



Webinar report

Strategies and methods to address undeclared work in the removal sector

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European Platform
tackling undeclared work



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Contents

Introduction	3
1.0 Challenges and perspectives from the employers' association.....	4
2.0 The Belgian Plan for Fair Competition in the removal sector.....	5
3.0 Spain: tackling undeclared work in the Removal Sector: Practices and innovative approaches.....	8
4.0 France – Mobilic: a sovereign digital tool for tackling undeclared work in the removal sector	9
Closing remarks	11



Introduction

On 26th September 2025, the European Platform tackling undeclared work – hereinafter the Platform – organised a webinar on ‘Strategies and methods to address undeclared work in the removal sector’. The event brought together 62 participants, including Platform members, observers, social partners and representatives from national authorities and from the European Labour Authority – hereinafter ELA.

The webinar aimed at providing an opportunity for Platform members and observers and relevant stakeholders to share experiences and exchange good practices about policy and enforcement measures in relation to tackling undeclared work in the removal sector. The removal sector includes a broad range of services, from residential removal (houses and flats) to commercial and office relocations, also including international and long-distance moves. Companies operating in the sector typically provide additional services such as packing, storage, and logistical support. It is a labour-intensive sector featured by its high seasonality, with peaks of activities concentrated in specific times of the year, such as public and school summer holidays. The removal sector makes use of a varied workforce, also including students and migrant workers, categories often vulnerable to undeclared work and exploitation. In this regard, the sector also sees low trade unions affiliation.

The removal sector is currently regulated under the legislative framework applicable to the broader road transport industry. However, there is an increasing demand to recognise the removal sector as a distinct and independent economic activity, as such a classification would enable the development and implementation of more targeted regulatory solutions and public policies that better address the sector’s specific characteristics, operational features, and structural challenges.

The webinar is the first event organised by the Platform about the removal sector. It is worth noting that the Platform has previously focused on the broader road transport sector on several occasions, including the 2018 seminar on tools and approaches to tackle undeclared work in the road transport sector¹, the 2020 webinar on innovative approaches to tackle undeclared work in the road transport sector, and the 2022 Peer Learning Dialogues on approaches on tackling undeclared work in transport of goods by light commercial vehicles². A 2025 study has also covered the topic of undeclared work in the courier, express and parcel delivery sector³.

The present report aims at providing an overview of the key elements discussed and presented at the webinar, including:

- Perspectives on the sector and the key challenges from the sectoral social partners;
- Policy measures aimed at ensuring fair competition within the removal sector;
- Enforcement practices and tools used for tackling undeclared work.

¹ Tackling undeclared work in the road transport industry (2018)
[Learning Resource Paper - Road Transport Seminar.pdf](#)

² Approaches tackling undeclared work in transport of goods by light commercial vehicles (LCV) (2022)
<https://www.ela.europa.eu/sites/default/files/2022-10/UDW-PLD-Approaches-tackling-undeclared-work-i...>

³ Key challenges in tackling undeclared work in the Courier, Express, and Parcel Delivery sector (2025)
https://www.ela.europa.eu/sites/default/files/2025-08/20250718_Study_Parcel_Delivery_vFinal_%28revi...



1.0 Challenges and perspectives from the employers' association

The presentation delivered by two representatives of FEDEMAC, the European Movers Federation, outlines the characteristics of the sector, key challenges and the impact of undeclared work and unfair competition on the sector.

FEDEMAC's intervention is grounded on the feedback from a questionnaire circulated within their national associates. Representatives of removal national industries from thirteen European Union – hereinafter EU – Member States and from the United Kingdom shared their views about the sector and the key challenges in relation to undeclared work in the survey.

The survey results clearly demonstrate the significant impact undeclared work poses for businesses in the removal sector. Undeclared work is seen as the most pressing challenge, in particular for the impact of unfair competition on companies playing by the rules. Furthermore, companies also face significant additional hurdles such as labour shortages, both in terms of recruitment of qualified personnel and staff retention, uneven digital transformation, issues related to cost sustainability and rising fuel costs.

