



**Protecting posted workers in the construction sector during COVID-19:
limits and promising practices**

EMECs EU Handbook

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Introduction

This report was produced as part of the ‘European market environment in the construction sector - Enhancing the free movement of posted workers in EU’ project (EMECs), co-funded by the European Commission, and addressing the impact of the COVID-19 pandemic on mobility, working conditions and social protection of posted workers in the construction sector.

By means of a set of research and mutual learning activities, the project aims at delivering proposals and recommendations to better support posted workers in case of future pandemics.

As part of the project, the already available **EU Report**¹ provides a review of EU level and national measures addressing mobility of workers and of the impact of restrictions on the construction sector. This compared and complemented information available in the set of EMECs Country reports addressing: **Germany, Italy, Spain, Poland, Portugal, and Romania**².

The EU Handbook departs from this knowledge to further explore: (i) responses adopted to ensure health and safety in the construction sector; (ii) measures to spread COVID-19-related information among workers having little or no knowledge of the local context and/or language, as it may be the case of posted workers; (iii) aspects concerning accessibility and adequacy of social protection for posted workers ahead of the new risks and needs; (iv) pandemic-related changes affecting vocational training in the construction sector and enhanced possibilities of remote learning.

All topics are explored by combining general information with examples and issues of major interest for posted workers.

Therefore, the review is not intended to provide a comprehensive overview of all measures implemented to counteract the COVID-19 pandemic in the explored domains, but rather to illustrate the most interesting aspects, as well as features of measures potentially useful for the elaboration of recommendations entailed during the final phase of the project. To this aim, each topic is treated first offering an overview of project-related findings, and secondly by means of an in-focus section pinpointing country specific measures of interest for their scope, achievements and/or limits. Links to the cited provisions and materials complement the EU Handbook by helping readers to deepen themselves contents of covered initiatives.

The main sources of information were country-level contributions provided by project partners. These contributions, referred to in the text as ‘country inputs’, were drafted on the basis of a common questionnaire to be filled combining desk research with interviews to stakeholders. Other sources used for the EU Handbook are mentioned throughout the text, including: additional interviews with stakeholders listed in Annex 1; the project’s country reports listed in Annex 3; written inputs submitted by Business Europe.

COVID-19 Health and safety protocols for the construction sector

All covered countries but Romania issued sector-specific health and safety guidance on the top of cross-sectoral recommendations, albeit with different tokens, depending on the country’s approach to COVID-19, as well as on the overall political and industrial relations setting.

In **Germany**, recommendations developed by BG BAU, the organisation for insurance against accidents at work in the construction sector, were recalled in a federal government edict requiring their application in construction sites and health and safety coordinators to act accordingly.

In **Italy**, legislation considered as compulsory the application of provisions established by means of a protocol involving the national government, representatives of large public contractors and of local governments, sectoral unions and employers’ organisations.

In **Poland**, a not binding protocol was made available by an employer’s association, recalling some compulsory measures.

In **Spain**, social partners at national and regional level issued sector specific guides building on general

¹ Iudicone, F. (2022), EMECs EU Report, available at: <https://emecs-project.eu/wp-content/uploads/2022/10/EMECs-EU-Report.pdf>.

² The project’s country reports are listed in Annex 3.

compulsory recommendations issued by the government.

In **Portugal**, following a first guide for construction sites released by the Chamber of Engineers (OE), detailed recommendations on how to protect construction workers were published by the Authority for Working Conditions (ACT), and, for the civil construction sector, by the Directorate-General for Health (DGS), all remaining non-compulsory. According to the interviewees, the collaboration between State bodies (DGS, ACT), professional associations, business associations and unions was very important to develop appropriate guidance.

Finally, in **Romania**, the Ministry of Work and Social Solidarity issued cross-sectoral guidelines, entailing some softer provisions for companies staffed with up to 50 employees. Guidelines themselves were not binding but most part thereof recalled binding requirements established by law.

The analysis implemented in the country inputs and completed on the basis of the full text of national protocols³ suggests a widespread adoption of measures in the following key areas, with the below mentioned main contents and distinctions.

- **Adjust work organisation**

Working in shifts, or simply organising different intervals to entry/breaks/exits was a common requirement. Some protocols further detailed the possible organisation of workers in 'self-sufficient, divided and easy to recognize' groups (Italy), 'fixed groups' (Portugal), or into fixed groups of maximum 4 persons (up to 15 in case the used technologies demonstrably require this) (Germany).

- **Reduce contact with external providers**

Examples of measures to keep distance with external providers are available in the Italian protocol (e.g., external carriers to remain in vehicles, follow dedicated paths, and use dedicated toilets) and in the Portuguese guidelines, accompanying restrictions to entry with a register to identify drivers and external personnel, as well as workers having contact with them.

- **Ensure safety distance**

Safety distance between workers was to be observed (1 meter in Italy; 1,5 meters in Poland and in Romania; 2 meters in Portugal; 2 meters in Spain, later reduced to 1,5 meters). The Polish protocol particularly stressed distance between work stations of 1,5 meters, whereas the Spanish one suggested reducing the number of in-presence workers in the construction sites to reduce risk of contact.

- **Ensure safe transport**

Approaches to ensure safety distance in means of transport differed. In Germany, BG BAU recommended using private vehicles as far as possible. In Italy it was required to use private means of transport or ad hoc vans instead of public transport, and of ensuring the safety distance (1 meter) inside the vehicles. In Poland, it was recommended to take every second seat in vehicles with 7-9 seats (not necessary in smaller ones), while in Portugal, in order to ensure safety distance, it was required to reduce the capacity of vehicles transporting workers to 2/3 of their capacity (plus ensuring availability of hydroalcoholic solutions on board).

Some protocols also suggested to reduce or cancel work travels of personnel, unless strictly necessary.

- **Ensure compliance with cleaning and general hygiene requirements**

On the top of reiterating general hygiene requirements (frequent cleaning of hands, use of masks, especially whenever it is impossible to maintain safety distance, avoiding sharing working tools), protocols set out measures to ensure disinfection of spaces.

³ The links to the above-mentioned documents are available in Annex 2. For the sake of simplicity, the word 'protocol' is used to refer to national level measures detailing how to tackle COVID-19 at work, regardless of the actual term used at national level.

In particular, usual recommendations concerned the ventilation of environments, the daily disinfection of common areas (like canteens, toilets, changing rooms), and, in some cases, frequent cleaning of working tools/machines or contact surfaces. In Portugal, a daily/weekly register of cleaning activities was required and it was recommended to have a dedicated and clean space for the Personal Protective Equipment.

- **Provide personal protective equipment (PPE) to tackle COVID-19**

Provision of disinfectant solutions for hands was a common recommendation, the Portuguese protocols stressing also the provision of gel dispenser, water, soap, garbage bins in all areas shared by workers and in access areas to the facilities, as well as of free masks, gloves and tests. The Spanish protocol required to make water, soap, paper towels and tissue dispensers available. In the light of the risk of unavailability of PPE, instead, the Italian agreement considered the possible unavailability of masks as a reason to interrupt construction works, without incurring in penalties entailed by the Civil Code for failure to fulfil a contractual obligation (in presence of documented request for PPE and delays in the delivery).

- **Disseminate information on COVID-19 risk**

Provision of information was a necessary complementary recommendation, to be filled by using posters or directly tasking of information duties the top and middle site managers or figures with Occupational Safety and Health (OSH) responsibilities. In Romania, instead, information was to be delivered mainly via electronic means. Yet, Romanian recommendations were not sector-specific. In the case of Portugal, companies were required to train workers outdoor on COVID-19 measures.

- **Manage cases of infections**

Isolation of workers with symptoms and immediate contact with health authorities was generally required. Under the applicable legislations, this meant entering the quarantine (initially of 14 days), possibly with remote health surveillance and assistance in case symptoms did not require hospitalisation. The country input from Portugal and the Romanian country report stressed the possibility for workers to be hosted in alternative facilities in the absence of appropriate conditions for isolation at home or in other locations designated by the person. To this aim, in Portugal, places like cultural and exhibition centres or youth hostels were adapted in order to host infected people. In Germany, it was required to make workers aware of the place used for isolation and to make sure water or non-alcoholic beverages were provided there. The Portuguese protocol stressed the importance of wearing a mask on the way to the isolation area via a defined path. In order to identify COVID-19 cases, the Italian, Polish and Romanian protocols required measurement of the body temperature at the entrance of the construction site, whereas the Portuguese one opted for self-monitoring by workers. The Italian protocol stressed that health surveillance activities had to be prosecuted, also considering their role in identifying fragile subjects and suspect cases, as well as in providing information to workers.

- **Develop COVID-19 plans and cooperate with workers' representatives**

In some cases, employers were required to adopt an ad hoc plan to address the COVID-19-related risk, like in Portugal, Spain, or in Germany (the latter requiring a plan in case of infection taking place in accommodation facilities), whereas in Italy the protocol recommended to establish committees at construction site level (or, in the absence thereof, at territorial level), involving workers' representatives and OSH workers' representatives to support the roll-out of measures in construction sites, and to verify the application thereof.

Italy – Updates on the national protocol addressing COVID-19 risk

Whereas a first cross-sectoral protocol was signed by social partners as of 14 March 2020⁴, periodical updates have been implemented in line with the evolution of knowledge on the pandemic and of tools to combat it. The latest update was signed on 30 June 2022⁵, marking a shift in the approach to tackle the pandemic.

