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The project followed internal devised ethical guidelines, no external ethical approval was required. Informed consent was obtained from all participants either verbally prior to the interview (and audio-recorded, if possible) or through completion of a paper or digital consent form.

Data availability statement

To guarantee confidentiality and anonymity of interview participation, full interview data cannot be made available upon request. Interview summaries could be shared upon request.

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Abstract

This article contributes to a nuanced theoretical understanding of industrial relations dynamics driving cross-country differences in the expansion and containment of precarious migrant labour, by investigating the role of industrial relations actors, labour market regulations and collective bargaining specifically. It compares the differential reliance on temporary and migrant labour in the food (and meat) sector in the Netherlands and Austria, two countries with a strong corporatist industrial relations tradition. The analysis draws on desk and policy research and interviews with trade union representatives, inspectors, employers, works councillors and migrant workers. The findings highlight the importance of regulations regarding flexible employment, the strength of sectoral industrial relations and collective bargaining, and representation at the workplace to explain the different outcomes for migrant workers.

Keywords: food sector, migrant labour, temporary employment, Austria, Netherlands, migrant labour regimes

Introduction

The food industry across the European Union, especially meat processing, has been in the spotlight for the structural precarious work and living conditions of low-waged migrant workers (Campanella et al., 2020; Bogoeski and Costamagna 2022). While in the Netherlands, temporary agency work as exploitative of migrant workers has risen to political salience, with the meat sector as a particularly prominent example, this has not been politicized as such in Austria. To explore the differences in outcomes for migrant workers, this article compares the diverging tracks regarding migrant labour in the Dutch and Austrian food sector, defined as factory produced food, including meat production,¹ but excluding agriculture.

Our central question is: How do industrial relations actors through laws and collective bargaining impact the way migrant labour is treated in the Austrian and Dutch food sectors? Austria and the

¹ NACE codes C10 and C11

Netherlands are interesting country cases to compare as they share a corporatist industrial relations tradition, characterized by institutionalized social dialogue and high collective bargaining coverage, and as EU member states have similar access to EU mobile labour. Our sectoral comparison draws on desk and policy research and interviews with trade union representatives, inspectors, employers, works councillors and migrant workers to identify similarities and differences in the use of migrant labour in the food sector in the two countries. Our analysis shows that underneath these commonalities, the interaction of industrial relations actors and social regulations at sectoral level diverges. Regulations regarding flexible employment, the strength of sectoral industrial relations, and worker representation at the workplace creates different outcomes for migrant workers. We show that differences at these interacting domains lead the food sectors in the two countries on different tracks regarding migrant labour and therefore create different sectoral migrant labour regimes (see introduction to this special issue). We thus contribute to the developing literature on sectoral migrant labour regimes (Sippola and Kall, 2017) by stressing the role of creative employer strategies (Jaehrling and Mehaut 2013; Wagner 2015), labour market regulations and collective bargaining (Marino and Keizer 2023) in shaping sectors' reliance on, and character of, migrant labour.

We find that the position of migrant food workers in the Netherlands is more precarious than in Austria. The interaction of labour market regulations with the industrial relations actors and their enforcement mechanisms have produced a sectoral migrant labour regime that enables an extensive use of temporary migrant labour in the Dutch food sector but a limited one in the Austrian one. In the Netherlands, food production is dominated by a few big employers that rely heavily on temporary work agencies with extended management and supervisory roles including worker accommodation, while in Austria there is a more diverse pool (both in size and number) of employers that rely sparingly on temporary migrant labour and invest in maximising worker retention. Simultaneously, collective bargaining agreements (CBAs) present in both countries are more effectively enforced in Austria compared to the Netherlands due to consolidated mechanisms such as trade qualifications and training included in the CBAs and an active presence of works counsellors in many workplaces.

Our article is structured as follows. We first provide a review of the literature on migrant labour and temporary employment followed by our methodology and empirical material. The findings start with an overview of temporary migrant labour in the food sector in both countries, and then discuss recruitment and industrial relations mechanisms in each country.

Literature overview

Various segmentation processes explain the heavy reliance on migrant labour in sectors where jobs are physically demanding and low paid, such as agriculture, care, construction, and food production (Arnholtz and Leschke, 2023; Krings, 2021; McCollum and Findlay, 2015; Piore 1979). There is a mutually reinforcing relationship between migrant labour and segmented labour markets; segmentation thrives because of ongoing employer demand for migrant labour *and* the ready availability of a large pool of migrant workers (Anderson and Ruhs 2010; McCollum and Findlay 2015). The dynamic interaction between employer recruitment practices, state regulation, trade union efforts and migrant worker agency (social practices) creates particular localized capital-labour relations with different modes and outcomes in terms of work and working conditions (Peck, 1996; Baglioni et al., 2022; Doellgast et al., 2018). This creates a 'distinct migration/labour market order' (Pajnik 2016: 162), subordinating migrants to precarious labour market conditions and creating particular migrant labour regimes (Sippola and Kall, 2017; introduction to this special issue).