FEDEMAC representatives highlighted the widespread adoption of unfair practices by fraudulent companies in the market and call for the increased attention of enforcement authorities. Particular attention has been paid to the widespread existence of empty shell companies. In the EU context empty shell companies, also known as letterbox companies, are often established in a Member State where the company has little to no business activity, with the goal of avoiding compliance with the applicable tax and labour legislation in the due Member State, especially in cases involving posting of workers.

FEDEMAC representatives referred that their members at national level, with no difference between Western or Eastern Europe, pointed out at the importance of increasing the attention of the law enforcement authorities to the sector. An enhanced and more consistent enforcement is considered by FEDEMAC essential to promote transparency and promote integrity within the sector. While digitalisation and innovative working methods are welcome, new challenges such as frauds through digital labour platforms emerge and require the attention of enforcement authorities.

During the presentation, FEDEMAC highlighted the availability of the EU level social partners to increase cooperation with national enforcement authorities. According to the information provided by their national members, a limited number of Member States offers examples of cooperation between enforcement authorities and social partners organisations in the removal sector. Relevant cases in this regard can be found in Austria (cooperation with the Financial Police) and in France (involvement in the National Plan against illegal work).

Considering the increasing relevance of cross-border challenges, FEDEMAC affirmed their strong willingness in promoting ELA's mission in ensuring fair labour mobility, underlining the importance of ELA in supporting Member States, ensuring exchange of information and raising awareness about good practices.



Policy measures aimed at ensuring fair competition within the removal sector

In the second intervention of the day, a representative from the Belgian SIIS – Social Information and Investigation Service – detailed the Belgian Plan for Fair Competition, as a targeted multi-stakeholders policy measure to address undeclared work and social fraud in the removal sector.

2.0 The Belgian Plan for Fair Competition in the removal sector

The removal sector in Belgium is considered a vulnerable sector. The estimated fraud amounts to approximately 50 to 65 million euros per year, with several factors, including the high-mobility of the removal activities, the increasing cross-border dimensions of the sector and the growing utilisation of digital labour platforms, representing a significant obstacle to enforcement authorities' actions.

Reports from inspections highlight the significant presence of undeclared work, bogus self-employment, social dumping and cross-border frauds in this sector. Similarly, inspections detected cases of misclassification of work, both through digital labour platforms but also by disguising employment relationships as forms as 'neighbourly assistance' with structured commercial services hidden as informal help.

In consideration of the challenges in detecting undeclared work and other labour-related abuses, in 2024 the Belgian authorities signed a specific Plan for Fair Competition for the removal sector.

The Plan for Fair Competition

The Plan follows a multi-stakeholder approach, with representatives from the enforcement authorities, the Ministry of Employment and Social Affairs, the Ministry of Economy, and the Ministry of Justice, as well as social partner organisations involved in its definition and implementation. Besides the Plan for the removal sector, several Plans have been rolled out for specific sectors considered to be at high risk of labour market abuse, including construction, private security sector and the meat industry. The Plan for Fair Competition for the removal sector includes 31 specific measures for the sector. Its measures are targeted to fight social fraud at national, Benelux and EU level.

The plan is rolled out across a period of over 42 months. The SIIS monitors the development, and the implementation of the Plan is assessed every six months together with the government, while annual consultations are organised with the social partners.

The plan is built upon four pillars: prevention, detection, inspections and sanctions.

- The plan aims to **prevent** undeclared work and social fraud through the utilisation of certificates, licences and through targeted awareness raising initiatives directed to clients and to companies, with an increased media coverage about the Plan measures for the sector. This



also includes specific initiatives such as a platform designed by the employers' organisation to raise awareness and promote fair work (<https://erkendeverhuizers.be/>).