The document recalled the importance of frequent disinfection and sanitisation of spaces, as well as of adequate information to workers on behaviours to keep and of notification to health authorities in case of infection, while softening or eliminating conditions concerning measurement of temperatures upon entrance, reduction of contacts with external carriers, and use of means of transport. At the same time, the updated protocol committed employers to make FFP2 masks available to workers, and to impose the use thereof: in closed environments, in case of contacts with the public, whenever it is not possible to guarantee social distance of 1 meter, for fragile workers or high risk tasks whenever indicated by the responsible of OSH preventive services or by the doctor appointed to support evaluation of risks and to implement health surveillance pursuant to the Italian OSH legislation (Legislative Decree no. 81/2008).

Spain – sub-sectoral guidance for works taking place in occupied housing

The Spanish regional communities developed their own guides and protocols. In the case of the Principality of Asturias, for example, the regional government published prevention guides by sector, including the technical document '**Rehabilitations, renovations and works in occupied housing, COVID-19**'⁶, which included a compendium of recommendations to be applied by self-employed professionals as well as by companies and employees, and to be given to inhabitants sufficiently in advance. This was a dynamic document, as adaptations could be included according to the evolution and phase of the pandemic related restrictions. The aim was to spread awareness among professionals and inhabitants on the necessary hygienic and sanitary measures when carrying out works. For example, only one worker at time was allowed access to the dwelling, establishing work shifts and avoiding the co-presence of more than one worker. It was also recommended to inform clients of the schedule for the execution of the works. Whenever the works were carried out in dwellings that shared spaces with others, access to any common area was restricted. Access was permitted only in compliance with specific safety and hygiene measures: workers entering the building had to be 'isolated', using coveralls, foot protectors, masks and gloves. In addition, their materials and tools had to be wrapped in plastic to ensure their isolation. These packs had to be cleaned with a disinfectant solution proven to be effective against coronaviruses before bringing them into the building and before taking them out again. If they had to leave and re-enter during the workday, or when the workday was over, the exit from the house had to be carried out under the same conditions for both workers and materials and tools. The guide also contemplated preventive measures to be taken into account by professionals in their movements such as the use of individual vehicles as a priority, or otherwise occupying different rows, keeping the maximum possible distance between them and with the necessary safety precautions (using FFP2/3 masks without valve, gloves, goggles and personal container of hand disinfectant).

⁴ The protocol is available at:

https://emecs-project.eu/wp-content/uploads/2022/11/Protocollo_marzo2020_IT-1.pdf

⁵ The protocol is available at: https://emecs-project.eu/wp-content/uploads/2022/11/PROTOCOLLO-AGGIORNAMENTO_IT-1.pdf.

⁶ Gobierno del Principado de Asturias (2020), Documento Técnico - Rehabilitaciones, reformas y obras en viviendas particulares habitadas, available at: https://coronavirus.asturias.es/documents/70545/0/doc_tecnico_rehabilitacion_obras_viviendas_particulares.pdf/d309d992-c775-8481-1843-9090b73ae0d5?t=1588955694838.

Germany – Guidance on travel and accommodation arrangements

Among recommendations for the construction sector released by BG BAU, managing the German statutory accident insurance scheme for the construction industry, specific instructions concerned accommodation of workers, a topic of particular relevance for posted workers.

An extract of key measures is provided in the box below.

Box 1 – Key measures to ensure safety in travel and accommodation arrangements – BG BAU⁷

- Before starting the activities, employees shall be divided into fixed working groups of a maximum of four persons. Larger groups of up to 15 persons are permissible only if the technologies used (e.g., construction methods such as formwork and reinforcement work, tunnel boring machines) demonstrably require this.
- A room/living arrangement in the accommodations that is binding for the entire period of the stay is to be provided. Different working groups shall be accommodated in separate accommodations if possible, or at least in separate areas of one accommodation.
- It shall be possible for employees of different work groups in one accommodation to maintain the minimum distance between each other. To ensure this, a reduction in normal occupancy and appropriate arrangements or reduction in furniture shall be made.
- It can be assumed that the hygiene requirements are met if each employee or worker has his or her own sleeping room. Thus, single occupancy of sleeping rooms shall be provided as a matter of principle.
- It is recommended that, if possible, each work group is provided with the necessary sanitary and social facilities for separate use by each work group. If this is not possible, it is necessary that facilities are cleaned and rooms adequately ventilated between uses.
- Suitable disinfectants for hand disinfection are to be provided in sufficient quantity (at least one dispenser per room, bathroom, toilet, kitchen).
- Replacement containers or quarantine accommodations for those suspected of infection or employees who may have contracted COVID-19 shall be provided in sufficient number and it shall be ensured that they have separate sanitary areas. In this room, drinking water or non-alcoholic beverages must be provided. The location of these facilities shall be made known to the employees.
- As a precautionary measure, plans are to be made for the event of infections in the accommodation (e.g., with reference to epidemic plans). In particular, arrangements must be made for the separate accommodation of sick persons (e.g., in the event of the onset of cold symptoms).

Information on COVID-19 risk and provisions

Access to information by employers and workers is vital to ensure adequate observance of recommendations, in the case at hand entailing a certain degree of commitment by each worker at the construction sites. The review implemented in the country inputs suggests the presence of several practices meant at reaching out workers with limited knowledge of the local language, including posted workers, albeit not always considered as adequately widespread.

In **Italy**, sectoral funds made available directly to affiliated employers posters to be printed and displayed in the construction site in compliance with requirements set out in the sectoral protocol. This indication seemed to be respected under most circumstances, according to data from site visits

⁷ The full text of the instructions is available at: <https://www.bgbau.de/service/angebote/medien-center-suche/medium/sars-cov-2-arbeitsschutzstandard-fuer-das-baugewerbe>.

by territorial OSH committees referred to in the Italian country report.

Yet, across covered countries, gaps emerge in the availability or adequate dissemination of detailed information materials in foreign languages, meaning information was often orally handed or even translated ad hoc by the employer. These limits have also been clearly stressed in inputs submitted by the EU-level employers' organisation Business Europe, recalling in turn observations of sectoral and national employers' organisations.

In **Germany**, the interviewee from 'Arbeit und Leben', a union-linked institution dealing with political adult education, emphasized that there was no clear information at the beginning of the pandemic. The regulations from the government were not translated by employers and workers had to find the information from other sources. Instead, interviews with employers posting workers to Germany point to 'conversation with every worker' to explain the situation up to the translation of information materials as approaches to inform workers.

In September 2021, answering a request by the German Green Party, the Federal government actually provided a detailed overview of information measures implemented and stressed that 'information about the COVID-19 vaccination was produced in numerous languages and disseminated especially in social networks. This also applies to the regular format Faktenlage, where misinformation around the topic of COVID-19 and the vaccination is taken up and debunked. In the production, the federal government is advised and supported by migrant multipliers in order to enable communication that is as appropriate as possible for the target group'⁸.

In **Portugal**, interviews suggest that information to posted and foreign workers during COVID-19 was passed on by the OSH technicians or work supervisors in English, and that there was no translation of documents concerning COVID-19 generally speaking, which once again raised the language and accessibility issue for posted workers.

As observed during the interviews conducted with relevant stakeholders in **Romania**, it seems that all information materials related to COVID-19 were produced exclusively in Romanian. In practice, information was also orally transmitted in English, so that English-speaking foreign workers could communicate with their non-English-speaking colleagues of the same nationality in their common mother language. One of the interviewees also mentioned that within the company he represented, there were also Romanian-speaking foreign workers who passed on information to their compatriots. On the other side, one of the interviewees mentioned that German trade unions disseminated information through newsletters written in the mother languages of the foreign/posted workers. Findings from **Poland** and **Spain**, instead, highlight the introduction of dedicated channels to inform mobile workers and their employers, as further detailed in the following section.

Information measures – focus on country-level examples

Germany – BG BAU guides for the construction sector

In order to disseminate its guidelines, BG BAU published occupational health and safety instructions in pictorial and verbal language, and promoted them as well via explanatory videos⁹, and via a brochure in 16 languages describing how construction companies shall handle cases of infection or suspect infection¹⁰.

⁸ See: <https://dserver.bundestag.de/btd/19/325/1932553.pdf>.

⁹ See, for instance: <https://www.bgbau.de/service/angebote/medien-center-suche/medium/1x1-im-arbeitsschutz-corona>.

¹⁰ The brochures can be downloaded at this link: <https://www.bgbau.de/service/angebote/medien-center-suche/medium/what-to-do-in-event-of-suspicion-or-confirmation-of-covid-19-disease-in-your-company-information-for-entrepreneurs-englisch-richtig-handeln-bei-verdacht-oder-bestaetigung-einer-covid-19-erkrankung-in-ihrem-betrieb>.