The mutually reinforcing interaction between inclusionary or exclusionary institutions (of state regulations; bargaining coverage and coordination; or enforcement), employer recruitment, union strategies, and worker solidarity (Doellgast et al., 2018) produces a specific migrant labour regime. Doellgast et al. (2018) note that these relational and institutional dynamics result in either virtuous regimes that manage to contain the spread of precarious work, or in vicious ones that feed the expansion of precarious labour.

Scholars point towards the creative and destructive strategies of employers to satisfy their demand for flexible and outsourced labour, especially in low quality job segments (Jaerlingh and Mehaut 2013; Wagner, 2015). To maintain a low-wage regime, employers' recruitment frequently relies on perceptions of workers' skills or ethnic group characteristics rather than personal proficiencies (Friberg and Midtbøen, 2018) Hence, in the recruitment process, skills as such often become indistinguishable from ethnicity.

In many low-waged labour market segments, temporary agencies, 'oil the wheels' (McCollum and Findlay, 2018) of segmentation, providing a flexible pool of labour, and taking over human resource functions. Labour turnover is, as Alberti and Sacchetto (2024) argue, a critical terrain of social contestation. While outsourced temporary labour is a means of employers to contract away their responsibilities and access a flexible low-cost workforce; for migrants, it is a way to respond to

workplace hostility (through exit) if they cannot count on local union, or social or political support. Outsourcing is a tried and tested employer strategy to increase labour control, ensuring a timely and compliant migrant labour force (Rogaly, 2008). In temporary agency arrangements, employer control can even extend beyond the workplace, and into the private realms of migrant lives in the form of work-housing arrangements (Meszmann and Fedyuk, 2025) or health care access (Mantu et al., 2015). While temporary agencies accommodate employers' needs for flexible (cheap) labour, they also have their own business interests lobbying for deregulation and flexible labour market regulations (Fedyuk & Meszmann, 2025).

Next to labour market regulation, sectoral collective bargaining critically shapes possibilities for outsourcing. Different scholars show that the absence of collective bargaining gives employers more leeway to lower working conditions and job statuses, leaving few options to collectively address these beyond the statutory regulatory thresholds (Marino and Keizer, 2023; Wagner and Refslund, 2016; Erol and Schulten, 2025). The same goes for collective agreements that are not well-enforced, feeding a vicious dynamic. Encompassing and effectively enforced sector-level bargaining, in contrast, are critical to uphold industry standards and limit outsourcing in the face of price-cutting pressures (Marino and Keizer, 2023).

Wagner and Refslund (2016) point to the critical role of trade union power to counterbalance employers' outsourcing pressures in the German and Danish meat sector. The encompassing industrial relations in the Danish meat sector and sectoral bargaining have maintained a virtuous regime in Doellgast et al.'s sense (2018), good wages and employment conditions. The weakened presence of unions in the German meat sector, has instead been unable to prevent widespread precarious subcontracted migrant labour. Indeed, it is the strength of Danish unions in sectoral collective bargaining and its enforcement at the workplace level through the Danish single-channel system that prevents employers from outsourcing workers. While the Danish meat industry also relies on EU migrant labour (about one third of the workforce), migrants are directly employed under the same terms and conditions as their Danish colleagues. They are further integrated into the sectoral industrial relations system through union membership (Wagner and Refslund, 2016: 345). Formal institutionalised bargaining rights thus support encompassing collective regulation that effectively regulate the conditions of workers including those in external (i.e. agency) work arrangements. But when unions' institutional power resources depend less on membership volumes and mobilisation capacity, incentives to engage precarious agency workers may be less and dependant on task distribution (Baccaro et al., 2003; Benassi and Dorigatti, 2020). In such contexts,

unions may focus either on limiting employer discretion regarding temporary work, or negotiate the extension of terms to temporary workers in order to protect their own collectively bargained labour standards (Benassi and Dorigatti, 2020).

