



Webinar report

Key challenges in tackling undeclared work in the courier, express, and parcel delivery sector

April 2026



European Platform
tackling undeclared work



LEGAL NOTICE

© European Labour Authority, 2026

Reproduction is authorised provided the source is acknowledged. For any use or reproduction of photos or other material that is not under the copyright of the European Labour Authority, permission must be sought directly from the copyright holders.

Neither the European Labour Authority nor any person acting on behalf of the European Labour Authority is responsible for the use which might be made of the following information.

The document has been prepared by the European Labour Authority; however, it reflects only the views of the presenters attending the webinar. The information contained in this report does not reflect the views or the official position of the European Labour Authority or the European Platform tackling undeclared work.



Contents

Introduction.....	1
1.0 General overview of the ELA Study: <i>Key challenges in tackling undeclared work in the Courier, Express and Parcel (CEP) delivery sector</i>	2
2.0 <i>Collective bargaining – renewal of the contract for the logistics, freight transport, and shipping - Italy</i>	4
3.0 The first collective agreement for platform workers which recognised delivery platform riders as employees – Spain	6
4.0 Social partners and their key role in tackling undeclared work through a multi-pronged approach – the <i>European Transport Workers’ Federation</i>	8
5.0 <i>Initiatives and digital tools to better address undeclared work in the CEP sector - Belgium</i>	10
6.0 <i>Action plan to combat social dumping in the transport sector - Norway</i>	12
Closing remarks.....	13



Introduction

On 30 January 2026, the European Labour Authority – hereinafter ELA – organised a webinar on “**Key challenges in tackling undeclared work in the Courier, Express, and Parcel Delivery sector**”. The event was the part of the work plan of the Platform tackling undeclared work (hereinafter the Platform). It brought together over 130 participants, including Platform members, observers, social partners, and representatives from national authorities and ELA. It provided an opportunity for Platform members and observers and relevant stakeholders to share experiences and exchange good practices on policy and enforcement measures related to tackling undeclared work in the Courier, Express, and Parcel Delivery (CEP) sector.

The sector is becoming an increasingly significant part of the economy, both in terms of its financial value and social impact. It is a labour-intensive sector where wage costs account for a significant proportion of the price charged to customers. However, it is not spared from social dumping and unfair competition, as customers often seek the lowest price, putting pressure on delivery companies.

Parcel delivery sector has received, particularly in some Member States, increasing attention as a sector highly susceptible to undeclared work. Enforcement of legislation, however, is cumbersome, and provides conditions which allow undeclared and under-declared work to emerge. A further complication arises from the varying regulations applicable to different types of transport operators, coupled with the limited enforcement measures within the legal framework to ensure compliance.

The webinar served as a follow-up initiative to promote the recently published study¹ on the CEP sector. Its objectives were to enhance understanding of the sector's characteristics and to identify opportunities for Member States to exchange best practices in both law enforcement and collaboration with all relevant stakeholders, including social partners.

The Platform has previously focused on the road transport sector on several occasions, including the 2018 seminar on tools and approaches to tackle undeclared work in the road transport sector², the 2020 webinar on innovative approaches to tackle undeclared work in the road transport sector, the 2022 Peer Learning Dialogues on approaches on tackling undeclared work in transport of goods by light commercial vehicles³, and the 2025 webinar on strategies and methods to address undeclared work in the removal sector⁴.

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

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

¹ 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...

² Tackling undeclared work in the road transport industry (2018)
[Learning Resource Paper - Road Transport Seminar.pdf](#)

³ 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...>

⁴ [Webinar on tackling undeclared work in the moving sector | European Labour Authority](#)



1.0 General overview of the ELA Study: *Key challenges in tackling undeclared work in the Courier, Express and Parcel (CEP) delivery sector*

Bettina Haidinger, the leading author of the study, presented its comprehensive overview, including the main characteristics of the sector, key challenges, and the detrimental effects of undeclared work and unfair competition on industry performance.

