- ▶ These challenges are even greater in some of the F2F sectors monitored. In **food processing**, hygiene protocols can make unannounced inspection visits difficult, leading employers to have time to hide problems at processing plants or instruct employees on what to say.⁸²

Even though rules appear tough on paper, the ESD fails to effectively deter non-compliance. DignityFIRM research points to insufficient awareness of existing powers and weak coordination that undermine enforcement.⁸³ Legal design also contributes to these constraints. EU law sets no minimum capacity requirements for labour inspectorates (e.g., staffing levels or resourcing), leaving these to national systems. While benchmarks exist in international standards, notably ILO frameworks, enforcement effectiveness ultimately depends on mandates, coordination and institutional practice at the national level.

Cross-border operations also pose challenges. While the EU has in recent years provided greater support, particularly through joint inspections with the European Labour Authority (ELA), this support is constrained by the Agency's own mandate and reliance on national initiation.

Effective enforcement thus varies from member state to member state, which in turn determines whether employers perceive a realistic chance of being caught and sanctioned.

Beyond legal and institutional constraints, workers in an irregular situation face major barriers to reporting substandard or exploitative working conditions.⁸⁴ As seen, fear makes it more likely that migrant workers accept dangerous working conditions. **Firewalls** could address this, but they are **often weak or absent**.⁸⁵ Illustrating the challenges is the practice followed in countries examined by the DignityFIRM project:

- ▶ In the **Netherlands**, the National Labour Authority combines and prioritises migration enforcement functions.⁸⁶
- ▶ In **Poland**, residence permits for exploited workers are effectively limited to trafficked persons.⁸⁷ While complaint routes exist, the prospect of return has a chilling effect on workers in Polish F2F sectors.

These examples expose the ESD's internal contradictions. In practice, without effective complaints mechanisms, the Directive's deterrence and protection elements **pull in opposite directions**. This creates a 'reporting

paradox': those most exposed are least able to report, especially where labour enforcement is entangled with immigration enforcement.

Looking forward, the more a system frames irregularity as the problem rather than its driving structural factors, the less frameworks such as the ESD will be able to rely on worker cooperation for effective enforcement. There are thus reasons to believe that these tensions will only grow with the reform of the return framework under negotiation, which likewise puts emphasis on return and sanctions for irregular migrants.

Yet it is not only irregularly staying non-EU nationals who struggle to use reporting mechanisms. Across member states, cases of abuse often go undetected for seasonal workers because they are highly dependent on employers.⁸⁸ **Spain** and **Italy**, for example, show that where workers rely on an employer or intermediary for wages and residence-related procedures, the perceived cost of complaining can already be too high, without even accounting for dependencies concerning accommodation, transport or future recruitment.⁸⁹

The more a system frames irregularity as the problem rather than its driving structural factors, the less frameworks such as the ESD will be able to rely on worker cooperation for effective enforcement.

Against this background, cases of exploitation are often identified via organisations such as trade unions or CSOs, especially where formal mechanisms are hard to access.⁹⁰ Some good practices have emerged in the context of DignityFIRM, providing support and counselling as well as enabling claims. These include cooperation with cultural mediators that supported inspections and awareness raising in **Italy** (for example under *PIU Supreme / AltCaporalato*), as well as first-line legal aid in the **Netherlands** (such as *FairWork*).

However, unions and CSOs face resource and staffing constraints.⁹¹ These come on top of barriers relating to administrative and judicial procedures, such as Third-Party Representation and evidential requirements. These can effectively undermine access to justice, especially considering the informality of F2F sectors and restrictive procedural thresholds. While outcomes are not systematically monitored (see Section 4), DignityFIRM can cite a few successful cases of compensation and wage recovery among the countries monitored.⁹² Where positive outcomes are rare or unforeseeable, confidence in the system declines further, and so do incentives to report.⁹³ Elsewhere, if effective measures are in place, as in Belgium and France, reporting has been shown to deliver promising results.⁹⁴

3.3 SEASONAL LABOUR: NARROW PATHWAYS AND EMPLOYER DEPENDENCY

Limited capacity and implementation shortcomings are not only significant with respect to sanctions for irregular employment or unsafe working conditions. They extend as far as recruitment channels, further complicating labour supply in agri-food industries. Taking a step back, difficulties in recruiting workers in F2F sectors illustrate the profound changes these sectors are experiencing.

The agricultural sector provides one example. The agricultural workforce is shrinking as fewer native-born workers enter the sector.⁹⁵ While this decline is not fully offset by foreign labour, the net effect has been a steady increase in the share of foreign workers, particularly in labour-intensive manual occupations. Native-born workers are unlikely to meet demand without major improvements in conditions and wages, which are unforeseeable considering the impact on prices and profits.⁹⁶

Unsurprisingly, DignityFIRM **confirms a structural reliance in member states on temporary, seasonal as well as year-round migrant labour to fill gaps.**⁹⁷ Yet it also emphasises persistent problems in ensuring adequate recruitment channels for foreign workers. Swift recruitment is especially important in F2F sectors like agriculture, where harvest size and timing are difficult to predict.⁹⁸ **Delays** in recruitment or visa approval can have **significant economic consequences** for employers.

The Seasonal Workers Directive (SWD) aims to create common standards for admission, residence and rights for seasonal workers, while limiting exploitation, overstays and informal hiring. As agriculture and parts of food processing relying on peak-season labour, the SWD is one of the EU's main instruments intended to reconcile labour demand with minimum standards of admission and protection.

Data on permits issued under the Directive offers a partial snapshot of its reach (see Section 4). Reporting is uneven. In some countries, annual permits are very high. Yet this can be misleading. Implementation varies across national contexts, and a shared pattern is that administrative and **procedural timelines often do not match the time-sensitive requirements of harvest cycles.**

Italy illustrates the mismatch. DignityFIRM notes that only a small share of applications results in a residence permit within relevant timeframes, and that some workers enter the country but then fail to secure employment due to delays and complexity.⁹⁹ The system requires checks and authorisations across multiple bodies, making recruitment programmes necessary but operationally weak. This creates a gap between policy design, implementation and actual work cycles. This leads to *ad hoc* solutions: In Italy, labour demand is often met with non-EU nationals already present in the territory. By contrast, 'seasonal workers' in agri-food sectors elsewhere may be EU mobile citizens, as in the **Netherlands**, or Ukrainian nationals, as in **Poland**.¹⁰⁰

For employers who cannot rely on these solutions and face labour supply constraints, the scheme's shortcomings may produce the opposite of the intended effect. Instead of facilitating compliant recruitment, slow and uncertain pathways **push employers and workers towards intermediation by private actors**, including informal and sometimes abusive agencies (see Section 3.4). This has consequences both for employers trying to fill positions quickly and for workers navigating riskier recruitment pathways.

The SWD also aims to secure decent working and living conditions, although DignityFIRM shows that protections remain patchy. In principle, seasonal workers can change employers, allowing them to leave poor conditions without losing their permit. In practice, strict conditions, time limits and national discretion can make job changes unrealistic. More broadly, implementation gaps stem from employer dependency and short-term permits.¹⁰¹

In this context, where administrative decisions take time and migrants have **no income between jobs**, the risk of falling into irregularity increases, contradicting the Directive's objective of fair treatment.¹⁰²

In principle, seasonal workers can change employers, allowing them to leave poor conditions without losing their permit. In practice, strict conditions, time limits and national discretion can make job changes unrealistic.

More broadly, the Directive does not consistently break employer dependency. Where lawful stay depends on maintaining employment, job loss can jeopardise residence and limited job-change options become a legal driver of precarity.¹⁰³ This can lock workers into low-quality employment and suppress complaints.

The **Italian case** also demonstrates how slow processing can deepen power asymmetries, giving leverage to employers and intermediaries and pushing workers into grey arrangements.¹⁰⁴ Similarly, the widely praised **Spanish 'GECCO'** (*Gestion Colectiva de Contrataciones en Origen*, or Collective Management of Hiring at Source) model of circular migration shows how, especially during peak demand periods, the system can still produce dependency and underreporting. This is especially the case when housing and transport are linked to employment and when workers' future recruitment prospects are also at stake.¹⁰⁵

It is worth noting that these dynamics are not unique to the EU but also characterise agri-food sectors elsewhere (see Box 6 on Ukraine).

BOX 6. UKRAINE'S AGRI-FOOD LABOUR NEEDS UNDER WARTIME PRESSURE

Russia's full-scale invasion has intensified **labour shortages** in Ukraine, including in agriculture and other F2F sectors. Employer associations and employment organisations describe workers scarcity as a **key barrier to economic recovery and growth**, with acute gaps reported in seasonal and production-dependent sectors where recruitment needs to be fast and predictable.¹⁰⁶ At the same time, war-related disruption has weakened administrative capacity to meet labour demand. Overstretched institutions and fragmented oversight also increase informality risks and exposure to exploitation.¹⁰⁷ Illustrating this, legal frameworks lack 'bridging statuses' between regular stay, loss of employer contact and job-search afterwards.¹⁰⁸ A key bottleneck is that **monitoring of abuses remains weak**. Ukrainian authorities are exploring reforms intended to reduce these pressures. One option would be to promote a single permit combining residence and employment authorisation, with digitalised procedures and a shift towards a worker-driven application model to reduce bureaucracy, improve predictability for employers and support safer labour-market integration.¹⁰⁹ Yet in the context of EU-membership reforms, more weight is placed on adapting to **asylum and irregular migration reforms**. This risks widening labour gaps in F2F sectors and amplifying demographic strain, with war-related displacement further tightening labour supply.

