

Manifesto 1 – WP3.2

# **To ensure food security and sustainability, the EU must place migrant workers and their dignified working conditions at the heart of the next policy cycle**

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## Core Reflections:

- > Recent farmers' protests across the EU have led to policy changes and initiatives seeking to reinforce the agri-food sector's shorter-term resilience to crises, raising concerns, however, for their impact on long-term sustainability targets.
- > Despite their vital role in the agri-food sector, (irregular) migrant workers, who often face poor and exploitative working conditions, have largely been overlooked.
- > In the new policy cycle, measures addressing the needs of farmers and ensuring adequate protection for agricultural workers, including (irregular) migrant workers, will be indispensable to achieving sustainability and resilience.
- > Targeted measures for migrant workers include the protection-sensitive implementation and enforcement of relevant labour standards, as well as efforts to address structural conditions leading to irregularity.
- > Achieving sustainability and resilience will also require enhanced efforts to address the uneven distribution of wealth in the supply chain, boosting farmers' competitiveness and strengthening their position vis-à-vis downstream actors.

## Introduction

In early 2024, Brussels, alongside several other European capitals, was gripped by a series of farmers' protests over mounting financial, administrative and geopolitical pressures. With the European Parliament elections approaching, the European Commission and national governments were fast to react with several practical and legal initiatives.

While these measures can be seen as reinforcing the agri-food sector's resilience to more immediate and shorter-term pressures, they have also sparked controversy for watering down environmental targets necessary for long-term sustainability.

Strikingly, despite their indispensable role in the effective functioning, sustainability and resilience of the EU's food system, agricultural workers, including migrant workers, have scarcely featured in the political debates and institutional responses following the protests. This is especially surprising considering the sub-standard working conditions and exploitation many of them continue to face.

In this context, this manifesto draws attention to the structural conditions that undermine the dignity of migrant agricultural workers, in line with the goals of the DignityFIRM project. At the same time, it highlights that the EU can only build a more resilient and sustainable agri-food sector if measures that benefit both farmers and migrant workers are prioritised. As the new political cycle approaches, this manifesto points to key actions and initiatives that EU policymakers should consider to that end.

## Farmers in focus as agricultural reforms come under the spotlight

As a core component of the [2019 Green Deal](#), and as reflected in its [2020 Farm to Fork Strategy](#) (F2F Strategy), the EU has set out to transform its agricultural sector into one that is more environmentally and socially sustainable and, at the same time, more resilient to crises. Meanwhile, the current [2023-2027 Common Agricultural Policy](#) (CAP) includes three [sustainability pillars](#): economic, environmental, and social.

Farmers, in [Brussels](#) and [elsewhere](#), while not forming a unified movement, protested over burdensome administrative requirements, primarily linked to environmental obligations under the CAP, as well as growing financial pressures in relation to broader supply chain dynamics. Russia's full-scale invasion of Ukraine, and [measures](#) taken to support [Ukraine](#), placed food sovereignty and security squarely on the EU's agenda, raising the stakes and transforming the protests into a [geopolitical issue](#).

Against this background, with a breakthrough of farmers' parties at the [national level](#) and the European Parliament elections on the horizon, the European Commission and member states were under pressure to come up with a show of support. [Key measures](#) introduced in response aim to provide greater flexibility in the CAP's environmental conditionalities, including exemptions for smaller farms from compliance controls. In addition, measures were also proposed to address structural imbalances along the supply chain. Among [others](#), these include a [planned proposal](#) on cross-border enforcement of unfair trading practices, as well as [initiatives](#) that will make it easier for farmers to act collectively vis-à-vis downstream actors, increasing their bargaining power.

While easing environmental requirements in particular has drawn [criticism](#) from commentators, not all of the [EU's efforts](#) to transform the agricultural sector have been derailed. Overall, the measures and proposals introduced show that support for farmers is considered indispensable for building a more resilient food system in the face of existing and possible future crises.

## **(Migrant) workers as indispensable yet vulnerable agricultural actors**

Considering recent events, it comes as a surprise that the contribution of migrant workers, whose labour is a [structural](#) and [vital](#) component of the EU's agricultural sector, was virtually absent from both public discussions and policymakers' reactions to the protests. Without them, a sustainable and resilient food system is impossible.

Despite their [essential role](#) in producing, harvesting and distributing food in the EU, migrant workers typically experience [difficulties](#) in accessing decent working and living conditions, and are vulnerable to [exploitation](#). This can include lower or unpaid wages, longer working hours, poor or exploitative accommodation or unsafe work. Migrants in an irregular situation – whose contribution to F2F sectors, from agriculture to food delivery, is significant – are especially at risk of exploitation and [sub-standard working conditions](#).

These dynamics, and the challenges faced by migrant agricultural workers are acknowledged in EU policy. The F2F Strategy, for example, explicitly notes the importance of ensuring the well-being of workers. In line with its social pillar, the current CAP also introduced, for the first time, a [social conditionality mechanism](#). Under the mechanism, certain CAP subsidies are made contingent on compliance with rules on [pay transparency and predictable working conditions](#), and on [workers' health](#) and [safety](#).

In addition, the EU has passed legislative instruments which stand to benefit agricultural workers by embedding mandatory due diligence and human rights protections into supply chain dynamics. Key recent examples include the [Corporate Sustainability Due Diligence Directive](#) (CSDDD) and the [Forced Labour Regulation](#).

