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Europe's ever expanding mobility patterns – posting, third-country nationals and the single European labour market

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ABSTRACT

This article shows that the single European labour market has come to consist of various streams of mobility, out of which long-term mobility is just one modest stream. Long-term mobility based on the free movement of workers is increasingly complemented by highly circular and more temporary mobility streams of posted workers based on the free movement of services. Another rapidly growing mobility stream consists of third-country nationals (TCNs) who are mobile within Europe as posted workers. This stream is based on case-law of the European Court of Justice, that allows TCNs with a valid work and residence permit in one Member State, to be posted freely across the EU. This article is a call to re-assess EU labour mobility as the diverse phenomenon it has become, encompassing not only mobility streams that were initially or historically part of the labour mobility vision of EU policy makers, but also labour streams that are (even) more short term and circular. One main conclusion is that a true single European labour market should be much more integrated administratively.

Keywords: posting; single European labour market; labour migration; third country nationals; free movement of workers; free movement of services

Introduction

Migration within and towards Europe today looks in many ways fundamentally different from what the founders of the European project ever imagined. It even looks markedly different from dominant perceptions among politicians, commentators and the public at large. The expectation that European enlargements would bring mass permanent migrations over the course of the past decades, never quite materialized to the extent that some expected or indeed feared. While mobility from Eastern European Member States did create increased mobility to the point that some locations now face serious issues of depopulation and skills shortages, mobility has taken shape in a variety of ways. The single European labour market has come to consist of various streams of mobility, out of which long-term mobility is just one modest stream. Long-term mobility based on the free movement of workers is increasingly complemented by highly circular and more temporary mobility streams of posted workers based on the free movement of services.¹ The 21st century single European labour market, then, encompasses movements based on both the free movement of labour and, more importantly we argue, the free movement of services.

Moreover, for a long time, the expectation regarding a single European labour market was that labour migration was something that would take place mainly within Europe, not from the outside into Europe. Indeed, the belief was that a larger, more fluid and flexible European labour market would reduce the need for workers from far away. In reality, an increasing number of third-country nationals (TCNs) are mobile within Europe as posted workers. As a consequence of case-law of the European Court of Justice (ECJ), TCNs who have a valid work and residence permit in one Member State are freely posted across the European Union (EU).² This evolution has given rise to an increasing stream of TCNs as posted workers.

Posting mobility thus also changes the nature of labour migration to and inside Europe. Classical labour migration increasingly makes way for hyper-flexible and circular labour mobility in ever expanding mobility circles. This process is ongoing and repositions classical third country labour migration as increasingly integrated into the single European labour market, without the classical limitations to cross-border movements for TCNs. TCNs become fully part of the single European labour market, a side-effect of the ECJ's case-law that was again not imagined by the initial founders of the European Communities and which limits the labour migration sovereignty of EU Member States.

Our article backs up these arguments with an in-depth analysis for Belgium. The main reason for focusing on Belgium is that there are exceptionally rich data available on labour migration flows and posting, including relatively detailed information on the

¹ A posted worker is an employee who is sent by his employer to carry out a service in another Member State for a temporary period (Commission 2016). It can also include posted self-employed persons, being persons who normally pursue an activity as self-employed person in a Member State who go to pursue a similar activity in another Member State.

² Case C-43/93 Vander Elst v Office des Migrations Internationales [1994] ECR I-3803.

origins, destinations and nature of the posting flows. Hence, Belgium is in terms of the richness of its data exceptional in the European context. Moreover, as one of the six original signatories to the Treaty of Rome, Belgium has been at the heart of the European project from the start and is one of the main receiving countries of posting mobility (De Wispelaere and Pacolet 2016).

This article is organized as follows. We start by reviewing the unexpected history of mobility in Europe, and position our arguments within this history. We then discuss the evolutions of the mobility landscape based on the Belgian case through a descriptive analysis of the Belgian LIMOSA data. We finish the paper with reflections on what this means for policy.

The unanticipated history of EU mobility and the single European labour market

Over the course of the EU's history, intra-EU labour mobility has always been conceived exclusively within the framework of the free movement of workers. The free movement of workers is one of the four pillars of the EU single market, next to the free movement of goods, capital and services, and was enshrined in the 1957 Treaty of Rome. Member States agreed to allow European citizens to move to another Member State to find work. The free movement of workers and the resulting single European labour market has known a somewhat conflicting history, a combination of fear (of migration waves) and enthusiastic promotion (by the Commission and the Court) at the same time. But the fears did not turn out to be justified, nor did the promotion of the concept turn out to be a great success. In contrast, after fifty years of inadequate mobility, parallel forms of mobility seem to make the promise of a single European labour market come true, which we will demonstrate in this paper. Before we do so, we briefly sketch the outlines of the unanticipated history of mobility in the EU.

Free movement of workers – a fear-promotion combo

As is well known, the free movement of workers allows citizens of EU Member States to move to any other Member State and search for work there, take up employment and settle there with their families, all while their social security rights are being managed by a complex European coordination system. The free movement of workers became part of the European Economic Community (EEC) project when Italy introduced the concept during the negotiations in the 1950s. Italy regarded the free movement of workers as an appealing tool to export its surplus labour (Ludera-Ruszel 2015). But one central aspect of the history of the free movement of workers is that the idea of an open labour market has caused stress among Member State policy makers at many intervals. Right from the start, when the regulation of free movement of workers was negotiated at the beginning of the 1960s, fears existed that Germany and France would face a wave of Italian workers. Similarly, at the occasion of some other EU enlargements, the free movement of workers came into the political attention of the Member States, as fears existed that opening the labour market would result in mass-movements and a

destabilisation of the labour market. This was the case for Greece joining in 1981, and Spain and Portugal in 1986. The fears resulted in transition periods during which old Member States were allowed to keep their labour markets closed to the new members. Greece, Spain and Portugal were given transition periods till 1987 and 1992 respectively. Citizens of new Member States needed to obtain a work permit with national authorities of Member States to be allowed entry into a national labour market. Similarly, Eastern Enlargement caused concern among Member States. Concerns existed regarding potentially negative effects on wages and employment of the native population and the increased use of host social security systems (Heinz and Ward-Warmedinger 2006; Woodruff 2008). Hence transition periods were imposed on the Eastern European members.

However, despite all this fear, and against all expectations, no inundating waves occurred when Italy, Greece, Portugal or Spain joined (Hönekopp and Werner 2000). In the 1960s, for a short period of time Italian workers left Italy to become guest workers in Germany, yet more Italians moved from southern Italy to Northern Italy to join the faster economic development of the North (Hille and Straubhaar 2001) and never considered leaving their country. In fact, the slight increase in immigration from Italy was below the mobility average by all European Economic Community (EEC) nationals in the 1960s (Werner 1976). For Greece, Spain and Portugal, no migration waves occurred after the end of the transition periods. For Greece, over the course of the first decade after the transition period, the number of extra migrants amounted only to 102,000 migrants, an increase of around 10,000 people per year. During the Spanish transition period, the number of Spanish citizens actually decreased by 25,000 (5%) (Dustmann et al. 2003).