These studies thus point out that it is the interaction between regulations, collective bargaining, sector specifics, industrial relations and trade union influence that shapes migrant labour. Certain interactions may contribute to pathways for sectors to resist or move out of vicious spirals of precarity. In the German meat industry, a long-standing coalition of NGOs, trade unions and churches successfully pressured the government to limit the use of subcontracting and temporary agency employment in response to COVID-19 outbreaks involving subcontracted migrant workers (Ban et al., 2021). While this measure changed one component in the industrial relations dynamic, protective (re-)regulation alone is not sufficient since there are indications that work norms have changed little in the German meat sector despite bringing workers through direct employment into the protective realm of existing workplace representation mechanisms (Erol and Schulten, 2025). The extant literature shows that workplace representation mechanisms have also eroded over the years in many countries creating a gap in the enforcement of existing protection mechanisms enabled through legislation and collective bargaining (Wagner and Refslund, 2016; Keizer et al., 2024).

Method and data

This article is based on desk and empirical research on the food sector in Austria and the Netherlands conducted in the context of a larger research project “[omitted for anonymized review]. Desk research included analysis of legislative and policy proposals, statistics, news media items and various policy reports. The empirical data was collected through 28 interviews (18 in Austria and 10 in the Netherlands) conducted in 2024 and 2025 with employers’ organizations, worker representation bodies, enforcement agencies, works counsellors, food sector employers and migrant workers.

Our empirical research combined interview data and desk research, taking a multi-scalar perspective. The case comparison was chosen to understand how, despite similar industrial relations systems and extended CBA coverage (Table 1), the food sector in the two countries differs in the use of temporary migrant labour. We studied the interrelation between national labour market regulations, sectoral bargaining practices, and worker and employer practices to examine the mechanisms shaping the different use of migrant labour. Due to a rather even distribution of foreign workers across a wide

range of sub-sectors, the Austrian fieldwork focused on the food manufacturing. The empirical study for the Netherlands focused on the meat processing subsector, as an exemplary case in the Dutch food industry of extensive use of temporary migrant labour. To underpin the similarities and differences with the Dutch case references to the Austrian meat processing subsector are made where relevant.

Table 1 Food industry and industrial relations in the Netherlands and Austria

	The Netherlands	Austria
Main food industry unions	FNV, CNV	PRO-GE (blue-collar), GPA (white-collar)
Employers' organisations	Central Organization of the Meat Sector	Chamber of Commerce (mandatory membership)
Level of wage bargaining in the food sector	Sector-level agreements with legal extension and statutory national minimum wage	Sector-level and sub-sector level agreements with legal extension
Collective bargaining coverage	72.5 % (national average); 77.1% in food sector (64.7% sectoral CBA; 12.5% company CBA)	100% (2020)
Sectoral union density	15 per cent (estimate)**	14.7 percent***
Workplace representation	Limited	Works councils (Betriebsräte) prevalent in larger workplaces, uncommon in smaller ones
Basic rate of pay in food, unskilled/skilled worker	14,06*-15,91/ 15,06- 21,17 (in meat sector, 2025)	Varies based on sub-sectoral CBAs.
Recruitment of migrant labour and temporary labour	Extensive and mainly temporary agency work	1/4 of workforce is of migrant background, yet temporary migrant labour is limited
Size food industry, in number of workers	193.900 workers, of whom 146,100 employees (excl. temporary agency workers)	86,700 (2023)****
*This is the statutory national minimum hourly wage on 1 January 2025 ** Based on membership of the largest union (FNV) only. *** Composite statistic based on 2019 Eurostat Labour Force Survey employment data and 2020 Eurofound Correspondents' trade union membership data **** Statistics Austria. Authors' own calculations. Approximate estimate due to small sample size		
Sources: CBS (Dutch Statistics); Dutch CBA meat sector 2025; Eurofound (2022).		

Temporary migrant labour in the food sector in the Netherlands and Austria

Global competition and outsourcing practices shape the low-waged jobs, harsh working conditions and frequent exploitation of migrant workers in food supply chains, and in the meat sector specifically (Gottlieb et al., 2025; Bogoeski and Costamagna, 2022). In both Dutch and Austrian food companies, working conditions are physically strenuous, jobs lowly remunerated and labour turnover high. Similarly, in both countries, the sector relies to an important extent on migrant labour: in the Netherlands, estimates range from 60 to 80 percent (SOMO, 2024; Onderzoeksraad voor Veiligheid, 2025); while in Austria, one fourth of the food workforce is migrant. Interestingly, the migrant backgrounds differ: the Dutch food sector mainly employs Polish, Romanian and Bulgarian workers; whereas in Austria, half of the migrant workers are EU citizens (14% from EU15 countries; 33% from CEE countries); and the rest third-country nationals from former Yugoslavia or Turkey (Kayran and Kadi, 2024).

