



# Posting of workers

Report on A1 Portable Documents  
issued in 2022

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## Glossary

**Basic Regulation:** Regulation (EC) No 883/2004 of the European Parliament and of the Council of 29 April 2004 on the coordination of social security systems.

**Implementing Regulation:** Regulation (EC) No 987/2009 of the European Parliament and of the Council of 16 September 2009 laying down the procedure for implementing Regulation (EC) No 883/2004 on the coordination of social security systems.

**Competent Member State:** The Member State in which the institution with which the person concerned is insured or from which the person is entitled to benefits is situated.

**EU-28:** Belgium (BE), Bulgaria (BG), the Czech Republic (CZ), Denmark (DK), Germany (DE), Estonia (EE), Ireland (IE), Greece (EL), Spain (ES), France (FR), Croatia (HR), Italy (IT), Cyprus (CY), Latvia (LV), Lithuania (LT), Luxembourg (LU), Hungary (HU), Malta (MT), the Netherlands (NL), Austria (AT), Poland (PL), Portugal (PT), Romania (RO), Slovenia (SI), Slovakia (SK), Finland (FI), Sweden (SE), and the United Kingdom (UK).

**EU-27:** Belgium (BE), Bulgaria (BG), the Czech Republic (CZ), Denmark (DK), Germany (DE), Estonia (EE), Ireland (IE), Greece (EL), Spain (ES), France (FR), Croatia (HR), Italy (IT), Cyprus (CY), Latvia (LV), Lithuania (LT), Luxembourg (LU), Hungary (HU), Malta (MT), the Netherlands (NL), Austria (AT), Poland (PL), Portugal (PT), Romania (RO), Slovenia (SI), Slovakia (SK), Finland (FI), and Sweden (SE).

**EU-15:** Belgium (BE), Denmark (DK), Germany (DE), Ireland (IE), Greece (EL), Spain (ES), France (FR), Italy (IT), Luxembourg (LU), the Netherlands (NL), Austria (AT), Portugal (PT), Finland (FI), Sweden (SE), and the United Kingdom (UK).

**EU-14:** Belgium (BE), Denmark (DK), Germany (DE), Ireland (IE), Greece (EL), Spain (ES), France (FR), Italy (IT), Luxembourg (LU), the Netherlands (NL), Austria (AT), Portugal (PT), Finland (FI), and Sweden (SE).

**EU-13:** Bulgaria (BG), the Czech Republic (CZ), Estonia (EE), Croatia (HR), Cyprus (CY), Latvia (LV), Lithuania (LT), Hungary (HU), Malta (MT), Poland (PL), Romania (RO), Slovenia (SI), and Slovakia (SK).

**EFTA countries:** Iceland (IS), Liechtenstein (LI), Norway (NO), and Switzerland (CH).

**Persons covered by Article 12 of the Basic Regulation:** Article 12 relates to employed persons who are employed by an employer which normally carries out its activities in a Member State and who are posted by that employer to another Member State to perform work on its behalf, and persons who normally pursue an activity as a self-employed person in a Member State who go to pursue a similar activity in another Member State.

**Persons covered by Article 13 of the Basic Regulation:** These persons pursue an activity as an employed/self-employed person in two or more Member States.

**Portable Document (PD) A1:** This certificate declares that the social security legislation of the issuing Member State applies and confirms that this person has no obligations to pay social security contributions in another Member State.

## Summary of main findings

The [Portable Document A1 \(PD A1\)](#) (previously the E101 certificate)<sup>1</sup> establishes the presumption that the holder is affiliated to the social security system of the Member State<sup>2</sup> which has issued the certificate and confirms that the person concerned has no obligations to pay social security contributions in another Member State. PDs A1 are issued to various groups of persons, though mainly to ‘posted’ workers and self-employed persons (see Article 12 of Regulation 883/2004) and to persons who pursue an activity as an employed/self-employed person in two or more Member States (see Article 13 of Regulation 883/2004).

Since 2014, data on the Portable Documents A1 (PDs A1) issued by the EU/EFTA countries and the UK is collected and reported by the [Network Statistics FMSSFE](#), on behalf of the European Commission - DG Employment. Hence, this year marks 10 years of collecting statistics on the PD A1.<sup>3</sup> As a result, it is a perfect moment to take a closer look at the evolution and trends of the collected and reported statistics since then. This year’s PD A1 report is therefore not limited to an analysis of the figures collected for the reference year 2022 but also highlights key evolutions and trends.

### **General evolution and trends of the PDs A1 issued**

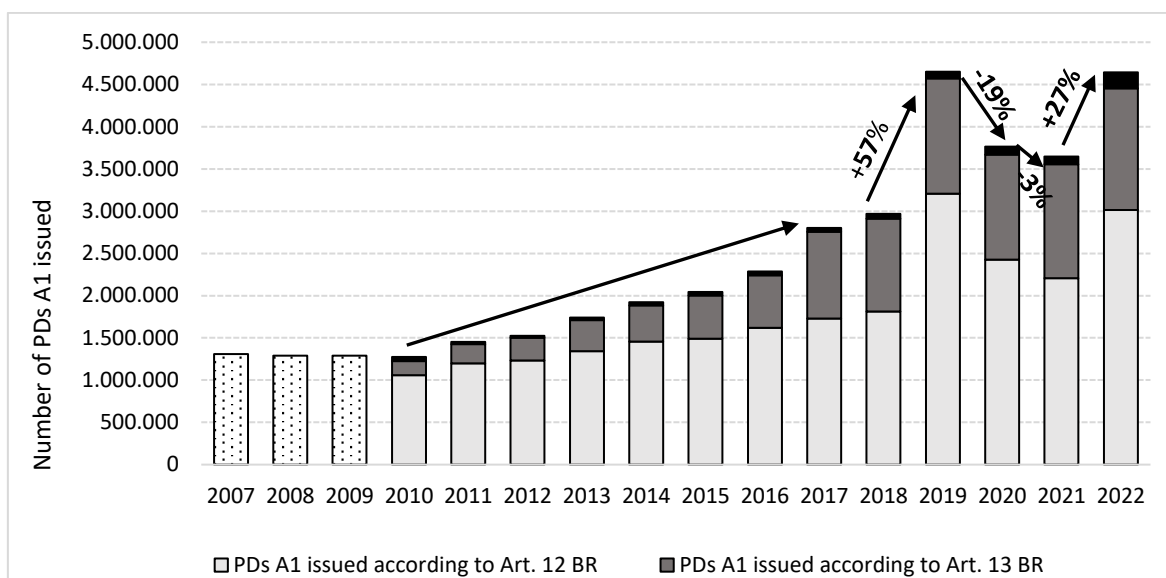
In 2022, approximately 4.6 million PDs A1 were granted by all reporting EU/EFTA countries and the UK. Reported data in *Figure 1* depict a huge, though not a constant linear increase in the number of PDs A1 issued over the past 15 years.<sup>4</sup> In some reference years, a sharp decline or growth occurred compared to the previous year, mainly due to a macro-economic event (e.g., most recently the COVID-19 pandemic) but also due to other reasons (e.g., some Member States have laid down sanctions in their national legislation for not having a PD A1 and/or carry out far more inspections on having a PD A1). In 2007, a total of about 1.3 million E101 certificates were issued by the reporting Member States. In the following three years, mainly because of the financial and economic crisis and its after-effects, fewer E101 certificates were issued compared to 2007. From 2011 and especially from 2013 onwards, there was a strong annual growth of the number of PDs A1 issued until 2020. There was a peak in growth in 2019 (+57 %), mainly due to an enormous increase of PDs A1 granted under Article 12 by Germany. In that year 4.6 million PDs A1 were issued. Due to the COVID-19 pandemic, a decline in the number of PDs A1 issued occurred in 2020 (-19 %) and 2021 (-3 %). In both years there was a substantial decrease of the number of PDs A1 issued compared to 2019. However, the number of PDs A1 issued were still significantly higher than in 2018 and before. The latest figures for 2022 show that the number of PDs A1 issued has returned to the 2019 level (+27 % compared to 2021). Consequently, between 2012 and 2022, the number of PDs A1 issued more than tripled, or increased by more than 3 million PDs A1.

<sup>1</sup> Since 1 May 2010, E101 forms have been replaced by PDs A1 by Regulation (EC) No 883/2004 on the coordination of social security systems. However, these new rules have been applied to nationals of Switzerland since 1 April 2012, and to nationals of Norway, Iceland, and Liechtenstein since 1 June 2012.

<sup>2</sup> The notion of “Member State” is used in this report to indicate the 27 countries belonging to the European Union (EU) in reference year 2022, the European Economic Area (EEA), Switzerland, and the United Kingdom (UK).

<sup>3</sup> Data are available on the PDs A1/E101 certificates issued from reference year 2005 onwards. Before 2014, it was the European Commission that collected such data, at that time on the number of E101 certificates issued. For an overview of the data for reference years 2005, 2006, 2007 see [“Study on the economic and social effects associated with the phenomenon of posting of workers in the EU”](#). For data for reference years 2008 and 2009 see [“Posting of workers in the European Union and EFTA countries : Report on E101 certificates issued in 2008 and 2009”](#). And for data for reference years 2010 and 2011 see [“Posting of workers in the European Union and EFTA countries : Report on E101 certificates issued in 2010 and 2011”](#).

