
Dr Torsten Müller

is Senior Researcher
at the European Trade
Union Institute (ETUI)
in Brussels, Belgium.

Prof. Dr Thorsten Schulten

is head of the Collective
Agreements Archive
of the Institute of
Economic and Social
Research (WSI) of the
Hans-Böckler-Stiftung
in Düsseldorf, Germany.
He is also honorary
professor at the
University of Tübingen,
Germany.

More bark than bite – a first assessment of the National Action Plans to promote collective bargaining

Torsten Müller and Thorsten Schulten

Policy recommendations

The European Union (EU) Directive on Adequate Minimum Wages requires Member States with collective bargaining coverage below 80% to adopt National Action Plans, with a view to promoting and progressively increasing coverage. To be effective, these Plans should meet the following criteria:

- Core measures: plans must prioritise legislative or institutional changes that promote sectoral collective bargaining, supplemented by ‘soft’ measures to raise awareness of the importance of (sectoral) bargaining and improve data quality.
- Capacity and readiness: measures are supposed to strengthen the bargaining parties’ negotiation capacity. More specifically, they should address the employers’ readiness to engage in sectoral negotiations, including the establishment of sectoral employers’ organisations, where needed.
- Implementation and funding: plans must include defined timeframes, dedicated funding and permanent tripartite structures for annual evaluation and revision.
- Monitoring and assessment: the European Commission (EC) must critically assess the adequacy of the Plans, require revisions when necessary, and initiate infringement procedures against Member States that fail to submit a Plan.
- EU-level support: the EC should also establish a ‘European Action Plan’ to support Member States in providing a framework of enabling conditions for collective bargaining.

Introduction

Strengthening collective bargaining is a key objective of the EU Directive on Adequate Minimum Wages, in addition to ensuring adequate minimum wages (European Parliament and Council of the European Union 2022). To achieve this, the Directive's most significant provision is Article 4.2, which requires Member States with less than 80% bargaining coverage to establish a National Action Plan to promote collective bargaining. Its aim is to create a 'framework of enabling conditions for collective bargaining' to progressively increase coverage. The Directive does not, however, prescribe any specific measures for the Plans. The Member States are free to choose the measures they deem most appropriate.

The Directive does set out procedural requirements, however. First, Member States must involve trade unions and employers in the establishment of the Plans. Second, they need to set out a clear timeline and concrete measures to progressively increase bargaining coverage. Third, the Plans must be reviewed and updated regularly, at least every five years. And fourth, they must be published and the EC notified. The Commission will evaluate and monitor the Plans and report to the European Parliament and the Council. The Directive does not specify a deadline, but the EC's expert group report clarified that the Plans should have been established by the 'end of 2025 at the latest' (European Commission 2023).

Written around five months after the submission deadline, this Policy Brief provides a first assessment of the Plans' content as of early May 2026. It also offers policy recommendations to ensure that they meet the Directive's objective of promoting collective bargaining and progressively increasing coverage. The key finding of this Policy Brief is that, overall, the twelve Plans so far submitted contain a lot of good intentions but all too often are formulated in a very vague and non-committal manner. It remains to be seen whether they will actually fulfil their purpose of progressively increasing bargaining coverage. To put it differently, so far, they reflect more bark than bite.