Nor did any wave occur with the accession of the United Kingdom, Ireland and Denmark (1973). The same goes for Austria, Sweden and Finland in 1995. For the most recent 'Eastern' enlargements (2004 EU8³ and 2007 EU2⁴) experts expected a rise in East-West mobility (Heinz and Ward-Warmedinger 2006). And mobility from the new Member States did increase despite the transition periods. The number of citizens in the old Member States from the Member States that joined the EU in 2004 and 2007 grew from about two million in 2004 to almost five million in 2009, representing an increase from less than 0.5% to 1.2% of the EU15⁵ total population in five years (Holland et al. 2011). Even though this increased mobility gave rise to some political contestation, especially in the context of the 2008 economic crisis (Engbersen et al. 2017), the increase in East-West mobility did not result in a paradigmatic shift in the overall mobility levels of the EU (Kahanec et al. 2009).

³ EU8 designates the 8 countries that joined the EU in 2004, besides Malta and Cyprus: Czech Republic, Estonia, Hungary, Lithuania, Latvia, Poland, Slovenia and Slovakia.

⁴ EU2 designates the 2 countries that joined the EU in 2007: Romania and Bulgaria.

⁵ EU15 designates the 15 countries that formed the EU before 2004: Belgium, Denmark, Germany, Ireland, Greece, Spain, France, Italy, Luxembourg, Netherlands, Austria, Portugal, Finland, Sweden and United Kingdom.

At the same time, over the course of the last 50 years, the free movement of workers became the subject of intense regulation and promotion by the European Commission, supported by expansive interpretation of the free movement by the Court. Free movement of workers was meant to help remove barriers in the development of a fully integrated single market. Theoretically, the high mobility of workers would help matching labour supply and demand, would result in better skill matches (Bonin et al. 2008), and reduce unemployment disparities across regions and Member States (Holland and Paluchowski 2013). The first regulations of the free movement of labour date back to the 1960s (Simmonds 1972). Several well-known bodies of EU law aimed at bolstering labour mobility, such as the coordination of social security systems to enable mobile workers to build up and enjoy social security rights across the EU, the harmonization of the recognition of qualifications across EU Member States, and the establishment of EURES (the European Employment Services) as a cooperation between the Public Employment Services (PES) of the European Economic Area (EEA) Member States and the Commission to further promote job searches across the EU. From her side, the Court supported the development of the free movement of workers by generously interpreting the workers' rights to free movement as laid out in EU legislation. It guaranteed equal treatment and the right to search employment (Woodruff 2008), but also ascertained generous family rights (Spaventa 2015). As a result, literature concludes that the free movement of workers has evolved from a strictly economic measure to a fundamental individual right (Ludera-Ruszel 2015).

However, despite the Commission and Court's best efforts to facilitate the free movement of labour, the moderate levels of free movement of workers, makes experts agree that the Single European Labour Market has not been achieved yet (Krause et al. 2016, Dhéret et al. 2013). Academics argue to focus on understanding the persisting power of cross-border *immobility* of the vast majority of EU workers, to explain why most workers do not even consider migrating across borders (Van Houtum and Van Der Velde 2004). Literature points to personal, institutional and demographic barriers that still remain to be overcome (Bonin et al. 2008). Personal factors play the most determining role in hampering intra- EU mobility (Krause 2014). A Eurobarometer survey of 2010 published by the European Commission (2010) points to a lack of language skills as the number one personal barrier, but also separation from the partner, having dependent children and the family situation have been found to be obstacles to mobility (Kovačič et al. 2006)

Another important set of factors can be called 'institutional'. The abovementioned 2010 Eurobarometer survey listed uncertainty about finding a job as the second most important barrier to mobility, and finding suitable housing as the third most important factor (European Commission 2010). Another institutional barrier is the existence of social security and welfare state links with the home country. Because of the overly complicated access to the welfare systems in other EU Member States, migrants tend to keep their institutional ties with home countries, which encourages circular rather than permanent mobility (Kureková 2013). Similarly, Heinz and Ward-Warmedinger (2006) refer to legal and administrative barriers, inefficient housing markets, the limited portability of occupational pension rights, problems with the

international recognition of professional qualifications and the lack of transparency of job openings. Finally, next to the above mentioned factors, demographic factors have been cited by Zimmerman (2013) as reasons for the insufficiently high level of mobility in Europe: rising female labour market participation, less mobile double-income households, as well as an increase in the homeownership rate.

Hence, despite the considerable EU apparatus developed to support the development of intra-EU mobility, mobility levels have remained disappointing. Before 2004, the actual movement of labour within the EU was indeed very limited. In 2002, the stock of EU citizens living in a Member State other than their own stood at 1.5% (2002) – a level that had remained the same for over 30 years (Dobson and Sennikova 2007). The share of EU mobile workers increased after the EU enlargements of 2004 and 2007 to about 2.6% in 2008 and 3.5% in 2014. The most recent figures show that there were still only 12.5 million EU movers of working age who were living in other EU Member States in 2017, representing a modest 4% of the total labour force (European Commission 2018). The 4% EU movers represents a smaller share of the EU labour force than TCNs, who constitute 5%. The annual inflow of EU citizens to other EU Member States in 2017 was only around 1.6 million or 0.5% of the total EU population. These inflow figures decreased, for the first time since 2012, by 4% between 2015 and 2016 (European Commission 2018). As a result, still more TCNs enter the EU than there are EU citizens migrating to other Member States.

An important aspect of intra-EU mobility is the considerable level of return-migration of EU citizens back to their home country. In 2016, for example, 680,000 EU citizens returned to their home country. Especially EU13⁶ countries demonstrate high shares of return flows. In Romania, for example, 89% of inflow figures represented Romanian returning nationals. High return shares indicate that long-term mobility based on the free movement of workers is dynamic and has been characterized by literature as highly flexible, even ‘liquid’, with high return levels as part of the mobility picture (Engbersen et al. 2013). This flexibility is in line with new mobility streams we discuss in this paper.