- The Plan for Fair Competition aims to strengthen **detection** of undeclared work through the adoption of a series of measures aimed at facilitating enforcement authorities' activities in detecting undeclared work. This encompasses data mining and data matching, including targeted innovative matching techniques allowing constant matching between social security data and rental contracts and a strengthened international cooperation. Systems of check-in and check-out for individual workers and for self-employed have been put into place. This is considered to be of great help for enforcement authorities as it enables inspectors to have more precise knowledge on the actual place of performance of services. Several elements are considered *triggering factors* for starting an inspection. These include indications from data mining showing abnormal rental patterns or fuel consumption, complaints received through the Point of Contact for Fair Competition, cooperation with international organisations such as ELA, the European Commission and the European Parliament, as well as sectoral reports resulting from cooperation with social partners and removal companies.
- Cooperation with the University of Ghent has provided data about the *best moments* for carrying out **inspections**. Inspections are targeted, and they are usually performed during the so-called 'peak periods', when most of the removals are carried out. This includes weekends and public holidays. This cooperation has also contributed to localise the areas where removals are most likely to take place, generally in the city centres, also considering the high presence of international organisations and big corporations in Belgium, which may require long and more lasting periods of removals. During inspections, inspectors can make use of specific apps such as MyDIA. It allows document verification, e.g. if workers are declared or not through the DIMONA⁴ database, or, using the LIMOSA⁵ database, if an A1 document has been issued for posted workers.
- The **sanctioning** approach includes administrative and criminal sanctions, which also comprises joint and several liability schemes.

Since the establishment of the Plan in 2024, inspections in the removal sector saw a +40% increase compared to the same period in 2023. 85 companies voluntarily improved compliance, and 12 millions of evaded contributions and taxes have been recuperated (estimated amount calculated by the moving

⁴ DIMONA is an electronic declaration system, which contains information on any employee entering or exiting the workforce in Belgium. It thus allows for the immediate identification of any undeclared employees. Every employer is obliged to register new employees in DIMONA. The central objective of DIMONA is to oblige employers to electronically inform the National Social Security Office (Rijksdienst voor Sociale Zekerheid - RSZ) of any employee who enters or leaves the company.

https://www.ela.europa.eu/sites/default/files/2021-09/DIMONA%20%28D%C3%A9claration%20Imm%C3%A9diate%20-%20Nmiddeellijke%20Aangifte%29_1.pdf

⁵ A foreign employer posting gainfully employed workers to Belgium, or his authorised representative, must inform the authorities via the website before the employment of the workers in Belgium. The LIMOSA declaration provides information about the worker and the employer (place of employment, duration of posting, work schedule, etc.). A receipt LIMOSA-1 is immediately issued.

Every posted employee must produce this LIMOSA-1 to his Belgian client or principal. This must be done before work starts

https://employment.belgium.be/en/themes/international/posting/concept-and-formalities/formalities#toc_heading_3



sector itself). At the same time, the first legal proceedings for fraud through digital labour platforms have been carried out.

Nonetheless, the SIIS representative highlighted the existence of continuous challenges related to the implementation of the Plan. Challenges persist relatively to capacity and resources issues from the enforcement side, limiting the detection of fraud in the sector. Questions were raised regarding compliance of some measures of the plan with EU legislation. In addition, several Plan measures are then seen as highly ambitious, but their implementation is seen as challenging.

Cooperation with social partners has played a crucial role in the development of the Plan; nevertheless, a degree of resistance to change has been observed among certain removal companies. This can be partly explained due to the Plan's requests for additional administrative requirements, which may entail greater bureaucracy and costs for businesses.

The Plan is considered to be a good model of cooperation between enforcement and public authorities and social partners organisations, and it is seen as a replicable model for other sectors and in other Member States.

The Plan for Fair Competition in the removal sector: next steps

The Plan is considered a model that can be replicated across other sectors and Member States. Hence, Belgium proposes a series of measures and policy recommendations which can be adopted for strengthening the fight against undeclared work in the removal sector:

- the expansion of the Plan for Fair Competition to other EU Member States (e.g. the Dutch and German removal sector);
- the adoption of an EU Fraud Barometer to monitor sectoral trends for strategic planning;
- the recognition of the profession of remover as distinct, clearly defined profession, as in the case of the lorry drivers;
- an EU-wide regulatory framework for providing supervision over digital labour platforms;
- the adoption of a holistic approach to tackle undeclared work in the sector, recognising that inspections alone are insufficient to this end;



Enforcement practices and tools used for tackling undeclared work

In the second part of the webinar, the presentations and discussions focused on new inspection approaches and innovative tools for tackling undeclared work in the removal sector.