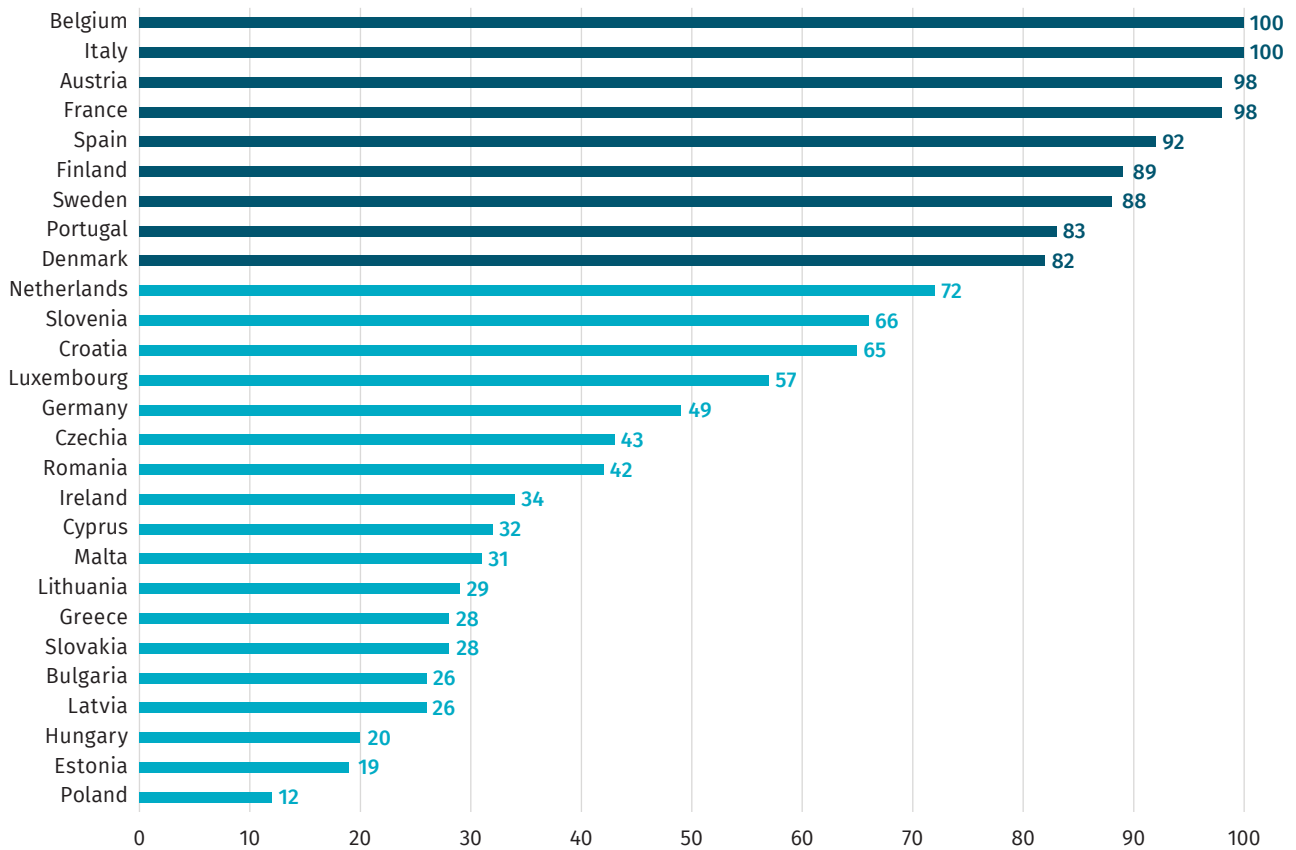
Who has submitted a National Action Plan so far?

According to the most recent figures from the OECD-AIAS ICTWSS database (shown in Figure 1), only nine EU countries currently meet the 80% bargaining coverage threshold.

These nine countries share two key characteristics that ensure high coverage: (i) collective bargaining takes place predominantly at the sectoral level; and (ii) high coverage in all countries is based on some form of state support. In Belgium, Finland, France and Spain this involves frequent use of the extension mechanism. This ensures that sectoral collective agreements apply to all companies in the respective sector. In other countries, the state contributes to comprehensive coverage more indirectly by supporting the bargaining parties' organisational strength. Examples include the Nordic countries and, to a lesser extent, Belgium, where a high level of unionisation is supported through the so-called 'Ghent System'. This is a state-subsidised and union-managed unemployment insurance scheme that creates a strong incentive for workers

to unionise. Austria provides another form of institutional support through its chamber system. Almost all companies are compulsory members of the Austrian Economic Chamber (Wirtschaftskammer Österreich), which concludes collective agreements on the employer side. This guarantees almost 100% coverage. By contrast, the other Member States, with coverage of 50% or less, lack the institutional framework and state support for sectoral bargaining. This demonstrates that achieving comprehensive coverage of at least 80% requires a system of sectoral bargaining with adequate state support.