Posting mobility to the rescue

While the history of inadequate free movement of labour unfolded, however, other forms of mobility started developing that were not based on the free movement of workers. These mobility streams add to the mobility landscape, are more circular and short-term, but increasing in volume and importance, and are changing the face of the traditional single European labour market. The main new source for these new streams of mobility is based on the free movement of services, rather than the free movement of workers. In the framework of delivering services freely across the EU, companies are allowed to bring along their employees to do the work. These workers are posted to the

⁶ We use the term EU13 to refer to the countries that joined the EU since 2004: Poland, Czech Republic, Latvia, Lithuania, Slovenia, Estonia, Slovakia, Hungary, Cyprus, Malta, Romania, Bulgaria and Croatia.

new Member State, but keep their employment contract in their home country, and keep paying their social security contributions there. They nevertheless temporarily work in another Member State. Posted workers are not officially part of the Commission's concept of the single European labour market (although they do get included in the Commission's mobility report). Mobility is still defined as the "action of persons (EU nationals or legally resident third-country nationals) undertaking their right to free movement by moving from one EU Member State to another" (European Commission 2019), in other words, mobility is still focussed on mobility based on the free movement of workers and not on the free movement of services.

Despite posting not being the archetypical form of mobility, and in contrast with the modest and rather stable levels of long-term mobility, EU data reveal high and increasing levels of posting flows. De Wispelaere and Pacolet (2018) mapped the number of postings across Europe, basing their analysis on the number of PDs A1⁷ issued by the EU Member States and EFTA countries. In 2017, these indicate 1.7 million postings to specific countries, representing an increase of 6.6% compared to 2016. The main receiving Member States in 2017 were Germany (427,000, or 25% of the total number of PDs A1 issued), France (241,000 or 14%) and Belgium (167,000 or 10%). It is estimated that one individual was sent abroad twice during a year, and therefore the number of PDs A1 related to postings to specific countries in 2017 would correspond approximately to 900,000 posted workers during that year. However, based on our data as well as academic critique, we suspect that these results are an underestimation (Dølvik and Visser 2009). It is further estimated that the 1.7 million postings to one specific Member State represent approximately 0.4% of employment throughout the EU, which is slightly higher than the mobility based on the free movement of workers.

Two things are well-known about posting and posted workers. First, the phenomenon has a bad reputation due to reports of social dumping and fraud. Posting is seen as causing pressures on local labour markets due to problems of wage dumping, deteriorating working conditions, fraudulent practices such as letter-box companies, abuses with working time, pay scaling, deductions for transport and lodging, etc. (Cremers et al. 2007, Alsos and Eldring 2008, Cremers 2016, Arnholz and Andersen 2018). Others point to possible displacement effects on local business and workers (Lhernould and Palli 2017) as well as the development of a dual labour market in some Member States (Doellgast and Greer 2007, Wagner & Lillie 2014, Wagner 2015, Hassel et al. 2016), which have contributed in giving posting a bad reputation. The use of posted workers is seen as a strategy of employers to avoid labour regulations and make use of low-wage workers in precarious jobs (Caro et al. 2015).

All evidence suggests that there are serious problems. A whole industry has emerged to bring demand and supply together. It is doubtful that a strict regard to the letter let alone the spirit of the Posted Workers Directive (PWD) constitutes much of a competitive asset in that industry. As Berntsen and Lillie (2015, 57) plausibly argue in

⁷ PD (Portable Document) A1 is a certificate which indicates the social security system that applies to a worker who works in more than one EU country.

this context: “The fact that firms operate in a legal grey zone where effective enforcement is lacking makes regulatory evasion hard to detect and control. As a result, firms experiment with cost-saving social dumping practices without having to run the risk of getting caught or punished. This sets in motion a dynamic where the ability and willingness to violate norms becomes a competitive parameter.”

It is however important to note that posted workers are attractive to employers for reasons other than cost. Often traveling solely and with the particular purpose of making money, they also tend to be more flexible and eager to work long and non-standard hours. While the labour law of the receiving countries applies, there is of course widespread concern that posted workers are displacing local workers and that they are exerting downward pressure on wages and working conditions. There is a lot of anecdotal evidence supporting this perception. Some of it is quite troubling. Yet systematic evidence is lacking, let alone that we have reliable estimates of the impact posting is having on local workers. Keep in mind that if posted workers complement local workers in areas where there are structural or temporary shortages the effect may well be positive.

Second, and in marked contrast to the immense controversy posting has caused in public and academic debate, data on the exact extent of posting across the EU are notoriously lacking, since no proper registration system exists yet and research has to rely on A1 certificates.

This article aims to nuance both statements. Based on Belgian data from the compulsory posting registration database LIMOSA, we can quite accurately describe posting flows, their origins and destinations, albeit only for one Member State - Belgium. These rich data allow us to indicate the growing importance of the posting phenomenon for the single European labour market. They also indicate that posting is a much wider and more varied phenomenon than the impression we get from media reports. Our data show, for example, that half of the posting flows occur between EU15 member states, where the social dumping argument plays much less, if at all. Additionally, our data show that posting figures are quite dynamic and that posting flows are stabilizing – including flows from EU13 member states which experience tight labour markets and a growing demographic deficit. Moreover, we demonstrate that there is a substantial and growing mobility of third country nationals (TCNs) across EU Member States via posting. The public imagination mostly focuses on posting as a phenomenon between new and old Member States, with posted workers being European citizens. However, as we will discuss below, the ECJ – as early as the 1990s – enabled TCNs to be posted freely across the EU provided they have a residence and work permit in the Member State from which they are posted. These TCNs, who would otherwise have great difficulty entering the medium- and low-skilled labour market of western European countries, circulate – both conceptually and legally – across EU Member States based on the free movement of services.

Belgium as an interesting case on the growing variety of mobility streams

As mentioned, research on posting is difficult due to a lack of reliable data (Pedersini

and Pallini 2010). A rare exception to the data problem has been created by the Belgian administration. In 2007, it developed a compulsory online system of registration of service provision in Belgium, called LIMOSA.⁸ Every employer who wishes to post workers (and every self-employed person (including TCNs)) to perform a temporary economic activity in Belgium has to register these workers in advance. The online registration of posted workers is intended to improve labour market intelligence and to combat fraud.

The LIMOSA system allows Belgium to gather much more accurate data than any current EUROSTAT effort would be able to collect. The database came under attack, however, by the Commission for obstructing the free movement of services. This was followed by a condemnation by the ECJ.⁹ Despite the ECJ's condemnation, and a temporary suspension of the LIMOSA database, the database was largely preserved. The Belgian government reduced the amount of information that needed to be registered in LIMOSA.

Belgium is a very interesting case to study posting and its growing relation to classical labour migration of TCNs. First, Belgium is one of the top receiving countries for posted workers (Wagner 2015). Posting seems to be playing a crucial role in Belgium as it has in many ways one of the most dysfunctional labour markets in Europe.