Against this background, issuing permits of longer duration (e.g. two years) as well as allowing workers to change employers – both options already possible under the Directive – are considered good practices.¹¹⁰ Relatedly, while most member states facilitate re-entry in line with the Directive's provisions, gaps remain. Where re-entry or renewal is uncertain, for example, the risk of overstaying also increases.

3.4 INTERMEDIATION AS A LABOUR-SUPPLY WORKAROUND

Seasonal permits aligned with EU standards do not consistently meet labour needs in many member states and diverse F2F segments. Across the national contexts examined by DignityFIRM, employers repeatedly face one or more of the following constraints:

- ▶ **Timing mismatch:** harvest cycles and peak demand do not align with slow, opaque or cumbersome procedures;
- ▶ **Uncertainty and administrative risk:** outcomes can be unpredictable and delays make recruitment unusable for time-sensitive work;
- ▶ **Cost pressure:** tight margins and value-chain pressures make compliant recruitment appear more costly than available alternatives.

When recruitment channels fail to deliver workers at the required speed and cost, actors shift to workaround systems and intermediaries that appear more controllable in the short term. DignityFIRM research confirms long-reported reliance on posting, temporary agencies, subcontracting and intermediaries.¹¹¹ A 2019 study by the EU Fundamental Rights Agency had already noted that recruitment agencies are particularly active in agriculture, suggesting that the situation has not improved substantially.¹¹² If anything, problems have been exacerbated by demographic trends and the increasingly marked preferences of native-born workers to avoid F2F labour, which many young Europeans in particular see as overly demanding.¹¹³

Turning to intermediaries may appear the most pragmatic option for both employers seeking labour fast and foreign workers wanting to make a living. However, increasing reliance on intermediaries also makes labour standards harder to enforce. Posting arrangements, temporary agencies and subcontracting can obscure who the real employer is and who is accountable for wages, hours, safety and housing when these are provided through the chain:

- ▶ **Italy:** various intermediaries offer ‘quicker solutions’ and sometimes manage the entire ‘life package’ (permits, contracts, housing and transport),¹¹⁴ but this **diffuses accountability** and entrenches dependency.¹¹⁵
- ▶ **Poland:** intermediation has evolved into systemic reliance on temporary work agencies and subcontracting chains that often bypass traditional labour protections. This creates fragmentation, with loopholes shifting responsibility away from end users, often leaving migrant workers with no clear employer to hold accountable for unpaid wages or substandard housing.¹¹⁶
- ▶ **Germany:** research on the meat industry shows that the use of subcontracting and temporary agencies normalises excessive hours, wage underpayment and unsafe working and housing conditions.¹¹⁷
- ▶ **Netherlands:** labour demand in agri-food systems is increasingly met through agencies, intra-EU mobility or other cross-border arrangements. Posting of non-EU nationals happens via subsidiaries or partners in Central and Eastern Europe. Employers often describe this as attractive because it avoids labour-market testing and reduces labour costs.¹¹⁸

In such settings, ensuring compliance with labour standards may hinge on the enforcement of internal market and intra-EU mobility rules rather than classic labour-migration tools, complicating implementation and the job of labour authorities.¹¹⁹ Long subcontracting chains further heighten the risk of labour rights abuses. Fraudulent posting and non-genuine arrangements through letterbox companies aggravate the situation, as they are used to secure cheap labour and circumvent labour and social security obligations.¹²⁰

The rise of outsourcing and **intermediation** also **complicates the enforcement of** instruments such as

the **CAP social conditionality mechanism**. In practice, the use of agencies, subcontracting and posting can make it more difficult to establish who is responsible for working conditions, making the imposition of conditionality penalties harder to justify.¹²¹ Although only those with a formal employment relation should fall under the mechanism, some authorities may seek to broaden its application to address these gaps.¹²² If labour supply shifts even further toward intermediated models, however, enforcement would also become more costly and resource-intensive.

While governed by different rules altogether, similar dynamics appear in **food delivery**. Where migrants are excluded from formal employment, they may be driven towards platform work,¹²³ which can also lead to **diffused responsibility** and complicate enforcement.¹²⁴

The use of agencies, subcontracting and posting can make it more difficult to establish who is responsible for working conditions, making the imposition of conditionality penalties harder to justify.

Tightening rules in this context can lead *mala fide* firms to adapt their operations deliberately in order to evade them, although this risk also exists for businesses that face financial or labour pressures.¹²⁵ Subcontracting and agency chains can externalise labour obligations and the risks of sanctions, producing what some analyses describe as “organised irresponsibility”.¹²⁶

Against this background, several initiatives at the national level have sought to address risks in intermediation and subcontracting, including criminal sanctions, certification regimes and sectoral bans. The **Netherlands** adopted the Labour Provision Admission Act (Wtta) in 2025, introducing a licensing regime that will prohibit hirers from using unlicensed labour suppliers once it enters into force. The government-issued license will be conditional on a financial guarantee on top of compliance with labour and tax laws.¹²⁷ In **Germany**, the ASKG banned subcontracting altogether, restricting the use of temporary agency workers and increasing fines for violating the regulations in core meat-industry activities (see Section 1.1). Subsequent improvements have been reported in wages, working time and medical assistance.¹²⁸

At EU level, several initiatives are being developed that reflect different priorities. On the one hand, **the 2026 Annual Single Market and Competitiveness Report** highlights that temporary posting is integral to the freedom to provide services but remains “too cumbersome” for companies, and notes that member states may set administrative requirements only if justified

BOX 7: LESSONS FOR F2F GOVERNANCE FROM SCHENGEN AND THE NEW PACT ON MIGRATION AND ASYLUM

The New Pact on Migration and Asylum comprises several reforms to the Common European Asylum System. Adopted in 2024, the new rules will become fully applicable in mid-2026. Although the reforms have generated polarising responses, including criticism for their human rights implications, a frequently overlooked innovation of the New Pact is its **implementation cycle** and the systematic efforts by the European Commission, together with other EU institutions and member states, to identify potential implementation gaps and strengthen preparedness ahead of the mid-2026 deadline. Through coordinated assessments and EU-level support, it aims to identify **needed capacities and resources** and align legal obligations with administrative preparedness.

A comparable implementation culture is largely absent in F2F and labour governance. Frameworks such as seasonal work pathways, labour inspection systems, sanctions regimes, safe reporting mechanisms and the issuing of work

permits depend on staffing, coordination and access to remedy, yet preparedness is rarely assessed systematically.

Schengen governance also offers a relevant parallel. It has long relied on structured evaluation and **follow-up mechanisms to detect weaknesses and drive corrective action**. Although the borderless area shows systemic vulnerabilities, particularly regarding prolonged internal border controls in relation to ‘secondary movements’, Schengen-related monitoring (including the Schengen Evaluation Mechanism) produces assessments and recommendations that can be used to compare systems, identify operational shortcomings and encourage remedial measures, often alongside other EU monitoring tools (e.g., vulnerability assessments and fundamental-rights monitoring). The key lesson for F2F governance is the value of regular, evidence-based capacity checks that prevent implementation gaps from becoming structural dysfunctions.¹²⁹

and proportionate.¹³⁰ Current EU action is accordingly focused on streamlining posting-related formalities rather than reopening the Posted Workers Directive itself. On the other hand, **the European Commission is working on a Quality Jobs Act**, with the stated goal to reduce precarious work and improve EU working conditions through fair wages, safe environments, increased training and stronger collective bargaining. This could specifically target abusive intermediation, with stakeholders (notably trade unions and the European Parliament) pressing to include binding measures to curb abusive subcontracting chains.

The growing reliance on intermediaries and resulting difficulty of enforcing standards also constitutes a governance failure and reflects a structural mismatch between labour demand and supply in high-pressure segments.

These initiatives should not be considered in isolation. Intermediated models flourish where regular recruitment channels do not function well enough to meet labour demand at the required speed, scale, cost and predictability. The growing reliance on intermediaries and resulting difficulty of enforcing standards also constitutes a **governance failure** and reflects a structural mismatch between labour demand and supply in high-pressure segments. Without reliable, workable recruitment channels, labour supply will continue to flow through intermediated models despite these initiatives.

Zooming out from intermediation to implementation more broadly, the challenges identified in this section across different policy frameworks can only be addressed if capacity and operational needs are systemically assessed. While such assessments are themselves resource-intensive, they could build on recent experiences in relevant policy areas (see Box 7). A cross-country assessment of legal, operational and practical needs could also help target EU financial and operational support. Such a systemic approach would also help break policy siloes, allowing authorities to identify cross-sectoral impacts.

4. Monitoring and evaluation: what do current indicators tell us, and what do they miss?

This final section examines what is measured when it comes to irregular work and irregularly staying workers in F2F sectors – and what remains invisible. Monitoring and evaluation determine what constitutes success and

which problems remain instead politically, legally and operationally marginal. This section uses DignityFIRM findings to assess current strengths and limitations.