<sup>4</sup> It would be interesting to take an even longer time perspective, and to see, for example, what the impact was of the enlargement of the European Union in 2004 on the evolution of the number of E101 certificates issued before and after 2004.

**Figure 1 - Evolution of the number of PDs A1 issued, by type, 2007-2022**

Source: Administrative data PD A1 Questionnaire 2023 and previous years

Both Poland and Germany have consistently issued by far the most PDs A1. Together, these two Member States issued 50 % of all PDs A1 in 2022. Until 2018, Poland was the main issuing Member State. This has changed from 2019. Since then, Germany is indisputably the Member State issuing the most PDs A1. The importance of both Member States differs strongly according to the legal ground which the PD A1 is granted for. Germany is the main issuing Member State for PDs A1 issued according to Article 12 while Poland is the main issuing Member State for PDs A1 issued under Article 13.

There is a growing importance of the number of PDs A1 issued according to Article 13 in the total number of PDs A1 issued. This was especially the case in the period between 2010 and 2018. Consequently, the share of the PDs A1 issued to persons covered by Article 13 in the total number of PDs A1 increased by almost 24 percentage points in that period (from 13 % to 37 %). This was mainly due to the high annual growth rates of the PDs A1 issued under Article 13 while for Article 12 annual growth rates were much lower. This raises the question whether there has been a shift from the use of Article 12 to Article 13 in recent years.<sup>5,6</sup> The peak in the number of PDs A1 issued under Article 12 in 2019 and 2022 resulted in a decrease in the relative importance of Article 13 in total for both years. In addition, there are also strong differences between Member States as regards the relative importance of PDs A1 issued under Article 12 or under Article 13 respectively. For example, France hardly granted PDs A1 according to Article 13. This appears to have changed in 2022. The (relative) importance of other provisions affecting the issuance of a PD A1 remains limited. This is also the case for the PDs A1 awarded under the application of Article 16 (specific agreement), even during the COVID-19 pandemic. However, this could change from July 2023 onwards due to the [Framework Agreement on the application of Article 16 \(1\) of Regulation \(EC\) No. 883/2004 in cases of habitual cross-border telework](#).

Below, the evolution and main trends of the number of PD A1 issued under Article 12 and Article 13 is discussed. After all, in the analysis of the number of PDs A1 issued, a clear distinction between 'posting according to Article 12' and 'pursuing activities in two or more Member States according to Article 13' is preferred.

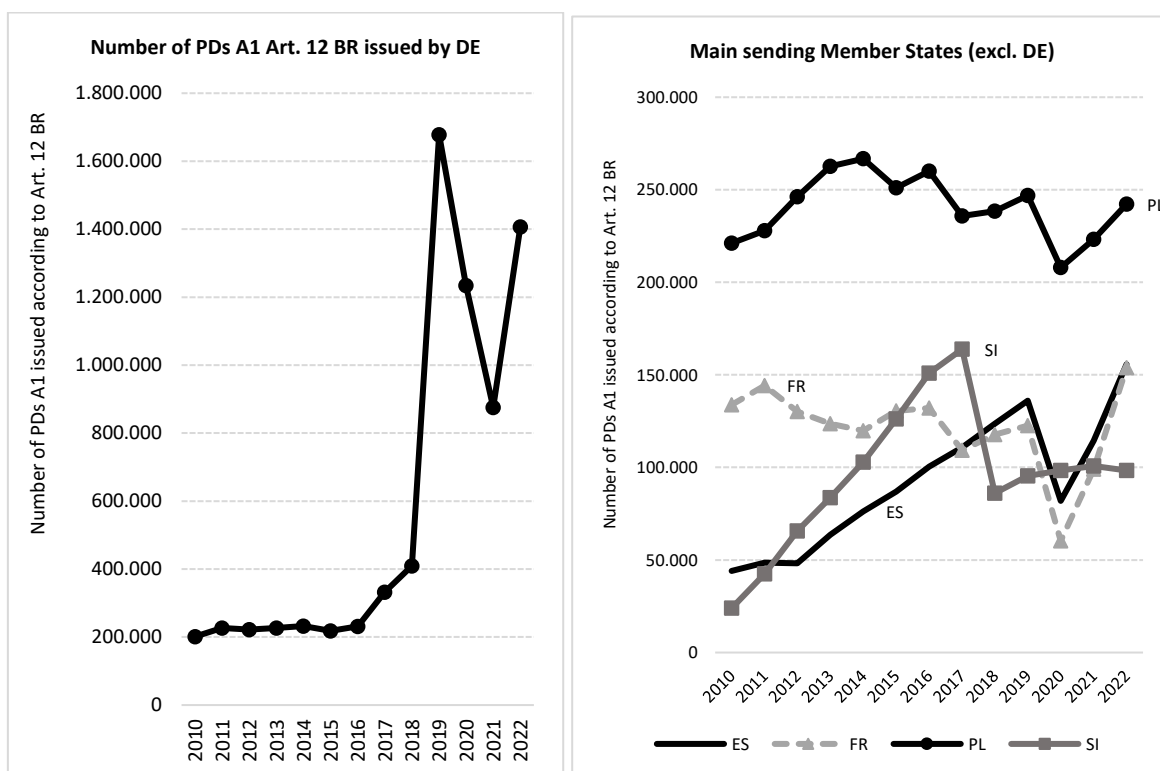
<sup>5</sup> Please note that in order to apply Article 13, it must be possible to ascertain in advance – by virtue of foreseeability or predictability in the next 12 months – not only when and for how long a work activity takes place, but also where (Article 14(10) of the Implementing Regulation).

<sup>6</sup> Such a shift has certainly taken place in Slovenia. Following the implementation of the Transnational Provision of Services Act in 2018, the total number of PDs A1 issued under Article 12 drastically decreased while many employers started with asking for a PD A1 under Article 13, which is not regulated by the Act (see also Figure 2 and 4 in the summary).

### Evolution and trends of the PDs A1 issued under Article 12 (i.e., posting)

In 2022, approximately 3 million PDs A1 were granted under Article 12, covering around 1.8 million persons. One posted worker or self-employed person received an average of 1.7 PDs A1 in 2022. This indicates that posted workers are sent to another Member State several times a year for a certain period. *Figure 2* on the number of PDs A1 issued according to Article 12 depicts an upward trend from 2010 to 2022. It can be assumed that the evolution of the number of PDs A1 issued according to Article 12 strongly depends on the evolution of cross-border trade in services. However, other factors may also have an impact on the evolution of the number of PDs A1 issued according to Article 12. For instance, the communication of competent authorities concerning the application for a PD A1 when making a 'business trip'<sup>7</sup> to another Member State may have a direct impact on its evolution. Compared to 2012, the total number of PDs A1 granted under Article 12 tripled in 2022. Between 2012 and 2018, a constant but relatively limited annual growth occurred (especially compared to the growth rates over the same period for PDs A1 issued under Article 13). However, in 2019 there was an unprecedented increase in the total number of PDs A1 issued under Article 12, mainly due to PDs A1 issued by Germany. Indeed, in 2019, Germany showed a fourfold increase in the number of PDs A1 issued compared to 2018, or an increase of nearly 1.3 million PDs A1. Due to the COVID-19 pandemic, a decrease in the number of PDs A1 issued occurred in 2020, which continued in 2021. Nonetheless, these numbers were still significantly higher in both years compared to 2018 and before. Moreover, 2019 could be considered an exceptional year, even an outlier, although this observation for 2019 can be refuted by the data that became available for 2022. Indeed, in 2022, about the same number of PDs A1 was issued as in 2019. Moreover, it shows how much the EU totals depend on fluctuations which occur in Germany.

**Figure 2 - Evolution of the number of PDs A1 issued under Article 12 BR, main issuing Member States, 2010-2022**



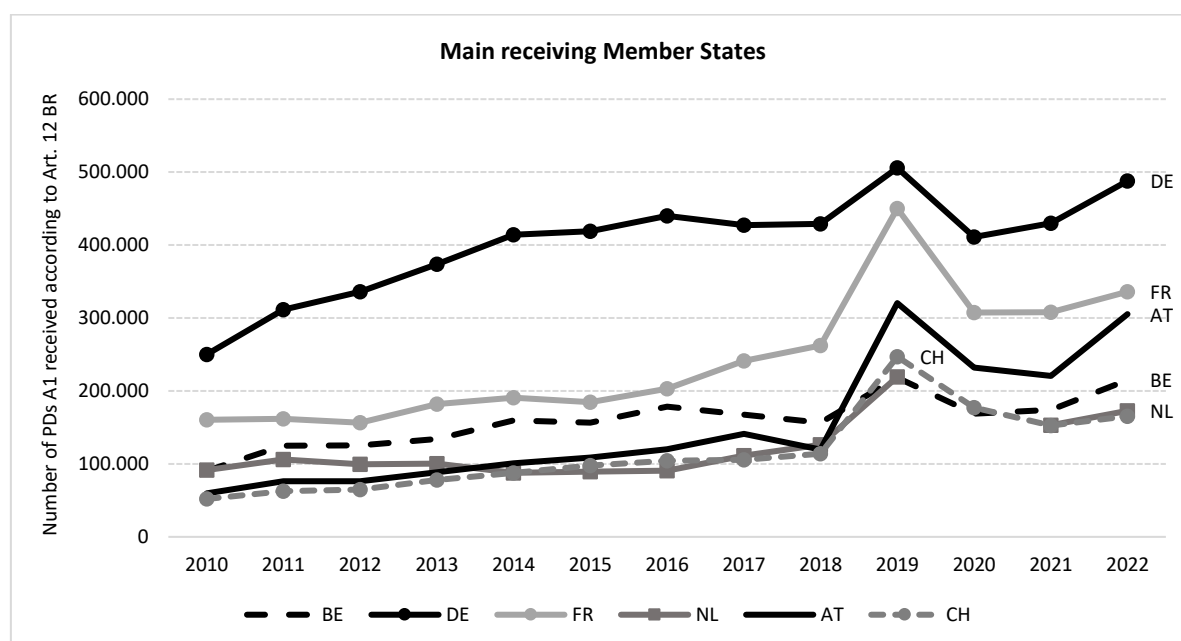
Source: Administrative data PD A1 Questionnaire 2023 and previous years