Figure 1. Extract from the brochure for construction companies in Hungarian language (BG-BAU)



A megfelelő eljárás, ha üzemében COVID-19 gyanú vagy megerősített betegség fordul elő
Információ vállalkozók részére

A **megfelelő eljárás** döntő, ha munkatársánál olyan tünetek lépnek fel, mint a száraz köhögés, láz, eddig ismeretlen légszomj:

Gondoskodjon arról, hogy a munkatárs:

- maradjon távol a munkahelytől (építési terület, iroda, takarított objektum) ill. haladéktalanul hagyja el azt. Más személyekkel érintkezve feltétlenül tartsa be a [távolságot](#) és viseljen a [száját és az orrot is takaró arcmaszkot](#).
- Az üzemorvos bevonásával telefonon vegye fel a kapcsolatot a háziorvossal vagy az illetékes egészségügyi hatósággal (megtalálható: <https://tools.rki.de/PLZTool/>).

Germany – Corona Task Force to exchange information and coordinate action across borders

In a view to address cross-border workers, the at time Minister President of North Rhine-Westphalia, Armin Laschet, created a Task Force under the leadership of the State Secretary for Europe, Mark Speich. Representatives of the state of Lower Saxony and of the German Embassies in the Netherlands and Belgium also participated in the task force. The aim was to improve the mutual sharing of information, to synchronize activities and to clarify issues of common interest for crisis management. Acknowledging the exchange of information and concerted action across borders are essential in times of crisis, the task force was built as an instrument to make quick arrangements and react to new developments, striving for coherent approaches in cross-border regions¹¹.

Italy – Translation of official communications and of general recommendations

Some Italian institutional portals on COVID-19 included an English version.

For instance, selected news concerning measures adopted to tackle COVID-19 were made available in English in the COVID-19 sections of the web-sites of the Minister of Health and of the Italian Civil Protection¹². Leaflets with key information on how to behave and how to tackle the virus in English were published on the Ministry of Health web-site¹³.

Some initiatives of Italian local authorities and NGOs have been spotted translating relevant measures and information on COVID-19 in different languages¹⁴.

¹¹ See: Land Nordrhein-Westfalen (2020), Ministerpräsident Laschet initiiert eine „Cross-Border Task Force Corona“ , Press release, 20 March, available at: <https://www.land.nrw/pressemitteilung/ministerpraesident-laschet-initiiert-eine-cross-border-task-force-corona>.

¹² For instance, on the COVID-19 sections of the web-sites of the Minister of Health and of the Italian Civil Protection, key news concerning measures adopted to tackle COVID-19 have been made available in English (<https://www.salute.gov.it/portale/nuovocoronavirus/homeNuovoCoronavirus.jsp?lingua=english>; [tps://emergenza.protezionecivile.gov.it/en/health/coronavirus](https://emergenza.protezionecivile.gov.it/en/health/coronavirus)), whereas an ad-hoc section in English was available on the institutional portal targeting migrants living in Italy (<https://integrazioneimmigranti.gov.it>).

¹³ See: https://www.salute.gov.it/portale/documentazione/p6_2_5_1.jsp?lingua=italiano&id=444; and: https://www.salute.gov.it/portale/documentazione/p6_2_5_1.jsp?lingua=italiano&id=443.

¹⁴ See: <https://ec.europa.eu/migrant-integration/news/italy-associations-and-authorities-providing-covid-19->

Figure 2. Extract from the leaflet providing guidance in English (Italian Ministry of Health)

NOVEL CORONAVIRUS: GUIDANCE

WHAT TO DO WHEN IN DOUBT

1. What symptoms should I look out for?
Fever and flu-like symptoms such as cough, sore throat, shortness of breath, muscle pain, tiredness are signs of a possible novel coronavirus infection.

2. I have fever and/or flu-like symptoms, what should I do?
Stay at home and call your family doctor (GP), paediatrician or primary care out-of-hours service (guardia medica).

3. How soon should I call the doctor?
Right away. If you think you might be infected, call as soon as you feel the symptoms of respiratory infection, describing your symptoms and contacts at risk.

Italy – Promotion of COVID-19 related measures among construction workers

The Italian national paritarian institutions of the construction sector created a poster with icons and short descriptions showing behaviours to keep in construction sites and distributed them to companies via the sectoral funds for them to display them on construction sites.

Other posters were created in different languages and spread to companies and workers via sectoral vocational training schools and paritarian health and safety committees. Some local funds even created simple explanatory videos, like the one from the funds of Friuli Venezia Giulia, reaching almost 20,000 views¹⁵.

In order to support the adoption of the protocol to tackle COVID-19 in the construction industry, the National paritarian Committee for OSH in the construction sector (CNCPT) provided practical guidance and instructions to companies by means of an ad-hoc Communication (Communication no. 37020/2020 of 16 April 2020).

Finally, as remarked by an interviewed Italian unionist, sectoral unions supported the vaccination campaign, promoting it among workers, and calling for the promotion of vaccinations at the workplace.

[information-different-languages_en](#).

¹⁵ The video is available at: <https://www.youtube.com/watch?v=TtzwPZGnnq0>.

Figure 3. Extract from a poster in Albanian on behaviours to keep in construction sites (Italian paritarian institutions of the construction sector)

Kujdesjet e duhura në kantier e kudo

Si të sillemi me kolegët dhe njerëzit e tjerë



Le të ndërtojmë një mbrojtje efektive së bashku në kantier!

cncpt
Network della sicurezza in edilizia

ANCC
COMMISSIONE NAZIONALE
PROMOTTRICE PER LE CAUSE SICILE

FORMEDIL
ENTE NAZIONALE PER LA
FORMAZIONE E L'AGGIORNAMENTO
PROFESSIONALE NELL'EDILIZIA



Poland – Translation of key information and hotlines for foreign workers

Information on the conditions for travelling and other COVID-19 measures was available in different languages on the government's website¹⁶, i.e., in Polish, English, Russian and Ukrainian.

More specific information concerning conditions of stay and work in Poland of posted and migrant workers during the pandemic was available in Polish, English, and Russian on the COVID-19 section of the Office for Foreigners¹⁷, with infographics making it easier to understand provisions applicable under different statutes; and in Polish, English, and partly in Ukrainian on the website of the State Labour Inspectorate¹⁸.

The National Labour Inspectorate launched telephone lines providing free legal counselling in Polish, English and Russian, which could be used by migrant and posted workers.

Information and legal assistance were addressed primarily to employees from Ukraine and to employees with knowledge of English. Migrant and posted workers using other languages had problems with accessing information and legal assistance.

Information in languages other than those indicated above was provided by the website and the hotline operating under the AKTYWATORWLKP project implemented in the Wielkopolska region¹⁹.

Romania – Use of informative tools to ease access to COVID-19 related provisions

In Romania, COVID-19 related measures were backed by several informative tools launched by the Romanian authorities, such as the 'fiipregatit.ro' platform of the Emergency Situations Department ('be prepared') which contains practical guides for the population regarding various emergency situations (including dealing with COVID 19), and 'stirioficiale.ro', a platform launched in partnership with the Romanian Government, providing official information on COVID-19, such as related laws and regulations, updates and data concerning the evolution of the pandemic, answers to frequent

¹⁶ See: <https://www.gov.pl/web/koronawirus>.

¹⁷ See: <http://archiwalna.udsc.gov.pl/cudzniemcy/epidemia-koronawirusa/>.

¹⁸ See: <https://www.pip.gov.pl/pl/informacje-dla-obcokrajowcow/covid-19-informacje-dla-cudzoziemcow>.

¹⁹ See: <https://www.migrant.info.pl/>.

questions etc²⁰. Yet, information was available in Romanian language only.

Figure 4. Extract from a poster in Romanian language with instructions on how to shop safely (Spanish Ministry of Health)



Spain – Posters, hotlines and guides to promote take-up of measures to tackle COVID-19

On the Ministry of Health website, in the Information to citizens section²¹, posters were available in several languages (English, French, Arabic, Romanian, Chinese, Russian, Bulgarian, German and Urdu). Posters aimed at helping foreign citizens to prevent COVID-19 contagion by separately addressing, with the help of icons and pictures, different topics, like: what to do in case of having symptoms, what to do in case of being diagnosed with COVID-19, recommendations for a correct quarantine, etc.

On 8 June 2020, the Ministry of Foreign Affairs, European Union and Cooperation launched a telephone service called '**CONECTA International Mobility**'²² to facilitate the international mobility of entrepreneurs, workers, technicians or other professionals who needed to travel abroad despite the restrictions derived from COVID-19. Through a telephone platform and with a simple phone call or email, users could make specific enquiries about the entry conditions and requirements of the different countries, the health measures established and what channels could be adopted to make them more flexible in the event of the need to take these trips. Thanks to this innovative tool, which was essentially

²⁰ The publication of contents has been discontinued as of 22 June 2022, following the lifting of the state of alert. The archive of the platform is available at: covid19.stirioficiale.ro.

²¹ See: <https://www.sanidad.gob.es/profesionales/saludPublica/ccayes/alertasActual/nCov/ciudadania.htm>.

²² See: La Moncloa (2020), Exteriores lanza CONECTA Movilidad Internacional, un servicio de información para facilitar los desplazamientos internacionales de empresarios y trabajadores, Press release, 05 June, available at: <https://www.lamoncloa.gob.es/serviciosdeprensa/notasprensa/exteriores/Paginas/2020/050620-conecta.aspx>.

informative and temporarily limited in reason of the duration of international restrictions on travels, queries regarding the requirements and procedures necessary to enter Spain for business or professional reasons were also dealt with. The Ministry channelled in a uniform manner all the queries that reached the different departments through different channels and provided homogeneous and precise responses from public administrations. To this end, the telephone was manned by four people a day, divided into two shifts, from Monday to Friday and between 9.00 am and 2.00 pm. The initial plan was to deal with around 100 calls per day, which would give a total of 500 calls per week. During the first week, nearly 800 telephone calls had been answered and more than a hundred e-mails had been responded²³.