Another aspect that needs highlighting, is that Belgium has one of the cheapest (in fact, it is free of charge) and fastest systems of work permits for TCNs. This traditional labour migration system allows Belgian employers to apply for a residence and work permit for TCNs, whom they wish to hire for work in their company in Belgium. This system of work and residence permits (now a single permit after the EU Directive was implemented), however, is flexible only for certain categories of workers, primarily the highly skilled (Mussche et al. 2010). For lower and medium skilled workers, the procedure is less flexible and based on a labour market test. Due to these barriers, the inflow of low-skilled TCNs through work permits is very limited. This is important to keep in mind when we analyse the posting data in Belgium, as posting has become a sizeable alternative route for TCNs to work in Belgium (see below).

Belgium as a portrait of an ever more hybrid and circular single European labour market

We use the results of a descriptive analysis of Belgian posting data for the years 2008-2018 to argue that posting is contributing to a great extent to the development of a hybrid single European labour market. We substantiate this argument by comparing figures on long-term labour mobility and posting to Belgium. According to Eurostat statistics, around 600,000 working-age EU citizens lived in Belgium in 2017, making up

⁸ <https://limosa.be/>

⁹ C-577/10, European Commission vs Belgium, 19 December 2012.

9% of the total stock of the working-age population. This figure reflects long-term mobility by EU citizens who made use of their rights based on the free movement of workers, students and other long-term forms of mobility.¹⁰ The annual *inflow* of EU citizens to Belgium in 2017 was around 47,000 or 0.7% of the total working-age population. Inflow figures remained very stable between 2009 and 2017 (1% decrease). As pointed out above, mobility based on the free movement of workers is not only long-term forms of mobility, but also takes highly flexible, even ‘liquid’, forms with high return levels. We see this reflected in the annual *outflow* of EU citizens from Belgium amounting to almost 31,000 in 2017.

The relatively modest in- and outflow based on the free movement of workers stands in contrast with the sharply rising influx of posted workers in Belgium based on the LIMOSA data, as this gives a more complete picture of the varied forms of mobility in the EU. Figure 1 shows the number of unique posted worker (employees and self-employed) who delivered a service in Belgium by year and citizenships.¹¹ Whereas in 2008, about 115,000 posted workers were registered, this figure gradually rose to about 230,000 posted workers and self-employed service-providers in 2018. These 230,000 workers performed approximately 850,000 service jobs in 2018 and the duration of their combined service jobs amounted to 107 days on average. These figures make clear that the inflow of posted workers is considerable and of much higher levels than the levels of long-term mobility flows.

Figure 1 also makes clear that the origins of posting streams are more diverse than the public debate suggests. As mentioned, the posting debate almost exclusively focuses on the very real challenges free service provision across the EU poses. Especially in the risk sectors such as transport, meat and construction, issues of social dumping and fraud based on posting mobility from new to old Member States are the focus of attention. However, our data show that half of the posting flows occur between EU15 Member States: of the 230,000 workers in 2018, 117,000 (51%) are citizens of EU15 Member States. About 55,000 (24%) are citizens of EU10¹² Member States and 29,000 (12%) come from EU3¹³ Member States (see Figure 1).

We do see the share of posted workers with EU10 and EU3 citizenships increasing over time: from 24% in 2008 to 37% in 2018. Additionally, LIMOSA registered 28,000 TCNs in 2018 that accounted for 12% of the total number of posted workers. In 2008, the absolute number of registered TCNs stood much lower at 10,000, representing a smaller share of 9%. Note that in Figure 1, we include both TCNs being posted from third countries with a work permit as well as TCNs being posted based on the Vander Elst case law (1994) in which the European Court of Justice (ECJ) decided

¹⁰ The 9% EU movers represents a bigger share of the Belgian labour force than TCNs, who constitute 5%.

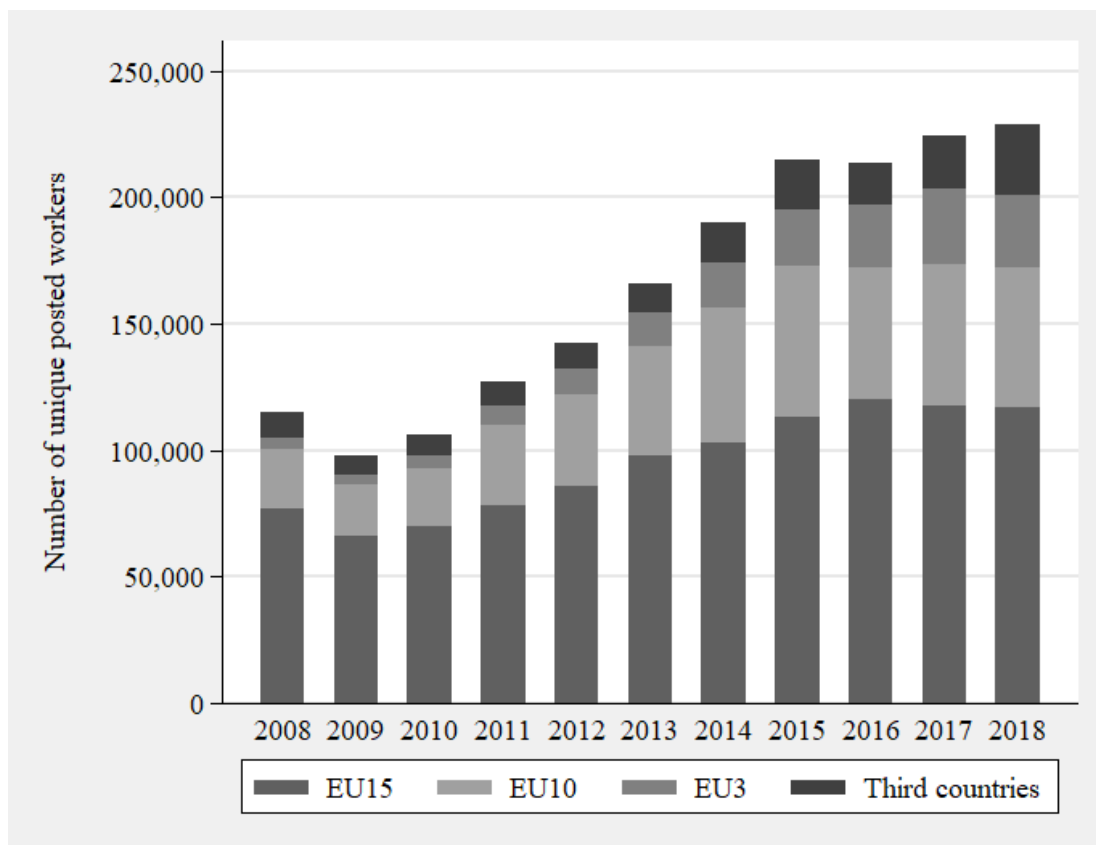
¹¹ Note that unique persons with postings who have already been reported in previous years, where the posting period runs for two or more years, are only visible in the first year (the year in which the posting declaration was created).