The study's methodological approach was presented, explaining that it is based on EU-level and national statistical data, alongside extensive interviews with labour inspectorates, social partners, and selected country case studies.

The study provides a comprehensive analytical framework to understand the structural problems that make the CEP sector particularly vulnerable to undeclared work and irregular labour practices.

The sector has undergone rapid transformation, driven by e-commerce growth, shifting postal markets, and increasingly complex delivery models, which has reshaped both the demand for labour and the mechanisms through which work is organised. As parcel volumes expanded significantly after 2019, recorded employment figures did not rise at the same pace, pointing to efficiency gains but also raising concerns regarding hidden or unregistered labour inputs.

An important challenge is the blurred categorisation of activities across postal, transport, and platform delivery. This not only complicates statistical measurement but also poses difficulties for enforcement bodies attempting to address irregularities in an increasingly hybrid sector.

The study documents a range of non-compliance patterns: underreported working hours (notably waiting and loading time), bogus self-employment, illegal employment of third-country nationals, fraudulent bankruptcies, and the problematic proliferation of short-lived or unregistered firms. In several countries, these challenges are exacerbated by the misuse of temporary-work agencies. These issues are rooted in structural drivers such as intense price pressure from principals and e-commerce intermediaries, economic dependency of small contractors on single clients, and long subcontracting chains that obscure accountability and weaken the enforcement of labour standards.

Although time-tracking tools for light commercial vehicles exist, they are often not properly used, creating enforcement blind spots. Mobile work, delivery pressure, and ineffective recording let under-reported hours and excessive working time go undetected, especially in long subcontracting chains. Low prices and diluted accountability further reduce incentives to use time-tracking for compliance, reinforcing underpayment and frequent subcontractor business failures.

Against this backdrop, the study emphasises the need for an integrated enforcement and governance framework. It highlights the importance of upstream accountability, digital traceability, coordinated inspections, and strengthening of workers' voice through collective bargaining and better minimum-wage enforcement mechanisms.



Conclusions & next steps

The CEP sector faces significant challenges related to undeclared work, complex subcontracting structures, and enforcement difficulties. The following conclusions and recommendations outline key findings and suggest measures to improve compliance, enhance enforcement, promote fair competition, and protect workers' rights.

1. Strengthen upstream accountability

Placing greater responsibility on principals and major buyers is essential. Requirements for due diligence, chain liability, and real-cost pricing can break the cycle of cost-driven subcontracting practices that encourage undeclared work.

2. Introduce and standardise digital traceability tools

Digital time records, tachographs for LCVs, registry systems, and chain-wide digital transparency can make hidden labour visible. These tools can support inspectorates in targeting risky operators and verifying compliant working hours.

3. Professionalise subcontractors and stabilise chains

Minimum standards for financial and organisational reliability—as well as certification of subcontractors—would prevent the proliferation of “disappearing firms” and strengthen compliance throughout the delivery chain.

4. Enhance inspectorate capacity and multi-agency coordination

Joint inspections (labour, tax, police, customs, road-safety authorities) are crucial for detecting irregularities in mobile work environments. Data-driven risk assessment should be systematically integrated into enforcement strategies.

5. Strengthen collective bargaining across the supply chain

Sectoral or chain-wide collective agreements, paired with joint liability, can establish enforceable condition floors and reduce irregular intermediation. They also provide a benchmark for reclassification in cases of bogus self-employment.



Open discussions – Collective bargaining: an effective national strategy to tackle undeclared work

In the second part of the webinar the participants reflected on and discussed how collaboration among key stakeholders in the CEP sector can strengthen overall efforts to address undeclared work and promote a fair competitive environment. Representatives from authorities and social partners provided insights into the influence of national collective agreements, emphasising how these frameworks improve employee working conditions and function as a robust tool for curbing undeclared work within the sector.