Social protection challenges and posted workers during the COVID-19 pandemic

The approach to contain the economic impact of COVID-19 on workers differed across countries. Among the wide array of measures amended or introduced to cushion the social effects of the pandemic on companies and workers, it is worthy to recall for the specificity of posted workers: benefits addressing sickness or quarantine due to COVID-19, and extension of short time work schemes (subsidising indemnities to workers for reduced working time or in case of stoppage of the activities), often accompanied by social security contribution reliefs.

For what concerns **sickness benefits**, the different approaches adopted towards sickness or quarantine due to COVID-19 could trigger some inequalities.

Portugal introduced a sickness allowance due to prophylactic isolation imposed by the Health Delegate. This allowance has a maximum duration of 14 days and is paid from the first day of isolation, corresponding to 100% of remuneration. If a situation of illness occurs after the end of the 14 days of prophylactic isolation, the worker is entitled to sickness benefit under the general terms of the social security system.

In **Spain**, since 10 March 2020, it was established, for a limited period of time and exclusively for the purposes of accessing the social security benefit for temporary disability, the assimilation of the periods of isolation or contagion of people caused by the COVID-19 virus to a situation of **accident at work**²⁴, which meant receiving a 75% share of the labour income subject to social security contributions from the first day of infection or isolation at the expense of the state. Should have sickness benefits applied, instead, the worker would have not been paid during the first three days, receiving 60% of the salary from the 4th to the 16th day of sickness by the company itself (with benefits paid out by the State only from the 17th day onwards).

In **Germany**, if employers are not contractually obliged to continue paying remuneration, under the Infection Protection Act (§ 56 IfSG) a compensation takes effect to protect employees in case of quarantine without symptoms because of a COVID-19 case. According to this, the employer continues to pay remuneration for the first six weeks of quarantine. The employer can apply for reimbursement for the payments from the authority responsible in the respective federal state (§ 56 para. 5 IfSG²⁵). Therefore, if the employer is obliged to continue to pay remuneration on the basis of an individual contract, collective agreement or statutory law because of sickness (§ 3 Continued payment Act, EFZG -), the employee does not receive compensation from the authority. Consequently, the employer has no claim for reimbursement against the authority.

Compensation under the Infection Protection Act for loss of earnings due to quarantine is not paid to

²³ See: La Moncloa (2020), Exteriores atiende 800 consultas sobre viajes laborales al extranjero durante la primera semana de 'Conecta Movilidad Internacional', Press release, 14 June, available at: <https://www.lamoncloa.gob.es/serviciosdeprensa/notasprensa/exteriores/Paginas/2020/140620viajes-extranjero.aspx>.

²⁴ Royal Decree-Law 6/2020, available at: <https://www.boe.es/buscar/act.php?id=BOE-A-2020-3434>.

²⁵ von Steinau-Steinrück, R., Mosch, U. (2009), Arbeitsrechtliche Maßnahmen bei ausgebrochener Pandemie, NJW-Spezial 2009, p. 578.

anyone who could easily have avoided the quarantine, i.e., who is to be blamed for fault against himself (travel to a high-risk area or unvaccinated persons) starting from 1 November 2021. In quarantine cases beginning on or after that date, workers must prove that they were vaccinated or recovered, or could not be vaccinated for medical reasons, in order to continue receiving compensation. In connection with a compensation of lost earnings, employers are allowed to obtain information about vaccination or convalescent status from affected individuals for this purpose. This was set in September of 2021, so people still had enough time to get vaccinated in time.

COVID-19 has also been recognised as accident at work, and its health consequences as occupational disease, under conditions to be ascertained on a case-to-case basis and grounded on the performance of activities at risk of infection. As a consequence, workers can access benefits provided by BG BAU²⁶. Interviewees from companies posting workers to Germany contacted for the project reported having paid them during quarantine, whereas the interviewed adviser of NGOs targeting migrants deemed absences to have been managed via unpaid vacations, also to avoid bureaucratic obstacles to access the benefits.

However, Art. 2a Sentence 1 of the Posted Workers Act (AEntG) expressly states that the remuneration must be 'for the performed work', leaving claims on remuneration of posted workers for periods of sickness outside its scope.

In **Italy**, beside being considered as sickness, infection from SARS-CoV-2 can be classified as accident at work, yet the presumption is not easy to prove outside occupations classified at 'high risk', like among health professionals or occupations requiring front office contact.

Outside this protection, soon after the introduction of the first lock-down in March 2020, also quarantine related to the disease was considered as sickness. This provision lasted until 31 December 2021. As a consequence, whenever entailed by collective agreement, workers had right to receive compensation by employers for the first three days, and were entitled to payment by the National Institute of Social Security (INPS) for the following days (50% between the 4th and the 20th day, and 66.66% afterwards). As far as the construction sector is concerned, white-collar workers are granted top-up payment by employers for the full amount of their pay (also for the first three days), whereas the coverage for blue-collar workers is more limited and depend on the length of sickness (in any case a compensation is granted between the 4th and the 20th day, i.e., a 37.95% of the minimum pay elements set by collective agreement at national and local level). As to workers posted to Italy, whether indemnities due by employers in case of sickness were due is uncertain. Guidance on the notion of 'remuneration' to be granted to workers posted to Italy by the National Labour Inspectorate (INL) does not mention sick pay among elements to be granted, but, on the top of a list of wage elements, the residual concept of 'any elements of remuneration entailed by the applicable sectoral national and territorial collective agreement having fixed and continuative nature' (Communications of INL no. 1 of 9 January 2017, and no. 2 of 18 October 2021).

In **Romania**, a compensation for sickness was granted both in case of COVID-19 and of quarantine in the measure of 75% of the salary (raised to 100% starting from September 2020) paid out by the State. The cost has not been shared with the employers as per other situations of sickness.

Poland also considered quarantine, and not only disease from SARS-CoV-2, as sickness, entitling workers to an 80% share of pay from the Social Insurance Institution (ZUS), in line with existing legislation on sickness benefits.

Apparently similar in the amounts, the benefits inherit differences in the actual wages, meaning posted workers might have to stay quarantined abroad while relying on a benefit adjusted according to the possibly lower salary received in the home country.

In addition, as pointed out by the interviewee from the European Trade Union Confederation (ETUC),

²⁶ See: IG BAU (2021), Coronavirus-Infektion kann als Berufskrankheit oder Arbeitsunfall anerkannt werden - Prüfung im Einzelfall, 5 May, available at: <https://igbau.de/Coronavirus-Infektion-kann-als-Berufskrankheit-oder-Arbeitsunfall-anerkannt-werden-Pruefung-im-Einzelfall.html>.

the mix between elements of remuneration and of social security does not favour clarity in a context where workers are often poorly protected. Standing from the review of country rules provided above, in certain cases the employer shall remunerate workers during the first days or even weeks of sickness, before social security benefits phase in, and/or shall integrate the amount. Despite amendments introduced to posting rules following the adoption of Directive 2018/957/EU, buttressing the application of ‘remuneration’ entailed in the host country, rather than the more restrictive ‘minimum rates of pay’, uncertainties and gaps remain.

Furthermore, ETUC complained uncertainties in the treatment of travel related quarantine, reporting that some employers either asked workers to perform work together with the group they travelled with (performing a ‘group quarantine’), or pretended not to pay for the days spent under quarantine, taking advantage of uncertainties over the new legal context.

The interviewee from the Labour Mobility Initiative network reported as well the episode of 15 workers posted from Poland to Germany and being quarantined following COVID-19 infection in quarantine centres. Albeit they were paid, uncertainties arose with regards to the application of German or Polish legislation. More in general, as far as posting from Poland is concerned, the interviewee pointed out that clear breaches of labour legislation still occur, for instance with failure to remunerate at all such idle times. Irregularities are found especially in case of chain posting, with workers hired via a temporary work agency and then channelled through multiple subcontracting chains.

In **Spain**, the consideration of quarantine mandated for public health in case of travel abroad was addressed by public authorities, yet limitedly to the tax domain. The Directorate General for Taxation considered days spent under quarantine in the host country as qualifying for the amount of income subject to exemption from the personal income tax (IRPF), which increases in reason of days worked abroad²⁷.

Nevertheless, problems did not concern only adequacy of benefits. In **Italy**, the benefit applicable in case of COVID-19 related quarantine was not recognized to workers posted abroad. By means of Communication no. 3653 of 9 October 2020, INPS interpreted the references to the need for decisions of local health authorities made in legislation as a necessary entitlement condition, as to preclude access to workers being quarantined abroad by foreign authorities.

Instead, access seemed to have been pretty easy according to **Portuguese** stakeholders interviewed for workers posted from the country. The application could be filed online through the Social Security Direct platform²⁸. In more detail, workers were to send to their employer in Portugal the declaration of isolation or equivalent official document issued by the Health Authority of the Member State where they work. The employer was to submit information to the Social Security Institute via the platform by filling the model GIT71-DGSS²⁹, together with the declaration of isolation GIT70-DGSS⁵, and with the COVID19-Declaration of prophylactic isolation for workers. However, the interviewee from the Association of construction and public works industrialists noted that there was no specific support for those who had to stay in quarantine after returning from a country considered at risk.