¹² EU10 designates the countries that joined the EU in 2004: Poland, Czech Republic, Latvia, Lithuania, Slovenia, Estonia, Slovakia, Hungary, Cyprus and Malta.

¹³ EU3 designates the countries that joined the EU in 2007: Romania and Bulgaria, and in 2013: Croatia.

that TCNs who possessed a valid work and residence permit of a Member State were free to be posted across the EU. We will focus on the ‘Vander Elst’ TCNs in the next section.

Figure 1. Number of unique posted workers and self-employed service providers to Belgium by citizenship, 2008-2018



Note: These figures do not show the sending country of posted workers; e.g. there are quite some workers with Polish citizenship that get posted from the Netherlands – they figure in the EU10 category, not in the EU15 category.

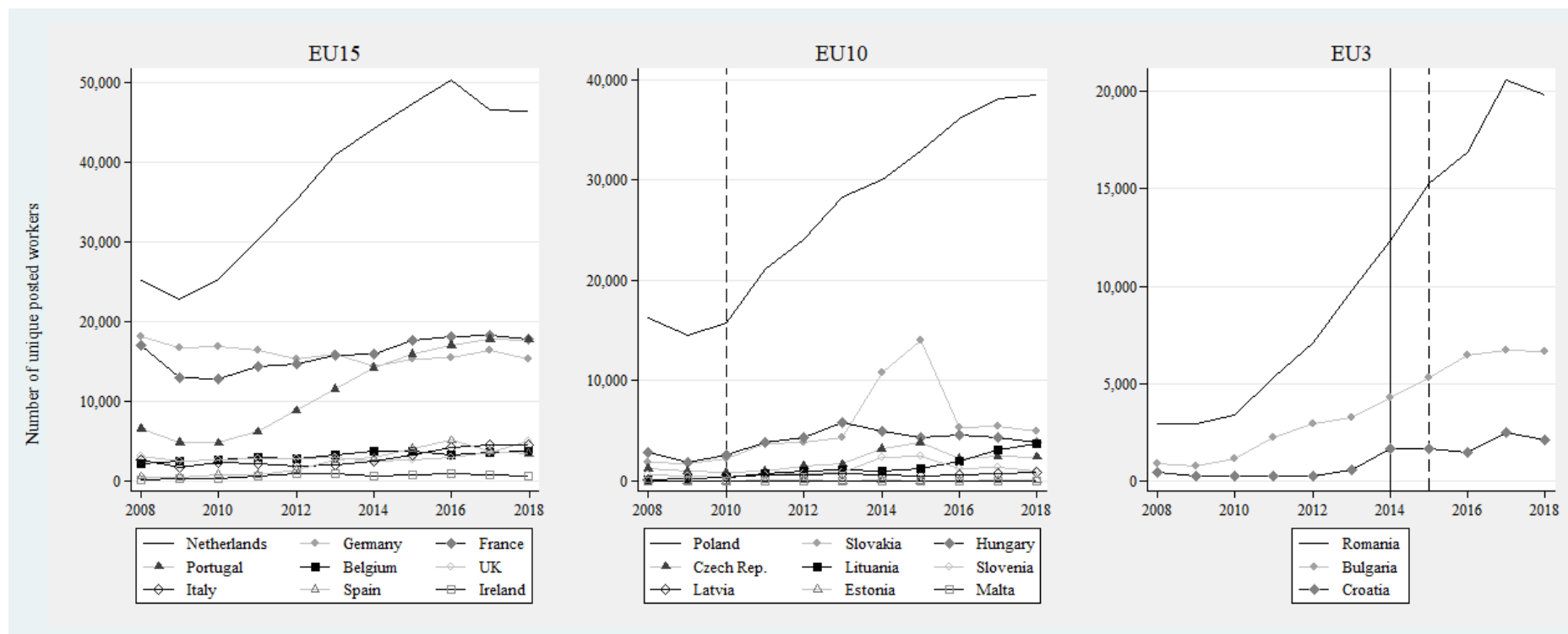
Source: Belgian National Social Security Office, LIMOSA data, own calculations.

Figure 2 breaks down the overall figures by main national groups. The major citizenships driving the rising EU15 posting numbers are neighbouring countries like the Netherlands, Germany and France, and in more recent years also Portugal. The other EU15 citizenships display a more or less steady, stable stream of posted workers as of 2008. From Figure 2 it becomes clear that there are other motives at play than a mere reduced cost for EU companies to use posting. Free service delivery existed before EU enlargement between EU15 Member States, and grew in importance both from EU15 and from the new Member States. We do not claim that cost differentials do not play at all between EU15 Member States. The lower social security contributions in the

Netherlands and Portugal may be a good motivation for crossing borders (OECD 2018). However, this cannot be said of posting from France and Germany.

The second trend we discuss here, is the one most posting literature and media reports focus on, i.e. the posting streams from (cheaper) new Member States (EU10 and EU3). For the EU10 we see a strong increase in the number of posted workers, from 23,000 in 2008 to about 55,000 in 2018. This increase, however, hides large differences between countries. The primary driver of this increase are Polish workers. Slovaks, Hungarians and the Czechs complete the top four. Likewise, we observe a strong increase in the number of EU3 postings to Belgium, which is mainly due to the steep increase of the number of Romanian posted workers. The number of EU3 posted workers rose from about 4,000 in 2008 to about 29,000 in 2018.

Figure 2. The main citizenships of posted workers from EU15 (left), EU10 (middle) and EU3 (right), 2008-2018



Note: The vertical lines indicate the lifting of mobility restrictions for EU10 workers in 2010, for Bulgarian and Romanian workers in 2014 and for Croatian workers in 2015. Austria, Greece, Denmark, Sweden, Luxembourg and Finland are not shown for EU15; Cyprus is not shown for EU10.

Source: Belgian National Social Security Office, LIMOSA data, own calculations.

We would argue, though, that posting figures are quite dynamic. As Figure 1 indicates, the posting levels decreased in the worst years of the financial crisis (2009-2010). Additionally, we observe a stabilisation of the number of posted workers in the last couple of years. For 2015-2018, Figures 1 and 2 indicate a certain plateau seems to have been reached. For EU10 and – to a lesser extent – for EU3 citizens, we observe a stabilisation of posting figures. Hence, the sense of a phenomenon out of control may be somewhat overstretched.