2.0 Collective bargaining – renewal of the contract for the logistics, freight transport, and shipping - Italy

The renewal of Italy's National Collective Agreement (NCA) for the logistics, freight transport and shipping sector marks a significant step forward in strengthening labour standards within complex delivery chains. The agreement implements measures designed to reduce the risks associated with undeclared work in the CEP sector through concrete contractual mechanisms designed to enhance transparency, clarify contract terms, and strengthen accountability from the outset.

Collective Agreements – although not provided of general validity (i.e., *erga omnes* effect) are *de facto* widely applied across sectors. In particular, they are used by courts and enforcement authorities as term of reference for compliance checks and, crucially, as benchmark for fair remuneration – making the sectorial minimum wage substantially binding for the employers.

The design of the recently signed new NCA shows how collective bargaining, when strategically linked to governance tools, can directly reduce the loopholes that enable irregular labour intermediation and concealed subcontracting.

At the heart of the renewed NCA is Article 42, which introduces a series of transformative measures aimed at regulating contracting-out practices. It states that CEP services can be outsourced (*appalto*) only towards companies applying the same NCA, and restricts the use of multilayer subcontracting, limiting it except among companies of the same group.. This provision directly addresses one of the CEP sector's most persistent vulnerabilities: the opacity generated by long and fragmented chains of intermediaries. By establishing joint liability, the agreement ensures that responsibilities for wage payments, social-security contributions, and compliance with working conditions extend throughout the chain, preventing principals from offloading risks onto smaller operators.

The agreement also sets out stringent **compliance criteria** for contractors and, when contemplated, subcontractors, covering technical competence, financial reliability, occupational health and safety adherence, and tax and social-security regularity. Instruments such as DURC⁵ and single tax-compliance⁶ certificates become prerequisites for participation in the chain. These criteria create a clear and enforceable benchmark for inspectorates and companies alike.

Enforcement mechanisms are equally robust. The NCA provides for the termination of outsourcing contracts in cases of non-payment of contributions, underpayment of workers, NCA misapplication, or

⁵ **Single Contribution Clearance Certificate** is attesting compliance with social security and social insurance contribution obligations

⁶ Italian tax-law certificate issued by the Agenzia delle Entrate (Italian Revenue Agency). It certifies that an undertaking is regular and compliant with its tax obligations



serious occupational safety and health (OSH) breaches. Joint monitoring by inspectorates and unions strengthens the practical enforceability of these standards.

A key element of this framework is the distinction—established by Article 29 of Legislative Decree No. 276/2003—between **genuine contracting** and **unlawful labour intermediation**. The collective agreement does not define contracting autonomously; instead, it **incorporates the statutory model** set out in Article 29 and ensures its application across CEP supply chains. Article 29 identifies the **essential criteria** of a genuine contract for services: the contractor's **organisational autonomy**, the **assumption of business risk**, the **exercise of managerial and supervisory powers**, and the **use of the contractor's own equipment and resources**. Where these conditions are not met, the relationship is classified as **unlawful labour supply** or **bogus contracting**, leading to the **reclassification of workers** under the principal contractor and the **recovery of unpaid wages and contributions**. Article 42 of the NCA **implicitly refers** to these legal criteria and embeds them in a contractual framework ensuring that outsourcing complies with the statutory requirements of genuine contracting. This mechanism serves as an **effective tool against bogus subcontracting**, a recurrent irregularity in the CEP sector.

The future introduction of **CIGAL**⁷ will complement these contractual rules. CIGAL is a digital traceability tool instituted by the Ministry of Labour and Social Policies and aimed at gathering data and cross-referencing information from various national databases, including fiscal records, social security contributions, and labour law compliance data. The tool is managed by **Unioncamere** (the Italian Union of Chambers of Commerce) and operates as a digital system designed to improve transparency and compliance in complex supply chains.