Short time work schemes guaranteed income stability to workers despite the pandemic. Depending on the actual country-level trends, restrictions and conditions for entitlement (associated with drops in working time, invoicing or turnover), the actual impact on the construction sector varies. For instance, the Spanish country report stressed construction being among the main beneficiaries, and the same can be said for Italy³⁰, whereas the country-level inputs from Poland suggest a little use by

²⁷ Consultation of the Directorate General of Taxes V0767-21 of 03/31/2021, available at: https://petete.tributos.hacienda.gob.es/consultas/?num_consulta=V0767-21. See, also: ÁTICO JURÍDICO - SALCEDO ABOGADOS (2021), Los días de cuarentena por el COVID 19, ¿computan a la hora de aplicar la exención del 7 p) LIRPF?, 17 September, available at: <https://aticojuridico.com/cuarentena-covid19-exencion-7p/>.

²⁸ <https://www.seg-social.pt/>.

²⁹ See: <https://www.seg-social.pt/formularios?bundleId=16820293>.

³⁰ Data from Italy actually show a peak in the months of March and April 2020, when most sector related activities

construction companies, for failing to meet requisites of turnover drop.

For what concerns **entitlement conditions**, it shall be noted in case of access to the **Spanish** scheme (ERTE), a company hosting posted workers had the obligation to send a written communication to the Unit of Large Companies and Strategic Collectives (UGE-CE) on the new situation of those foreigners documented as 'highly qualified professionals' according to law. In **Italy**, conditions to access the short time work schemes, extended and simplified for stoppage or reduction of activities due to COVID-19, include a link between the worker and a 'productive unit established in Italy'. As acknowledged during the interview with INPS, this is considered as met for workers posted from Italy only upon their return from abroad, a requirement which was not changed when travel restrictions were in place³¹.

In terms of **amount of benefits**, the situation also varies. For instance, whereas in **Poland** maximum amounts are computed as a percentual share of the minimum wage, reaching 90% in case of severe reduction of turnover due to COVID-19, in **Portugal** the maximum amount is capped at three times the minimum wage (i.e., at a 300% level). On the top of these limits, the amount is usually linked with the actual wage of workers.

If differences in the duration of benefits are less of concern, since, in case of longer breaks, posted workers had chance to return the home country, gaps in the amount may have meant significant loss of income for posted workers in case of short breaks or of breaks with a 'hiccup' pattern. In fact, on the one side they faced limits to get back at work in the home country, basically because of quarantine requirements, and, on the other hand, they were still not affiliated to social security institutions administering the benefits in the host country, risking to remain in a limbo.

As pointed out by the ETUC interviewee, this exclusion could be particularly painful at a time access to unemployment benefits in case of dismissal was also complicated for posted workers. In fact, despite uncertainty over the reprise of works in the host country, they could have to return home in order to comply with activation measures possibly imposed over percipients of unemployment benefits. The situation was particularly risky for third country workers posted from EU, since their permit of stay could be linked with their employment contract. A company interviewed for the German country report was of a similar advice, stressing that third country workers posted to the country tried to get hired by a German company and access German benefits. Similarly, the Polish country report stresses that many Ukrainian posted workers remained in the country after the beginning of the pandemic applying for immigrant visas³².

Examples of additional benefits and schemes introduced by social partners and sectoral funds and possibly apt to overcome these limits are presented below.

were stopped (65.6% of construction companies and 58.6% of their employees on short time work schemes due to COVID-19), and a marginal use later on. See: INPS and Banca d'Italia (2020), Le imprese e i lavoratori in cassa integrazione Covid nei mesi di marzo e aprile, available at: https://www.bancaditalia.it/pubblicazioni/note-covid-19/2020/Prime-evidenze-CIG_29072020.pdf. See also, the monthly reports on the use of short time work schemes due to the health emergency, available at: <https://www.inps.it/osservatoristatistici/5>.

³¹ See also guidance provided by the Tuscany Region in the answer to the Faq no. 8 at: https://www.regione.toscana.it/documents/10180/23344174/FAQ%20%20CASSA%20INTEGRAZIONE%20IN%20DEROGA_29_06_2020.pdf/eb0df755-42f0-00c9-549e-44936077d7f2.

³² This trend was discontinued following the war escalation in February 2022, when many Ukrainian workers returned to their country in order to join the army.

Focus on initiatives by social partners, and sectoral funds to support construction workers during the pandemic

Germany

In the construction industry, social partners collectively agreed on a 2020/2021 'Corona benefit' to be paid by employers in recognition of the personal contribution made by individual employees during the COVID-19 pandemic within the operational scope of the Federal Framework Agreement for the Construction Industry (BRTV-Baugewerbe). This bonus should have been provided as an addition to the wage, salary and training allowance owed in any case for:

- industrial workers, salaried employees and foremen at the latest with the wage/salary of January 2022;
 - in the tariff areas West and Berlin in the amount of € 500. and
 - in the tariff area East in the amount of € 220,
- apprentices in the 2nd to 4th year of training in the West and Berlin collective bargaining areas in the amount of € 110.

For granting of the Corona benefit, the following aspects were to be observed:

- The prerequisite for entitlement was an existing employment relationship from which the employee had a wage claim. If the employment relationship existed only temporarily, the bonus should have been reduced by one quarter for each full calendar month in which there was no entitlement to remuneration in the period from July to October 2021; this also applied to apprentices.
- In the case of part-time work, the benefit was to be reduced proportionately to the share of the agreed weekly working time to the collectively agreed working time; in the case of partial retirement, the benefit was to be reduced by 50%. This also applied if employment was taken up during the year.
- The Corona benefit was exempted from wage tax and social security contributions insofar as the tax allowance of € 1,500 was not exceeded due to any Corona benefits already received from the employer after 1 March 2020. The amount exceeding € 1,500 was subject to contributions.
- The Corona benefit was not liable for contributions to the SOKA-BAU sectoral fund in accordance with § 15 para. 4, 2 of the collective agreement on the social fund procedure in the construction industry (VTV).
- The Corona benefit had to be evidenced in the wage account in accordance with § 4 para. 2 No. 4 in the Wage Tax Implementation Ordinance (LStDV).

Yet, the benefit did not fall within collectively agreed conditions applicable to posted workers.

Italy

By means of the agreement of 23 March 2020, social partners of the construction sector mandated the Italian sectoral funds (Casse Edili) to introduce facilitations for companies and workers.

As to the latter, the holiday pay and the seniority pay were anticipated by few months. In line with later instructions issued by the organisation coordinating Casse Edili at national level, CNCE, funds had to pay an 80% share of the amount for holiday pay accrued during the first three months of the contractual year (October – December 2019) as a first tranche by the end of April 2020, and started issuing payments for the seniority pay in April 2020³³.

Posted workers regularly registered at the sectoral funds were entitled to receive the benefit, albeit in practice they might not meet requisites for seniority pay (i.e., at least 2,100 worked hours over a two-year time span).

³³ The first tranche of the holiday pay is usually paid in May, whereas the seniority pay takes place normally in July.

Romania

The sectoral fund Casa Socială a Constructorilor granted allowances to employees of member companies whose construction sites were suspended as a result of the measures imposed for the COVID-19 pandemic.

In order to benefit from this measure, workers had to prove to work on the basis of an individual employment contract and to be employed by a member company that has contributed to the establishment of the social protection fund managed by the fund. The social protection offered by the sectoral fund included:

- social protection benefits during the interruption of the activity: 75% of the average for the last 3 months of the gross basic salary during the emergency / alert period established at national level. Along with the payment of the allowances, the sectoral fund also covered income and social security contributions due by the employee / employer on the amount of the granted allowances;
- keeping the job during the interruption of the activity;
- entitlements deriving from the status of construction employee: seniority at work, social insurance rights, tax rebates, etc.

Access to benefits was available for workers posted from Romania and to the country, provided his/her company registered at the fund and contributions had been paid for at least one month. In line with applicable legislation, the fund transfers allowances back to the employer, who confirms receipt by the employees via a sworn statement.

Access to vaccines, testing and social aids

In terms of access to COVID-19 **vaccination campaigns**, information was first retrieved from thematic reports of the European Social Policy Network (ESPN)³⁴ and from the analysis implemented by the Fundamental Rights Agency (FRA)³⁵, then reviewed in the light of the assessment made by the Platform for International Cooperation on Undocumented Migrants (PICUM) network³⁶. Overall, whereas vaccination campaigns were formally universal in their coverage, their actual implementation featured limits in some countries because of the procedures of registration. Albeit the sources focus especially on undocumented migrants or on asylum-seekers and refugees, information therein contained, as summarised below, suggests posted workers may have been de facto excluded in some cases.

In **Germany**, it was required either to provide for a registered address or to demonstrate to live in Germany 'under normal circumstances'. The appointment was taken by internet or phone and an identity card or a passport was required to get the COVID-19 vaccine. Yet, some federal authorities required as well proof of health insurance or proof of residence in the home country.

Starting from April 2021, the possibility to get a vaccine at a doctor's office was introduced, paying a € 20 fee when proof of health coverage cannot be provided.