Four challenges stand out: (1) **data is incomplete or absent**, with underreporting widespread and cross-country comparisons difficult; (2) **what is measured reflects siloed priorities**, with cross-domain dynamics escaping monitoring; (3) recorded data reflects **outputs rather than outcomes**; and 4) there is **no systematic assessment of implementation capacity**, obscuring financial and operational needs and weakening feedback loops into agenda setting and policy design.

4.1 DATA GAPS: UNDERCOUNTING, UNDERREPORTING AND SILOES

DignityFIRM confirms that a fundamental obstacle to addressing structural problems in F2F sectors is limited awareness of key dynamics in agri-food labour systems. However, what remains invisible is as significant, if not more so, than what is measured. Seasonal permit data offers a useful example. Official Eurostat data show a sharp rise in seasonal permits issued by member states in recent years. In 2024, Italy (146,099), France (41,700) and Spain (20,810), three countries with large F2F sectors in need of foreign labour, accounted for over three quarters of all permits issued (273,897). Yet the data also shows clear gaps: five countries reported issuing no seasonal permits, and another three reported fewer than one hundred.

While some variation is inevitable, existing gaps corroborate long-reported blind spots, with academic and policy literature highlighting that reported numbers of seasonal workers constitute the ‘tip of the iceberg’ of the migrant workforce in F2F sectors.¹³¹ Beyond lack of reporting, permits for less than three months are not considered, and that not all member states record admission from visa-free countries.¹³² Traditional surveys

therefore tend to undercount short-term migrant work. Fragmented and localised employment arrangements (see Section 3.5) further complicate quantification.¹³³

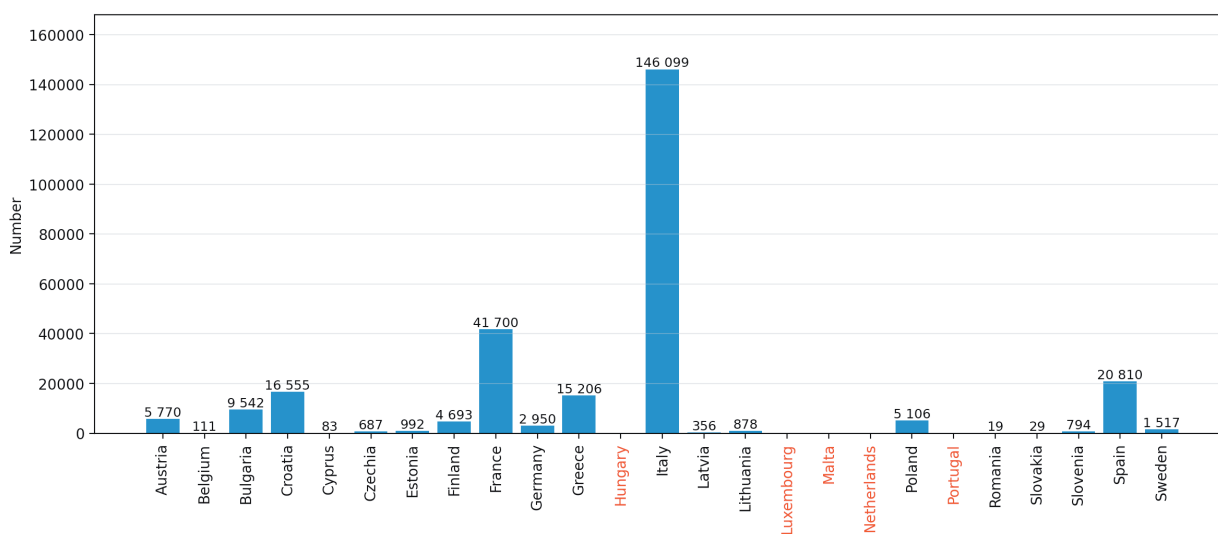
With sufficient data-gathering resources, these gaps could potentially be reduced. Yet a more fundamental issue is that supply and demand are inherently hard to estimate due to the characteristics of the workforce. This is because, for example, intra-EU workers who perform seasonal labour are not counted.¹³⁴ Even more significant is that studies and surveys remain based on actual numbers of permits released, overlooking that F2F sectors rely on precarious, temporary but also undeclared work, including by irregular migrants. Many agricultural workers are thus not reflected in official statistics.

Studies and surveys remain based on actual numbers of permits released, overlooking that F2F sectors rely on precarious, temporary but also undeclared work, including by irregular migrants. Many agricultural workers are thus not reflected in official statistics.

These gaps cannot be bridged by quantitative assessments alone. Instead, a more systemic approach that **complements quantitative with qualitative assessments** – including via stakeholder consultations and participatory, community-based indicators – are

Figure 2

NUMBER OF SEASONAL WORK PERMITS ISSUED BY MEMBER STATES IN 2024



Note: In red, countries that, due to data collection gaps, reportedly issued no permits. Source: Eurostat.

needed to more accurately measure the presence and contribution of informal work and undocumented workers in F2F sectors.¹³⁵ Even so, these measurements will only provide estimates, not precise figures.

Similar challenges affect non-EU countries. In **Morocco**, the limited political salience of migrant farm labour is partly explained by the fact that migrant workers are not explicitly treated as a target population in agricultural policy. This is in part due to limited data and the perception that number of migrant farm workers remain ‘insignificant’ at the national level, despite growing reliance in specific segments.¹³⁶

Statistical information about **labour standards** is likewise distorted, as minor incidents or non-fatal accidents are typically not reported, and therefore not counted. A recent study for the European Commission on work standards in F2F sectors acknowledges that EU-level databases suffer from **underreporting of non-fatal work accidents** and under-representation of key groups (e.g. self-employed farmers and temporary, seasonal and sub-contracted workers),¹³⁷ in line with DignityFIRM findings.

Against this background, there is a risk that the low complaint or accident numbers are mistaken for a sign that certain sectors offer **safe and healthy work environments**. On the contrary, precarity, fear of retaliation, language barriers and isolation all lead to high exposure to abuse (see Section 3.1). This generates underreporting and means that harms can appear anecdotal even when they are structural and systemic.

The monitoring of labour and health standards more broadly reveals similar challenges and blind spots. Generally speaking, standardised EU-level datasets on safety and health metrics are considered a solid foundation for more in-depth assessment, enabling consistent cross-country comparisons and insights into trends. In some of the countries monitored by DignityFIRM, comprehensive data is collected, from complaints, inspection counts – including on temporary work agencies and posting-related inspections – wage and social security violations, OSH violations and consultations.¹³⁸

There is a risk that the low complaint or accident numbers are mistaken for a sign that certain sectors offer safe and healthy work environments. On the contrary, precarity, fear of retaliation, language barriers and isolation all lead to high exposure to abuse

In some cases, such as in **Italy**, labour exploitation is comprehensively defined, using criteria that include repeated violations, working hours and rest-period

regulations, wages below those established by collective bargaining agreements, breaches of occupational safety and health rules, as well as degrading living conditions.¹³⁹ This shows the scope for innovative monitoring practices to emerge at the national level.

However, differences in enforcement between countries, including inspection practices, legal definitions, reporting frameworks and the role of enforcement authorities, complicate data collection and comparability.¹⁴⁰ In such circumstances, collecting data that allows risk to be mapped comprehensively and comparatively will remain a challenge.

Housing access provides another illustration of widespread blind spots. The EU collects broad data, the most relevant being the EU-SILC (Statistics on Income and Living Conditions). Eurostat also includes relevant statistics. In 2025, Eurostat released updated integration indicators that compare housing quality by citizenship.¹⁴¹ These indicators point to the disproportionate challenges faced by non-EU citizens, for example in relation to overcrowding.

However, several critical gaps remain:¹⁴²

1. **The EU lacks a dedicated, granular database for housing conditions** linked to specific categories of persons, particularly seasonal workers.
2. There is no systematic EU-level data on housing provided by employers. Because many seasonal workers live on-site (e.g. close to farms), their living conditions are often invisible to standard household surveys like EU-SILC. Statistics on EU citizens also do not exist, because they are not covered by the Seasonal Workers Directive, which only mandates housing standards for non-EU nationals, while the intra-EU mobility regime is also silent on housing conditions.
3. **EU housing surveys are infrequent snapshots**, at best taken annually. As such, they miss workers who are only present for a few months.
4. Surveys offer national overviews and therefore fail to capture local dynamics in agricultural hubs such as Almería (Spain) or Foggia (Italy).

This means that the housing challenges faced by certain workers – including dependencies on employer-provided accommodation and the risk of immediate homelessness in the event of job loss – are not captured by existing statistics. Policymakers can only rely on specialised, qualitative reports.

Looking across the relevant databases and policies affecting F2F sectors, it also becomes clear that each policy domain measures itself according to its own indicators: seasonal permits issued, the number of work accidents, inspections carried out, housing units available, and so forth. Beyond the policy fields so far mentioned in this section, the success of return policy is also measured in terms of returns executed.

This siloed approach, while understandable from the narrow viewpoint of each of these individual fields, generates blind spots that hinder an appropriate measurement policy effectiveness and interdependencies. The determinants of good and poor outcomes are inherently cross-domain. Illustrating this, changes in return policy could exacerbate precarity, worsen working conditions and intensify labour supply pressures.