Conclusions & Further Steps

Italy's model is especially noteworthy because it turns collective bargaining, traditionally a tool for negotiating wages and working conditions, into a **mechanism of sectoral regulation and enforcement**. The Italian case illustrates how social partners can fill gaps that legislation alone cannot cover, particularly in complex subcontracting environments.

Structured social-partner engagement and contractual innovation can serve as a strong defense against undeclared work, bogus self-employment, and opaque subcontracting practices. Building on these insights, the following conclusions and further steps outline how these measures can be translated into practical improvements for the sector:

1. Strengthen European convergence on subcontracting governance.

Article 42 of the Italian sectorial NCA provides a model for other Member States seeking to regulate complex delivery chains.

2. Expand digital traceability systems.

Platforms similar to **CIGAL** should be considered EU-wide, enabling cross-border data sharing.

3. Promote social partner involvement in enforcement.

Italy shows that social partners and inspectorates can complement one another effectively.

4. Define rigorous criteria for genuine subcontracting.

Clear operational tests reduce ambiguity and limit opportunities for disguised labour supply.

5. Use chain-wide collective agreements as a compliance equaliser.

Harmonised standards prevent social dumping and ensure fair competition.

⁷ CIGAL= *Cruscotto informativo gestione appalti logistica*



3.0 The first collective agreement for platform workers which recognised delivery platform riders as employees – Spain

Spain has become one of the first EU countries to confront the legal ambiguity of platform-mediated delivery work by introducing a **universal presumption of employment** for platform couriers.

Spain's starting point is the **Workers' Statute**, an established legal instrument that governs employment relationships in the Spanish labour market. The Statute's criteria (**voluntary nature**, **remuneration**, and above all, **dependence under the organisation and management of another entity**) had always provided a workable foundation for determining employee status. However, the rise of digital platforms, algorithmic assignment systems, and multi-layer outsourcing structures created new challenges for interpreting these criteria in practice.

Spanish platform couriers were often classified as independent contractors despite working patterns that mirrored employee status: platforms set fees, controlled scheduling, owned or mandated use of key digital tools, issued instructions through algorithms, and penalised non-performance. These features created a gap between legal classification and actual working conditions.

Before the legal reform, Spanish labour inspectorates began challenging this gap through case-by-case investigations. Inspectorate actions focused on several key questions: **"Who sets the fees? Who owns and controls the work tools?"**, and **"Who determines working hours and availability windows?"** In each major case, the answer consistently pointed toward the platform, not the courier. These results were important not only for litigation but also for shaping new legislative design.

Spain eventually codified these insights into national law through what colloquially became known as the **"Rider Law."** In Spain's new regulatory interpretation, the digital platforms' algorithmic management systems constitute evidence of employer control, thereby aligning platform couriers with the traditional indicators of employment relationships. This also establishes a coherent legal pathway for inspectors and courts to evaluate work arrangements beyond contractual labels.

A major innovation is the **universal presumption of employment** for platform riders, which shifts the burden of proof entirely onto companies. Rather than requiring workers or authorities to demonstrate subordination, firms must now prove that couriers are genuinely self-employed—a reversal that significantly strengthens enforcement capacity.

This assumption played a crucial role in shaping Spain's first collective agreement for platform workers, offering clear guidance on applying legal provisions to those in logistics, delivery, and restaurant industries. This agreement operationalised the existing criteria outlined in the Workers' Statute for platform delivery work. Furthermore, it explicitly acknowledged algorithmic management as a form of employer control and restored representation and bargaining rights for workers in a sector that was previously characterised by fragmentation.

Although regulatory modifications have been implemented, enforcement difficulties remain. Companies continue to adapt by outsourcing logistics functions, constructing multilayer subcontracting schemes, or relying on third-country nationals working without the required permits. These patterns reflect the broader adaptability of irregular practices in response to regulatory tightening.

Spain's response relies heavily on strengthened inspection practices. Labour inspectors increasingly operate in joint teams with police forces, conducting inspections in logistics centres where couriers pick



up packages. The authorities also target fraudulent temporary agencies and have pursued reclassification of end-chain workers directly under principal contractors.