<sup>7</sup> "As far as the coordination of social security is concerned, Regulations (EC) No 883/2004 and 987/2009 provide that, for every cross-border work-related activity (including 'business trips') the employer, or any self-employed person concerned, is under the obligation to notify the competent (home) Member State, whenever possible in advance, and obtain a Portable Document A1. That obligation covers any economic activity, even if only of short duration. These Regulations do not provide for any exceptions for business trips either." (See the [Practical Guide on Posting](#) (EC, 2019)).

Whereas in 2010, Poland, Germany, France, Portugal, and Luxembourg issued the most PDs A1 under Article 12, the main issuing Member States in 2022 were Germany, Poland, Italy, Spain, and France. Apart from the unprecedented increase in 2019 that occurred in Germany, several other EU/EFTA countries show a notable growth (e.g., Spain, Italy, Switzerland, and Slovenia (until 2017)). Poland, the main issuing Member State in 2010, experienced a relatively stable evolution in the number of PDs A1 granted according to Article 12. Finally, there are several countries showing a negative evolution. Czechia, Estonia, Cyprus, Iceland, and the United Kingdom all issued less PDs A1 under Article 12 compared to 2010.

The most prominent receiving Member States in which workers and self-employed persons with a PD A1 issued under Article 12 are temporarily active have remained largely the same between 2010 and 2022 (Figure 3). It concerned mostly the following EU/EFTA countries: Germany, France, Austria, Belgium, the Netherlands, and Switzerland. The main bilateral flows as well as the importance of flows between different regions sometimes fluctuate, which can mainly be explained by the fluctuations in the number of PDs A1 issued under Article 12 by Germany.

**Figure 3 - Evolution of the number of PDs A1 issued under Article 12 BR, main receiving Member States, 2010-2022**



Source: Administrative data PD A1 Questionnaire 2023 and previous years

Not all responding Member States are able to provide sectoral data as well as data on the number of persons with a PD A1 and the validity period of the PD A1. Over the ten years of data collection, the number of Member States, not least the main issuing ones, able to provide data on these variables increased. This has had a positive impact on the representativeness of the reported EU-average figures. However, this variability makes that EU-averages for some variables can fluctuate strongly depending on the reporting year. For example, Germany has been reporting data by sector since 2020 and since 2022 Germany provided figures on the number of unique persons involved and on the average validity period of the PD A1. As a result, the relative importance of the construction sector in the EU has changed considerably. Before 2020, the construction sector covered around 40 % of the PDs A1 issued under Article 12, but this percentage did not include figures from Germany. By adding figures from Germany, the share of the construction sector dropped to around 20 % from 2020 onwards. In addition, it was often assumed that the average posting period was approximately three to four months. However, this EU-average did not include figures for Germany. In 2022, the average validity period of a PD A1 under Article 12 granted



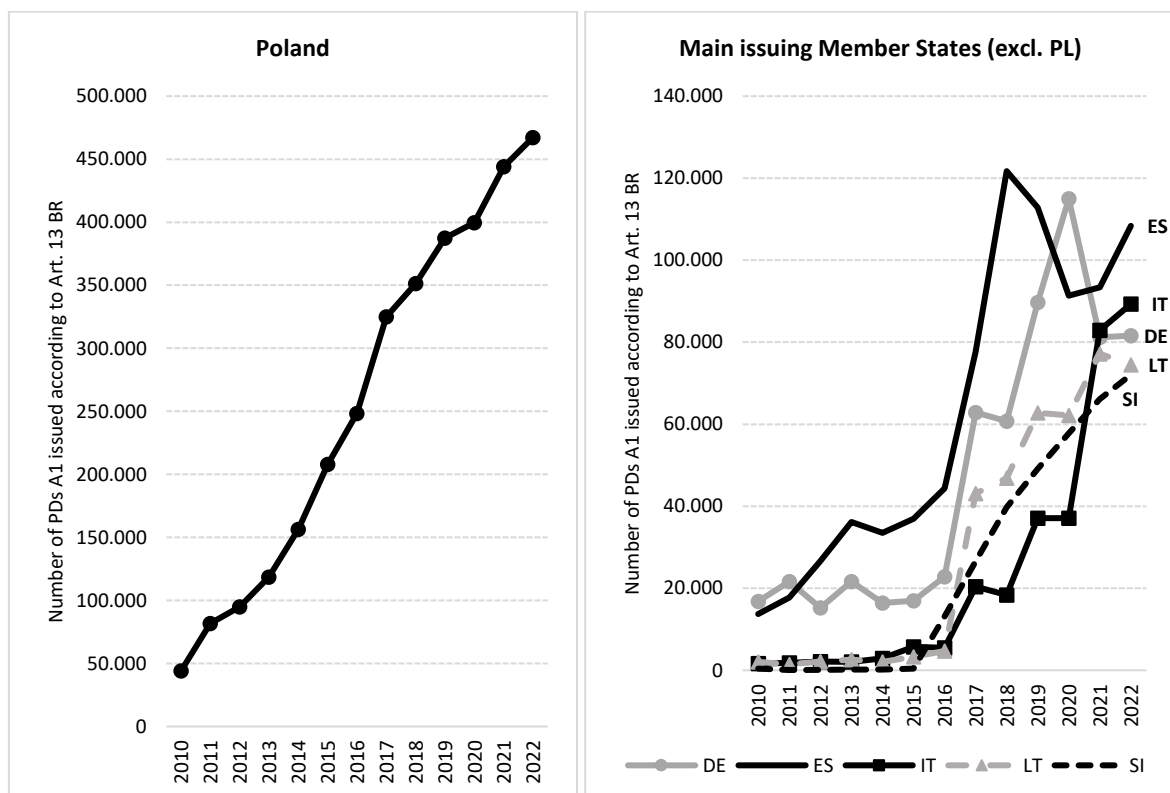
by Germany was 21 days. This brings the EU-average down to about 60 days or about 2 months.

Finally, the share of the number of self-employed persons in total appears to be relatively stable. Only in Slovakia more than half of the PDs A1 under Article 12 are granted to the self-employed, and a strong growth has occurred during the past years.

### ***Evolution and trends of the PDs A1 issued under Article 13 (i.e., active in two or more Member States)***

In 2022, approximately 1.4 million PDs A1 were granted under Article 13, covering roughly 1.3 million persons. The number of PDs A1 granted according to Article 13 has continuously been on the rise from 2010 to 2022, with only a small decline during the COVID-19 pandemic (2020 and 2021). In 2010 the level of the number of PDs A1 awarded according to Article 13 was very low with only 168 000 PDs A1 issued. Between 2010 and 2018, the number of PDs A1 granted under Article 13 showed a strong annual growth, with for instance a 64 % growth in 2017 compared to 2016. The strong increase can mainly be explained by the increasing importance of international road freight transport (and the increased number of inspections in this sector). Approximately 40 % of the PDs A1 granted under Article 13 is issued to persons active in road freight transport. Moreover, it is mainly Member States that have an important share in international road freight transport, such as Poland, Slovakia, Spain, and Lithuania, which issue a high number of PDs A1 under Article 13. Between 2010 and 2022, there has been a continuous increase in the number of PDs A1 issued according to Article 13 by Poland, even during the COVID-19 pandemic (*Figure 4*). Finally, the recent sharp increase in the number of PDs A1 issued according to Article 13 by Slovenia (since 2016) and Lithuania (since 2017) should be noted. Especially seeing that both Member States hardly issued any PDs A1 under Article 13 until recently.