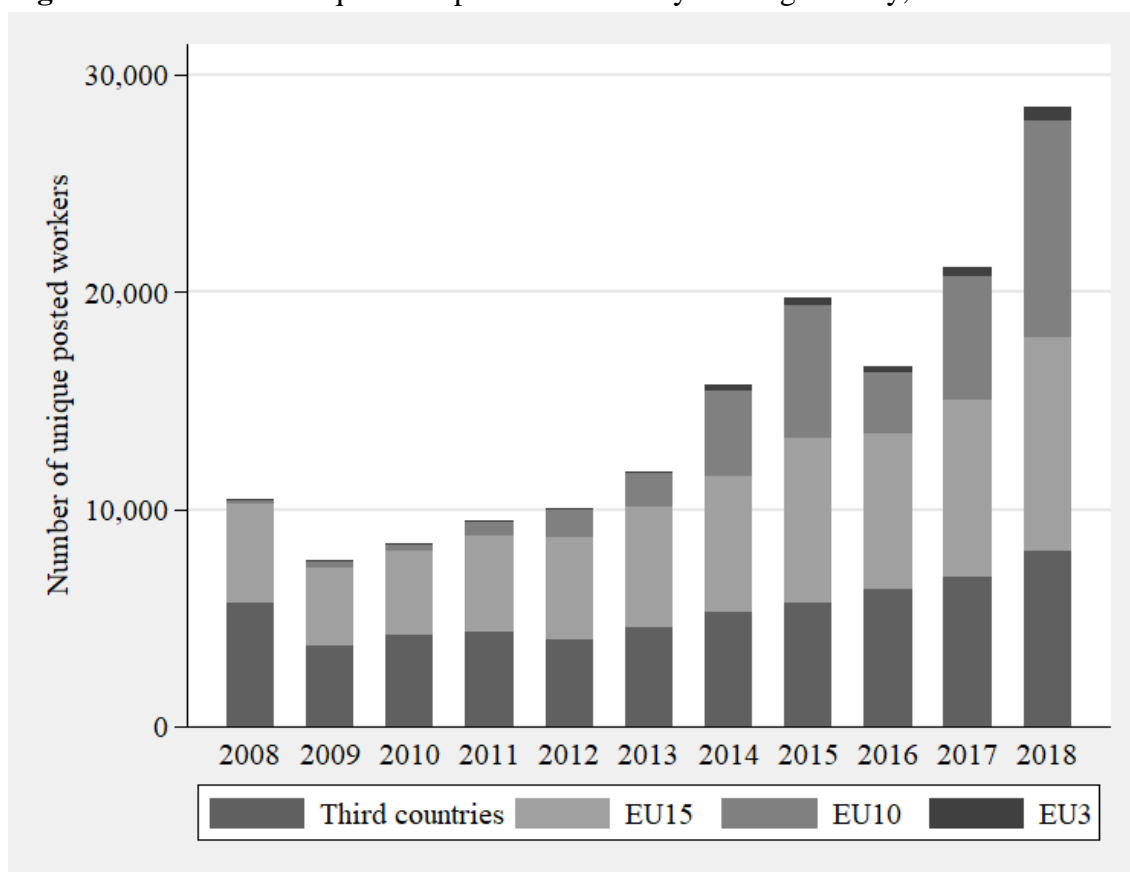
An important explanation for this stabilisation is the severe tightness in the labour markets of Central and Eastern European (CEE) countries caused by economic growth, a fast aging workforce and emigration (Lutz et al. 2019). Having peaked in the late 1990s, the region's workforce is now shrinking at a fast rate, due to aging and net outward migration. Meanwhile, economic growth in the region has accelerated. Unemployment has fallen sharply in recent years, and most CEE economies have lower unemployment than the EU average. Recruitment difficulties have strongly accelerated wage levels over the past couple of years. Hence, rising wages may deter Central and Eastern European workers from migrating across borders to look for better employment opportunities. At the same time, with labour markets tightening and labour costs rapidly rising, the competitive advantage of workers from accession countries will further shrink over time and could mean that businesses will prefer workers from elsewhere.

We show in the coming section that the stabilisation of posted worker flows from EU10 and EU3 countries is giving way to new mobility flows of TCNs who are posted between EU countries.

Ever widening circles of mobility – TCNs as posted workers, integrating classical labour migration into the single European labour market

Within the posting landscape itself, changes are taking place. Posting in the 1990s and early 21st century was mostly a matter of intra EU15 mobility. After the EU's expansion as of 2004, and increasingly since labour restrictions were lifted, new Member States' nationals increased the territorial scope of permanent and circular mobility significantly. A third expansion of mobility patterns has been developing with an increasing number of TCNs who are being posted by their employers from another EU Member State to Belgium. TCNs are usually associated with the traditional form of labour migration based on work and residence permits and originating from Third Countries. However, as Figure 3 shows, 20,000 TCNs were posted from other EU Member States to Belgium in 2018, and this without any form of work permit. These workers performed 58,000 service jobs in that year. The average duration of their combined service jobs amounts to about 100 days. The figure clearly shows that the mobility of TCNs across EU Member States as enabled by the ECJ is a substantial and growing phenomenon. The number of 20,000 TCNs entering Belgium from other EU Member States far surpasses the number of TCNs who entered based on the classical national labour migration route.

Figure 3. Number of unique TCN posted workers by sending country, 2008-2018



Source: Belgian National Social Security Office, LIMOSA data, own calculations.