Figure 1 **Collective bargaining coverage in EU Member States (in %; 2024 or most recent year available)**



Sources: OECD/AIAS (2025); for Greece: estimates from the Ministry of Labour (Vgenis 2026); for Slovenia: Republic of Slovenia Statistical Office (2025).

Although the deadline for submitting the Plans to the EC was the end of 2025, at the time of writing (May 2026) only twelve out of the 18 countries have done so (see Table 1). An English translation of all Plans can be found online on the WAGE-UP website of the European Trade Union Confederation (ETUC 2026).

Table 1 **Status of Action Plans (May 2026)**

Plan submitted	Plan pending	Plan not required
Bulgaria, Czechia, Estonia, Greece, Ireland, Latvia, Lithuania, Malta, Netherlands, Poland, Romania, Slovakia	Croatia, Cyprus, Germany, Hungary, Luxembourg, Slovenia	Austria, Belgium, Denmark, France, Finland, Italy, Portugal, Spain, Sweden

Source: authors' compilation.

Timeframe, funding and monitoring of the National Action Plans

Important procedural conditions for the Plans' effective implementation include whether they contain a clear timeframe and a dedicated budget for the various measures included, and whether they set out a structure to ensure monitoring, evaluation and enforcement. Table 2 illustrates that only half of the existing Plans include these three aspects. Only seven countries (BG, CZ, EL, IE, NL, PL, SK) defined a clear timeframe and concrete deadlines for completing the various measures; timelines in the Plans for Lithuania and Romania are vague. Financing the measures is also crucial for their effectiveness. This applies in particular to capacity-building measures. Only in six countries (CZ, IE, LT, MT, PL, RO) do the Plans provide for a budget dedicated to individual measures requiring additional funding. European sources such as the European Social Fund Plus (ESF+) frequently play a significant role. The impact of the Plans on bargaining coverage also depends heavily on effective implementation and enforcement. Czechia, Greece and Slovakia foresee the establishment of a permanent tripartite body to evaluate the implementation annually. These bodies will also discuss other issues related to collective bargaining and can suggest further measures and updates to the Plan. In Poland and Romania, these tasks will be performed by existing tripartite structures, such as the Social Dialogue Council and the National Tripartite Council for Social Dialogue, respectively.

Table 2 Timeframe, funding and monitoring of the National Action Plans

Clear timeframe provided	Budget assigned to measures	Tripartite structure for monitoring and evaluation provided
Bulgaria, Czechia, Greece, Ireland, Netherlands, Poland, Slovakia	Czechia, Ireland, Lithuania, Malta, Poland, Romania	Czechia, Greece, Poland, Romania, Slovakia

Source: authors' compilation.

'Soft' measures in the National Action Plans

As regards the substantive provisions for promoting collective bargaining, 'soft' measures feature most prominently (see Table 3). These include measures to improve the quality and availability of data on collective bargaining and collective agreements. This frequently involves new data collection tools to provide a sounder empirical basis for the calculation of bargaining coverage. In Czechia, for instance, the previous method, based on the Average Earnings Survey, is to be replaced by the 'Unified Monthly Employer Report'. This explicitly requires employers to report whether they are covered by a collective agreement. In other countries, such as Bulgaria, Greece and Poland, the Plan foresees the introduction of a digital register of collective agreements to enable their electronic submission, registration and sharing.

The second set of 'soft' measures aims to raise awareness of the importance of (sectoral) collective agreements, particularly among employers but also

among the general public. This involves organising targeted public campaigns to disseminate best practice, preparing information material on the role of agreements and bargaining parties, and integrating issues related to collective bargaining into school and university curricula. A third set of measures in this category involves conducting further research into the obstacles to collective bargaining, as well as other country-specific aspects.