**Figure 4 - Evolution of the number of PDs A1 issued under Article 13 BR, main issuing Member States, 2010-2022**



Source: Administrative data PD A1 Questionnaire 2023 and previous years

# 1. Introduction

## 1.1. Brief overview of the legal framework

The main principle of the EU rules on social security coordination<sup>8</sup> is that persons are subject to the legislation of a single Member State only. If the person works, the legislation of the Member State where the economic activity is carried out applies (*lex loci laboris*). In some very specific situations, other criteria apply. Such situations include, *inter alia*, 1) employed persons who are employed by an employer which normally carries out its activities in a Member State and who are posted by that employer to another Member State to perform work on its behalf (Article 12(1) of the Basic Regulation), 2) persons who normally pursue an activity as a self-employed person in a Member State who go to pursue a similar activity in another Member State (Article 12(2) of the Basic Regulation); and 3) persons who pursue an activity as an employed/self-employed person in two or more Member States (Article 13 of the Basic Regulation).<sup>9</sup> Under Article 12 of the Basic Regulation, the social security legislation of the Member State where the employer normally carries out its activities / where the self-employed activity is normally pursued continues to apply for up to 24 months. Under Article 13 of the Basic Regulation, special rules for persons who are normally employed, self-employed, or both employed and self-employed in two or more Member States are laid down to ensure that the social security legislation of only one Member State is applicable.

In the situations discussed above, a 'Portable Document A1 (PD A1)' is issued.<sup>10</sup> This certificate declares that the social security legislation of the issuing Member State applies and confirms that the person concerned has no obligations to pay social security contributions in another Member State. The current legal framework provides that the employer or the person concerned must inform the competent institution about their planned transnational activities, whenever possible before these activities take place. Subsequently, after verification of several conditions, a PD A1 is provided by the competent institution.<sup>11</sup> <sup>12</sup>In practice, authorities are not always informed about these transnational activities. Consequently, there might be a discrepancy between the number of PDs A1 issued and the actual number of persons being sent abroad. However, it is likely that this difference has narrowed in recent years. Indeed, some Member States have laid down sanctions in their national legislation for not having a PD A1 and/or carry out far more inspections on having a PD A1. In addition, the communication of competent authorities concerning the application for a PD A1 when making a 'business trip' to another EU/EFTA country may also have a direct impact.

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<sup>8</sup> Regulation (EC) No 883/2004 of 29 April 2004 on the coordination of social security systems (also referred to as Basic Regulation) and Regulation (EC) No 987/2009 of 16 September 2009 laying down the procedure for implementing Regulation (EC) No 883/2004 on the coordination of social security systems (also referred to as Implementing Regulation).

<sup>9</sup> See EC (2013), *Practical guide on the applicable legislation in the European Union (EU), the European Economic Area (EEA) and in Switzerland*.

<sup>10</sup> For instance, in cases subject to Article 13 of the Basic Regulation, the person concerned must inform the relevant institution in the Member State of residence, which will launch the procedure for determining the applicable legislation. Once the competent Member State has been identified, it will issue a PD A1.

<sup>11</sup> Under the CJEU case-law (see e.g., Case C-202/97, FTS, paragraph 51 EU:C:2000:75) the competent authority needs to carry out a proper assessment of the facts relevant to the application of the rules for determining the applicable social security legislation and, consequently, to guarantee the correctness of the information contained in the PD A1.

<sup>12</sup> Regarding the granting of a PD A1, the Administrative Commission lays down the structure, content, format, and detailed arrangements for the exchange of documents, and the Implementing Regulation sets out the information policy affecting the granting of a PD A1. Nonetheless, Member States still have an important margin of discretion for designing their internal PD A1 granting procedure.

## 1.2. Content of the PD A1 report

The data presented in this report concerns data provided by Member States on reference year 2022<sup>13,14</sup> about the number of Portable Documents A1 (PDs A1), which replaced the E101 forms.<sup>15</sup> First, a general overview of the number of PDs A1 issued is presented in *Chapter 2*. Next, the focus is on those PDs A1 issued related to persons covered by Article 12 (*Chapter 3*). This is done by providing a breakdown by classification of the sending and receiving Member State, by status, by sector of activity, and by focusing on the impact on the national labour market of the sending and receiving Member State. Furthermore, data are reported on the number of individual persons involved and the duration persons are pursuing an activity abroad, to gain better insight into the impact of persons covered by Article 12. In *Chapter 4*, more detailed figures on persons who are active in two or more Member States under Article 13 are presented. Finally, cases of fraud or error are reported in *Chapter 5*.

Almost all Member States provided detailed figures on the number of PDs A1 issued. For Hungary and Cyprus reference is made to the 2021 data. Only Switzerland could not provide a breakdown by receiving Member State for the PDs A1 issued according to Article 12. Regarding the collection of more detailed figures on the PDs A1 issued according to Article 12, 22 Member States provided a breakdown by sector of economic activity. Furthermore, 22 and 20 Member States respectively were able to provide (partial) data on the number of individual employed/self-employed persons and on the duration persons are pursuing an activity covered by Article 12. Regarding the collection of more detailed figures on the PDs A1 issued to persons active in two or more Member States 15 Member States provided a breakdown by sector of economic activity, 21 Member States reported the number of individual persons active in two or more Member States and 16 Member States provided data on the duration. These response rates indicate that the image presented for some indicators is incomplete due to missing data from several Member States. This is of course not without consequence for the robustness of the overall conclusions. It should be noted that for the first time, Germany has provided data on the number of unique persons with PD A1 granted under Article 12 and on the average posting duration. Of course, this also affects EU totals and averages.

As of 1 February 2020, the United Kingdom is no longer part of the European Union. Since last year, the EU-28 aggregate is replaced by an EU-27 aggregate (excluding the UK) in all thematic statistical reports. There are two Agreements now governing the relations between the EU and UK in terms of social security coordination<sup>16</sup>. First, the **Withdrawal Agreement (WA)**<sup>17</sup> entered into force on 1 February 2020 with a transitional period until 31 December 2020. It provides for *full coordination* to all those persons (including their family members/survivors) who have continuously been in a cross-border situation involving the EU and the UK since before the end of the transition period. This means that the complete

<sup>13</sup> The Network would like to thank all delegations of the Administrative Commission for providing these data. Moreover, we would like to thank the Commission and the Administrative Commission for remarks, comments, and exchanges on previous versions.

<sup>14</sup> See *Annex III* for the content of the PD A1 Questionnaire. The questionnaire also asks whether Member States are aware of cases of fraud or error with regard to the provisions on the PD A1. An analysis of the replies can be found in the thematic report on fraud and error (Jorens *et al.* (2022), *Fraud and error in the field of EU social security coordination*, Network Statistics FMSSFE, European Commission – DG EMPL).

<sup>15</sup> For Hungary and Cyprus, data from reference year 2021 is used, seeing that no data were provided for reference year 2022.

<sup>16</sup> European Commission, Latest developments on free movement of workers, social security coordination and posting of workers at EU level, MoveS Seminar Posting of workers: quo vadis, 17 June 2022.

<sup>17</sup> Agreement on the withdrawal of the United Kingdom of Great Britain and Northern Ireland from the European Union and the European Atomic Energy Community 2019/C 384 I/01. See <https://eur-lex.europa.eu/legal-content/EN/TXT/?qid=1580206007232&uri=CELEX%3A12019W/TXT%2802%29>



social security coordination acquis<sup>18</sup> applies to these persons. Furthermore, *partial coordination* applies to persons who are not covered by Art. 30 (full coordination) but have been subject to both UK/EU social security legislation before the end of the transition period. This includes among others EU rules concerning the aggregation of periods, rights and obligations deriving from such periods. Provisions of the Withdrawal Agreement can be extended to protect the rights of person who were in triangular situation involving the UK, EU and EEA/Switzerland at the end /before the end of transition period. The **Trade and Cooperation Agreement (TCA)**<sup>19</sup> was signed on 30 December 2020, was applied provisionally as of 1 January 2021, and entered into force on 1 May 2021. In this Agreement there is a Protocol on Social Security Coordination which covers all persons who 1) are or have been covered by the social security legislation of an EU Member State or of the UK; 2) are residing in an EU Member State or the UK; 3) are or have been in a cross-border situation between an EU Member State and the UK as from 1 January 2021. This Protocol fully coordinates all branches of social security coordination that are currently coordinated under the Basic Regulation except for family benefits, long-term care, special non-contributory cash benefits, and assisted reproduction services. Additionally, there is a partial coordination for invalidity benefits and unemployment benefits. However, this Protocol does not apply to situations involving a UK national moving between two or more Member States, without a cross-border element with the UK as such. Furthermore, it does not apply to the EEA and Switzerland. This thematic report covering the posting of workers is the only one in which a distinction between both agreements could be provided. Where applicable, figures for the Withdrawal Agreement (UK WA) and the Trade and Cooperation Agreement (UK TCA) are reported separately, as well as the total for the United Kingdom (UK)<sup>20</sup>.

### 1.3. Some important methodological remarks

The statistics that become publicly available by collecting data on PD A1 are nearly the only source of comparable information at European level to estimate the number of postings/posted workers. Consequently, these data are frequently used by scholars as well as in political debates. When using and citing these data, it is of utmost importance that the limitations of these figures are clearly described.