Together, the presumption of employment, collective agreement, and joint inspection practices constitute a multifaceted strategy aimed at rebuilding legal clarity and operational accountability in a sector long marked by opacity and informality. However, the sustainability of this model depends on continuous enforcement capacity to counter the evolving tactics used to circumvent labour obligations.

Conclusions & next steps

Spain's presumption of employment has influenced EU-level discussions on platform work, labour status, and algorithmic management. It has become a reference point in debates around proposed Platform Work Directive and national reforms in other Member States.

The approach demonstrates that longstanding employment-law principles can be made fit for the digital age when paired with modern enforcement instruments and collective bargaining frameworks.

By highlighting the practical lessons emerging from Spain's approach, these findings naturally lead into the conclusions and further steps aimed at strengthening enforcement and improving compliance across the sector.

1. Strengthen enforcement capacity to match corporate adaptation

Spain's innovative legal tools are only as effective as the enforcement capacity behind them. Sustained investment in labour inspectorates, digital investigation tools, and joint operations is essential to counter increasingly sophisticated evasion strategies.

2. Enhance oversight of subcontracting chains

Given that companies frequently shift irregular practices into outsourced or multi-layered chains, stronger due-diligence obligations and transparency requirements for principals are needed to ensure compliance throughout the delivery network.

3. Expand algorithmic management regulation

Transparency rights should evolve into more proactive algorithmic accountability measures, including auditing obligations, risk assessments, and penalties specifically tied to algorithmic manipulation or discriminatory management practices.

4. Promote sector-wide collective bargaining coverage

The collective agreement represents a major achievement, and Member States could build on it by promoting broader bargaining coverage across subcontracted chains and ensuring that negotiated standards cascade downstream effectively.



4.0 Social partners and their key role in tackling undeclared work through a multi-pronged approach – the *European Transport Workers’ Federation*

The representative from the European Transport Workers’ Federation (ETF) offered a clear and compelling analysis of how structural fragmentation in the CEP sector undermines workers’ rights, weakens collective representation, and creates fertile ground for undeclared work. Speaking from the worker-movement perspective, she emphasised that while collective bargaining is a foundational tool for improving conditions, its effectiveness is limited when employment relationships are scattered across multiple contractors, subcontractors, and cross-border operators. In such a landscape, union representation often dissolves as work becomes increasingly individualised and dispersed.

Social partners alone cannot tackle the entrenched challenges of the sector unless their negotiations are reinforced by legislative safeguards and supported by well-resourced inspectorates. The accelerating trend toward fragmented and mobile employment models exposes gaps that voluntary agreements cannot fill on their own. To address these vulnerabilities, ETF has identified a series of priorities that would provide the regulatory backbone needed to make negotiated standards genuinely enforceable throughout complex supply chains. These priorities include introducing EU-level limits on subcontracting, strengthening joint liability mechanisms, ensuring equal treatment across chain levels, increasing inspectorate resources, and establishing economically sustainable delivery rates that allow companies to comply with labour standards rather than compete through wage suppression.

Recent examples were highlighted to demonstrate how supply chain agreements can effectively extend protections when designed properly. One such example is the supply chain agreement in Italy, concluded with one of the world’s largest online retailers, which extends the coverage of labour standards beyond the main contractor to include contractors and subcontractors. This model illustrates how sector-wide or chain-wide collective agreements—when linked with shared responsibility across tiers—can create consistent protection even in highly fragmented delivery ecosystems.

Overall, the ETF representative’s intervention reinforced the idea that tackling undeclared work in the CEP sector requires aligning collective bargaining with robust regulatory frameworks at both national and EU levels. Without these legislative backstops, even a very well-designed collective bargaining agreement can struggle to reach the lower tiers of delivery chains where undeclared work and irregular practices are most prevalent.



