



Response by the Danish Government to the open public consultation on a study to support the impact assessment of a possible EU initiative related to the application of competition rules to collective bargaining by self-employed workers

In respect of the questionnaire from the Commission, reference is made to the Danish Government's response of the 15th of February regarding the inception impact assessment of a possible EU initiative related to the application of competition rules to collective bargaining by self-employed workers.

In addition to our previous comments, the Danish Government would like to note the following:

- We do not support a so-called "third category" on the labour market supplementing the existing categories of "worker/employee" and "self-employed. We are concerned of the risk of a de-facto third category by introducing special initiatives for platform workers undermining the worker's rights of this particular group on the labour market. In our view, focus should be on removing barriers to collective bargaining and organization for all workers, including those working in bogus self-employment schemes.
- In our opinion this initiative concerning the competition rules and the expected initiative to improve the working conditions of people providing services through platforms are closely connected. We find it necessary to discuss and address the initiative concerning working conditions prior to discussing the consequences for the competition rules, as the latter should be seen as a derivative issue of the former.

Finally, we would like to reiterate the importance of respecting national competence and giving the sufficient flexibility to the Member States different labour market models. Working conditions for platform workers and other people working in atypical employment relations are of high importance to the Danish Government, and we have therefore initiated an analysis with the aim of pointing to possible solutions. We are looking forward to sharing and discussing the findings of this analysis with the Commission at a later stage.