Firstly, the reader's attention is drawn to the fact that differences exist in the notion of 'posted' used by the Basic Regulation compared to the Posting of Workers Directive (Directive 96/71/EC)<sup>21</sup>. Consequently, persons might be 'posted' under the Basic Regulation but not in the meaning of the Directive. For instance, self-employed persons falling under Article 12 (2) of the Basic Regulation are not covered by the Posting of Workers Directive. In addition, workers who are sent temporarily to work in another Member State, but do not provide services there, are not covered by the Posting of Workers Directive. This is the case, for example, for workers on business trips (when no service is provided), attending conferences, meetings, fairs, following training, etc. In contrast, persons might also be posted under the Posting of Workers Directive and not under the Basic Regulation. For instance, workers who pursue an activity in two or more Member States (Article 13 of the Basic Regulation) may fall under the terms and conditions of the Posting of Workers Directive. Furthermore, according to the EU rules on social security coordination, workers

<sup>18</sup> Basic Regulation and Implementing Regulation

<sup>19</sup> Trade and Cooperation Agreement between the European Union and the European Atomic Energy Community, of the one part, and the United Kingdom of Great Britain and Northern Ireland, of the other part. See [https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=uriserv%3AOJ.L\\_.2021.149.01.0010.01.ENG&toc=OJ%3AL%3A2021%3A149%3ATOC](https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=uriserv%3AOJ.L_.2021.149.01.0010.01.ENG&toc=OJ%3AL%3A2021%3A149%3ATOC)

<sup>20</sup> For convenience, the notion "Article 12" is used to refer to PDs A1 issued under Article SSC.11 of the SSC Protocol to the Trade and Cooperation Agreement between the EU and the UK. Similarly, the notion "Article 13" is used to refer to PDs A1 issued under Article SSC.12.

<sup>21</sup> Directive 96/71/EC of the European Parliament and of the Council of 16 December 1996 concerning the posting of workers in the framework of the provision of services.

who at the outset will be posted for a period of longer than two years fall outside the posting provisions of the Regulation, and in such case, they need to be socially insured in the host Member State, unless a specific agreement under Article 16 of the Basic Regulation is concluded. Hence, in the absence of such agreement, they no longer need a PD A1, and these workers will not appear in the related data. In this regard, data on incoming posting undertakings and posted workers registered by national declaration tools may complement the data on postings provided by the A1 certificate. Since 2018, such data are collected at EU level.<sup>22</sup>

Secondly, a posting undertaking which posts a worker to another Member State, or in the case of a self-employed person the person him/herself, must contact the competent institution in the sending Member State. Whenever possible this should be done in advance of the posting. This obligation is defined by Article 15 (1) of the Implementing Regulation. Nonetheless, in some cases, a posting may take place without the institutions being informed of it or the PD A1 is awarded retroactively. This creates a discrepancy between the number of PDs A1 issued according to Article 12 and the actual number of persons being sent abroad on the basis of Article 12.<sup>23</sup> Nevertheless, some Member States, such as France<sup>24</sup> and Austria, recently seem to be much stricter in their judgment of having a PD A1 as a condition for being legally posted. They implemented sanctions in case of failure to show a PD A1 and/or are currently carrying out far more inspections on having a PD A1. As there are often high administrative sanctions if no proof can be delivered, it might be an incentive for posting undertakings to ask for a PD A1. This also applies for business trips.<sup>25</sup> Above measures may have a positive impact on the compliance with Article 15 of the Implementing Regulation. As a result, the discrepancy between the number of PDs A1 issued and the actual number of mobile persons covered by Articles 12 or 13 of the Basic Regulation is likely to have narrowed (slightly) over the past few years. From a statistical point of view this improves the data accuracy. Nevertheless, it may still be an underestimate of the true scale.<sup>26</sup>

<sup>22</sup> See [De Wispelaere, F., De Smedt, L. & Pacolet, J. \(2022\), Posting of workers - Collection of data from the prior notification tools - Reference year 2020](#), Network Statistics FMSSFE, Brussels: European Commission.

<sup>23</sup> According to Eurostat data, in 2021, almost 10 million trips for professional reasons were carried out among the EU-27 Member States. It concerns the number of trips with a duration of one night or over, excluding domestic trips, and one person can make multiple trips per year. It seems likely that for many of these professional trips a PD A1 under Article 12 BR must be applied for. However, 'only' 2.2 million PDs A1 under Article 12 were issued in 2021.

<sup>24</sup> Article L 114-15-1 of the 'Code de la sécurité sociale'.

<sup>25</sup> See the [Practical Guide on Posting](#) (EC, 2019) (section 2.4. "What about 'business trips' to another Member State? Are the rules on posting applicable to any mission abroad of workers?"): "As far as the coordination of social security is concerned, Regulations (EC) No 883/2004 and 987/2009 provide that, for every cross-border work-related activity (including 'business trips') the employer, or any self-employed person concerned, is under the obligation to notify the competent (home) Member State, whenever possible in advance, and obtain a Portable Document A1. That obligation covers any economic activity, even if only of short duration. These Regulations do not provide for any exceptions for business trips either."

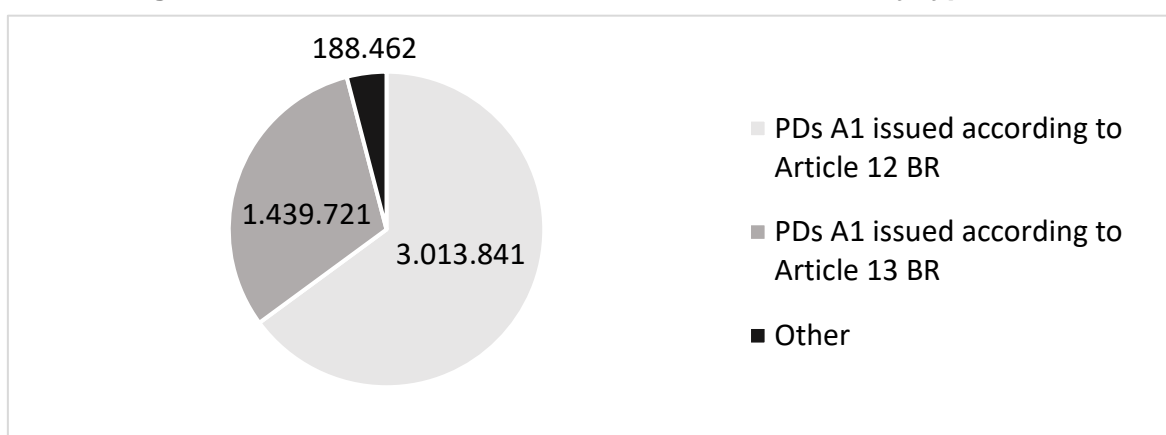
<sup>26</sup> See, footnote 22 with regard to Article 12. Regarding the number of PDs A1 issued under Article 13 for road freight transport, for example, the comparison could be made with the number of drivers attestations (i.e., this is a uniform document certifying that the driver of a vehicle carrying out road haulage operations between Member States is either lawfully employed by the EU transport operator concerned in the Member State in which the operator is established, or lawfully placed at the disposal of that operator. This document is needed for drivers who are not a national, neither a long-term resident of an EU Member State, so that their employment status can be checked, and irregular and illegal employment is combatted) issued and in circulation knowing that a lot of TCNs provide international transport. [https://transport.ec.europa.eu/system/files/2022-10/driver-attestations-in-road-freight-transport\\_2022-10.pdf](https://transport.ec.europa.eu/system/files/2022-10/driver-attestations-in-road-freight-transport_2022-10.pdf)

## 2. An overall picture of the number of PDs A1 issued

### 2.1. Number of PDs A1 issued in 2022

A total number of 4.6 million PDs A1 were issued at the request of the employer or the person concerned in 2022. The majority of these PDs A1 were applicable to persons covered by Article 12, namely 3 million (*Figure 1*). Another 1.4 million PDs A1 were issued to persons covered by Article 13. The remaining 188 000 PDs A1 were issued for other categories, mainly issued to civil servants (136 642 PDs A1), as well as to persons covered by an 'Article 16 Agreement' (19 554 PDs A1) and mariners (17 540 PDs A1) (see also *Table 1*).

**Figure 1 - Total number of PDs A1 issued, breakdown by type, 2022**



Source: Administrative data PD A1 Questionnaire 2022

The highest number of PDs A1 were issued by Germany, namely more than 1.6 million in 2022 (*Table 1*). The second most important Member State is Poland with over 723 000 PDs A1 issued. Together, these two Member States issued 50 % of all PDs A1 in 2022. Additionally, Italy and Spain issued more than 250 000 PDs A1 each, while Belgium, France, Lithuania, Austria, Slovenia, Slovakia, and Switzerland also issued over 100 000 PDs A1 each. Between 50 000 and 100 000 PDs A1 were issued by the Czechia, Croatia, Luxembourg, Hungary (data 2021), the Netherlands, Portugal, and Romania. Bulgaria, Denmark, Estonia, Latvia, Malta, Finland, and the United Kingdom issued less than 50 000 PDs A1 but more than 10 000 PDs A1. Finally, Ireland, Greece, Cyprus (data 2021), Sweden, Iceland, Liechtenstein, and Norway each issued less than 10 000 PDs A1. The distinction between the EU-14 and EU-13 Member States indicates that the EU-14 issued 3.0 million PDs A1 while the EU-13 issued around 1.5 million PDs A1. A visual representation of the relative share of each Member State is provided in *Annex II*, for the total number of PDs A1 issued (*Figure A1*), PDs A1 issued under Article 12 (*Figure A2*), and PDs A1 issued under Article 13 (*Figure A3*).