In **Italy**, most regions required the Italian ID number assigned for health assistance and fiscal purposes (Codice Fiscale), which is assigned upon residence in the country.

In contrast, in some cities there have been 'open days' to open up vaccinations without particular requirements, usually with the Johnson & Johnson vaccine and with the key support of volunteers/NGOs.

A similar situation occurred in **Spain**, where most regions restricted access to people registered in their

³⁴

See:

https://ec.europa.eu/social/main.jsp?advSearchKey=%20ESPN_covid2021&mode=advancedSubmit&catId=22&policyArea=0&policyAreaSub=0&country=0&year=0.

³⁵ See: <https://fra.europa.eu/en/publication/2021/covid19-rights-impact-june-1#country-related>.

³⁶ See: <https://picum.org/covid-19-undocumented-migrants-europe/>.

health databases. In many cases, cooperation was sought with NGOs to identify people not covered in the database and contact them in order to administer the Johnson & Johnson vaccine.

In **Poland**, unclarity was reported, as official guidance seemed to limit access to people regularly residing in the country, albeit this is not clearly stated in the Vaccination Programme.

In **Portugal**, in order to guarantee universal access to vaccines, people could book their vaccination via a web-site in English and Portuguese languages, stating their personal details, phone number and address, and get a vaccine provided they could prove their identity via any kind of document.

For what concerns **Romania**, the PICUM network did not provide an assessment. Yet, both the ESPN report and FRA inputs³⁷ suggest that vaccination access was granted to all people 'staying' in the country, regardless of the status³⁸.

Country inputs from Germany, Italy and Portugal report extensive information also regarding features and limits of measures to enhance **access to COVID-19 tests**.

In **Germany**, financial aids to ensure free access to testing once a week were introduced in March 2021, also via testing points. Further measures were introduced to contain the prices of tests for everybody.

In the work place, the 'SARS-CoV-2 Occupational Health and Safety Ordinance' imposed upon the employer the responsibility and financing of measures to prevent and tackle the disease. The regulation changed during the pandemic depending on the situation. Yet, according to 'Arbeit und Leben', it was not clear who had to bear testing requirements upon entry; some workers could not afford to pay the tests at the border and had to refuse work proposals.

In order to reduce the cost of COVID-19 tests in 2021 in **Italy**, a capping was imposed on the related prices, a measure benefitting all people buying tests in the country regardless of their status.

Instead, free testing was available upon prescription by the general practitioner, therefore being harder to access for posted workers. Some initiatives were mapped to offer free testing for persons not assigned a general practitioner in Italy, mostly in large cities like Milan³⁹ and Rome⁴⁰.

In regions betting on testing strategies, some further initiatives have been implemented with different scope. For instance:

- during the 2021 summer, the Veneto Region implemented a programme to guarantee free testing without any prescription as a policy to track the disease and study its mutations. It also increased the presence of points for testing at ports and airports in order to test persons entering Veneto, especially if not vaccinated⁴¹;
- the Friuli Venezia Giulia Region earmarked resources to extend the possibility of free testing. Yet, compliance with two conditions was required to access this option: (i) residing in the region; (ii) holding a medical certificate demonstrating they cannot get vaccinated; thus, limiting the option to a tiny fraction of the population and excluding posted workers⁴².

³⁷ Human European Consultancy (2021), Coronavirus pandemic in the EU – Fundamental Rights Implications. National vaccine deployment. Romania, FRA, available at: https://fra.europa.eu/sites/default/files/fra_uploads/ro_report_on_national_vaccine_deployment.pdf.

³⁸ Pop, L., Pescaru, D., Fărcășanu, D. (2021), Social protection and inclusion policy responses to the COVID-19 crisis, ESPN, Luxembourg: Publications Office of the European Union.

³⁹ See: <https://www.jumamap.it/it/milano-tamponi/>.

⁴⁰ See: <https://www.jumamap.it/it/tamponi-gratuiti/>.

⁴¹ See the Order of the Veneto Region no. 112 of 19 July 2021, available at: <https://drive.google.com/file/d/1fIX2JFfyLTQRe2Y4kNjSFxT0nOkLFT-1/view>.

⁴² See: ANSA (2021), Covid: Regione Fvg, tamponi rapidi gratis per non vaccinabili, 12 August 2021, available at: <https://www.ansa.it/friuliveneziagiulia/notizie/2021/08/12/covid-regione-fvgtamponi-rapidi-gratis-per-non->

The country input from **Poland** highlights the availability of free tests for a short period, albeit with low take-up by the population.

Since the beginning of the COVID-19 pandemic, **Portugal** implemented a free testing plan. Initially, if people showed symptoms, they were sent by the family doctor to COVID-19-dedicated health centres' and to hospitals to get tested. Later the procedure was implemented via the National Health Service (SNS 24). It should also be noted that the national testing strategy, including free access to COVID-19 testing, targeted anyone on the Portuguese territory, without discrimination based on nationality or citizenship status, and this included posted workers with the A1 form⁴³. Rapid Antigen Tests (TRAg) were initially paid for by citizens who wanted to diagnose COVID-19. On 1 July 2021, the application TRAg became fully reimbursable in pharmacies and laboratories duly authorized by the Health Regulatory Entity (ERS)⁴⁴. In practice, users did not pay up to four tests per month, subject to registration at the National Health Service. It is unknown if posted workers were granted access even only with the European Health Insurance Card. This reimbursement scheme ended as of 1 May 2022⁴⁵.

Generally speaking, restrictions in the availability of free testing, including the phasing out in Germany and Portugal at a time the pandemic was still strong, shall be read also in the light of the objectives to contain public spending and to accelerate the vaccination campaign.

During specific periods (such as during Christmas time in 2021), local authorities also implemented large testing schemes open to everyone for free.

For what concerns **other emergency support measures** mentioned as relevant for posted workers in the country inputs, the examples below from Italy and Portugal shows some lights and shadows on the ability and willingness of institutions to reach out those most in need of food aids among all people staying in the country, regardless of their status, whereas the country inputs from Italy and Spain highlight the introduction of measures protecting tenants from evictions.

Among others, the suspension of evictions was introduced without any requisite in Italy and limitedly to persons in vulnerable conditions in Spain. However, information is not sufficient to understand if this requisite and its actual implementation was sufficient to protect posted workers in precarious conditions.

Focus on means and limits of measures to reach out vulnerable population with food aids

Italy

On the ground of results from a survey published by the Italian Ministry of Labour and Social Policies and by the Association of Italian Municipalities (ANCI)⁴⁶, it emerges that many Italian municipalities networked with the Civil Protection, the Caritas, and the Red Cross, as well as with stores, companies and local NGOs to provide emergency aids, aspects which helped them to reach out people in need still unknown to the public authorities. Among the covered initiatives, we can mention the delivery of food aids, also following donations by citizens, and distribution of masks.

The Italian Association of Legal studies on Immigration reported some cases of municipalities

[vaccinabili f3a283d8-75e6-4cbb-a381-5b7709c2df0f.html](https://www.vaccinabili.it/2021/11/18/vaccinabili-f3a283d8-75e6-4cbb-a381-5b7709c2df0f.html).

⁴³ Under social security coordination rules, the A1 form certifies that the worker is lawfully insured in the sending country in case of posting.

⁴⁴ See: Vasconcelos, B. (2021), Testes rápidos de antígeno serão compartilhados até ao final do ano, Notícias ao Minuto, 18 November, available at: <https://www.noticiasao minuto.com/economia/1875439/testes-rapidos-de-antigenio-serao-compacticados-ate-ao-final-do-ano>.

⁴⁵ SIC Notícias (2022), Covid-19: testes rápidos deixam de ser gratuitos nas farmácias a partir de domingo, 29 April, available at: <https://sicnoticias.pt/especiais/coronavirus/2022-04-29-covid-19-testes-rapidos-deixam-de-ser-gratuitos-nas-farmacias-a-partir-de-domingo>.

⁴⁶ Zaccari, E., Pugliese, A., Tomasin, P. (2020), I Servizi Sociali al tempo del Coronavirus. Pratiche in corso nei Comuni Italiani, Ministero del Lavoro e delle Politiche sociali and ANCI, available at: <https://www.fondiwelfare.it/wp-content/uploads/2020/07/I-Servizi-Sociali-al-tempo-del-Coronavirus.pdf>

restricting access to vouchers for the purchase of basic goods on the basis of a residence status or, for foreigners, of a permit of long stay. In the case of the municipality of Ferrara, the eligible requests were even to be ranked according to the 'territorial rooting on the basis of citizenship'⁴⁷.

The act of the municipality of Ferrara, as well as acts from the municipalities of Bonate Sopra (Bergamo), Palma Campania (Naples) and Nola (Naples) restricted access to aids on the basis of a residence status.

Instead, case law reinstated that similar aids fall within the set of fundamental rights that cannot be restricted on the basis of rules determining the stay of people in a country for them addressing basic human needs, and imposed access to the benefit on the basis of domicile rather than residence status and of the presence of a situation of economic difficulty.

The same approach was pursued in the infringement concerning the food aids made available by the Municipality of Rome, which initially covered 'residents and persons who cannot reach their place of residence'⁴⁸.

Portugal

In Portugal, many emergency aids targeting people unknown to public authorities were implemented with the involvement of charities, NGOs, and the work of volunteers.