Conclusions & next steps

While collective bargaining remains an indispensable pillar for improving working conditions, it cannot on its own counteract the systemic forces driving non-compliance in the CEP sector. Collective agreements only function effectively when they cover the majority of workers in a sector, employers are identifiable and accountable, supply chains are transparent, and enforcement mechanisms exist to translate contractual rules into reality. Today's CEP market—fractured into layers of subcontracting, self employment arrangements, cross border operators and platform models—undercuts each of these prerequisites.

This is why ETF strongly advocates for **complementary legislative measures** at both Member State and EU level, ensuring that collective bargaining has a real and enforceable impact throughout supply chains.

1. Strengthen legislative frameworks to support collective bargaining

Collective agreements must be backed by strong legal frameworks that ensure coverage across all tiers of subcontracting. This includes EU-level rules on maximum subcontracting depth, mandatory due-diligence obligations, and robust joint-liability provisions.

2. Enhance inspectorate capacity and strengthen cross-border collaboration

Given the mobile and cross-border nature of CEP work, inspectorates must have the staff, digital tools, and mandate to enforce standards consistently across jurisdictions and supply-chain levels.

3. Ensure economic sustainability throughout the chain

Establishing minimum delivery-rate thresholds and requiring principals to offer fair pricing can significantly reduce incentives for undeclared labour.

4. Expand chain-wide collective bargaining coverage

Collective bargaining agreements should automatically cascade to subcontractors and agencies. Models such as the Italian supply-chain agreement can serve as templates for sector-wide replication.

5. Develop EU-level frameworks for chain governance

To avoid regulatory arbitrage and fragmented enforcement, Member States need coordinated EU standards on subcontracting rules, algorithmic management transparency, and rights enforcement across borders.

6. Integrate worker-voice mechanisms into digitalised and platformised delivery models

As algorithmic management spreads, collective representation must adapt through access to algorithmic data, digital organising tools, and enhanced information rights.



Tackling undeclared work in the CEP sector: national level practices and innovative approaches

In the third part of the webinar, the presentations and discussions focused on new inspection methodologies, advanced tools, and policy initiatives designed to tackle undeclared work in the sector.

5.0 *Initiatives and digital tools to better address undeclared work in the CEP sector - Belgium*

The representative of Social Information and Investigation Service offered a detailed presentation on Belgium's **BELPARCEL** system, one of the most advanced digital governance initiatives designed to make labour practices in the CEP sector more transparent, traceable, and enforceable. His analysis showed how digital tools, when paired with legal obligations and coordinated enforcement, can reshape the way authorities, companies, and workers interact within fast-moving delivery chains.

BELPARCEL system was introduced in phases, each targeting a specific vulnerability within the sector. Belgium began by requiring the **mandatory registration of all last-mile parcel-delivery companies**, creating a foundational registry that authorities can use to map operators and identify unregistered or high-risk actors. Soon after, companies were required to appoint a **delivery-rights coordinator**, a designated person responsible for compliance across the organisation. This was followed by the introduction of a **minimum remuneration formula**, intended to counter destructive price competition and reduce incentives for undeclared work. The system became fully operational with **semi-annual reporting obligations**, including “nil returns”⁸ to ensure all companies remain visible even when inactive. A **public list of registered operators** further increases transparency and enables businesses to avoid engaging with non-compliant subcontractors.

One of the most promising impacts of BELPARCEL system is its contribution to **enforcement clarity**. By generating a digital trail of companies and workers, the system equips labour inspectorates and principals with reliable information. This visibility discourages businesses from outsourcing to unregistered entities and helps define where liability sits within complex delivery chains. It effectively turns previously opaque and fragmented networks into auditable structures

However, the BELPARCEL system encountered resistance from its initial stages and continued to face challenges throughout its implementation. All social partners (both workers' and employers' organisations), expressed unanimous opposition to the original design, raising concerns about feasibility, administrative burdens, and proportionality. An appeal to the Constitutional Court led to a review process, after which the system was upheld but marked for simplification by the incoming government. The new federal government has indicated its intention to adjust the system in consultation with social partners to ensure proportionality and practical applicability. This dynamic demonstrates that although digital registries serve as effective tools for compliance, their sustained success is contingent upon collaborative development, legitimacy, and the engagement of relevant stakeholders.