Another difference is the sectors' reliance on temporary employment, especially temporary agency work. In the Netherlands, a quarter of the industry's 194,000 workforce has a temporary agency contract or is solo self-employed. In meat processing, only half of the workforce (33,000 persons) is directly employed. In Austrian food, the share of migrant workers in temporary employment is much smaller. In 2023, approximately 86,700 persons were employed in Austria's food and drink production sector, around 23,500 were foreign nationals and about 1,600 held temporary contracts. The share of migrants in temporary employment is consistently higher compared to Austrian-nationals, though the difference is small (Kayran and Kadi, 2024).

The prevalence of temporary migrant employment in the Dutch food industry fits with the overall high presence of temporary employment in the Netherlands. With one in three employees on a fixed-term contract (including temp agency work), the Netherlands is among the EU countries with the highest share of flexible work. Almost two thirds (65%) of all workers from Central and Eastern European countries in the Netherlands work on a fixed-term contract. The temporary agency sector has grown steadily in the Netherlands, especially after the permit system for agency firms was abolished in 1998. There are an estimated 15,000 temporary agency firms active in the Dutch labour market. In contrast, temporary agency work is more modest and more regulated in Austria, where, as

of June 2024, 2,050 companies were authorized to provide temporary employment services (Statistik Austria, 2025). Yet, most temporary agency workers are non-Austrian (40,998 of the 74,954 temporary agency workers in 2024).

In the Netherlands, the Allocation of Workers and Intermediaries Act (*Wet Allocatie Arbeidskrachten en Intermediairs*, or WAADI) regulates the temporary agency sector. The Waadi stipulates equal pay, allowances and working time for temporary agency workers with workers that perform comparable tasks that are directly employed by a user company. However, deviations from these principles are possible through CBAs. In Austria, temporary work is regulated by the Austrian Anti-Wage and Social Dumping Act (LSD-BG) and the Temporary Agency Work Act (AÜG).

In both countries, employment conditions are also regulated by sectoral collective agreements (Table 1). In the Netherlands, around 72 per cent of all employees are covered by a collective bargaining agreement; in the food sector this is 77%. The prevalent level of collective bargaining is the sectoral level; nine in every ten employees under a collective agreement are covered by a sectoral agreement. Yet, wage levels for the jobs of migrants are at about the statutory minimum wage. Whereas in Austria, collective bargaining coverage has always been high and reportedly 100% in 2020 (Eurofound, 2022) and extended to cover temporary workers. However, due to the lower skill tasks, many temporary migrant workers are paid lower wages than others in the sector.

By 2025, the Dutch meat sector has developed into an export-driven industry, dominated by a few large companies, weak social dialogue, low unionization rates and a predominantly migrant workforce contracted by temporary agency firms, who also arrange migrants' accommodation. Whereas in the Austrian food sector, the multilevel and encompassing industrial relations system has kept the share of temporary migrant labour comparatively limited.

The Netherlands

Recruitment: widespread outsourcing and precarious position migrant workers

Despite partial automation, the Dutch meat industry remains labour intensive (Campanella et al., 2020; Berkhout et al., 2014). Automation has simplified meat sector jobs, increasing companies' demand for lower skilled and entry level workers, for whom, as mentioned above, Dutch companies rely largely on temporary agency firms that supply migrant workers.

A Romanian team leader at the de-boning department of a Dutch meat factory, explains how the agency recruitment process works:

These agencies, they bring in Polish, Hungarians, Romanians, everything! 'Can you work? Well, please come!'

The worker explains how new agency workers come in every week, often without having sufficient experience with deboning. Considering how language barriers complicate on-the-job training, the Romanian worker prefers to work with fellow Romanians. This feeds a racialization of the production process, where different nationality groups work in separate departments (cf. Piro & Sacchetto, 2022). Since the recruitment process is taken over by temporary work agencies, skills have practically become subordinate to ethnicity (and linguistic ties).

Agencies not only supply production labour, but they also provide for management tasks, by supplying team leaders or production line coordinators, and as such function more as subcontractors (Cremers 2022). Agencies also provide private life services such as accommodation. While agency-arranged accommodation facilitates access to the Dutch labour market, the work/accommodation-bind simultaneously keeps migrants in precarious employment. Moving out of temporary agency employment requires workers to find private accommodation, which is highly complex in the tight housing market in the Netherlands especially with an insecure employment contract. Although since 2023 a separation between rental and work contracts is legally required, temporary agencies remain in practice important accommodation-providers for migrants.