The Food Bank promoted the creation of the Food Emergency Network⁴⁹, in partnership with the 'ENTRAJUDA' association. The network guarantees food distribution with the help of volunteers from social solidarity institutions, the Parish Councils and other entities.

Ahead of the pandemic, the Portuguese Caritas immediately created a Food Fund⁵⁰, organised through the diocesan Caritas institutions, and also provided supermarket shopping vouchers and monetary aid to pay rents, electricity, medicines and medical exams.

Among other experiences, the Red Cross food also provided emergency food aid⁵¹ through the support of the Food Bank Against Hunger, a supermarket chain, the European Fund to Help the Most Deprived Persons and other entities.

Vocational training and COVID-19

As health, safety and hygiene at work figure among the matters for which posted workers shall be granted application of host country legislation, the project devoted a focus on changes affecting vocational training on aspects linked with COVID-19, at the same time investigating wider developments in the field of remote learning capable of influencing the way workers are trained at distance in the future, including before working abroad.

Indeed, ahead of the new biological risk, in the covered countries the first reaction has been to suspend or reduce in presence trainings, to be possibly replaced by remote learning. In-presence training later resumed in the framework of OSH protocols.

⁴⁷ See: ASGI (2020), Il Comune di Ferrara ottempera all'ordine del Tribunale in materia di Buoni spesa, 25 September, available at: <https://www.asgi.it/notizie/il-comune-di-ferrara-ottempera-allordine-del-tribunale-in-materia-di-buoni-spesa/>.

⁴⁸ See: Pipponzi, M. (2020), Non Discriminazione. Rassegna giurisprudenza italiana. Diritto, Immigrazione, Cittadinanza, no. 2/2020; Biondi Dal Monte (2020), Cittadini, stranieri e solidarietà alimentare al tempo del coronavirus, ASGI, 21 May, available at: <https://www.asgi.it/notizie/cittadini-stranieri-e-solidarieta-alimentare-al-tempo-del-coronavirus/>. Acts and sentences can also be found at: <https://www.asgi.it/notizie/tribunale-di-brescia-discriminatorio-limitare-i-buoni-spesa-ai-soli-stranieri-lungo-soggiornanti/>; <https://www.asgi.it/banca-dati/tribunale-di-roma-decreto-inaudita-altera-parte-22-aprile-2020/>.

⁴⁹ See: <https://rededeemergencia.pt/>

⁵⁰ See: Agência Ecclesia (2020), Covid-19: Cáritas Portuguesa lança fundo de emergência centrado na ajuda alimentar, 22 April, available at: <https://agencia.ecclesia.pt/portal/covid-19-caritas-portuguesa-lanca-fundo-de-emergencia-centrado-na-ajuda-alimentar/>.

⁵¹ See: <https://www.cruzvermelha.pt/apoio-social/grupos-vulner%C3%A1veis/ajuda-alimentar.html>.

On the top of some noteworthy experiences, described below, some general limits of remote teaching were pointed out, taking into consideration the specificities of the construction sector.

For instance, in the opinion of the **Polish Sectoral Council for Competence in Construction**, remote learning was abused numerous times, as the necessary element of practical training was often overlooked and adequate remote training tools were not provided. An interviewed OSH expert and trainer from Italy stressed how difficulties arise also due to lack of adequate web connection or device, language obstacles or even for workers following training from the construction site.

In **Romania**, the suspension of all education and training activities was accompanied during the state of alert by a special authorization regime⁵² making online vocational trainings possible under the main following conditions:

- an online platform for holding and recording the course;
- a trainer with IT and digital skills;
- information regarding the way in which the provider intends to run the course in online format;
- the proposed tools for ongoing evaluation and final evaluation;
- ensuring the access of the participants that have devices connected to the internet.

Yet, interviews implemented for the country-level input suggest that this modality was eventually not used for construction workers in the country.

In **Portugal**, the Director of a **vocational training centre** stressed that the new modality shall stay for its advantages, albeit they will decide which courses will be supplied this way and which ones will return to the standard in presence modality will be taken on a case-by-case basis. As pointed out by a Portuguese labour inspector, while allowing people to access trainings remotely, and see the recording when they have time, e-learning featured some noteworthy limits, i.e., lack of co-presence with colleagues, and obvious hampers for the implementation of practical sessions.

Country-level inputs point also to the introduction of ad-hoc courses to train companies and workers on measures necessary to tackle the virus, including, in **Portugal**, trainings targeting managers and preparing them to introduce and apply construction site plans in line with new requirements. Indeed, as anticipated above, some protocols addressing the COVID-19 risk in the construction sector, like the Portuguese one, did entail training (open air) of workers in order to guarantee application of the new rules.

In the Iberian country, unionists themselves with experience on OSH matters held awareness-raising training sessions with workers in order to prevent contagion.

In **Germany**, as reported by BG BAU, the new hazards and protective measures were incorporated into the curriculum of apprentices, with general information made available in various languages.

In **Italy**, the COVID-19 risk was included in the 16-hour long basic OSH course that all workers shall attend before to start working in construction pursuant to collective agreement. Special courses were implemented to inform companies and workers on the COVID-19 risk. For instance, the vocational training school of Bologna reported to have trained more than 400 persons in one month (online) with voluntary online courses lasting 3-6 hours on the COVID-19 risk, in a province where there are about 4,000 construction workers. They stressed that this high involvement followed serious concerns by

⁵² Ordinul Ministrului Muncii nr. 1149/2020 din 16 iulie 2020 privind stabilirea domeniilor de activitate și a procedurii pentru autorizarea furnizorilor de formare profesională să desfășoare programe de formare profesională a adulților în sistem on-line, available at: http://www.mmuncii.ro/j33/images/Documente/Munca/2020/Ordin_nr_1149_2020_site.pdf.

both employers and workers.

Short information on COVID-19 is still included in lessons addressing biological risks as part of vocational training on OSH matters. The Italian vocational training schools introduced also courses to become operator of sanitization activities (currently discontinued).

In **Poland**, the obligatory health and safety training programme has been extended to include modules concerning protection from COVID-19 at work (primarily personal protective equipment and emergency procedures in case of infection or danger of infection). Trainings for supervisors included as well anti-pandemic compliance monitoring modules. Training programmes have been disseminated by the Polish Association of Health and Safety Service Employees, associating most employees of OSH services authorized to conduct training courses. If necessary, trainings were made not only in Polish, but also in Ukrainian or Russian. For other groups of employees, translators were hired as needed. This system worked quite well in large companies and smaller ones cooperating with large contractors⁵³. Problems appeared in small companies operating autonomously in the renovation sector. In fact, it is difficult to verify the actual implementation of training programmes, although employers provide formal confirmation.

Both in Italy and in Poland, provisions extending the validity of periodical obligatory trainings have been spotted.

On the other hand, interviews implemented in **Romania** suggest that the contents of training for construction workers have not been updated to include measures tackling the COVID-19 risk, an aspect connected also with the rather low involvement in education and vocational training of people in working age in the country. Changes affected instead training targeting HR professionals, meant to prepare them in assisting employers to reorganise work and OSH measures pursuant to new COVID-19 requirements.

Vocational training and COVID-19 – focus on country-level measures and developments

Germany – Courses targeting foreign workers during the pandemic

During the pandemic, 'Arbeit und Leben' started organising online trainings in several languages, including on COVID-19 and on workers' rights.

They published also guidance in several languages about the COVID-19 and the rights of the workers⁵⁴ and distributed it on the social media, online and among their partners. Beside disseminating important information, these tools helped raising interest over the activities of 'Arbeit und Leben' among the target public.

The offer of courses included also training for social workers and consultants working with mobile workers. Contents included the so called 'short-time work allowance' benefit, the termination of employment, the quarantine, etc. For example, they offered the following online trainings:

- Webinar in Spanish on 'Labour law during the corona pandemic'⁵⁵;
- Webinar in Polish on the subject of 'Notice of termination'⁵⁶.

⁵³ Although medium and small construction companies could (and still may) apply for co-financing (up to 80% of costs) for training of both health and safety training instructors as well as language training and vocational training for employed migrant workers, in practice, very few of them do, as they need to keep employees on construction sites. These trainings, however, could not include posted workers.

⁵⁴ See, for instance: https://bema.berlin/site/assets/files/1244/4_corona_englisch-1.pdf.

⁵⁵ See: <https://www.facebook.com/events/239351151220289/?ref=newsfeed>.

⁵⁶ See: <https://www.facebook.com/events/2859811794287617/?ref=newsfeed>.

Spain – Exploiting opportunities of online training

The offer of **online trainings increased** significantly during the pandemic; initiatives such as Conecta Fundación, of the national vocational training institute for the construction sector (FLC), were launched, with sectorial webinars and online conferences⁵⁷. FLC offered free training even through its platform of open and short online courses (MOOC)⁵⁸. Courses targeted different subjects starting from April 2020. It is worth mentioning the free online course launched in June 2020 under the title ‘Preventive measures against COVID-19 in the construction sector’, lasting four hours and informing workers and companies in the sector on the main measures, procedures and protocols before the reprise of construction activities with the relaxing of restrictions. FLC also developed other resources, such as informative posters, guides and infographics, disseminated through the Línea prevención portal⁵⁹ for companies to adequately inform workers on preventive measures to tackle the virus.