The row percentages provided in *Table 2* give the opportunity to analyse the differences between the different types of PDs A1. In total 65 % of all PDs A1 were provided according to Article 12 while 31 % were provided under Article 13. The remaining 4 % were issued under the category 'others'. However, there are clear differences between EU-14, EU-13, and EFTA countries when analysing the distribution by type of case in which a PD A1 is granted. Whereas the EU-14 issued around three quarters of PDs A1 under Article 12, the importance of this Article is much less pronounced for EU-13 Member State (41.6 %). Indeed, the EU-13 Member States issued the majority of PDs A1 under Article 13 (56.1 %). For EFTA Member States, PDs A1 issued under Article 12 are most important (74.6 %).

A total of 19 Member States<sup>27</sup> mainly issued PDs A1 to persons covered by Article 12. The importance of Article 12 in total is especially high in Greece (100 %, although it only concerns 26 PDs A1), France (92 %), Germany (88 %), and Luxembourg (85 %). All other Member States<sup>28</sup>, except for Malta, issued the majority of PDs A1 to persons active in two or more Member States. In this group of Member States, especially Czechia (87 %) stands out, as they issued more than eight out of ten PDs A1 to persons under Article 13. The second most important issuing Member State Poland granted around two thirds of PDs A1 by applying Article 13. Only Malta issued 88 % of PDs A1 for other situations, particularly mariners (83 %). Finally, it might be interesting to point out that in general in the United Kingdom Article 12 is more pronounced overall (61 %). However, persons under Article 13 are more likely to remain in scope of Article 30 of the Withdrawal Agreement over time than persons under Article 12. This means a difference is opening up between the Trade and Cooperation Agreement (TCA) (68 % under Article 12) and the Withdrawal Agreement (WA) (39 %). With the latter also seeing a high share issued under Article 13 (47 %).

Even though the majority of PDs A1 are provided by competent administrations through the application of Article 12 and 13 of the Basic Regulation, other types are possible as well. For example, Germany issued a relatively high number of PDs A1 for civil servants, namely 113 045 PDs A1 (*Table 1*). Malta issued over 8 700 PDs A1 for mariners, while Denmark, Germany, and Spain each issued over 2 300 PDs A1 for flight or cabin crew members. Finally, some 19 544 PDs A1 were issued under Article 16. This is a similar number compared to 2021 (19 131 PDs A1). The majority of PDs A1 under Article 16 were issued by Germany (3 589 PDs A1), Luxembourg (2 840), and Croatia (2 238).

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<sup>27</sup> BE, DE, IE, EL, ES, FR, HR, IT, LU, HU (data 2021), AT, PT, RO, SI, SK, IS, LI, CH, and UK.

<sup>28</sup> BG, CZ, DK, EE, CY (data 2021), LV, LT, NL, PL, FI, SE, and NO.

**Table 1 - Total number of PDs A1 issued by the competent Member States, breakdown by type, 2022**

Sending MS	Employed, active under Article 12(1)	Self-employed, active under Article 12(2)	<i>Sum persons active under Article 12</i>	Employed, working in two or more States	Self-employed, working in two or more States	Working as an employed person and as a self-employed person in different States	Working as a civil servant in one State and as an employed/self-employed person in one or more other States	<i>Sum active in two or more States</i>	Civil servant	Contract staff	Mariner	Flight or cabin crew member	Exception (Art. 16)	Working as an employed / self-employed person in only one Member State	<i>Sum others</i>	<i>Total</i>
<b>EU-27</b>	<b>2 732 107</b>	<b>151 261</b>	<b>2 883 368</b>	<b>1 247 160</b>	<b>126 017</b>	<b>15 028</b>	<b>9 645</b>	<b>1 397 850</b>	<b>131 625</b>	<b>408</b>	<b>16 955</b>	<b>10 020</b>	<b>17 421</b>	<b>2 452</b>	<b>178 881</b>	<b>4 460 099</b>
<b>EU-14</b>	<b>2 172 403</b>	<b>88 907</b>	<b>2 261 310</b>	<b>515 127</b>	<b>28 124</b>	<b>6 780</b>	<b>9 351</b>	<b>559 382</b>	<b>117 323</b>	<b>405</b>	<b>3 376</b>	<b>9 006</b>	<b>12 455</b>	<b>1 209</b>	<b>143 774</b>	<b>2 964 466</b>
<b>EU-13</b>	<b>559 704</b>	<b>62 354</b>	<b>622 058</b>	<b>732 033</b>	<b>97 893</b>	<b>8 248</b>	<b>294</b>	<b>838 468</b>	<b>14 302</b>	<b>3</b>	<b>13 579</b>	<b>1 014</b>	<b>4 966</b>	<b>1 243</b>	<b>35 107</b>	<b>1 495 633</b>
<b>EFTA</b>	<b>106 894</b>	<b>995</b>	<b>107 889</b>	<b>24 594</b>	<b>2 868</b>	<b>1 870</b>	<b>512</b>	<b>29 844</b>	<b>4 474</b>	<b>&lt;5</b>	<b>59</b>	<b>215</b>	<b>1 297</b>	<b>850</b>	<b>6 896</b>	<b>144 629</b>
<b>Total</b>	<b>2 853 658</b>	<b>160 183</b>	<b>3 013 841</b>	<b>1 279 296</b>	<b>132 466</b>	<b>17 799</b>	<b>10 160</b>	<b>1 439 721</b>	<b>136 642</b>	<b>409</b>	<b>17 540</b>	<b>10 353</b>	<b>19 530</b>	<b>3 988</b>	<b>188 462</b>	<b>4 642 024</b>
<b>BE</b>	74 261	5 200	<b>79 461</b>	57 923	2 934	616	601	<b>62 074</b>	555	0	120	93	679	155	<b>1 602</b>	<b>143 137</b>
<b>BG</b>	12 031	128	<b>12 159</b>	13 355	130	298	<5	<b>13 784</b>	257	<5	219	0	132	60	<b>669</b>	<b>26 612</b>
<b>CZ</b>	6 206	1 530	<b>7 736</b>	43 381	13 614	3 700	76	<b>60 771</b>	431	0	0	26	137	404	<b>998</b>	<b>69 505</b>
<b>DK</b>	9 823	259	<b>10 082</b>	32 453	433	72	80	<b>33 038</b>	174	0	476	2 458	1 205	22	<b>4 335</b>	<b>47 455</b>
<b>DE</b>	1 358 274	48 771	<b>1 407 045</b>	76 139	2 645	1 796	986	<b>81 566</b>	113 045	18	264	2 357	3 589	0	<b>119 273</b>	<b>1 607 884</b>
<b>EE</b>	4 130	23	<b>4 153</b>	12 686	39	40	<5	<b>12 767</b>	131	0	11	22	<5	27	<b>194</b>	<b>17 114</b>
<b>IE</b>	2 790	222	<b>3 012</b>	1 786	208	48	9	<b>2 051</b>	68	0	<5	47	248	0	<b>364</b>	<b>5 427</b>
<b>EL</b>			<b>26</b>					<b>0</b>							<b>0</b>	<b>26</b>
<b>ES</b>	146 579	9 149	<b>155 728</b>	102 339	5 951	92	6	<b>108 388</b>	995	0	982	3 449	1 364		<b>6 790</b>	<b>270 906</b>
<b>FR</b>	151 822	1 990	<b>153 812</b>	11 056	849	274	16	<b>12 195</b>	32	<5		298	68	<5	<b>401</b>	<b>166 408</b>
<b>HR</b>	49 572	157	<b>49 729</b>	28 724	524	286	11	<b>29 545</b>	149	0	1 788	61	2 238	<5	<b>4 240</b>	<b>83 514</b>
<b>IT</b>	209 436	13 912	<b>223 348</b>	83 329	4 809	855	316	<b>89 309</b>	709	0	185	0	1 494	7	<b>2 395</b>	<b>315 052</b>
<b>CY</b>	71	8	<b>79</b>	2 288	20	15		<b>2 323</b>	19		368		255	250	<b>892</b>	<b>3 294</b>
<b>LV</b>	4 011	<5	<b>4 014</b>	16 967	182	95	<5	<b>17 245</b>	91		1 391	7	966	9	<b>2 464</b>	<b>23 723</b>
<b>LT</b>	33 882	164	<b>34 046</b>	74 350	78	67		<b>74 495</b>			775				<b>775</b>	<b>109 316</b>
<b>LU</b>	60 017	388	<b>60 405</b>	6 484	243	1 056	10	<b>7 793</b>	<5	0	17	91	2 840	0	<b>2 949</b>	<b>71 147</b>
<b>HU</b>	46 054	437	<b>46 491</b>	21 003	229	619	<5	<b>21 853</b>	393	0	0	0	105	7	<b>505</b>	<b>68 849</b>
<b>MT</b>	715	58	<b>773</b>	424	39	23	<5	<b>487</b>	19	0	8 718	423	3	100	<b>9 263</b>	<b>10 523</b>
<b>NL</b>	20 439	3 446	<b>23 885</b>	55 881	6 111	633	41	<b>62 666</b>	0	386	654	5	0		<b>1 045</b>	<b>87 596</b>
<b>AT</b>	73 398	4 915	<b>78 313</b>	51 980	896	1 063	6 661	<b>60 600</b>	495	0	0	132	429	25	<b>1 081</b>	<b>139 994</b>
<b>PL</b>	228 683	13 599	<b>242 282</b>	397 798	68 970	367	120	<b>467 255</b>	11 501	<5	60	458	931	126	<b>13 077</b>	<b>722 614</b>
<b>PT</b>	59 205	217	<b>59 422</b>	26 275	2 487	5	0	<b>28 767</b>	12	0	0	0	73	0	<b>85</b>	<b>88 274</b>
<b>RO</b>	35 075	53	<b>35 128</b>	30 584	11			<b>30 595</b>	222		245		20		<b>487</b>	<b>66 210</b>
<b>SI</b>	96 368	2 075	<b>98 443</b>	67 983	2 674	1 332	67	<b>72 056</b>	1 053	0	<5	10	62	237	<b>1 366</b>	<b>171 865</b>
<b>SK</b>	42 906	44 119	<b>87 025</b>	22 490	11 383	1 406	13	<b>35 292</b>	36	<5	0	7	114	19	<b>177</b>	<b>122 494</b>
<b>FI</b>	4 638	296	<b>4 934</b>	4 877	402	61	65	<b>5 405</b>	761	0	281	50	336	149	<b>1 577</b>	<b>11 916</b>
<b>SE</b>	1 695	142	<b>1 837</b>	4 605	156	209	560	<b>5 530</b>	476	0	396	26	130	849	<b>1 877</b>	<b>9 244</b>
<b>IS</b>	99	60	<b>159</b>	13	18	31	<5	<b>66</b>	46	0	11	<5	0	9	<b>70</b>	<b>295</b>
<b>LI</b>	630	<5	<b>632</b>	282	18	52	43	<b>395</b>	11				15	0	<b>26</b>	<b>1 053</b>
<b>NO</b>	1 749	151	<b>1 900</b>	1 888	244	572	102	<b>2 806</b>	465		47		413	161	<b>1 086</b>	<b>5 792</b>
<b>CH</b>	104 416	782	<b>105 198</b>	22 411	2 588	1 215	363	<b>26 577</b>	3 952	<5	<5	211	869	680	<b>5 714</b>	<b>137 489</b>
<b>UK TCA</b>	12 222	6 658	<b>18 880</b>	4 790	2 467	234	<5	<b>7 493</b>	432	0	396	22	n.a.	536	<b>1 386</b>	<b>27 759</b>
<b>UK WA</b>	2 435	1 269	<b>3 704</b>	2 752	1 114	667	<5	<b>4 534</b>	111	0	130	96	812	150	<b>1 299</b>	<b>9 537</b>
<b>UK</b>	14 657	7 926	<b>22 584</b>	7 542	3 581	901	<5	<b>12 027</b>	543	0	526	118	812	686	<b>2 685</b>	<b>37 296</b>