Such siloed approaches are therefore likely to prioritise narrow policy goals despite their systemic effects elsewhere, or to reinforce policy inertia. They also complicate efforts to trace improvements in working conditions to specific policy interventions. For example, the social conditionality mechanism will remain under pressure to deliver a measurable impact. In practice, factors such as improved access to information, decent housing and language support for foreign workers, or stronger mandates for national authorities, could all contribute to better working standards. In such a context, attributing improvements solely to the mechanism may prove difficult.

4.2 FROM OUTPUTS TO OUTCOMES: WHAT MONITORING MISSES

Two further shortcomings hinder systematic assessment: the focus on outputs and weak capacity measurement. Starting from the former, across F2F sectors and frameworks, **it is outputs rather than outcomes that typically shape policy monitoring and evaluation.** Across member states, monitoring focuses on inspection – numbers of inspections, infringements detected and fines issued – rather than remedies – wage recovery achieved, retaliation prevented or complaints resolved – or prevention, including accident rates, repeat offenders and the development of a safety culture.

The **Netherlands** provides an illustrative example in the context of employment sanctions. Dutch authorities monitor complaints against employers. However, outcomes such as compensation or wage recovery are not tracked.

Output metrics can also obscure policy impact. In the same example, this may lead policymakers to confuse the number of inspections, or even sanctions imposed on businesses, with the overall state of working and living conditions. It could also lead them to prioritise punitive approaches by only measuring and considering corresponding indicators, without assessing whether such approaches actually improve conditions for migrant workers. Collecting outputs instead of outcomes thus limits the understanding of where policy attention should focus.

In OSH, **prevention and the development of a safety culture are crucial**, yet monitoring largely focuses on fatal or non-fatal injuries rather than indicators of preventive performance.

In labour migration policy, while the number of **seasonal permits issued should be assessed against**

industry needs or national quotas, surveys like Eurostat mainly capture authorisations issued and some of their characteristics. This means that policymakers and experts may focus on annual increases or decreases in permits rather than whether policies are adequate to meet sectoral labour demand at specific times.

In the case of return policy, monitoring focuses on the number of return decisions issued and returns executed. EU and member state representatives typically emphasise low ‘return rates’ as evidence of ineffective rules – even though, ironically, the Return Regulation currently under negotiation could further reduce these rates.¹⁴³ What is not tracked is how people come in and out of irregularity, or how non-returnable individuals enter the labour market or regularise their status, leading to case resolution.¹⁴⁴

Prioritising outputs signals what the system values, not what it needs. This reflects an administrative tendency to measure what can be more easily collected or quantified. Policymakers also have the tendency to substitute, and confuse, what is easiest to count with what they should know, often leading to misleading inferences.¹⁴⁵

This can undermine evaluation and limit the positive impact of many initiatives in F2F sectors. However, the choice of indicators is inherently political. This also means that alternative approaches are possible, paving the way for improvements in how F2F work is assessed, organised and governed.

Prioritising outputs signals what the system values, not what it needs. This reflects an administrative tendency to measure what can be more easily collected or quantified.

Perhaps the most consequential blind spot is **the lack of capacity assessment and monitoring** across member states. There is little or no understanding of the resources available to national authorities, judicial actors, agencies and offices. However, DignityFIRM research shows that many operate with insufficient resources, as illustrated by the capacity of national labour authorities to investigate exploitation cases and in the resources available to offices responsible for processing work permits applications.

These constraints weaken both F2F sectors and EU governance more broadly. Without systemic assessments of capacity, EU institutions and other relevant actors struggle to provide necessary technical, operational and financial support. In their absence, EU initiatives will continue to have uneven effects across member states, limiting their positive impact on F2F sectors, migrant and other workers, businesses and other stakeholders.

Conclusion and recommendations

F2F sectors face several interrelated challenges. Among them, socio-economic dynamics presently dominate policymakers' attention, as illustrated by competitiveness and simplification frames. Agri-food governance, however, is weakened by flaws in the policymaking process. Agenda setting reveals power asymmetries and limited consultation, weakening stakeholder support. Poor sequencing produces inconsistent priorities. Delivery is undermined by uneven national capacities and fragmented enforcement. Monitoring remains incomplete and siloed, limiting policy recalibration.

Although siloed agendas and weak governance affect F2F sectors as a whole, the problem is more pronounced in the case of migrant workers, as migration policies add a further layer of complexity. While better practices and praiseworthy initiatives exist, these cannot on their own address structural barriers to dignified work.

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

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

- 1. Break status-dependence as a driver of exploitation.** When residence and work rights depend on a single employer or short, opaque procedures, bargaining power weakens; irregularity can become a structural condition and labour supply mechanisms. To this end, EU and national authorities should:
 - ▶ **Design labour migration instruments that reduce precarity and employer dependency**, including stable permits, easier employer change, clear renewal rules, equal treatment and safeguards against abuse;
 - ▶ **Upgrade seasonal labour governance to strengthen implementation, reflect actual demand and labour market dynamics, and reduce dependency.** The Commission and Parliament should assist member states in implementing frameworks to meet labour demands, while also ensuring the enforcement of protective measures, with the following priority areas:

- identify measures to reduce the administrative and procedural barriers to accessing both general work permits and seasonal work permits, as well as to preventing labour exploitation;
- promote multi-year permits which are not employer-dependent, enable status change and do not require workers to leave the country for a minimum time period.

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

2. Make intermediaries and liability chains

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

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

3. Treat housing and living conditions as a core

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

- ▶ **De-risk and de-couple housing from work and residence permits.** Multiple strategies should be pursued, anchoring these in EU initiatives on housing (see Box 5 for an overview). The former, for example, could include mandatory registries. The latter could involve initiatives ensuring that workers have a rental contract that is distinct from their employment contract;
- ▶ **Support housing programmes decoupled from employment and migration status**, using EU funding streams (e.g., ESF+ and regional development funds) and clear minimum standards. They should also ensure that funding is appropriately allocated to the same end as part of 2028–2034 EU budget;

- ▶ **Clarify mandates and coordination for housing oversight** (e.g. of labour inspectorates, local authorities, health and safety bodies), so living conditions are not ‘everyone’s issue and no one’s responsibility’;
 - ▶ **Embed housing indicators into monitoring systems** so housing is not treated as anecdotal (see below on monitoring more broadly).
4. **Rebalance incentives in value chains so compliance is not ‘priced out’.** Producers and SMEs operate under tight margins and asymmetric bargaining power; when compliance is a cost without countervailing leverage, the system encourages ‘selective non-compliance.’ To this end, the European Commission should:
- ▶ **Systematically assess supply-chain pressure points in F2F** and how they undermine compliance.
 - ▶ **Pair labour standards with tools that improve producer leverage**, including stronger enforcement and awareness of unfair trading practices and the promotion of competition-law exemptions to promote dignified working conditions.
5. **Strengthen reporting safeguards and support access to reliable information.** If reporting abuses and seeking remedies increases deportation or retaliation risk, workers will not report; enforcement of standards becomes punitive and displacement-driven rather than protective and preventive. To this end, EU and national authorities should:
- ▶ **Adopt binding firewalls separating labour and immigration enforcement** so workers can report without risking retaliation, detention or removal. Support for the reporting of abuses will also help improve data on non-fatal accidents (see below on monitoring);
 - ▶ **Ensure effective access to remedies**, including wage recovery, timely complaint handling, translation and protection against retaliation (including dismissal/deactivation where relevant). Access to remedies for those subject to detention pending deportation, where they had previously engaged in work, should be maintained;
 - ▶ **Improve access to independent information and support services, including through EU funding** for migrant workers throughout the recruitment process and once in employment.
6. **Measure what matters and create feedback loops.** When systems measure only outputs, policies cannot evolve. To this end, EU and national authorities should:
- ▶ **Invest in EU-wide monitoring of working and living conditions to inform priorities.** As part of these efforts, authorities should also ensure better data collection, also striving to close gaps and achieve comparability across member states;
- ▶ **Ensure an effective EU monitoring framework by adding key indicators. These indicators should be able to monitor outcomes**, including quality of employment (e.g. effective earnings, working time, contract type), the outcomes of complaint, controls, and additional policy initiatives (e.g. wage recovery, resolution, regularisation);
 - ▶ **Pursue a more comprehensive monitoring of dynamics of irregularity**, including its causes and pathways in and out of irregularity in all member states, rather than relying solely on return rates as a metric for the effectiveness of policies on irregular migration;
 - ▶ **Carry out systematic assessments of policy reforms transcending formal policy boundaries.** The impacts of return policies on labour governance should also be analysed, for example;
 - ▶ **Complement quantitative data with qualitative national-level and sector-specific insights**, including on culture and approaches to safety and health. This should integrate different data sources, including that collected by civil society and via participatory research;
 - ▶ **Use monitoring to create feedback loops.** Evaluation findings should trigger the review of implementation and, where needed, adjustment of policy design across relevant policy fields, rather than leading to siloed reporting and revisions.
7. **Make the monitoring and assessment of implementation capacity a key governance goal – not an afterthought.** Even well-designed rules fail when member states lack capacity, coordination or political support to implement them. The goal should be to ensure a level-playing field and legal certainty. To this end, the European Commission, in coordination with member states and EU agencies, should:
- ▶ **Systematically assess national implementation capacity**, particularly in high-risk, high-pressure sectors such as F2F, to identify where EU-level operational support and financial assistance are needed. The assessment should cover labour pathways, migrant workers’ rights across policy areas such as employment, migration, victims’ rights, data protection, Seasonal Workers’ and Employers’ Sanctions directives as well as relevant sectoral legislation. Clear benchmarks should be set to compare and assess administrative, operational and enforcement capacity.
 - ▶ **Link EU funding incentives to real-world implementation** where feasible and proportionate. Among others, the EU should carry out a systematic cost-benefit analysis of the size of farms to be covered by the social conditionality mechanism, while also ensuring adequate support for farmers falling within its scope. In addition, the European Commission should set a deadline for carrying

out a further assessment of potential additional frameworks to be covered by the mechanism, particularly minimum wage and seasonal work protections.