Table 3 ‘Soft’ measures in National Action Plans

Data quality and availability	Awareness and outreach	Research and analysis
Bulgaria, Czechia, Estonia, Greece, Ireland, Poland, Romania, Slovakia	Bulgaria, Czechia, Estonia, Greece, Ireland, Latvia, Lithuania, the Netherlands, Poland, Romania	Czechia, Estonia, Greece, Ireland, Latvia, Lithuania, Malta, the Netherlands, Poland, Slovakia

Source: authors’ compilation.

Promoting bargaining parties’ capacity to act

Another key issue addressed in the submitted Plans is promoting the capacity and willingness of trade unions and employers’ organisations to negotiate collective agreements. As Table 4 shows, the most common measure is capacity-building through training in negotiation skills and dispute resolution, alongside the provision of codes and handbooks of best practice. Concrete measures specifically aimed at strengthening the unions’ capacity to act are found less frequently.

A notable exception – to some extent – is the Irish Plan. This includes a qualified government commitment to examining legal protection for union representatives and to working towards an agreement between unions and employers to facilitate physical and digital union access to workplaces. However, this commitment is qualified by the requirement that access be ‘subject to agreed criteria’. This essentially grants employers a de facto veto. The Netherlands has also vaguely announced legislative measures to safeguard trade union independence.

In Estonia and Poland, the Plans include potential incentives for employers to engage in collective bargaining. In Estonia, this involves discussing the possibility of allowing agreements to derogate from the law with regard to working and rest times. In Poland, it entails the possibility of providing tax incentives or special access to training funds for employers that conclude agreements.

Table 4 Enhancing the bargaining parties’ capacity to act

Capacity-building	Focus on unions	Focus on employers
Bulgaria, Czechia, Greece, Ireland, Lithuania, Malta, Netherlands, Poland, Romania, Slovakia	Ireland, the Netherlands	Estonia, Poland

Source: authors’ compilation.

Measures aimed at strengthening sectoral bargaining

There is a wide range of measures to strengthen sectoral collective bargaining (Müller and Schulten 2025). Despite its importance for bargaining coverage, however, most Plans do not go beyond generally acknowledging the important role of sectoral bargaining. They do not set out concrete measures to promote negotiations at sectoral level. Often, this merely involves a commitment to ‘reviewing’, ‘evaluating’ or ‘assessing’ existing practices and regulations to identify potential measures to promote sectoral bargaining.

There are some exceptions, however (see Table 5). Specific measures in the Plans include increasing funding for promoting sectoral bargaining (CZ); facilitating the extension of agreements (EL, MT, PL); and using public procurement as a tool to promote (sectoral) bargaining by including social criteria for preferential access to public funds (PL). Ireland and the Netherlands also include public procurement but in vague terms: Ireland proposes exploratory research into the possibility of introducing bargaining coverage as a weighting criterion in public procurement, while the Netherlands merely states that procurement regulations will be clarified.

Another, more frequently mentioned measure is allowing cross-sectoral trade union and employers’ confederations to conclude (or co-sign) sectoral collective agreements, particularly in sectors characterised by low coverage, the absence of unions or precarious working conditions (EE, EL, LV, MT). The Maltese Plan specifies that this involves the possibility of concluding high-level collective agreements, negotiated by a High-Level Tripartite Council to establish a sector-wide minimum floor for wages and working conditions in non-unionised sectors without a collective agreement.

Other Plans promote regular meetings between the bargaining parties to encourage negotiations at sectoral level (IE, LT, RO). In Lithuania, this involves ‘roundtable discussions’ for employee and employer representatives on how to strengthen collective bargaining at sectoral and territorial levels. Similarly, Romania foresees half-yearly tripartite meetings for sectors without collective agreements to identify ways to unblock bargaining at sectoral level. Furthermore, the Romanian Plan aims to oblige employers to enter into negotiations with representative unions in public institutions and state-owned enterprises. This is an obligation to negotiate, though not necessarily to conclude an agreement, mirroring the French model. Ireland commits to strengthening ‘Employment Regulation Orders’ (ERO) negotiated by unions and employers within a Joint Labour Committee to set minimum pay rates and employment conditions for workers in specific sectors where collective bargaining is not well established. While the Plan remains vague on how to strengthen it, the success factor defined is an increase in the number of sectors covered.