⁸ A **nil return** is a required report that must be filed **even when there is nothing to report**. It formally tells the authority that no relevant activity took place during the reporting period.



Conclusions & next steps

Overall, BELPARCEL represents an important institutional effort to improve supply-chain visibility and strengthen the foundations for effective enforcement in a sector marked by fragmentation and high levels of subcontracting.

The Belgian experience demonstrates that digital solutions can effectively shed light on previously hidden segments of delivery chains, foster accountability, and enable more targeted and efficient enforcement. But it also highlights the importance of balancing administrative demands with sector realities to ensure broad support and sustained use.

Taken together, these findings highlight the central challenges and operational insights shaping the sector's current enforcement landscape and provide the basis for the conclusions and further steps outlined below.

1. Strengthen stakeholder engagement and co-creation

Digital tools are most effective when designed collaboratively. Future refinements should involve social partners early to ensure practical, widely accepted solutions.

2. Expand integration with other databases

Linking digital solutions like BELPARCEL with tax systems, labour registries, social-security databases, and cross-border platforms would multiply its impact and close loopholes used by irregular operators.

3. Ensure proportionality and minimise administrative burdens

To maintain sector support, reporting requirements must remain efficient and targeted, focusing on areas with the highest risk of undeclared work.

4. Introduce risk-based enforcement using data provided by digital tracking systems

It would be beneficial for inspectorates to increasingly rely on real-time registry data to prioritise inspections, identify suspicious subcontracting patterns, and allocate resources more effectively.

5. Promote transparency among principals and buyers

Public operator lists allow companies to verify partners. Strengthening due-diligence obligations for principals can further reduce the use of non-compliant subcontractors.



6.0 *Action plan to combat social dumping in the transport sector - Norway*

In his presentation, the representative of the **Labour Inspection Authority** outlined Norway's comprehensive **Action Plan to Combat Social Dumping in the Transport Sector**, a strategy that stands out for its extent, enforcement depth, and targeted focus on the CEP segment. Norway's approach demonstrates how multi-agency coordination, strong buyer-side obligations, and robust regulatory tools can significantly narrow the space for undeclared work and labour exploitation in a highly mobile sector.

The action plan comprises **39 measures** spanning regulation, supervision, enforcement, inter-agency cooperation, and international coordination. Importantly, the CEP sector is identified as a **priority area for inspections**, reflecting its vulnerability to irregular practices and the rapid expansion of van-based delivery operations.

Several regulatory measures have recently entered into force, reshaping expectations for both domestic and foreign operators. These include a **licensing requirement for international van transport**, with a national permit added from 1 January 2026, and the introduction of **HSE cards for van drivers**, providing clear worker identification beginning in 2026. Moreover, Norway has established a **general minimum wage for van drivers** at NOK 229 (€19.7) per hour, in effect from June 2025, ensuring a predictable wage floor for workers regardless of subcontracting level. The action plan also places explicit **duties of supervision on transport buyers and all users of subcontractors**, requiring them to verify compliance across multiple chain levels. This upstream accountability is a cornerstone of the Norwegian model.

Operationally, Norway's action plan is distinguished by its strong emphasis on **joint field presence**. Labour inspectors work alongside the Public Roads Administration, the Police, Tax Authorities, and Customs in frequent, coordinated roadside checks. These operations create a credible and continuous enforcement presence that is difficult for non-compliant operators to evade.

The Norwegian authorities also emphasised **preventive outreach**, including multilingual information campaigns and awareness-raising activities targeting mobile workers. In late August 2025, authorities reached out to approximately **1,000 van drivers** through multilingual awareness efforts. Authorities are exploring additional tools, such as publishing suspension decisions and restricting public or private purchasers from collaborating with companies subject to closure orders.