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

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

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

- 1 See: <https://www.dignityfirm.eu/>.
- 2 See: Hooper, Kate and Le Coz, Camille (2020), "A Race Against the Clock: Meeting Seasonal Labor Needs in the Age of COVID-19", Migration Policy Institute; Kalantaryan, Sona; Mazza, Jacopo and Scipioni, Marco (2020), Meeting labour demand in agriculture in times of COVID 19 pandemic, Luxembourg, EUR 30235 EN, JRC120800; Milieu Consulting SRL; Law & Policy Consulting (2025), "Study on the working conditions of farm employees in the EU agriculture sector", European Commission; Corrado, Alessandra (with contributions from Caruso, Francesco; Lo Cascio, Michele; Nori, Michele; Palumbo, Letizia and Triandafyllidou, Anna) (2018), "Is Italian agriculture a 'pull factor' for irregular migration – and, if so, why?", Open Society Foundations (accessed 2 March 2026); International Organization for Migration (2022), "Mapping Risks to Migrant Workers in Supply Chains in Europe: Case studies and best practices from the agriculture, food-processing, manufacturing and hospitality sectors", International Organization for Migration; Triandafyllidou, Anna (2017), "A Sectorial Approach to Labour Migration: Agriculture and Domestic Work", in McAuliffe, Marie and Klein Solomon, Michele (eds.), *Ideas to Inform International Cooperation on Safe, Orderly and Regular Migration*, Geneva: International Organization for Migration; Gadea, Elena; Pedreño, Andrés and de Castro, Cristina (2017), "Producing and mobilizing vulnerable workers. The agribusiness of the region of Murcia (Spain)", in Corrado, Alessandra; de Castro, Cristina and Perrotta, Domenico (eds.), *Migration and Agriculture: Mobility and Change in the Mediterranean Area*, Oxon: Routledge, pp. 79–94; Augère-Granier, Marie-Laure (2021), Migrant seasonal workers in the European agricultural sector, European Parliamentary Research Service; European Parliamentary Research Service (2019), The cost of non-Europe in the area of legal migration, European Parliament; Vergolini, Loris and Vlach, Eleonora (2021), "The role of legal status in the labour market integration of immigrants: Evidence from Italy", *International Migration*.
- 3 This confirms the findings of the comparative report: van Liempt, Ilse; Grzymala-Kazłowska, Aleksandra; Matuszczyk, Kamil and Palumbo, Letizia (2026), "[Immigration Status and Labour Conditions: Migrant workers in Agriculture, Delivery and Logistics, and Domestic and Care Work in Europe](#)", I-CLAIM (accessed 2 March 2026). This comparative report, which was in preparation at the same time of the DignityFIRM Final Report/Discussion Paper, similarly analyses the living and working conditions of migrants with "insecure residence status" in overlapping labour-market sectors, including agriculture and delivery. The comparative assessment of these dynamics across six countries draws similar conclusions and emphases, in line with this Discussion Paper, that "irregularity is not an anomaly but a structural feature of contemporary labour regimes. It organises access to work, determines degrees of visibility and protection, and reflects broader hierarchies of gender, race, and mobility that underpin Europe's political economy."
- 4 Hassel, Anke and Wegrich, Kai (2022), *How to Do Public Policy*, Oxford: Oxford University Press; Cairney, Paul (2019), *Understanding Public Policy: Theories and Issues* (2nd ed.), London: Bloomsbury Academic; Wallace, Helen; Pollack, Mark A. and Young, Alasdair R. (2025), *Policy-Making in the European Union* (9th ed.), Oxford: Oxford University Press.
- 5 See Neidhardt, Alberto-Horst; Milazzo, Eleonora; Kapeti, Lydia; van Meeteren, Masja and de Lange, Tesselkje (2024), "[Dignity for \(irregular\) migrants employed in Farm to Fork sectors: A regulatory infrastructure approach to EU legal and policy frameworks](#)", DignityFIRM. This Working Paper transcends traditional policy silos and disciplinary boundaries, providing a comprehensive mapping of EU-level legislative and policy frameworks in four key domains: migration management, the European Pillar of Social Rights, the EU's Farm to Fork strategy, and corporate social responsibility. The Paper's premise is that these policies collectively shape the conditions and vulnerabilities faced by irregular migrant workers. Rather than isolating these policy domains, the Working Paper presents them as interconnected components of a broader 'regulatory infrastructure.' This infrastructure encompasses not only legal and policy dimensions but also incorporates economic and commercial considerations, relevant actors, social structures, and technological factors.
- 6 SDG 8: Decent Work and Economic Growth. This goal seeks to promote sustained, inclusive, and sustainable economic growth, full and productive employment, and decent work for all. Of particular relevance is Target 8.5, which aims to achieve, by 2030, full and productive employment and decent work for all women and men, including for young people and persons with disabilities, and equal pay for work of value. Furthermore, Target 8.8 focuses on protecting labour rights and promoting safe and secure working environments for all workers, including migrant workers, in particular women migrants, and those in precarious employment; SDG 12: Responsible Consumption and Production This goal emphasizes ensuring sustainable consumption and production patterns. In the context of the Farm-to-Fork strategy, this involves moving towards food systems that are not only environmentally sustainable but also socially responsible. It implies that the 'sustainability' of the value chain must account for the human cost of production, ensuring that the drive for efficiency and low-cost food does not come at the expense of the fundamental rights and dignity of the workers who sustain the system.
- 7 Particularly, Objective 1 – Collect and utilize accurate and disaggregated data as a basis for evidence-based policies; Objective 6 – Facilitate fair and ethical recruitment and safeguard conditions that ensure decent work; Objective 7 – Address and reduce vulnerabilities in migration; Objective 15 – Provide access to basic services for migrants; Objective 16 – Empower migrants and societies to realize full inclusion and social cohesion; and Objective 21 – Cooperate in facilitating safe and dignified return and sustainable reintegration.
- 8 For a similar mapping of the least environmentally sustainable crops, also indicating possible priorities to cut emissions, see Cao, Peiyu; Bilotto, Franco; Gonzalez Fischer, Carlos; Mueller, Nathaniel D.; Carlson, Kimberly M.; Driscoll, Avery W.; Gerber, James S.; Smith, Pete; Tubiello, Francesco N.; West, Paul C.; You, Liangzhi and Herrero, Mario (2026), "Spatially explicit global assessment of cropland greenhouse gas emissions circa 2020", *Nature Climate Change*.
- 9 See: Zuleeg, Fabian; Emmanouilidis, Janis A. and Borges de Castro, Ricardo (2021), "Europe in the age of permacrisis", Brussels: European Policy Centre (EPC); Carrera, Sergio and Luk, Ngo Chun (2020), "In the Name of COVID-19: An Assessment of the Schengen Internal Border Controls and Travel Restrictions in the EU", Brussels: Centre for European Policy Studies (CEPS).
- 10 European Commission (2020), A Farm to Fork Strategy for a fair, healthy and environmentally-friendly food system, Brussels, COM(2020) 381.
- 11 Anderson, Bridget; Poeschel, Friedrich and Ruhs, Martin (2021), "Rethinking labour migration: Covid-19, essential work, and systemic resilience", *Comparative Migration Studies*, Volume 9, Number 1, Article 45.
- 12 European Commission (2021), Contingency plan for ensuring food supply and food security in times of crisis, Brussels, COM(2021) 689 final, 12 November 2021.
- 13 Ponzo, Irene (2025), "The governance of irregular migrant work: Policy clusters and regional convergences", DignityFIRM, 30 September 2025.
- 14 Andalucia Acoge; Alianza por la Solidaridad; ASGI; Caritas Europa; CILD; CNCD-11.11.11; Jornaleras de Huelva en lucha; Corporate Europe Observatory; EFFAT; EPHA; Eurodiaconia; European Alternatives; FairWork; Fair Trade Advocacy Office; Feedback; Cepaim; Generation 2.0; Gentium; Greek Forum of Refugees; ICMC; Intersos; KISA; LAWRS; La Strada International; Open Society; Oxfam; Picum and Slow Food Europe (2020), "Without rights for agri-food workers, Europe's food supplies rest on shaky grounds", 16 April 2020.
- 15 Answer to Research Guidelines on EU Law from Germany, On File With Author.
- 16 Gottlieb, Nora and Niediek, Lukas (2026), "COVID-19 as a catalyst for re-regulating migrant labour in the German meat industry", DignityFIRM, 19 January 2026.
- 17 Gottlieb and Niediek (2026).
- 18 Palumbo, Letizia (2020), "[The Italian Plan for Regularisation: Real progress for migrants' rights?](#)", Migration Policy Centre.
- 19 European Migration Network; Organisation for Economic Co-operation and Development (2021), "The impact of COVID-19 in the migration area in EU and OECD countries", Umbrella Inform, April 2021
- 20 See for example European Commission (2025), Proposal for a Joint Employment Report 2026, Brussels, 28 November 2025.
- 21 For example, in the case of the European Food Security Crisis preparedness and response mechanism (EFSCM). See: European Commission, "[Ensuring global food supply and food security](#)", European Commission website (accessed 2 March 2026).
- 22 The main source utilised in this section is Ponzo, Irene (2025), "The governance of irregular migrant work: Policy clusters and regional convergences", DignityFIRM, 30 September 2025.
- 23 Rakowska, Katarzyna; Fihel, Agnieszka and Kaczmarczyk, Paweł (2025), "The Role of the State Labour Inspectorate in Preventing Irregular Employment of Migrant Workers in Poland", DignityFIRM, 6 November 2025, pp.2-4)