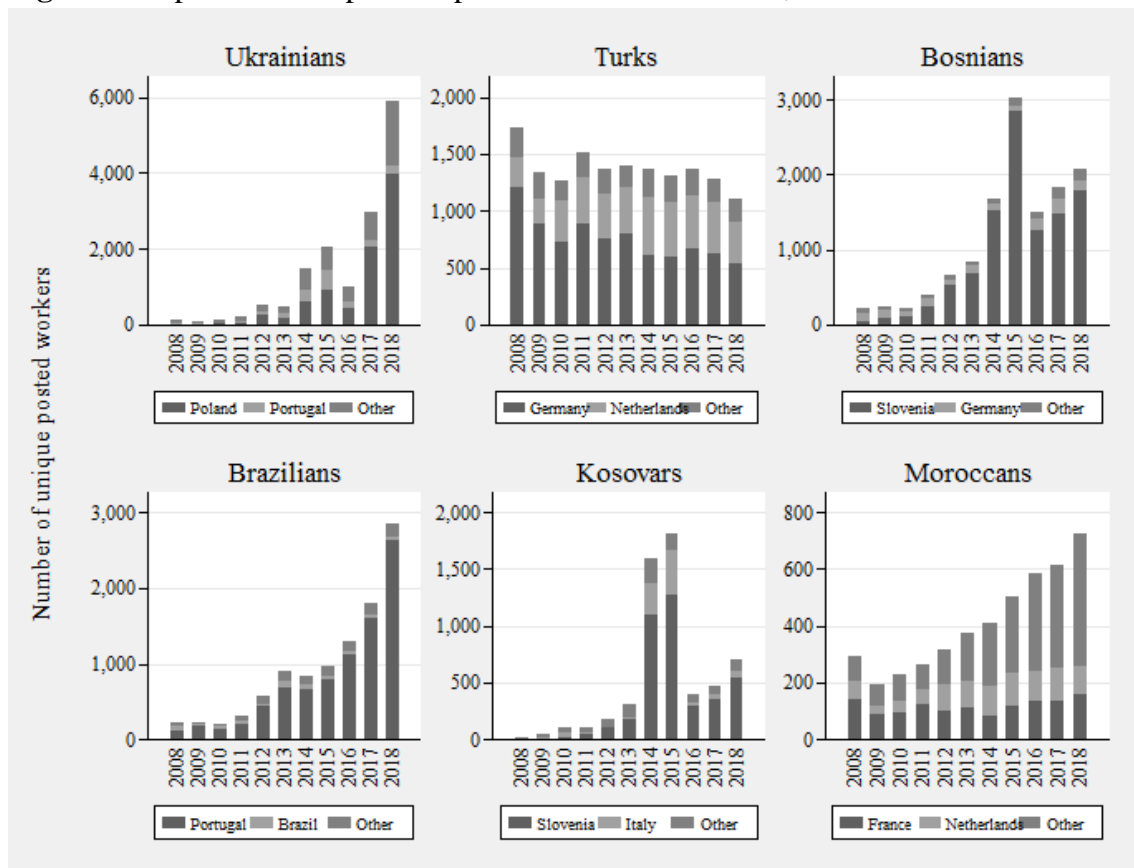
As mentioned, this development is based on the Vander Elst case (1994) of the European Court of Justice (ECJ). In Vander Elst, the ECJ decided that TCNs who are in the possession of a work and residence permit of an EU Member State can be freely posted across the EU. The Vander Elst case concerned a Belgian employer who employed Moroccan workers in Belgium. The workers had the legally required work and residence permits. Vander Elst planned to provide services in France and planned to take his Moroccan employees along for the job. He had obtained short stay entry visas for the workers from the French Consulate and sent them to France to carry out the work. However, the French authorities objected. They claimed Vander Elst was in breach of French immigration law as no work permits had been obtained for the Moroccan workers. Vander Elst appealed against the fine he received. The Vander Elst case was a landmark decision, and the first in a line of cases crafting free mobility for posted workers. Several cases in the 2000s confirmed this rule and ensured that Member States did not impose barriers for posted TCNs (Hatzopoulos 2010).¹⁴ The significance of this case-law increased with the years, as the slashing of any borders for TCN posted

¹⁴ Case C-445/03 *Commission v Luxembourg, posted workers I* [2004] ECR I-10191; See also, the condemnation of Luxembourg in 2006. Case C-319/06 *Commission v Luxembourg, posted workers II* [2008] ECR I-4323; Case C-244/04, *Commission v Germany*, [2006] ECR I-00885; Case C-168/04, *Commission v Austria, posted workers* [2006] ECR I-9041.

workers effectively installed a free mobility regime for TCN workers. TCN workers who obtained a work and residence permit in one EU Member State can be posted by their employers to any EU Member State. This development is striking, in view of the fact that only very gradually have Member States transferred sovereignty in the area of migration to the European level (Strumia 2016). Member States were not eager to join the ECJ's enthusiasm for the free movement of services applied to TCNs (Bertola and Mola 2010). They repeatedly put conditions and restrictions on TCN posted workers. But in its case-law the ECJ time and again condemned any migration requirements for posted workers.

TCNs who are posted from another EU Member State to Belgium have a very large variety of citizenships. About 200 third-country citizenships are represented in the database. To obtain a better picture of who makes predominantly use of the TCN mobility regime, we zoom in on the top 6 citizenships that are posted to Belgium from EU countries in the 2008-2018 period: Ukrainians, Turks, Bosnia-Herzegovina, Brazil, Kosovo and Morocco. Figure 4 shows that Poland is the main sending country of Ukrainian posted workers. Bosnian and Serbian workers are mainly sent from Slovenia. Turkish posted workers are predominantly posted from Germany and the Netherlands, while Brazilians are mostly posted from Portugal. The majority of Moroccans are posted from Italy, France, Spain and the Netherlands.

Figure 4. Top 6 citizenships TCN posted from EU countries, 2008-2018



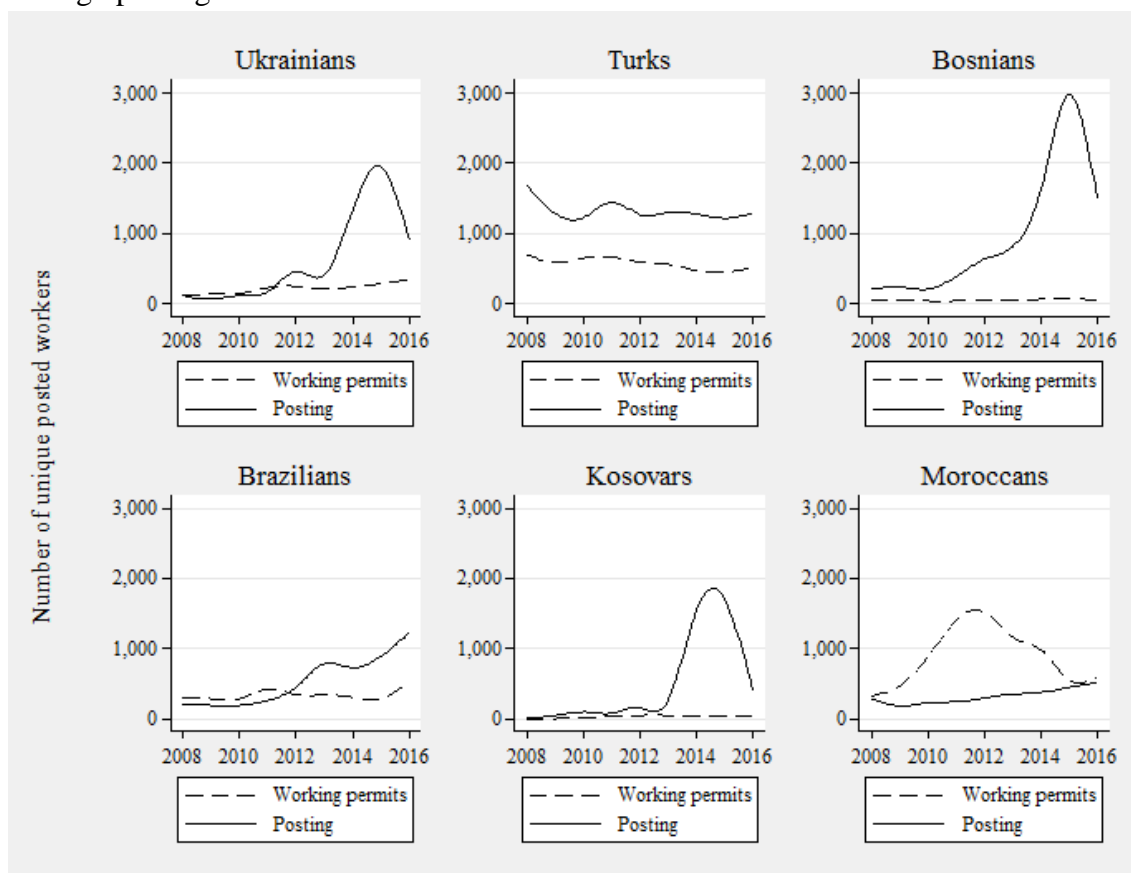
Source: Belgian National Social Security Office, LIMOSA data, own calculations.