Although employers and employer organisations on the one hand and trade unions on the other disagree about the extent of compliance with regulation by meat companies and temporary agencies

active in the meat sector, the sectors' price-competitiveness certainly is an incentive for companies to reduce labour costs. An employer representative (cited in Berkhout et al., 2014: 34) stated that two thirds of the meat companies explore the limits of the law. According to the Netherlands Labour Authority (NLA) recurrent issues are: non-payment of hours worked, wage thefts, absence of a written employment contract; excessive deductions and a lack of safety measures or protective gear (see Van de Goorbergh et al., 2025: 23).

Interviewed workers mention the ever-increasing work pace in the meat factories. A Polish worker with over 20 years' experience working in different Dutch meat factories via temporary agencies, reports he is no longer able to keep up with the required pace:

In the beginning, it was still great. It was normal work and everyone had their own tasks. But after more Poles, Romanians, Hungarians started coming, it got worse and worse... Everyone shows how good they are because the boss patted them on the back, and slowly everything started to go to hell. The company demanded a faster and faster pace, more and more work. (...) And now, I just couldn't do it at that pace.

The worker mentions the vicious dynamic behind omnipresent labour turnover (cf. Alberti and Sacchetto, 2024), with workers working extra hard to obtain more secure positions, driving up the work pace and employers' (unrealistic) expectations of work performance. Different reports note that temporary agency employment contributes to unsafe and unhealthy working conditions (Onderzoeksraad voor Veiligheid, 2025). Indeed, workplace accidents and safety hazards were frequently mentioned by the interviewed workers. The Polish worker recalled:

In the beginning, I stabbed myself here and severed an artery... Back then, they gave us short gloves to work with. Now the metal gloves must be long, up to here [shows his elbow]. You need to wear a metal apron and a chain mail with sleeves, to work safely. But we didn't have it back then. Only after my accident, the factory provided us with long gloves.

Compensation for and accurate assistance in case of workplace accidents is limited practice. This was the case for the Polish worker but also for a Romanian meat worker who received no health care assistance, nor sickness benefits after a workplace accident:

Once, a pallet of meat fell onto my foot, causing a muscle fracture. No one helped me, I had to go and get treated in Romania, by a private doctor. I was bed-ridden for 6 months. I didn't get any payment for sick leave.

The worker spent 6,000 euros for the medical treatment on his foot, exhausting one year of savings.

Flexible labour market regulations and a lack of collective enforcement

Despite the collective bargaining coverage of 77% in the Dutch food sector, the content of and the compliance with the sectoral collective agreement strongly depends on the employers and employers' organization. In the Netherlands, enforcement is scattered across different actors. The labour inspectorate (NLA) controls compliance with the labour laws, including the payment of the statutory minimum wage, and compliance with the working times act. Although the NLA and trade unions cooperate, labour inspectors do not enforce the CBA. Though the enforcement capacity of the NLA has increased in recent years, it remains limited; it has the capacity to inspect only 2% of the temporary employment agencies in 2023 (Aanjaagteam Bescherming Arbeidsmigranten, 2020: 22). New legislation is in preparation to make persecution of severe labour abuses more effective. Monitoring compliance and enforcing collective agreements is the responsibility of the social partners. In the temporary agency and construction sectors, social partners created specific compliance monitoring bodies, which do not exist in the meat sector. Most migrants work via temporary work agencies that only supply workers to the meat industry and workers therefore fall under the scope of the meat sector CBA, and not the temporary agency CBA.

Migrants are under-represented among trade union members. Trade union activities include settling urgent disputes, such as non-payment, dismissal, loss of housing, health care access (also after workplace injuries), lack of health insurance. Individual migrants often become members in such cases. Dutch trade unions have no legal right to access the workplace and rely on active members at the workplace (but union activity at the workplace is generally not well-developed) or depend on being granted access to the workplace by management. The collective agreement for the meat sector of 2024 includes an appeal to employers to facilitate trade union access to the workplace. In practice, however, union officials still need to negotiate workplace access.

In response to ongoing signals of bad employment conditions of migrants in the Dutch meat sector, a public-private meat, poultry and temporary agency Taskforce was formed in 2024. Initially, the taskforce included various employer organisations, the NLA, the Ministry of Social Affairs and Employment and the SNCU (enforcement body for the agency sector). The Minister of Social Affairs and Employment invited trade unions to join the Taskforce meeting in fall 2024. The taskforce needs to devise plans to improve protection of migrant workers in the sector. At the same time, the Ministry studies the option of a sectoral ban on temporary agency work or a legal requirement of a

minimum percentage of the workforce that is directly employed by a company.² The government also funds local information and support points where migrant workers can seek information and assistance, and from 2024 the free legal aid service for people on minimum income is asked to facilitate access to legal redress for migrant workers.