- ²⁴ Celoria, Eleonora and Ponzo, Irene (2026), "The governance of counter-exploitation policies in agriculture in Italy: Lagging behind despite progressive legislations", DignityFIRM, 4 February 2026.
- ²⁵ Giampaolo, Mattia and Ianni, Aurora (2020), "The Master Gang System in Italy", Global Call to Action Against Poverty (GCAP), Case study report No. 1, November 2020.
- ²⁶ European Commission (2024), Political Guidelines for the next European Commission 2024-2029, Strasbourg, 18 July 2024.
- ²⁷ Draghi, Mario (2024), "[The future of European competitiveness – A competitiveness strategy for Europe \(Part A\)](#)", Brussels: European Commission (accessed 2 March 2026).
- ²⁸ European Commission (2025), A simpler and faster Europe: Communication on implementation and simplification, Brussels, COM(2025) 47 final, 11 February 2025; European Commission (2025), Commission work programme 2025: Moving forward together: A Bolder, Simpler, Faster Union, Brussels, COM(2025) 45 final, 11 February 2025.
- ²⁹ The Talent Pool has not yet been officially adopted. See European Commission (2023), Proposal for a Regulation of the European Parliament and of the Council establishing an EU Talent Pool, Brussels, COM(2023) 716 final; European Commission (2023), Annex to the Proposal for a Regulation of the European Parliament and of the Council establishing an EU Talent Pool (List of EU-wide shortage occupations), Brussels, COM(2023) 716 final; European Labour Authority, "[Labour shortages and surpluses in Europe](#)", European Labour Authority (accessed 2 March 2026).
- ³⁰ Rakowska, Katarzyna; Fihel, Agnieszka and Kaczmarczyk, Paweł (2025), "The Role of the State Labour Inspectorate in Preventing Irregular Employment of Migrant Workers in Poland", Warsaw: Centre of Migration Research (University of Warsaw), 6 November 2025. See also: Kaczmarczyk, Paweł (2024), "COVID-19 and labour market adjustments: policies, foreign labour and structural shifts", *Journal of Ethnic and Migration Studies*, Volume 50, Number 5, pp. 1226–1251; and Górny, Agata and Kaczmarczyk, Paweł (2018), "A known but uncertain path: The role of foreign labour in Polish agriculture", *Journal of Rural Studies*, Volume 64, pp. 177–188.
- ³¹ Garcés, Blanca and de Lange, Tesseltje (2026), "Dignity for migrant workers in agriculture", DignityFIRM, Policy Brief, March 2026.
- ³² Hooper, Kate (2019), "Spain's Labour Migration Policies in the Aftermath of Economic Crisis", Brussels: MPI Europe; Corrado (2018).
- ³³ See: de Lange, Tesseltje (2025), "[Chain Liability for migrant workers' unpaid wages in the Netherlands](#)", DignityFIRM (blog post) (accessed 2 March 2026), 21 August 2025; de Lange, Tesseltje; Naaktgeboren, Sterre and van Meeteren, Masja (2025), "Employer Sanctions in the Netherlands: How to Bridge Policy Silos to Protect Migrant Workers", DignityFIRM.
- ³⁴ Krilić, Sanja Cukut; Garcés-Mascareñas, Blanca; Güell, Berta; Kuti, Simona and others (2024), "Mapping evidence on the conditions of migrant workers in the F2F sectors", DignityFIRM, Work Package Report, July 2024; See also PICUM (Platform for International Cooperation on Undocumented Migrants) (2023), "[Regularisation mechanisms and programmes: Why they matter and how to design them](#)", PICUM, January 2023.
- ³⁵ European Commission (2024), [A shared prospect for farming and food in Europe](#) (Strategic Dialogue on the future of EU agriculture – final report), European Commission website, September 2024.
- ³⁶ European Environmental Bureau, "[Strategic Dialogue: Farmers and NGOs reach historic consensus calling for a fair and sustainable transition for EU food and farming](#)", European Environmental Bureau website (accessed 2 March 2026), 4 September 2024.
- ³⁷ European Environmental Bureau, "[Collaboration remains on the menu with appointment of new Agri-Food Advisory Board \(EBAF\)](#)", European Environmental Bureau website, 27 January 2025.
- ³⁸ Darhour, Hanane and Bouzid, Hajar (2026), "Irregular migrant work in Morocco: Dynamics and governance constellations", DignityFIRM, Working Paper, 6 February 2026.
- ³⁹ European Commission, "[Quality Jobs Roadmap highlights key role of social partners and social dialogue in shaping future-proof European labour market](#)", News article, European Commission website (accessed 3 March 2026), 12 December 2025.
- ⁴⁰ Gottlieb, Nora and Ertel, Mascha (2024), "Migration, Work, and Health: Mapping the Evidence – A systematised review of the global literature on the interrelations between migration, work, and occupational health inequities", DignityFIRM, Working Paper, July 2024.
- ⁴¹ European Commission (2024), [Political Guidelines for the next European Commission 2024–2029](#), Strasbourg, 18 July 2024 (accessed 2 March 2026); European Council (2024), [The Budapest Declaration on the New European Competitiveness Deal](#), Budapest, 8 November 2024.
- ⁴² European Commission (2025), A Simpler and Faster Europe: A New Approach to Boost Prosperity and Resilience, Brussels, COM(2025) 30 final, 29 January 2025.
- ⁴³ European Commission, "[Simplification](#)", European Commission website (accessed 2 March 2026).
- ⁴⁴ European Commission (2022), Impact assessment report accompanying the document Proposal for a Directive of the European Parliament and of the Council on Corporate Sustainability Due Diligence and amending Directive (EU) 2019/1937, Brussels, SWD(2022) 42 final, 23 February 2022.
- ⁴⁵ United Nations Development Programme (2025), "Human Rights vs. Competitiveness: A False Dilemma?", United Nations Development Programme (accessed 2 March 2026).
- ⁴⁶ European Parliament (2025), "[Simplified sustainability reporting and due diligence rules for businesses](#)", European Parliament News, 16 December 2025.
- ⁴⁷ Garcés and de Lange (2026), op.cit.
- ⁴⁸ See Milieu (2025), op.cit; Celoria, Eleonora and Ponzo, Irene (2026), "Employers and compliance with labour standards in agriculture: Social conditionality and incentive mechanisms in Italy", DignityFIRM, Policy Brief, 27 January 2026.
- ⁴⁹ European Parliament (2025), "[Deal to simplify EU agriculture rules](#)", European Parliament News, 10 November 2025. See EFFAT (2025), "[Not a New Day for CAP: New Architecture Hides Dangerous Threats for Agricultural Workers](#)", July 18 2025.
- ⁵⁰ Eurostat, "[Farms and farmland in the European Union – statistics](#)", *Statistics Explained* (accessed 2 March 2026).
- ⁵¹ Milieu (2025).
- ⁵² This initiative is being currently developed under the Seasonal and Fair Employment framework (SaFE). See International Centre for Migration Policy Development, "[SaFE: Seasonal and fair employment blueprints](#)", International Centre for Migration Policy Development (accessed 2 March 2026). The SaFE project is a technical assistance initiative launched by the International Centre for Migration Policy Development (ICMPD) in collaboration with the European Commission (DG HOME). ICMPD Project Overview: International Centre for Migration Policy Development, "[SaFE: Seasonal and fair employment blueprints](#)", International Centre for Migration Policy Development (accessed 2 March 2026); Migration Partnership Facility (MPF) Portal: Migration Partnership Facility, "MPF Projects", Migration Partnership Facility (accessed 2 March 2026); European Commission, "[Migration Partnership Facility \(MPF\)](#)", European Commission (accessed 2 March 2026).
- ⁵³ Celoria, Eleonora and Ponzo, Irene (2026), "Employers and compliance with labour standards in agriculture: Social conditionality and incentive mechanisms in Italy", DignityFIRM, Policy Brief, 27 January 2026; See also Naaktgeboren, Sterre E. and de Lange, Tesseltje (2025), "Social Conditionality in the EU Agricultural Policy in the Netherlands: Missing the Target?", DignityFIRM, Policy Brief, August 2025.
- ⁵⁴ Milieu (2025).
- ⁵⁵ European Commission, Proposal for a Regulation of the European Parliament and of the Council establishing a common system for the return of third-country nationals staying illegally in the Union, and repealing Directive 2008/115/EC, Legislative Proposal (COM(2025) 101 final), European Commission, March 2025.
- ⁵⁶ European Council (2024), European Council meeting (17 October 2024) – Conclusions, Brussels, EUCO 25/24.
- ⁵⁷ von der Leyen, Ursula (2024), "Europe's Choice: Political Guidelines for the next European Commission 2024–2029", Strasbourg: European Commission.
- ⁵⁸ Kierans, Denis and Vargas-Silva, Carlos (2024), "The Irregular Migrant Population of Europe", MirreM, Working Paper 11/2024, October 2024; Salihoğlu, Aslı and Vargas-Silva, Carlos (2024), "Irregular Migrants in the Informal Economy: Conceptual Issues and its Measurement", MirreM, Working Paper 5/2024, 2024; Wagner, Martin; Desmond, Alan and Kraler, Albert (2024), "EU Policy Framework on irregular migrants", MirreM, Working Paper 8/2024, 2024.
- ⁵⁹ European Commission (2025), Analytical supporting document accompanying the Proposal for a Regulation of the European Parliament and of the Council establishing a common system for the return of third-country nationals staying illegally in the Union, Brussels, SWD(2025) 250 final, 16 May 2025.
- ⁶⁰ Passalacqua, Virginia (2022), "Has the seasonal workers directive missed its target? Evidence from Italy during the pandemic", *European Law Open*, Volume 1, Number 3, pp. 690–698.
- ⁶¹ European Council on Refugees and Exiles (2017), "The 'No-Work' Policy: Why denying asylum seekers the right to work is detrimental to both individuals and society", Brussels: ECRE, November 2017.