Conclusions & next steps

Norway's model uses a combination of regulation, monitoring, enforcement, and buyer obligations to close loopholes. The result is a policy environment where non-compliance carries real consequences, and where labour standards are reinforced not only by inspectors but also by informed buyers and workers. This comprehensive framework promises to improve both labour conditions and road safety in the CEP sector.



Taken together, the insights from Norway's action plan reveal the key structural challenges and practical enforcement lessons shaping today's CEP landscape, and they form a clear foundation for the conclusions and further steps that follow.

1. Expand buyer-side due-diligence requirements

The action plan already establishes buyer duties, but further standardisation—such as digital compliance checks or certification mechanisms—could strengthen chain-wide accountability.

2. Enhance digital integration across agencies

Joint inspections could be supported by shared digital platforms, enabling real-time access to licensing status, wage data, operator history, and prior violations.

3. Strengthen cross-border enforcement

Deeper cooperation with other labour inspectorates and road-control authorities would reduce opportunities for regulatory arbitrage.

4. Introduce predictive and risk-based inspection models

Using registry data, wage records, and traffic flows to identify high-risk operators would help target inspections more effectively.

5. Increase focus on preventive outreach

The success of the 2025 multilingual campaign suggests that greater investment in awareness, rights information, and employer guidance could further reduce non-compliance.

6. Extend transparency tools for public and private buyers

Publishing suspension or closure orders—and preventing buyers from contracting with sanctioned firms—would create strong economic incentives for compliance across the chain.

Closing remarks

The closing session of the webinar brought together all the insights generated throughout the event, weaving them into a coherent and actionable vision for tackling undeclared work in the Courier, Express and Parcel (CEP) sector. The discussion underscored that while Member States differ in institutional arrangements and enforcement capacities, the structural challenges they face are remarkably similar. Across Europe, long subcontracting chains, opaque business structures, inadequate traceability mechanisms, and weak worker protections continue to facilitate irregular practices.

Participants' interventions during the webinar highlighted that **upstream accountability must become the organising principle of CEP sector governance**. With subcontracting chains identified as the core structural risk, the main idea that emerged from the webinar was that obligations must be placed on principals and buyers, those who drive pricing structures, set delivery schedules, and shape competitive



dynamics. Shifting responsibility upward ensures that legal obligations do not dissipate across fragmented supply chains.

Improving **transparency and traceability tools** were highlighted as essential to confronting hidden labour. Tools such as digital registries, hour-tracking systems for light commercial vehicles, tachographs, and identification cards can transform opaque delivery chains into verifiable and enforceable systems. These instruments offer practical mechanisms for establishing visibility and supporting effective inspections.

The session also emphasised the need for **robust collective bargaining across entire supply chains**, supported by joint liability. Extending collective agreements downstream beyond main contractors to subcontractors and platform intermediaries, creates enforceable wage and condition floors, reduces the scope for unfair competition, and limits the attractiveness of irregular intermediation.

Participants reflected on Spain's **presumption of employment** as a powerful example of legal clarity, particularly for platform-mediated work. When combined with effective enforcement capacity, such presumptions can prevent misclassification and restore rights to workers whose employment status has been blurred by digital business models

Another cross-cutting message was that **enforcement must be both multi-agency and field-based**. Cooperation between labour inspectorates, road authorities, police, tax and customs ensures that evasive practices can be detected at the roadside, at logistics hubs, and along transport corridors. These coordinated efforts were seen as vital in addressing mobile work environments where inspections are otherwise difficult.

Overall, the concluding discussion presented a unified vision: lasting improvements in the CEP sector depend on a package of measures combining upstream duties, chain-wide collective agreements, digital traceability, and coordinated inspections. This integrated model provides a realistic pathway towards sustained compliance, safer roads, and fairer competition.