3.0 Spain: tackling undeclared work in the Removal Sector: Practices and innovative approaches

The session commenced with a presentation from a representative of the National Antifraud Office, who provided an overview of sector-specific considerations in Spain.

The speaker emphasised the importance of authorities adapting their strategies to tackle undeclared work, as it presents challenges due to high workforce mobility, lack of fixed workplaces, variable working hours, short-term tasks like picking and placing, and fluctuating staffing requirements.

Inspections can be difficult to carry out effectively, as their success depends on being conducted at the appropriate time and location. Failure to identify the appropriate time and location may lead to the impossibility of identifying illegal practices.

Labour inspectorates have identified **knowledge** as a critical factor for increasing the effectiveness of inspections, particularly in complex or high-risk cases. Therefore, enhancement of knowledge and operational efficiency is fundamental for improving the overall success of inspection activities.

Building knowledge and pursuing efficiency

In Spain close collaboration with sectoral associations was established, offering valuable insights and enabling the development of targeted strategies to address undeclared work within the removal sector.

First key element to consider is a clear distinction between removal companies and removal activities, when it comes to tackling undeclared work, as removal activities are often performed outside a formalized removal company (informality being a clear trait of the sector: see references to “friendly/neighbourly support” mentioned above). As a labour-intensive and highly competitive sector, it is clear that actors within this sector have the tendency to cut expenses, especially in social protection area, leading to frequent use of undeclared work, despite the risks faced if inspected.

Initially, labour inspectors sought to discover and tackle undeclared work by conducting inspections in newly developed areas, deploying teams to systematically survey these zones on foot and to monitor locations designated for the parking of removal trucks, as indicated by posted signage.



This approach was successful in identifying illegal practices but time-consuming, and a need for **efficiency** improvement appeared, as the involvement large teams of inspectors to identify a relatively low number of undeclared workers seemed likely to indicate a low cost-benefit ratio.

Within this context, shifting the paradigm required a thorough review of removal regulations and enhanced collaboration among all relevant stakeholders. On the basis of the applicable legal framework for Spanish Labour and Social Security Inspectorate, a cooperation system was set with the municipalities. The system also included an inspection plan adopted on the information provided by local authorities with regard to places for future removal activities. This allowed broader coverage and the deployment of multiple inspection teams with a significant increase in the effectiveness of inspections as result.

A key takeaway from examining labour inspectors' efforts to raise knowledge and boost efficiency is that working together with both private and public organisations is vital. Each sector has its own specific characteristics that need to be understood before inspections take place. In areas like the removal industry, where activities are widespread and highly mobile, readiness in the inspection activity is especially important for tackling undeclared work effectively.

4.0 France – Mobilic: a sovereign digital tool for tackling undeclared work in the removal sector

EU Regulation 561/2006 applies to drivers of vehicles weighing more than 3.5 tons or with more than 9 seats operating across Europe⁶. Companies specialising in light road transport, including those in the removals sector, must comply with national regulations.

In France, since 1971, a national law specifies that drivers excluded by the EU regulation must monitor their working hours by using **the individual control booklet** (LIC). Implementing this act has been seen as challenging: the law foresees all records to be kept on paper, making them easy to be changed or falsified. As a result, it hampers enforcement authorities' activities in ensuring genuine compliance with the law, especially regarding the recording of working hours

Building trust and pursuing compliance

Since 2015, the removal sector has been asking for a change. Stakeholders aimed at moving away from the old system and using a digital solution instead.

In reality, the aforementioned legal provision posed three major challenges for both private companies in the transport sector and law enforcement authorities when conducting inspections.