- ⁶² In Germany, any person working in a de facto employment relationship in Germany ought to be included in statutory social insurance and health insurance (SSHI). Yet it is unlikely that workers, once arrested and/or deported, can successfully claim SSHI benefits. See: Answer to Research Guidelines on EU Law from Germany, On File With Author.
- ⁶³ Parusel, Bernd, “[A Draconian Return System: High Humanitarian Cost of the Forthcoming Return of Irregular Migrants](#)”, *Verfassungsblog* (accessed 2 March 2026).
- ⁶⁴ Ponzo, Irene (2025), “Relationships between migration and labour policies in the production of irregular labour in Italy”, DignityFIRM, Policy Brief, May 2025. The Moroccan government undertook in 2013 and 2017 two large-scale regularisation campaigns which granted more than 50,000 residence permits to irregular migrants, mainly from sub-Saharan Africa. As a result, the country has become the first African country to implement such mechanisms. Morocco’s National Immigration and Asylum Strategy (SNIA), see above, Box 2.
- ⁶⁵ Reforms to the *arraigo* system (RD 629/2022 and the 2025 extension) prioritise economic contribution and labour integration, yet remain utilitarian and top-down, effectively excluding migrant and civil society voices. Pasetti, Francesco (2025), “Relation between labour and immigration policies in the production of irregular migrant work in Spain: The case of food delivery”, DignityFIRM, Policy Brief, 14 October 2025.
- ⁶⁶ Saiz, Elma and Puente, Óscar (2026), “[The Government of Spain launches an extraordinary regularisation process for foreign nationals already living in Spain](#)”, *La Moncloa*, 27 January 2026.
- ⁶⁷ Pasetti (2025).
- ⁶⁸ Katarzyna Rakowska, Agnieszka Fihel, and Paweł Kaczmarczyk (2025).
- ⁶⁹ See Ponzo, Irene (2025), “The governance of irregular migrant work: Policy clusters and regional convergences”, DignityFIRM, Working Paper, 30 September 2025.
- ⁷⁰ See Neidhardt, Alberto-Horst (2024), “Navigating the New Pact on Migration and Asylum in the shadow of Non-Europe”, Brussels: European Policy Centre, January 2024; Trauner, Florian and Slominski, Peter (2018), “How do Member States Return Unwanted Migrants? The Strategic (non-)use of ‘Europe’ during the Migration Crisis”, *JCMS: Journal of Common Market Studies*, Volume 56, Number 1, pp. 101–118, January 2018.
- ⁷¹ Gottlieb and Ertel (2024).
- ⁷² Answer to Research Guidelines on EU Law from Italy, Poland and Spain, On File With Author.
- ⁷³ Gottlieb and Ertel (2024).
- ⁷⁴ Gottlieb and Niediek (2026).
- ⁷⁵ See de Lange, Tesseltje and Falkenhain, Mariella (2024), “Precarity prevented or reinforced? Migrants’ right to change employers in the recast of the EU Single Permit Directive”, *Frontiers in Sociology*, Volume 8, pp. 1–12
- ⁷⁶ Answer to Research Guidelines on EU Law from Germany, On File With Author.
- ⁷⁷ Answer to Research Guidelines on EU Law from Germany, On File With Author. See also Platform for International Cooperation on Undocumented Migrants (PICUM) (2025), “[Occupational Safety and Health of Undocumented Migrant Workers in Europe](#)”, PICUM (accessed 2 March 2026).
- ⁷⁸ A 2021 report by the FRA assessed the Employers’ Sanctions Directive’s impact on migrant worker protections, revealing significant failures in how member states have integrated and enforced the Directive within their domestic legal systems. See European Union Agency for Fundamental Rights (2021), *Protecting migrants in an irregular situation from labour exploitation – Role of the Employers Sanctions Directive*, Luxembourg: Publications Office of the European Union, 24 June 2021
- ⁷⁹ de Lange, Tesseltje, Naaktgeboren, Sterre, van Meeteren, Masja, (2025), [Employer Sanctions in the Netherlands: How to Bridge Policy Silo’s to Protect Migrant Workers](#), DignityFIRM.
- ⁸⁰ Answer to Research Guidelines on EU Law from Poland, On File With Author.
- ⁸¹ Answer to Research Guidelines on EU Law from Spain, On File With Author.
- ⁸² Answer to Research Guidelines on EU Law from Germany, On File With Author.
- ⁸³ de Lange, Tesseltje; Naaktgeboren, Sterre and van Meeteren, Masja (2025), “Employer Sanctions in the Netherlands: How to Bridge Policy Silo’s to Protect Migrant Workers”, DignityFIRM, Policy Brief, 16 January 2026.
- ⁸⁴ European Union Agency for Fundamental Rights (2021), “[Protecting migrants in an irregular situation from labour exploitation – Role of the Employers Sanctions Directive](#)”, Luxembourg: Publications Office of the European Union (accessed 2 March 2026), June 2021; See also Platform for International Cooperation on Undocumented Migrants (2020), “[A Worker is a Worker: How to Ensure that Undocumented Migrant Workers Can Access Justice](#)”, PICUM, 6 April 2020.
- ⁸⁵ Platform for International Cooperation on Undocumented Migrants (PICUM) (2025), “[Reporting obligations and ‘firewalls’](#)”, PICUM.
- ⁸⁶ Answer to Research Guidelines on EU Law from the Netherlands, On File With Author.
- ⁸⁷ Katarzyna Rakowska, Agnieszka Fihel, and Paweł Kaczmarczyk (2025).
- ⁸⁸ European Migration Network (2020), *Attracting and protecting the rights of seasonal workers in the EU and the United Kingdom*, Brussels: European Migration Network, Synthesis Report, December 2020.
- ⁸⁹ Answer to Research Guidelines on EU Law from Italy, On File With Author.
- ⁹⁰ Legarda Díaz-Aguado, Imanol (2025), “Migrant organisations led actions”, DignityFIRM, Working Paper, 18 December 2025.
- ⁹¹ Answer to Research Guidelines on EU Law from the Netherlands, On File With Author.
- ⁹² de Lange; Naaktgeboren and van Meeteren (2025).
- ⁹³ Ibid.
- ⁹⁴ Platform for International Cooperation on Undocumented Migrants (PICUM) (2020), “[A Worker is a worker: How to Ensure that Undocumented Migrant Workers Can Access Justice](#)”, PICUM, 6 April 2020.
- ⁹⁵ Kalantaryan, Sona; Mazza, Jacopo and Scipioni, Marco (2020), Meeting labour demand in agriculture in times of COVID 19 pandemic, Luxembourg, EUR 30235 EN, JRC120800. See also: Martin, Philip, *Farm labour in California and some implications for Europe*, Routledge, 2020.
- ⁹⁶ Kalantaryan, Mazza, and Scipioni (2020).
- ⁹⁷ Answer to Research Guidelines on EU Law from Italy, On File With Author.
- ⁹⁸ Hooper and Le Coz (2020). Answer to Research Guidelines on EU Law from the Netherlands, On File With Author.
- ⁹⁹ Ponzo, Irene (2025), “Relationships between migration and labour policies in the production of irregular labour in Italy”, DignityFIRM, Policy Brief, May 2025.
- ¹⁰⁰ Garcés, Blanca (2026), “Known but ignored. Labour and living conditions of migrant workers in agriculture”, DignityFIRM, Working Paper, February 2026.
- ¹⁰¹ Platform for International Cooperation on Undocumented Migrants (PICUM) (2020), “[Designing labour migration policies to promote decent work](#)”, PICUM.
- ¹⁰² Zoetewij-Turhan, Margarite Helena (2018), “The Seasonal Workers Directive: Another Vicious Circle?”, in Rijken, Conny and de Lange, Tesseltje (eds.), *Towards a Decent Labour Market for Low-Waged Migrant Workers*, Amsterdam: Amsterdam University Press, Chapter 5.
- ¹⁰³ Katarzyna Rakowska, Agnieszka Fihel, and Paweł Kaczmarczyk (2025), op.cit.
- ¹⁰⁴ Answer to Research Guidelines on EU Law from Italy, On File With Author.
- ¹⁰⁵ Garcés, Blanca; Molinero, Yolanda and Jones, Alice (2026), “Employer Sanctions in the Circular Migration in Spain: Good Practice?”, DignityFIRM, Working Paper; Güell, Berta and Garcés-Masareñas, Blanca (2020), “Agricultural seasonal workers in times of Covid-19 in Spain”, ADMIGOV Deliverable 3.3, Barcelona: CIDOB, December 2020.
- ¹⁰⁶ Kovalenko, Olha; Sushko, Iryna and Hryhorieva, Yevheniia (2025), “Incentives for Employers to Comply with Minimum Social and Labour Standards in Ukraine”, DignityFIRM, Policy Brief, October 2025.
- ¹⁰⁷ Sushko, Hryhorieva, Kravchuk, and Kovalenko (2025).
- ¹⁰⁸ Sushko, Iryna; Hryhorieva, Yevheniia; Kravchuk, Pavlo and Kovalenko, Olha (2025), “Irregular Status in Migration Policy: Why It Matters in Ukraine Now”, Policy Brief, 20 October 2025.
- ¹⁰⁹ Sushko, Iryna (2024), “[Build back better: War does not stop Ukraine from preparing migration laws for EU accession](#)”, DignityFIRM (blog post), 19 March 2024.
- ¹¹⁰ Milieu (2025), op.cit.
- ¹¹¹ European Labour Authority (ELA), Report on the posting of third-country nationals, Technical Report, European Labour Authority, March 2023; European Labour Authority (ELA), Report on the posting of third-country nationals, Technical Report, European Labour Authority, June 2025.