The above figure clearly shows that the mobility of TCNs across EU Member States as enabled by the ECJ is a substantial and growing phenomenon. Most of these posted workers would usually have a harder time obtaining a work permit in view of the fact that most are low or medium skilled and for this category of workers, Belgian labour migration rules are significantly stricter. Nevertheless, employers can successfully avoid national labour migration restrictions through the system of the free movement of services.

To assess how significant the entry of posted TCNs from EU countries is as compared to TCNs entering on a classical work permit, we compare the number of posted workers with Belgian work permit data for our top 6 citizenships (figure 5). We focus exclusively on posted employees, not on the self-employed. For the top 5 posting origins (who are posted from another EU Member State by their employers) – Ukraine, Bosnia, Brazil, Turkey and Serbia – the number of posted workers outnumbers the number of work permits to a large extent. In other words, for the top 5 posting origins (representing most of the TCN postings), posting significantly surpasses the Belgian labour migration system as an entry point to perform work in Belgium. For Ukrainian workers (the top posting TCN origin) posting mobility is almost ten times more substantial than work permit based migration. For Bosnians (second highest), work permit migration is less important as compared to the substantial number of Bosnian workers entering based on posting. For Brazilians (third), posting gradually became more important than work permits. For Turks (fourth) and Serbians (fifth), the number of posted workers is about three to four times larger than the number of workers entering on a classical work permit. Only for Moroccans (sixth) work permits are still more important than the number of postings.

Of course, work permits do provide a continuous right of residence for one year, which is usually taken up. This is not the case with posting: workers enter (often more than once) for shorter service jobs. Hence, TCN labour migration, traditionally fully under the migration sovereignty of the individual Member States, is partly extracted from that sovereignty and liberalized based on the free movement of services. A consequence of this is that TCNs being posted from other Member States represent ever expanding circles of posting mobility in and towards the EU.

Figure 5. Comparison of TCNs entering on a working permit B and TCNs entering through posting



Source: Belgian Federal Public Service Employment, Labour and Social Dialogue – Belgian National Social Security Office, LIMOSA data, own calculations

Conclusion and policy reflections

European unification never brought the mass permanent migration flows within Europe that many expected and indeed feared. The single European labour market has instead come to consist of various layers and modes of mobility. Mobility based on the EU core principle of the free movement of workers has been sizeable in some instances but its overall magnitude remains limited. It is matched by highly circular and more temporary mobility streams based on another core EU principle: the free movement of services.

Posting is an exceptionally contentious and much-debated issue in Europe today, and rightfully so. It is hard to think of an issue that exemplifies more vividly the tension that eagerly sought-after economic integration and a lacklustre social Europe has created. Having emerged as a “by-product” of the core and by the ECJ arduously enforced principle of free movement of services, posting has developed into a crucial labour mobility phenomenon in Europe today.

While we remain at a loss as to the exact impact posting is having on host country labour markets, a picture of the size and nature of the phenomenon is now slowly emerging. It is an impressive one, but also a more nuanced one than the current

debate projects. Hence, building on Belgium's uniquely rich registration data, we argue that there is a need to re-assess EU labour mobility as the diverse phenomenon it has become, encompassing not only mobility streams that were initially or historically part of the labour mobility vision of EU policy makers, but also labour streams that are (even) more short term and circular. Posting is also a diverse phenomenon in itself. Belgian data indicate that more than half of posting traffic occurs among EU15 citizenships – indicating that posting also reflects deep economic integration among some old Member States as Benelux, Germany and France. For these streams economic integration, skill shortages and specialization are more important drivers than low labour cost associated with social dumping. Unfortunately, the (justified) focus on social dumping blurs the fact that posting is a much more diverse phenomenon than social dumping streams only.

This article also provides some hard evidence that posting has a dimension that is widely suspected but not yet well-documented. This concerns the role of third country nationals (TCNs) as posted workers in the EU. As a consequence of case-law of the European Court of Justice, TCNs with a valid work and residence permit in one Member State, can be posted freely across the EU. This is actually happening at a significant scale. The EU's circles of labour mobility are widening.

One of the main reasons to include posting into a vision of a single European labour market is that posting mobility is here to stay. For this reason, posting is ideally normalized, hence also properly organized and regulated as an established intra-EU mobility form. Here the challenges remain formidable. It remains to be seen what the revision of the Posted Workers Directive (PWD) will bring. The revised PWD should bring more safeguards against social dumping and second tier work standards and wages for posted workers. But the enforcement of legal safeguards remains quite difficult. Even with a more strongly protective legal framework in place, the administrative and technological capacity remains only a fraction of what is needed for effective enforcement. Many EU Member States have only just begun to link data bases scattered across their own national, regional and local administrations, let alone that they are linking up to foreign databases.

Far better and efficient registration systems, such as the Belgian LIMOSA example, are a must – both country-wise and integrated at the EU level. In fact, the (perceived) problems associated with posting, such as social dumping, are a wake-up call that a true single European labour market should be much more integrated administratively. The establishment of a European Labour Authority (ELA) is a step in the right direction, with its aim to provide information on rights and obligations to workers and employers, and to support cooperation between Member States through among others joint inspections. We recommend a much stronger push for proper data collection of all forms of mobility, both at the level of Member States, and the EU, overseen by the ELA.

The irony is that these urgent actions present themselves at a time when there are widespread calls for “less Europe”. So-called “populist” parties and politicians are virulently anti-Europe and mainstream politicians are resisting expanding European

administrations, let alone creating new ones. Yet if Europe is to have a future as a functioning and legitimate economic entity then this is exactly what is needed.

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