\* CY and HU: data 2021.

Source: Administrative data PD A1 Questionnaire 2023

**Table 2 - Total number of PDs A1 issued by the competent Member States, row percentage breakdown by type, 2022**

Sending MS	Employed, active under Article 12(1)	Self-employed, active under Article 12(2)	Sum persons active under Article 12	Employed, working in two or more States	Self-employed, working in two or more States	Working as an employed person and as a self-employed person in different States	Working as a civil servant in one State and as an employed/ self-employed person in one or more other States	Sum active in two or more States	Civil servant	Contract staff	Mariner	Flight or cabin crew member	Exception (Art. 16)	Working as an employed / self-employed person in only one Member State	Sum others	Total
EU-27	61.3 %	3.4 %	64.6 %	28.0 %	2.8 %	0.3 %	0.2 %	31.3 %	3.0 %	0.0 %	0.4 %	0.2 %	0.4 %	0.1 %	4.0 %	100 %
EU-14	73.3 %	3.0 %	76.3 %	17.4 %	0.9 %	0.2 %	0.3 %	18.9 %	4.0 %	0.0 %	0.1 %	0.3 %	0.4 %	0.0 %	4.8 %	100 %
EU-13	37.4 %	4.2 %	41.6 %	48.9 %	6.5 %	0.6 %	0.0 %	56.1 %	1.0 %	0.0 %	0.9 %	0.1 %	0.3 %	0.1 %	2.3 %	100 %
EFTA	73.9 %	0.7 %	74.6 %	17.0 %	2.0 %	1.3 %	0.4 %	20.6 %	3.1 %	0.0 %	0.0 %	0.1 %	0.9 %	0.6 %	4.8 %	100 %
<b>Total</b>	<b>61.5 %</b>	<b>3.5 %</b>	<b>64.9 %</b>	<b>27.6 %</b>	<b>2.9 %</b>	<b>0.4 %</b>	<b>0.2 %</b>	<b>31.0 %</b>	<b>2.9 %</b>	<b>0.0 %</b>	<b>0.4 %</b>	<b>0.2 %</b>	<b>0.4 %</b>	<b>0.1 %</b>	<b>4.1 %</b>	<b>100 %</b>
BE	51.9 %	3.6 %	55.5 %	40.5 %	2.0 %	0.4 %	0.4 %	43.4 %	0.4 %	0.0 %	0.1 %	0.1 %	0.5 %	0.1 %	1.1 %	100 %
BG	45.2 %	0.5 %	45.7 %	50.2 %	0.5 %	1.1 %	0.0 %	51.8 %	1.0 %	0.0 %	0.8 %	0.0 %	0.5 %	0.2 %	2.5 %	100 %
CZ	8.9 %	2.2 %	11.1 %	62.4 %	19.6 %	5.3 %	0.1 %	87.4 %	0.6 %	0.0 %	0.0 %	0.0 %	0.2 %	0.6 %	1.4 %	100 %
DK	20.7 %	0.5 %	21.2 %	68.4 %	0.9 %	0.2 %	0.2 %	69.6 %	0.4 %	0.0 %	1.0 %	5.2 %	2.5 %	0.0 %	9.1 %	100 %
DE	84.5 %	3.0 %	87.5 %	4.7 %	0.2 %	0.1 %	0.1 %	5.1 %	7.0 %	0.0 %	0.0 %	0.1 %	0.2 %	0.0 %	7.4 %	100 %
EE	24.1 %	0.1 %	24.3 %	74.1 %	0.2 %	0.2 %	0.0 %	74.6 %	0.8 %	0.0 %	0.1 %	0.1 %	0.0 %	0.2 %	1.1 %	100 %
IE	51.4 %	4.1 %	55.5 %	32.9 %	3.8 %	0.9 %	0.2 %	37.8 %	1.3 %	0.0 %	0.0 %	0.9 %	4.6 %	0.0 %	6.7 %	100 %
EL	100.0 %	0.0 %	100.0 %	0.0 %	0.0 %	0.0 %	0.0 %	0.0 %	0.0 %	0.0 %	0.0 %	0.0 %	0.0 %	0.0 %	0.0 %	100 %
ES	54.1 %	3.4 %	57.5 %	37.8 %	2.2 %	0.0 %	0.0 %	40.0 %	0.4 %	0.0 %	0.4 %	1.3 %	0.5 %	0.0 %	2.5 %	100 %
FR	91.2 %	1.2 %	92.4 %	6.6 %	0.5 %	0.2 %	0.0 %	7.3 %	0.0 %	0.0 %	0.0 %	0.2 %	0.0 %	0.0 %	0.2 %	100 %
HR	59.4 %	0.2 %	59.5 %	34.4 %	0.6 %	0.3 %	0.0 %	35.4 %	0.2 %	0.0 %	2.1 %	0.1 %	2.7 %	0.0 %	5.1 %	100 %
IT	66.5 %	4.4 %	70.9 %	26.4 %	1.5 %	0.3 %	0.1 %	28.3 %	0.2 %	0.0 %	0.1 %	0.0 %	0.5 %	0.0 %	0.8 %	100 %
CY	2.2 %	0.2 %	2.4 %	69.5 %	0.6 %	0.5 %	0.0 %	70.5 %	0.6 %	0.0 %	11.2 %	0.0 %	7.7 %	7.6 %	27.1 %	100 %
LV	16.9 %	0.0 %	16.9 %	71.5 %	0.8 %	0.4 %	0.0 %	72.7 %	0.4 %	0.0 %	5.9 %	0.0 %	4.1 %	0.0 %	10.4 %	100 %
LT	31.0 %	0.2 %	31.1 %	68.0 %	0.1 %	0.1 %	0.0 %	68.1 %	0.0 %	0.0 %	0.7 %	0.0 %	0.0 %	0.0 %	0.7 %	100 %
LU	84.4 %	0.5 %	84.9 %	9.1 %	0.3 %	1.5 %	0.0 %	11.0 %	0.0 %	0.0 %	0.0 %	0.1 %	4.0 %	0.0 %	4.1 %	100 %
HU	66.9 %	0.6 %	67.5 %	30.5 %	0.3 %	0.9 %	0.0 %	31.7 %	0.6 %	0.0 %	0.0 %	0.0 %	0.2 %	0.0 %	0.7 %	100 %
MT	6.8 %	0.6 %	7.3 %	4.0 %	0.4 %	0.2 %	0.0 %	4.6 %	0.2 %	0.0 %	82.8 %	4.0 %	0.0 %	1.0 %	88.0 %	100 %
NL	23.3 %	3.9 %	27.3 %	63.8 %	7.0 %	0.7 %	0.0 %	71.5 %	0.0 %	0.4 %	0.7 %	0.0 %	0.0 %	0.0 %	1.2 %	100 %
AT	52.4 %	3.5 %	55.9 %	37.1 %	0.6 %	0.8 %	4.8 %	43.3 %	0.4 %	0.0 %	0.0 %	0.1 %	0.3 %	0.0 %	0.8 %	100 %
PL	31.6 %	1.9 %	33.5 %	55.0 %	9.5 %	0.1 %	0.0 %	64.7 %	1.6 %	0.0 %	0.0 %	0.1 %	0.1 %	0.0 %	1.8 %	100 %
PT	67.1 %	0.2 %	67.3 %	29.8 %	2.8 %	0.0 %	0.0 %	32.6 %	0.0 %	0.0 %	0.0 %	0.0 %	0.1 %	0.0 %	0.1 %	100 %
RO	53.0 %	0.1 %	53.1 %	46.2 %	0.0 %	0.0 %	0.0 %	46.2 %	0.3 %	0.0 %	0.4 %	0.0 %	0.0 %	0.0 %	0.7 %	100 %
SI	56.1 %	1.2 %	57.3 %	39.6 %	1.6 %	0.8 %	0.0 %	41.9 %	0.6 %	0.0 %	0.0 %	0.0 %	0.0 %	0.1 %	0.8 %	100 %
SK	35.0 %	36.0 %	71.0 %	18.4 %	9.3 %	1.1 %	0.0 %	28.8 %	0.0 %	0.0 %	0.0 %	0.0 %	0.1 %	0.0 %	0.1 %	100 %
FI	38.9 %	2.5 %	41.4 %	40.9 %	3.4 %	0.5 %	0.5 %	45.4 %	6.4 %	0.0 %	2.4 %	0.4 %	2.8 %	1.3 %	13.2 %	100 %
SE	18.3 %	1.5 %	19.9 %	49.8 %	1.7 %	2.3 %	6.1 %	59.8 %	5.1 %	0.0 %	4.3 %	0.3 %	1.4 %	9.2 %	20.3 %	100 %
IS	33.6 %	20.3 %	53.9 %	4.4 %	6.1 %	10.5 %	1.4 %	22.4 %	15.6 %	0.0 %	3.7 %	1.4 %	0.0 %	3.1 %	23.7 %	100 %
LI	59.8 %	0.2 %	60.0 %	26.8 %	1.7 %	4.9 %	4.1 %	37.5 %	1.0 %	0.0 %	0.0 %	0.0 %	1.4 %	0.0 %	2.5 %	100 %
NO	30.2 %	2.6 %	32.8 %	32.6 %	4.2 %	9.9 %	1.8 %	48.4 %	8.0 %	0.0 %	0.8 %	0.0 %	7.1 %	2.8 %	18.8 %	100 %
CH	75.9 %	0.6 %	76.5 %	16.3 %	1.9 %	0.9 %	0.3 %	19.3 %	2.9 %	0.0 %	0.0 %	0.2 %	0.6 %	0.5 %	4.2 %	100 %
UK TCA	44.0 %	24.0 %	68.0 %	17.2 %	8.9 %	0.8 %	0.0 %	27.0 %	1.6 %	0.0 %	1.4 %	0.1 %	n.a.	1.9 %	5.0 %	100 %
UK WA	25.5 %	13.3 %	38.8 %	28.9 %	11.7 %	7.0 %	0.0 %	47.5 %	1.2 %	0.0 %	1.4 %	1.0 %	8.5 %	1.6 %	13.6 %	100 %
UK	39.3 %	21.3 %	60.6 %	20.2 %	9.6 %	2.4 %	0.0 %	32.2 %	1.5 %	0.0 %	1.4 %	0.3 %	2.2 %	1.8 %	7.2 %	100 %