Finally, the NAPs include broader institutional and legislative changes such as strengthening labour inspectorates (RO, SK), speeding up arbitration processes and ensuring full ultra-activity of collective agreements (both in EL). Others include expanding the issues to be covered by collective bargaining

(PL) and legislative changes to extend the scope of collective bargaining to employees in new forms of work, such as digital platforms (BG).

Table 5 **Measures to strengthen sectoral bargaining**

Extension of collective agreements	Public procurement	Confederations signing sectoral agreements	Setting up / strengthening sectoral structures	Other institutional measures
Greece, Malta, Poland	Ireland, Netherlands, Poland	Estonia, Greece, Latvia, Malta	Ireland, Lithuania, Romania	Bulgaria, Czechia, Greece, Poland, Romania, Slovakia

Source: authors' compilation.

Greece as best practice case so far

If one submitted Plan is to be singled out as best practice case so far, it is the Greek one, which ticks all the boxes in terms of content and process. It is the only Plan based on a Tripartite Social Agreement concluded by the government and peak-level trade union and employers' organisations (in November 2025). This Agreement already sets out targeted policy measures to strengthen collective bargaining, which were further operationalised by the December 2025 'Action Plan for the Promotion of Collective Bargaining in Greece 2026–2030'. Implementation of the Plan began in January 2026 with the adoption of Law 5278/2026, formally incorporating its substantive content into the domestic legal framework.

Of the twelve existing Plans in May 2026, the Greek one stands out for several reasons. First, all three parties involved supported the Plan, and all seemed interested in promoting collective bargaining. Second, its content goes beyond 'soft measures' by setting out institutional changes that effectively reverse many of the measures introduced during the management of the economic and financial crisis of the early 2010s. In particular, this applies to facilitating the extension of sectoral collective agreements and reintroducing full ultra-activity of collective agreements. This will ensure that they remain valid after they expire, including for newly hired employees, until a new one is concluded.

Moreover, regarding procedures, the Plan defines a concrete timeframe for the various measures and establishes a framework for systematic monitoring and enforcement. The core of this framework is the establishment of a tripartite working group within the Ministry of Labour and Social Security tasked with monitoring, evaluating and supporting the Plan. From 2028, this working group will prepare annual evaluation reports assessing progress in bargaining coverage and the Plan's implementation. The framework also provides for targeted audits by the labour inspectorate to ensure effective compliance with the terms of collective agreements. Obviously, the proof is in the pudding: the Plan's actual impact on collective bargaining and coverage depends on its effective

implementation. However, also in this respect Greece was off to a good start as Law 5278/2026 served as an immediate first step to put the Plan into practice.

General assessment of National Action Plans

What makes a good National Action Plan? Sectoral bargaining and state support are crucial for high coverage, so a good Plan must address both. It must also satisfy three core criteria: (i) it should contain concrete measures with an immediate and far-reaching impact on bargaining coverage, most notably through introducing institutional or legislative changes promoting sectoral bargaining; (ii) it should address employers' unwillingness to negotiate, which is a key obstacle particularly in Central and Eastern Europe, but not only there, by either strengthening unions' capacity to force employers to the negotiation table or by creating incentives for employer engagement in sectoral bargaining; and (iii) it should ensure effective implementation through enforcement measures, such as tripartite structures that regularly monitor and evaluate progress of the plan.