⁶ Starting from 1 July 2026, light commercial vehicles (LCVs) with a maximum permissible mass exceeding 2.5 tonnes (including any trailer or semi-trailer) and engaged in cross-border transport operations or cabotage will fall under the same regulatory regime applicable to heavy commercial vehicles (HCVs). This includes the mandatory installation of second-generation smart tachographs (V2), and full compliance with EU rules on maximum daily and weekly driving times, minimum break requirements, and mandatory daily and weekly rest periods, in accordance with Regulation (EC) No 561/2006



- **First**, the reporting had to be done every single day by the employee. That made it really hard to know if the working hours were reported correctly, reported later, or even changed afterwards. And in the end, even the employees themselves were not guaranteed that their hours were recorded properly.
- **Second**, companies often considered the 1971 law as a hurdle for their activities and for individuals without expertise in this area, comprehending all the intricacies could be challenging. Consequently, many organisations found it impractical to implement an additional system solely for tracking working hours.
- **Third**, concerns arose regarding the reliability of paper-based records. Such documentation rarely provides full certainty, as it may be ambiguous, easily misplaced or altered with relative ease. Consequently, reliance on paperwork alone proves insufficient for the effective monitoring of working hours and may create opportunities for the inaccurate reporting of employees' actual working hours to the authorities.

To meet the demands of the removal sector, a digital solution was developed, marking the start of Mobilic through the BetaGov programme.

Mobilic - the digital tool that offers benefits to all stakeholders in the labour market

After the application has been developed and launched, it provides stakeholders with various benefits and utilities, including the following:

- For **drivers**, the mobile application offers a straightforward and efficient method to record their working hours. This not only ensures compliance but also provides drivers with a clear record of their working hours, including ride duration and break periods. As a result, many employees became aware of potential exploitation by their employers and violations of labour laws.
- **Employers** use the mobile application as well. It supports them in complying with labour regulations and allows managers to easily track and verify employees' working hours, ensuring that they are not exceeding legal limits and are taking appropriate breaks. This real-time information is invaluable for making informed decisions and ensuring that the company remains compliant. Additionally, the system also ensures transparency for employees: if an employer/manager makes any changes to their working hours, the application sends automatic notifications to employees allowing everyone to have clear information about what will be reported to the authorities. This data could be used in trial procedures.
- Mobilic app also includes features for the **enforcement authorities**. They can access employees' working hours data during roadside inspections by scanning a QR code from the employee's space in the mobile app. This allows the authorities to check whether the employer is accurately recording working hours as expected and to identify any potential violations. If any discrepancies or alerts are detected, it indicates a breach of national regulations. The authorities can then review the detailed records and see if the employer or the employees



made any modifications. The system is designed to ensure transparency and make it easier to identify and address any issues, avoiding a punitive approach on employers.

The impact of Mobilic on undeclared work depends on how it is implemented and how thoroughly it is used. By providing real-time, transparent data and making it easier for employers and authorities to monitor compliance, it significantly reduces the opportunity for undeclared or off-the-record work. It also creates a digital trail that makes it easier to detect inconsistencies. The effectiveness also depends on training, the adoption rate by both employees and companies, and how rigorously the system is enforced.

Closing remarks

The removal sector is a sector affected by undeclared work. Its high reliance on seasonal and temporary employment, and on more vulnerable categories such as students and migrant workers, exposes the sector to unfair working practices and causes disruptions to a competitive business environment.

The sector is characterised by high labour mobility, with frequent changes in workplaces and tasks sometimes performed in private residences, which presents challenges for effective labour inspections. Cash payments for services, particularly for small-scale or household moves, may make it more difficult to track undeclared work and envelope wages. Furthermore, the lack of digital tools and mandatory tracking systems for smaller operations, and limited trade union representation present additional challenges.

Perceptions of the sector vary from country to country, with a trend developed in the western regions of the European Union to evaluate the removal sector as an independent entity; however, perspectives on this approach vary due to the insufficient data made available for a significant number of stakeholders. National policies sometimes remain unclear to stakeholders, even when they result from collaboration between public and private sectors.

The presentations and feedback during the webinar highlighted that tackling undeclared work in the removal sector requires a combination of sector-specific knowledge, efficient and targeted inspections, digital tools for transparency, and strong collaboration between public and private stakeholders. The diversity of national approaches also suggests that sharing best practices and adopting successful models can enhance effectiveness across Europe.