



Fair Labour Mobility EU (Pilot Project) - IQ Consult gGmbH - Franz-Rennfeld-Weg 5 - D-40472 Düsseldorf

Roxana Mînzatu

European Commission
Rue de la Loi / Wetstraat 200
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Ensuring Sustainable Counselling Structures for Mobile and Migrant Workers in Europe

Dear Commissioner Mînzatu,

We are writing to you jointly as trade union organisations participating in the pilot project “Fair Labour Mobility EU” (former project “Fair European Labour Mobility – FELM”). Drawing on our shared experience in providing counselling and support to mobile and migrant workers across Europe, we would like to underline the urgent need for a permanent, EU-wide counselling network for mobile and migrant labour.

Across Member States and sectors, our daily counselling practice shows that mobile and migrant workers continue to face significant barriers in accessing and enforcing their rights in practice. Existing rights frequently do not reach those most in need of protection, particularly in complex cross-border employment situations.

The experience gathered through FELM and its predecessor projects clearly demonstrates that counselling for mobile and migrant workers is not a generic information task. It requires specialised expertise, in-depth knowledge of labour law and social security systems, sector-specific understanding, and the capacity to handle transnational casework. Most importantly, it depends on trust-based, low-threshold and worker-oriented structures that are accessible to workers throughout the entire employment cycle.

In many cases, effective support is only possible when counselling centres in countries of origin and destination work closely together. Such cross-border cooperation enables counsellors to

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clarify applicable legislation, identify responsible actors within complex subcontracting chains, and support workers in recovering unpaid wages or social security contributions. Without stable and coordinated structures, many cases fall through the gaps between national systems, leaving workers without effective remedies.

From this perspective, counselling for mobile and migrant workers must be understood as a public responsibility of European interest. Labour mobility is a structural and long-term element of the internal market, not a temporary phenomenon. Counselling structures therefore require continuity and institutional stability. Reliance on short-term, project-based funding risks the loss of accumulated expertise, trust relationships and established cross-border cooperation, ultimately weakening the effective enforcement of workers' rights.

We therefore strongly encourage the European Commission to take the next step and initiate a permanent, sustainably funded EU-wide counselling network for mobile and migrant workers. Such a network should be institutionally anchored, operate independently and in a worker-oriented manner, and build on the proven experience within trade union and trade union-related structures.

We firmly believe that a permanent counselling network would make a substantial contribution to the effective enforcement of EU labour law, the prevention of exploitation and social dumping, and the implementation of the European Pillar of Social Rights. We therefore encourage the Commission to explicitly take the need for such a network into account in the current reflections on the Labour Mobility Package. We remain at your disposal to provide further information and practical insights from counselling experience.

Yours sincerely,

On behalf of the FELM partner organisations



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