- ¹¹² European Union Agency for Fundamental Rights (FRA), «Protecting migrant workers from exploitation in the EU: workers' perspectives», Report, European Union Agency for Fundamental Rights (FRA), September 2019
- ¹¹³ See European Commission (2024), The CAP's impact on generational renewal, local development and jobs in rural areas, Brussels, SWD(2024) 81 final, 8 April 2024; CEJA (European Young Farmers) (2023), "Young Farmers are key to the EU's Strategic Autonomy: Manifesto for the 2024–2029 term", CEJA, December 2023.
- ¹¹⁴ Ministry of Labour and Social Policies (2020), Three-year Plan to tackle labour exploitation and unlawful recruitment in agriculture (2020–2022), Rome: Government of Italy. The document candidly identifies that illegal recruitment thrives due to the "institutional vacuum" in rural areas. Public employment agencies are often too slow to meet the immediate needs of the harvest, leaving a gap that the caporali fill by providing both labour and essential logistics (transport and food).
- ¹¹⁵ Ponzo (2025).
- ¹¹⁶ Garcés (2026).
- ¹¹⁷ Gottlieb and Niediek (2024), op.cit; Answer to Research Guidelines on EU Law from Germany, On File With Author.
- ¹¹⁸ Answer to Research Guidelines on EU Law from the Netherlands, On File With Author.
- ¹¹⁹ Answer to Research Guidelines on EU Law from the Netherlands, On File With Author.
- ¹²⁰ European Labour Authority (2025), *Posting of third-country nationals: contracting chains, recruitment patterns, and enforcement issues. Insights from case studies 2025*, Luxembourg: European Labour Authority, Technical Report, June 2025.
- ¹²¹ Milieu (2025).
- ¹²² Milieu (2025); Celoria, Eleonora and Ponzo, Irene (2026), "Employers and compliance with labour standards in agriculture: Social conditionality and incentive mechanisms in Italy", DignityFIRM, Policy Brief, 27 January 2026; de Lange; Naaktgeboren and van Meeteren (2025).
- ¹²³ Pasetti (2025).
- ¹²⁴ Answer to Research Guidelines on EU Law from Spain, On File With Author.
- ¹²⁵ Gottlieb and Niediek (2024). Answer to Research Guidelines on EU Law from Germany, On File With Author.
- ¹²⁶ See de Lange and Falkenhain (2024).
- ¹²⁷ Wet toelating terbeschikkingstelling van arbeidskrachten (Wtta); Aanjaagteam Bescherming Arbeidsmigranten (2020), Geen tweederangsburgers: Aanbevelingen om misstanden bij arbeidsmigranten tegen te gaan (No Second-Class Citizens: Recommendations to Combat Abuses Against Migrant Workers), Final Report, The Hague: Government of the Netherlands, 30 October 2020.
- ¹²⁸ Answer to Research Guidelines on EU Law from Germany, On File With Author.
- ¹²⁹ Tsourdi, Evangelia (Lilian); Neidhardt, Alberto-Horst and Hahn, Helena (eds.) (2024), *From Compromise to Implementation: A New Era for EU Migration Policy?*, Brussels: European Policy Centre, December 2024.
- ¹³⁰ European Commission (2026), The 2026 Annual Single Market and Competitiveness Report, Brussels, COM(2026) 46 final, 30 January 2026.
- ¹³¹ European Trade Union Institute (ETUI) (2023), *Analysing the flows and labour market outcomes of short-term mobile workers in the EU*, ETUI Working Paper, 2023; Organisation for Economic Co-operation and Development (OECD) (2025), *International Migration Outlook 2025*, OECD Publishing.
- ¹³² Kalantaryan, Mazza and Scipioni (2020).
- ¹³³ European Economic and Social Committee (EESC) (2023), *Collecting data on the situation of social protection of seasonal workers in the agri-food sector*, EESC Report, 2023.
- ¹³⁴ EPRS (2021), p.3
- ¹³⁵ See for inspiration Imanol Legarda Díaz-Aguado, Migrant organisations led actions, Working Paper (WP7 Participatory Action Research (PAR), D8.3), DignityFIRM, 18 December 2025
- ¹³⁶ Darhour, Hanane and Bouzid, Hajar (2026), "The governance of irregular migrant work in the national agricultural policies in Morocco", DignityFIRM, Working Paper.
- ¹³⁷ These include Eurostat's European Statistics on Accidents at Work (ESAW) and EU-OSHA's European Survey of Enterprises on New and Emerging Risks (ESENER). See: Milieu (2025).
- ¹³⁸ Answer to Research Guidelines on EU Law from Poland, On File With Author.
- ¹³⁹ Celoria, Eleonora and Ponzo, Irene (2026), "The governance of counter-exploitation policies in agriculture in Italy: Lagging behind despite progressive legislations", DignityFIRM, Working Paper, February 2026.
- ¹⁴⁰ Answer to Research Guidelines on EU Law from Italy, On File With Author.
- ¹⁴¹ Eurostat (2024), *Housing in Europe – 2024 edition*, Interactive Publication, April / November 2024 (accessed 2 March 2026).
- ¹⁴² See European Labour Authority (2024), *Accommodation and food service activities: Issues and challenges related to labour mobility*, Strategic Analysis, October 2024; European Commission (2025), *Employment and Social Developments in Europe 2025: Unlocking the potential of people: Promoting higher employment in the EU*, Luxembourg: Publications Office of the European Union, September 2025.
- ¹⁴³ This is due to the obligations to issue return decisions even without concrete prospects for repatriation.
- ¹⁴⁴ See Belmonte, Martina; Pingsdorf, Julia; Cortinovis, Roberto; Nedee, Astrid and Tintori, Guido (2025), *Managing irregular migration and return*, Luxembourg: Publications Office of the European Union, Joint Research Centre (JRC) Science for Policy Report, December 2025.
- ¹⁴⁵ Maegan Hendow, Martin Wagner, Jill Ahrens, Myriam Cherti, Denis Kierans, Albert Kraler, Arjen Leerkes, Lucy Leon, Alejandra Rodríguez Sánchez, Lalaine Siruno, Jasper Tjaden, Carlos Vargas-Silva, How fit is the available data on irregular migration for policymaking?, Policy Brief, MlrreM Project, October 2024.

The **European Policy Centre** is an independent, not-for-profit think tank dedicated to fostering European integration through analysis and debate, supporting and challenging European decision-makers at all levels to make informed decisions based on sound evidence and analysis, and providing a platform for engaging partners, stakeholders and citizens in EU policymaking and in the debate about the future of Europe.

The **European Migration and Diversity (EMD)** Programme provides independent expertise on European migration and asylum policies. The EMD Programme's analyses seek to contribute to sustainable and responsible policy solutions and are aimed at promoting a positive and constructive dialogue on migration and mobility. The Programme follows the policy debate and conducts analysis taking a multidisciplinary approach, examining both the legal and political aspects shaping European migration policies. EMD analysts focus, amongst other topics, on the reform of the Common European Asylum System; the management of the EU's external borders and the Schengen governance; cooperation with countries of origin and transit; the integration of beneficiaries of international protection and mobile persons into host societies; the links between migration and populism; the development of resettlement and legal pathways; and the EU's free movement acquis. The EMD team benefits from a strong network of academics, NGO representatives and policymakers, who contribute regularly to publications and policy events.

With the strategic
support of



King Baudouin
Foundation

Working together for a better society



This project has been funded by the European Union's Horizon 2020 research and innovation programme under grant agreement No 101094652