There are no formal requirements to establish a temporary agency firm, except for registration with the Chamber of Commerce. Various reports from government advisory bodies and committees have pointed out the problematic role of temporary employment agencies in the employment of migrant labour. It is not uncommon that temporary agencies are part of an intricate web of inter-related agencies, sometimes owned by the same person (SOMO, 2024). The regulation of agency firms will be tightened through an admission scheme for temporary agency firms (expected to take effect on January 1st, 2028), and a public registry listing all agencies that are granted a permit to operate in the Netherlands.

That temporary agency firms have multiple ways to drive down labour costs is frequently acknowledged, also by the NLA. Agencies can save up to 10-25 per cent in labour costs by mandatory rent of small accommodation or accommodations on holiday parcs to migrant workers; 5-15 per cent by reducing sickness leaves; 25-50 percent by not paying for hours worked (including overtime); 15-20 per cent by keeping workers in the first, cheapest temporary agency contracts (NLA, 2021: 3). In 2024, the NLA signalled the frequent misuse of immediate dismissals of migrant workers in the meat sector, allowing agencies to hold back pay as well as holiday payments from the moment of dismissal. The NLA uncovered 7,000 cases of immediate dismissal among three temporary agency firms in the period 2020-22, amounting up 1 to 5 million euros in benefits for the firms (NLA, 2024). According to the NLA, migrant workers were often unaware of this and were sometimes re-hired later by the same agency.

Workplace representation is underdeveloped in the Netherlands. Although large meat companies (with more than 50 employees) are required to have a works council, these are not set-up to represent temporary migrant worker interests. The Works Councils Act (WOR, *Wet op de Ondernemingsraden*) regulates information rights of works councils (at least once a year) regarding the use of temporary agency workers in the company (article 31b sub 3) and stipulates that works councils try to enforce terms of employment, working conditions, working and break times (article 28 sub 1).

² Tweede Kamer, vergaderjaar 2023–2024, 25 883, nr. 500

Collective agreement provisions specifically for migrant temporary agency workers include an income guarantee of 2 months minimum wage (article 34b sub 3 meat CBA), accommodation for at least 4 weeks after dismissal (article 34b sub 2 meat CBA), and the need for companies to hire migrant workers directly if they have worked at the same company for more than five years *and* stay in the Netherlands on a long-term basis and have their own accommodation in the immediate vicinity (article 34c sub 1 meat CBA). Few migrants are able to meet these criteria, particularly the private accommodation one, needed to move out of temporary agency employment.

Austria

Recruitment: sourcing direct and committed workers for physically strenuous jobs

Austrian food manufacturing is experiencing labour and skill shortages and challenges in retaining newly recruited employees due to the labour-intensive nature of the sector. While the interviewed workers reported overall positive experiences regarding their terms and conditions, there are notable caveats as noted by social partners and workplace representatives. The work itself remains inherently strenuous and often unattractive, which results in high turnover. Depending on the sub-sector, shift work, labour intensity, environmental conditions such as temperature, hygiene requirements, and in some occupations physically demanding work, make many food sector jobs unattractive. This is particularly acute in sub-sectors with low levels of automation, such as meat processing, where workers face intensive monotonous work, and often unpleasant conditions. Wages are also rather low compared to other sectors (Kayran and Kadi, 2024).

In response to shortages and high staff turnover, food producers aim to recruit workers, both migrant and native, for longer term arrangements. Recruitment efforts are oriented towards the domestic labour market and the process is multi-pronged, involving temporary work agencies in and outside Austria as well as workers sent by the Austrian Public Employment Service (Arbeitsmarktservice – AMS). However, due to the nature of the work there is a preference for workers with specific national qualifications and skills certificates, regulated as part of the bipartite collective agreements in the sector, as well as basic German language skills, although some workplaces accommodate some degree of multilingualism. Because of mandatory staff training and certification on Austrian standards and legal requirements, e.g. hygiene, machine operation or occupational safety and

health, as well as the lack of significant cost savings due to the prevalence of the collective bargaining agreement covering both directly employed and temporary workers, temporary agency work is limited in Austria.

Nevertheless, Austrian food companies do recruit migrant workers, some through temporary agencies. A significant share are long-term migrants or naturalized citizens from third countries. Austria also experiences significant cross-border labour mobility with its neighbours (European Commission, 2025). In the food sector, these are mostly commuters from Hungary and Slovakia.