As a result of the lessons learned from COVID-19, FLC of the Principality of Asturias launched a new initiative to promote digitalisation among workers in the construction sector: the Aula Abierta Digital (Digital Open Classroom)⁶⁰. Since the beginning of 2022, companies and workers in the sector enjoy free access to training via this e-learning platform.

Poland – a protocol to ensure safe vocational training during the COVID-19 pandemic

In Poland, the National Labour Inspectorate advised the Chief Sanitary Inspectorate⁶¹ on recommendations in the field of health and safety training and occupational safety during COVID-19. These recommendations were eventually included also in the health and safety training programmes in construction (as for the sector-related protocol promoted by the employers’ association Porozumienie dla Bezpieczeństwa w Budownictwie).

Actually, the protocol specified as well conditions for conducting health and safety training at the workplace, namely:

- introductory training via video calls was recommended. On-the-job training, only by the immediate supervisor, was possible keeping a safe distance of at least 1.5 meters;
- on-site information training should be conducted in small groups, preferably outside. It was possible to pass the materials to the person supervising works on the subcontractor's side in order to familiarize with employees;
- in the case of periodic training, e-learning platforms were recommended for white-collar workers and for engineering and technical managers, and videoconference tools for workers in blue-collar positions;
- Group training in presence had to be kept to a minimum.

Spain – Measures to ensure safe vocational training during the COVID-19 pandemic

In Spain, vocational training centres in the construction sector were closed for nearly three months after the proclamation of the State of Alarm on 14 March 2020. At the end of May, they gradually resumed their activity and all of them had to adapt to the regulations established in the Contingency Plan against COVID-19, following all the recommendations of the health authorities to ensure the safety of students and reducing the number of students per activity. Each centre had to develop its **own procedure**, which included aspects such as signposting, prepare spaces to guarantee the recommended distancing, cross ventilation, provision of gels, gloves and masks, adaptation of

⁵⁷ Fundación Laboral de la Construcción (2020), Memoria 2020. Comprometid@s con el sector, pp. 7-13, available at: https://memoria2020.fundacionlaboral.org/wp-content/uploads/2021/07/Memoria_2020_cap1.pdf.

⁵⁸ See: <https://www.trabajoenconstruccion.com/MOOC/AccesoMOOCsFlc.aspx>.

⁵⁹ Some examples of guidelines to prevent COVID-19 in construction are available here: <https://www.lineaprevencion.com/busca/covid>.

⁶⁰ See: <http://www.flc.es/aula-abierta-digital;jsessionid=44851E4832D8AD9B593CEDEE81B8732B>.

⁶¹ This was the authority actually tasked of issuing obligatory decisions regarding COVID protection measures and procedures.

timetables to avoid crowding at entrances/exits and breaks, etc⁶².

With the end of the State of Alarm on 21 June 2020, **face-to-face classes** started again with the training centres prepared with the abovementioned measures, plus others. For instance, the paritarian vocational training school FLC Asturias provided each teacher/tutor/monitor with a backpack to carry with them at all times and anywhere, containing paper and disinfectant, as well as masks and hydroalcoholic gel to support their group of students. Even CO2 detectors were placed in all classrooms. The practice areas also had their own specific measures, in addition to the above, such as disinfection of clothing, machinery, individual use of tools and equipment, and locking of changing rooms.

In general, training centres reduced the number of participants per classroom, limited the time of exposure to the minimum possible, and created the figure of the COVID-19 coordinator, who was to ensure the correct implementation of the health protocol.

The situation also affected the selection process for courses. For example, at FLC Asturias, courses started to be carried out online, with the online completion of the dossier and selection test, as well as the delivery of the accrediting documentation by email, in order to avoid travel and crowding of candidates, reinforcing the process with an intense telephone support service.

⁶² An example of a COVID-19 protocol adopted by a training center is available at: https://emecs-project.eu/wp-content/uploads/2022/11/COVID-PROTOCOL-TRAINING-CENTER_ES-1.pdf.

Conclusion

Ahead of the new COVID-19 risk, OSH provisions in the construction sector have been equipped with new measures. Across the covered countries the adopted protocols shared similar recommendations, albeit aspects concerning travels show a variety of approaches meant to reduce the risk, whereas adaptation of accommodation facilities seemed overlooked.

In terms of information measures meant to reach workers with little knowledge of the language, despite some gaps, several examples emerge, including not only the use and distribution of easy-to-understand materials but also the availability of dedicated phone lines to address doubts by employers and workers.

Among the mentioned measures, it is worthy to recall the cross-border institutional task force meant to tackle possible inconsistencies and lack of clarity among COVID-19 launched by the North-Rhine Westphalia German state and covering Belgium and Netherlands as well.

Whereas a range of benefits were adjusted or introduced to take into account the new context, it is unclear how these affected posted workers, with findings suggesting workers posted from countries with lower levels of wages/benefits may have suffered of inadequate coverage. Some formal limits in the access to benefits in the home country for workers sent abroad have also been spotted.

Few gaps in the accessibility of other emergency measures, including access to vaccines, tests, and benefits emerged, due to the link with residence status or registration in national health insurance systems. Nevertheless, some initiatives meant to overcome these shortcomings were detected, suggesting possible strategies to be followed in case of future pandemic.

Developments in the area of vocational training suggest remote learning as an option useful to help workers get acquainted with OSH risks in the future, even if far from the workplace. Yet, remote learning conceals also risks of elusion in a context requiring as well practical knowledge.

Annex 1 - List of interviewees

Position	Organisation	Date
Policy Adviser	ETUC	7 October 2022
Legal Adviser	Labour Mobility Initiative	14 October 2022
President	Italian National Institute of Social Security (INPS)	9 November 2022

Annex 2 - List of COVID-19 national protocols analysed for the study

Germany:

Title in original language: SARS-CoV-2-Arbeitsschutzstandard für das Baugewerbe

Issued by: Organisation for insurance against accidents at work in the construction sector (BG BAU)

Available at:

https://emecs-project.eu/wp-content/uploads/2022/11/SARS-CoV-2-BG_BAU_DE.pdf

Italy:

Title in original language: Protocollo condiviso di regolamentazione per il contenimento della diffusione del COVID-19 nei cantieri

Issued by: Ministry of Infrastructures and Transports, Ministry of Labour and Social Policies, associations of municipalities and of provinces (ANCI, UPI), large public contractors in the area of civil infrastructures (ANAS, RFI) sectorial employers' organisations representing large companies and cooperatives (ANCE, Alleanza delle Cooperative), sectorial unions (Feneal UIL, Filca CISL, Fillea CGIL).

Available at:

https://emecs-project.eu/wp-content/uploads/2022/11/Protocollo240420_IT.pdf

Poland:

Title in original language: Zbiór zasad bezpieczeństwa w zapobieganiu COVID-19

Issued by: Employers' association representing large contractors in the construction sector (Porozumienie dla Bezpieczeństwa w Budownictwie)

Available at:

https://emecs-project.eu/wp-content/uploads/2022/11/Zbior_zasad_COVID_PL.pdf

Portugal:

Title in original language:

Recomendações complementares.

Adaptar os locais de trabalho | Proteger os trabalhadores

Setor de atividade:

Construção

Issued by: Labour Inspectorate (ACT)

Available at:

https://emecs-project.eu/wp-content/uploads/2022/11/ACT_RecomendacoesComplementares_PT.pdf

Title in original language: COVID-19: Prevenção e Controlo de Infeção no Setor da Construção Civil

Issued by: Directorate-General for Health (DGS)

Available at:

https://emecs-project.eu/wp-content/uploads/2022/11/COVID-19-Prevencao-e-Controlo-de-Infecao_PT.pdf

Spain:

Title in original language: Guía de actuación en materia preventiva por causa del COVID-19 en las obras de construcción

Issued by: sectorial employers' organisation (CNC), sectorial unions (CCOO construcción y servicios, UGT FICA)

Available at:

https://emecs-project.eu/wp-content/uploads/2022/11/Guide_socialpartners_ES.pdf

Integrated by:

Guía de actuación en materia preventiva por causa del COVID-19 en los centros de trabajo del sector de la construcción

Available at:

https://emecs-project.eu/wp-content/uploads/2022/11/Guide_Adaptacion-junio2020_ES.pdf

Romania:

No sector-specific protocols.

General provisions in:

Ghid pentru revenirea la muncă în condiții de siguranță pentru angajați și angajatori

Issued by: Ministry of Labour and Social Protection and Labour Inspectorate

Available at:

https://emecs-project.eu/wp-content/uploads/2022/11/ghid_revenirea-la-munca-RO.pdf

Annex 3 – List of EMEcs country reports referred to in the study

CNCE, FGB srl SB (2022), EMEcs Country report Italy, available at: https://emecs-project.eu/wp-content/uploads/2022/10/EMEcS_Italy.pdf.

FLC Asturias (2022), EMEcs Country report Spain, available at: https://emecs-project.eu/wp-content/uploads/2022/10/EMEcS_Spain.pdf.

Jijie, D. T., Guțu, I., Jijie, A. (2022), EMECS Country report Romania, available at: https://emecs-project.eu/wp-content/uploads/2022/08/EMEcS_-Romania.pdf.

Kus, J. (2022), EMEcs Country report Poland, available at: https://emecs-project.eu/wp-content/uploads/2022/10/EMEcS_Poland.pdf.

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