Measured against these three criteria, overall assessment of the twelve existing Plans is rather sobering. They favour 'soft measures' but, with a few exceptions, remain weak on institutional changes promoting sectoral bargaining. However, soft measures such as raising awareness of the importance of collective bargaining should not be belittled. If you ask a young person today whether they are covered by a collective agreement, the likely response is not 'yes' or 'no', but a counter-question: 'what is a collective agreement?' Soft measures are vital for promoting collective bargaining where it lacks a deep tradition, particularly in Central and Eastern Europe. However, because their effect is long term, soft measures should complement other institutional measures with a more direct impact on coverage rather than form the key component of Plans.

When assessing the Plans, the broader context of transposition of the Directive into national law also matters. In Czechia and Slovakia, for instance, legislative changes were introduced to facilitate the extension of sectoral agreements when transposing the Directive into national law (Müller 2025). This makes further legislative changes in support of sectoral bargaining within the Action Plan less likely.

Many Plans are formulated in vague language, with equally vague timeframes. Even when plans refer to concrete institutional or legislative changes, they often use heavily qualified language involving terms such as 'explore', 'assessment', 'test', 'pilot' and 'potential'. As Doherty (2025) notes regarding Ireland, this does not amount to a robust commitment to introduce changes. Consequently, many Plans amount to little more than declarations of intent. This often reflects a political situation in which governments were not keen to promote collective bargaining and employers opposed initiatives to this end. The resulting measures, therefore, often represent the lowest common denominator, typically soft measures.

This also reflects the Directive's three options for establishing a Plan: in consultation with the employers' associations and trade unions; in agreement with them; or by their own joint request and agreement. Greece is the only

country so far that has chosen the third option, reflecting the support of all parties involved in drawing up the Plan. In all other countries, plans resulted from consultation processes in which far-reaching proposals from unions were ultimately excluded. The Estonian case is the most telling example: the list of measures omitted due to employers' opposition is longer than the actual Plan.

The need for a European Action Plan to promote collective bargaining

Given the non-committal language used in many Plans and signs of weakening government support for strengthening collective bargaining, the EC has an important role in ensuring their effective implementation. The Commission needs to critically evaluate national plans to ensure they meet the objective of 'progressively increasing bargaining coverage'. This also involves requiring Member States to revise Plans if the EC found that this is not the case. Furthermore, the Commission must pressure the seven Member States that missed the deadline to submit their Plans. This can also include initiating an infringement procedure.

The EC should not consider its job done with the European Minimum Wage Directive. Although the Directive has already led to significant changes in many Member States (Müller 2025), the often minimalist approach of national governments to transposing the Directive into national law more generally and to the Plans more specifically highlights the need for additional supportive measures at European level.

One way to ensure continued European-level support for collective bargaining is to establish a 'European Action Plan to Promote Collective Bargaining'. This is aimed at supporting the Member States in providing for a framework of enabling conditions for collective bargaining. Analogous to the national Plans, this 'European Action Plan' should include a clear timeline and concrete measures to support the Member States in realising the political objective of progressively increasing the rate of bargaining coverage. Such a European Plan should be established in full compliance with the principle of subsidiarity and in cooperation with recognised European social partners, It should also be regularly reviewed and updated.

A European Action Plan should include the following:

- (i) Direct oversight: ensuring proper transposition of the Minimum Wage Directive and the Plans to promote collective bargaining by reviving the Commission Expert Group for the transposition of the Minimum Wage Directive. This would ensure the involvement of social partners in their evaluation.
- (ii) Policy alignment: ensuring proper implementation of all other European directives, initiatives and instruments that explicitly address the issue of collective bargaining. They include, in particular, the Directive on pay transparency and the Directive on transparent and predictable working conditions and making the strengthening of collective bargaining a core element of the forthcoming EU Quality

Jobs Act to live up to the commitment made to promoting collective bargaining in the EU Quality Jobs Roadmap.