Temporary agency work is used in response to immediate staffing needs for short periods of time (few days to months), peak times or specific seasons. Some employers have long-standing relationships with temporary agency firms; others use them on an *ad hoc* basis. Due to training and certification requirements, agency workers are mostly engaged in so-called simple tasks, such as loading/unloading or packaging, which limits their use and reinforces the preference for long-term workers:

What we need in our company is to find employees who will stay with the company for the long term. That is the goal, because you must train every employee, teach them all the necessary skills, and then try to get them into training programmes. We do not want to lose anyone, because training a new employee takes a lot of patience (interview with a works councillor 1).

Temporary agency work, including temporary migrant work, is in the food sector often used as a probationary period with the intention of offering workers a fixed-term contract when the temporary contract expires, usually after six months or less. Companies prefer workers with long-term employment intentions, for instance workers who learn German:

We make video calls with our Spanish employees to see how well they speak German, because they are told that they must perform at a certain level in German so that they can express themselves and they come here especially for the job. ...But they also get apartments from [agency name] Those who are looking for a place to live here tend to stay.... They want to build a life here, which is of course what we want and would wish for them (interview with works councillor 4).

To persuade temporary (migrant) workers to shift from temporary employment to direct longer-term contracts, employers offer training and better pay based on collectively bargained wage rates, which they can receive with Austrian training and certification enabling their promotion to skilled occupations.

Encompassing industrial relations and integrative enforcement

In the Austrian industrial relations system workers are protected through three main pillars. Every person employed in Austria is automatically a member of the Chamber of Labour (Arbeiterkammer - AK), a public institution that provides legal counselling in labour rights and employment. Workers can also voluntarily become a member of a trade union, which in Austria are organized by sector under an umbrella organization, the Austrian Trade Union Federation (Österreichischer Gewerkschaftsbund - ÖGB). Workers' interests are also represented by company-level works councils (Glassner and Hoffmann, 2023). Collective bargaining takes place between the trade unions and the Chamber of Commerce (Wirtschaftskammer Österreich - WKÖ), whose membership is mandatory for all employers.

CBA coverage in Austria is estimated to be between 95-98 percent and in the food and drink sector specially 100 percent covering 25 distinct sub-sectors (Eurofound, 2022; Glassner and Hoffmann, 2023). A large portion of the food processing sector is governed by the Framework Collective Agreement for the Food and Beverage Industry (NGG), which covers a variety of industrial sub-sectors including meat processing, soft drinks, brewing, confectionery, and fruit juice (Bundesministerium für Bildung und Frauen, 2015). However, for some sectors there is also a craft or trade sector equivalent, as in the meat sector where there is the industrial contract noted above and the Butchers' trade agreement, which covers small and medium-sized businesses (Wirtschaftskammer Österreich, 2024). The deciding factor between the industrial and craft category of a given firm is the size and capital of the business, with larger operations falling under the industrial NGG contract, and smaller, owner-managed workshops covered by the craft or trade agreement (Bundeskanzleramt, 2023). The Collective Agreement for Commercial Workers also covers a significant part of the meat processing subsector and white-collar workers in the sector are covered by a separate agreement negotiated by the GPA (Wirtschaftskammer Österreich, 2024).

Although there is no statutory minimum wage, according to the PRO-GE official interviewed, the trade union has negotiated a minimum salary above 2000 euro gross in most sub-sectors with varying degrees of progress by sector. These rates and the collective agreement more broadly are applied to all directly employed workers regardless of their origin. Furthermore, collective bargaining terms are extended to temporary agency workers, thus guaranteeing equal employment conditions for all employees regardless of their employment status. The collective agreements are enforced by both the Financial Police, as stipulated in the Austrian Anti-Wage and Social Dumping Act, and the social partners themselves.

The interviewed works councillors and trade union officials consistently emphasized that the sectoral collective agreement is strictly enforced, often reinforced by vigilant works councils operating at the workplace. While precise data on the prevalence of works councils, particularly by sub-sector, are limited and somewhat dated, studies from 2013 show that works councils are common in larger firms but rare in firms with less than 10 persons (Worker Participation, n.d.). Works councils have significant information and consultation rights and the ability to conclude company agreements, although these are exceedingly rare (Eurofound, 2024). The works councils also represent temporary agency workers, although some of their rights (like payroll oversight) can only be enforced via agreements with the agency or through their own works council.