Rather than doubling down on these efforts and acknowledging the essential role played by migrant

workers in the agricultural sector, the EU's response to the farmers' protests suggests the risk of backpedalling on commitments, including regarding social sustainability. For [example](#), proposals to delay or even remove social conditionality from the CAP were put forward during the Commission's consultation process on measures that could reduce the administrative burden on farmers.

While the Commission did not yield to these pressures, robust implementation of the social conditionality mechanism will be crucial. But more broadly, to ensure food security and the sustainability and resilience of its food system, the EU will have to ensure steadfast, if not stronger, support for migrant workers in the agri-food sector by taking further initiatives in the future. As the new policy cycle approaches, this begs the question of how the EU could achieve that, politically and practically.

## **Credit where credit is due to farmers and workers in the new legislative cycle**

Looking at the political and media reaction to the protests, one might get the misleading impression that the wellbeing of migrant workers is difficult to square with farmers' interests and demands. Yet, the farmers' protests have brought the sustainability and resilience of the EU's agri-food sector into the spotlight, both of which will require measures that benefit farmers and workers in the new political cycle.

To begin with, the uneven distribution of wealth in the agri-food sector remains a core structural challenge. With a large portion of [consumer revenue](#) in the sector often going to [downstream actors](#) at the points of processing, distribution and sale, farmers face financial pressure to cover their costs. This creates the risk that they address the pressure by turning to more vulnerable migrant workers. Considering that a large portion of CAP subsidies go to [larger farms](#), smaller to medium-sized farms are particularly at risk in this regard.

[Proposed efforts](#) to address these imbalances are welcome, but must be carried forward and result in concrete results in the new cycle.

This could include further investigation into prohibiting purchases below production costs, as already implemented in [some member states](#), as well as [efforts](#) to limit or compensate for the presence of cheaper, non-EU products on the market.

Building resilience and sustainability will also require policymakers to think outside of the box, for example, considering the establishment or expansion of [fair-trade schemes](#), which could include social sustainability criteria. In addition, in accordance with [guidelines](#) published by the Commission in December 2023, farmers can, subject to certain conditions, enter into cooperation agreements on sustainability without breaching EU competition law. While this measure is only meant to enhance [environmental sustainability](#), the exceptions could be extended to agreements which promote social sustainability, to the benefit of (migrant) workers.

More than this, support for implementation as well as enforcement of the CSDDD and the Forced Labour Regulation must be prioritised in the new cycle. By requiring employers to take proactive steps against [harmful labour practices](#), these instruments can help avoid abuse along the food supply chain. Employers that have the resources to comply will gain a competitive advantage. Considering this, [adequate support](#) should be made available to smaller and under-resourced employers in particular.

Measures that can strengthen farmers' positionality or, more broadly, contribute to ending violations of human rights along supply chains must be complemented, however, with further measures targeted at protecting migrant agri-food workers.

To begin with, in the new policy cycle, it will be crucial to ensure the implementation of the CAP social conditionality mechanism. This requires strengthening the capacity of [responsible national authorities](#), who are often underfunded and in some countries, struggle to fulfil their monitoring and enforcement responsibilities. The exemption of small farms from compliance checks, combined with only voluntary sustainability [reporting standards](#) may also mean that poor working conditions go unnoticed for longer.

In this context, while strengthened support for farmers remains key, it will be important that the flexibility granted in response to the protests is balanced with measures that effectively ensure the protection of workers. Strengthened cooperation with and [between social partners](#) will be key in this regard, in particular [trade unions](#), to ensure that poor and exploitative conditions are made known. Reinforcing and expanding the [mandate of the European Labour Authority](#), including to conduct [own-initiative investigations](#), could provide a further layer of oversight, while at the same time strengthening the Agency's capacity to support national authorities.

At the same time, efforts must ensure that implementation of the social conditionality mechanism is protection-sensitive, and that all migrant workers benefit from it, including those in an irregular situation. Complementary [firewall protections](#) should be put in place and fully utilised for this reason, to ensure that where persons in an irregular situation come into contact with labour authorities during checks, or when making use of complaint or reporting procedures, they are not at risk of deportation.

In addition, to put an end to the structural conditions that lead to the exploitation of irregular migrant workers in particular, [pathways](#) out of irregularity will also be of the essence. While the treatment of irregular migrant workers remains the prerogative of member states, and regularisation is [politically divisive tool](#), experience

shows that it can bring [diverse benefits](#). Apart from addressing [labour shortages](#) for states, it can facilitate strengthened access to [socio-economic rights](#) for individuals, decreasing vulnerability and promoting the dignity of workers.

In the midst of [repeated crises](#) with origins and implications across [policy fields](#), efforts to build resilience and sustainability in the EU's agri-food sector will only grow in importance. EU efforts and initiatives to be taken in the next policy cycle must ensure that both farmers and workers, including migrant workers who are an integral part of the agri-food sector, receive comparable attention and support. Food security, and the dignity and wellbeing of migrant workers both depend on it.

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## About the Author

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## About DignityFIRM

Towards becoming sustainable and resilient societies we must address the structural contradictions between our societies' exclusion of migrant workers and their substantive role in producing our food.

[www.dignityfirm.eu](http://www.dignityfirm.eu)



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