- (iii) Public procurement: revising directives to ensure that public funds go only to organisations that respect workers' and trade union rights, including rights to fair remuneration and collective bargaining.
- (iv) Funding conditionality: linking financial support from EU funds, such as the ESF+, Just Transition, the Social Climate Fund and the Common Agricultural Policy, to serious attempts by Member States to promote collective bargaining. This should extend to the proposed EU Industrial Accelerator Act which aims to set a new framework for European industrial policy but lacks any social conditionality so far (Bauermann 2026). A 'serious attempt' could be defined as bargaining coverage of more than 80% or a Plan with concrete measures to reach that target. This would incentivise Member States to include measures in their Plans with a direct impact on bargaining coverage.
- (v) European Semester: integrating the promotion of sectoral bargaining into the annual procedure of socio-economic coordination and surveillance in the context of the European Semester, providing Country-Specific recommendations to countries with bargaining coverage below the 80% threshold.
- (vi) Financial support: securing capacity-building funds for trade unions and employers' federations within the Multi-Annual Financial Framework for 2028–2034.
- (vii) Continuous review: ensuring that the European Action Plan is a 'living document', reviewed and revised annually in consultation with the recognised European social partners.

While a European Action Plan for the EC would ensure continuing European-level support for collective bargaining, it must be complemented by corresponding national initiatives. National government commitment remains an essential prerequisite for the effectiveness of National Action Plans, but a European one would provide progressive forces with powerful tools to exert pressure on national policymakers.

References

- Bauermann T. (2026) Der Industrial Accelerator Act und die Zukunft der Industrie in der EU, IMK Kommentar 18, Hans-Böckler-Stiftung.
- Doherty M. (2025) We'll get by with a little help from our (EU) friends... Ireland, the adequate minimum wage Directive, and the action plan for collective bargaining, Italian Labour Law E-Journal, 18 (2), 51–61. <https://doi.org/10.6092/issn.1561-8048/23535>
- ETUC (2026) Wage-up. Minimum wage and collective bargaining systems in Europe. <https://wage-up.etuc.org/>
- European Commission (2023) Transposition of Directive (EU) 2022/2041 on adequate minimum wages in the European Union, Report Expert Group.
- European Parliament and Council of the European Union (2022) Directive (EU) 2022/2041 of the European Parliament and of the Council of 19 October 2022 on adequate minimum wages in the European Union, OJ L 275, 25.10.2022, 33–47.
- Müller T. (2025) Here comes the sun: the formal transposition and political impact of the European Directive on adequate minimum wages in the EU, Report 2025.04, ETUI. <https://www.etui.org/4GY>
- Müller T. and Schulten T. (2025) The road to 80% collective bargaining coverage: the need for ambitious national action plans under the Minimum Wage Directive, Policy Brief 2025.01, ETUI. <https://www.etui.org/4GM>
- OECD/AIAS (2025) ICTWSS database. <https://www.oecd.org/en/data/datasets/oecdaias-ictwss-database.html>
- Republic of Slovenia Statistical Office (2025) 66.3% of persons in paid employment covered by collective agreements at the national level, News, 06.10.2025.
- Vgenis T. (2026) Collective bargaining: what changes are on the table, Liberal, 09.05.2025. <https://www.liberal.gr/oikonomia/sylogikes-diapragmateyseis-poies-allages-briskontai-sto-trapezi>

Cite this publication: Müller T. and Schulten T. (2026) More bark than bite – a first assessment of the National Action Plans to promote collective bargaining, Policy Brief 2026.08, ETUI.

The ETUI Policy Brief series is edited jointly by Kurt Vandaele and Bart Vanhercke. The editor responsible for this issue is Kurt Vandaele, kvandaele@etui.org

This electronic publication, as well as previous issues of the *ETUI Policy Briefs*, is available at www.etui.org/publications. You may find further information on the ETUI at www.etui.org.

© ETUI aisbl, Brussels, June 2026. All rights reserved.
ISSN 2031-8782



The ETUI is co-funded by the European Union. Views and opinions expressed are however those of the author(s) only and do not necessarily reflect those of the European Union or the ETUI. Neither the European Union nor the ETUI can be held responsible for them.