Works councillors play a crucial role in linking temporary agency workers to Austria's system of social partnership and in safeguarding compliance with collective agreements. Works councillors contact and support migrants through a variety of ways, ranging from direct personal exchanges during shop-floor inspections or informally in the cafeteria, word-of-mouth among workers to various small gifts on holidays or birthdays. To accommodate a multi-national workforce, works councillors discussed involving non-Austrians workers with a migrant background in the works councils, using translation applications, or having colleagues act as interpreters. Often, works councillors serve as the first point of contact when issues arise. Although the system of dual representation can be confusing, councillors consistently emphasize that they intervene when problems occur, often in cooperation with the Chamber of Labour or trade unions:

...the [temporary migrant] workers can come directly to me, and I'll send them to the Chamber of Labour because if I [as a works councillor] say there is a problem then [the chamber of labour] take it seriously. And that also applies to temp workers that do not have good [German] language skills. ...because [their support is] going to be multilingual (interview with works councillor 6).

Despite this support, sometimes temporary migrant workers may fear asserting their rights, especially if they are pressured by the agencies to seek solutions out of court. Often temporary migrant workers do not join a union due to a poor perception of unions in their home country and limited funds for union contributions, as well as the temporary nature of their employment. Works councillors' interventions, ranging from direct negotiations with management to mobilizing support from the Chamber of Labour or unions, help to maintain the integrity of workplace protection, particularly when temporary agencies violate the rules.

...you mentioned "black sheep." There definitely are some in the industry. The best example was at a temp agency where hours or incorrect wages were paid out. When the employees complained, one of them said, "Okay, I'll take

this to court.” ...The person [later] said they had reached an out-of-court settlement with the temporary work agency (interview with works councillor 8).

Yet, the need for these corrective efforts highlights that violations are likely more common in parts of the industry without works councils, leaving significant gaps in protection for workers in smaller firms or less organized settings.

Concluding discussion

In this article, we compared the food industry in the Netherlands and Austria, two countries with similar industrial relations systems but different migrant labour regimes. The analysis showed how labour market regulations and industrial relations mechanisms, including workplace representation, produce different experiences for migrant workers in temporary employment and therefore different sectoral migrant labour regimes. While the share of migrant labour across food subsectors in Austria is rather modest, there is a high concentration of migrant labour in meat processing in the Netherlands.

An important difference between the sectors in the two countries is the use of temporary migrant labour. In Austria, employers use temporary (migrant) work in a limited capacity either to respond to immediate needs or as a transition to direct employment. Criteria like German language proficiency and technical professional skills limit the scope for temporary labour in the Austrian food sector. In the Netherlands such criteria are absent, and there is a wide use of migrant labour and systemic employer reliance on temporary agency intermediaries. The business model of migrant temporary agency work in the Netherlands, like elsewhere in the EU (Meszmann and Fedjuk, 2025), includes the outsourcing of non-labour aspects such as accommodation, management of work processes and payroll tasks.

Despite the similarities between the national industrial relations systems in both countries, our analysis showed that the existence of industrial relations institutions, such as broadly enforced collective bargaining agreements, workplace representatives and public institutions that represent the interests of all workers regardless of their contractual status such as is the case in Austria have maintained a decency threshold in migrants' working conditions in contrast to the Netherlands. It is exactly the encompassing industrial relations and integrative enforcement that restrain employer exit-options to undercut collectively negotiated terms and conditions in the Austrian food industry, as it is the lack thereof that has led the Dutch meat industry to develop a structural reliance on

precarious migrant workers supplied by temporary agencies. The interaction between the liberal regulation of the temporary agency sector in the Netherlands, the price-competitive pressures of powerful meat companies and the dwindling power of trade unions to collectively control the conditions of work and employment of a growing non-unionized precarious migrant workforce has fed the vicious dynamic in the Dutch meat industry. This also explains why critical voices in the Netherlands demand state-mandated regulatory changes to minimize the use of temporary agency work in the meat sector.

Our comparative analysis corroborates theoretical findings on migrant labour regime dynamics that point towards the interaction of regulation, sectoral dynamics, industrial relations and additionally the critical role of collective enforcement in shaping the use and conditions of migrant labour (Marino and Keizer, 2023; Doellgast et al., 2018; Wagner and Refslund, 2016). Our cross-country sectoral analysis highlighted how the Austrian system maintained its capacity to broadly protect migrant workers against widespread abuse, through shared enforcement responsibilities and efforts of works councils, social partners and public authorities. Whereas in the Netherlands, trade unions struggle to shield migrant workers from abuse, as their capacity to enforce the sector extended collective agreement is severely limited. Next to limiting temporary agency work, collective enforcement would thus need to be strengthened to change the employment dynamic in the Dutch meat industry into a more virtuous one.

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