\* CY and HU: data 2021.

Source: Administrative data PD A1 Questionnaire 2023



Table 3 demonstrates that the share of Member States may differ strongly according to the type of case which the PD A1 is granted for. For instance, around one third of the PDs A1 provided to persons covered by Article 13 are issued by Poland. However, Poland's share in total is much lower regarding A1 certificates issued to persons covered by Article 12 (some 8 %). This contrasts with Germany, the main issuing Member State of PDs A1 issued to persons falling under Article 12. More than 46 % of the PDs A1 granted to persons covered by Article 12 are issued by Germany. This Member State shows a much lower share in the total number of PDs A1 issued to persons covered by Article 13, namely only 6 %. Another striking finding is that while the share of Slovakia in total is limited (3 %), it amounts to more than one quarter of the total number of PDs A1 issued to posted self-employed persons according to Article 12(2).

In total, 64 % of PDs A1 in 2022 were issued by the EU-14 (mainly by Germany) while the EU-13 issued 32 %. However, when only focussing on PDs A1 issued under Article 13, the EU-13 issued most PDs A1 (58 %) (mainly by Poland) as opposed to the EU-14 (39 %).

**Table 3 - Total number of PDs A1 issued by the competent Member States, by type, share in column total, 2022**

Sending MS	Employed, active under Article 12	Self-employed, active under Article 12	Sum persons active under Article 12	Active in two or more States under Article 13	Others	Total
EU-27	95.7 %	94.4 %	95.7 %	97.1 %	94.9 %	96.1 %
EU-14	76.1 %	55.5 %	75.0 %	38.9 %	76.3 %	63.9 %
EU-13	19.6 %	38.9 %	20.6 %	58.2 %	18.6 %	32.2 %
EFTA	3.7 %	0.6 %	3.6 %	2.1 %	3.7 %	3.1 %
Total	100 %	100 %	100 %	100 %	100 %	100 %
BE	2.6 %	3.2 %	2.6 %	4.3 %	0.8 %	3.1 %
BG	0.4 %	0.1 %	0.4 %	1.0 %	0.4 %	0.6 %
CZ	0.2 %	1.0 %	0.3 %	4.2 %	0.5 %	1.5 %
DK	0.3 %	0.2 %	0.3 %	2.3 %	2.3 %	1.0 %
DE	47.6 %	30.4 %	46.7 %	5.7 %	63.3 %	34.6 %
EE	0.1 %	0.0 %	0.1 %	0.9 %	0.1 %	0.4 %
IE	0.1 %	0.1 %	0.1 %	0.1 %	0.2 %	0.1 %
EL	0.0 %	0.0 %	0.0 %	0.0 %	0.0 %	0.0 %
ES	5.1 %	5.7 %	5.2 %	7.5 %	3.6 %	5.8 %
FR	5.3 %	1.2 %	5.1 %	0.8 %	0.2 %	3.6 %
HR	1.7 %	0.1 %	1.7 %	2.1 %	2.2 %	1.8 %
IT	7.3 %	8.7 %	7.4 %	6.2 %	1.3 %	6.8 %
CY	0.0 %	0.0 %	0.0 %	0.2 %	0.5 %	0.1 %
LV	0.1 %	0.0 %	0.1 %	1.2 %	1.3 %	0.5 %
LT	1.2 %	0.1 %	1.1 %	5.2 %	0.4 %	2.4 %
LU	2.1 %	0.2 %	2.0 %	0.5 %	1.6 %	1.5 %
HU	1.6 %	0.3 %	1.5 %	1.5 %	0.3 %	1.5 %
MT	0.0 %	0.0 %	0.0 %	0.0 %	4.9 %	0.2 %
NL	0.7 %	2.2 %	0.8 %	4.4 %	0.6 %	1.9 %
AT	2.6 %	3.1 %	2.6 %	4.2 %	0.6 %	3.0 %
PL	8.0 %	8.5 %	8.0 %	32.5 %	6.9 %	15.6 %
PT	2.1 %	0.1 %	2.0 %	2.0 %	0.0 %	1.9 %
RO	1.2 %	0.0 %	1.2 %	2.1 %	0.3 %	1.4 %
SI	3.4 %	1.3 %	3.3 %	5.0 %	0.7 %	3.7 %
SK	1.5 %	27.5 %	2.9 %	2.5 %	0.1 %	2.6 %
FI	0.2 %	0.2 %	0.2 %	0.4 %	0.8 %	0.3 %
SE	0.1 %	0.1 %	0.1 %	0.4 %	1.0 %	0.2 %
IS	0.0 %	0.0 %	0.0 %	0.0 %	0.0 %	0.0 %
LI	0.0 %	0.0 %	0.0 %	0.0 %	0.0 %	0.0 %
NO	0.1 %	0.1 %	0.1 %	0.2 %	0.6 %	0.1 %
CH	3.7 %	0.5 %	3.5 %	1.8 %	3.0 %	3.0 %
UK TCA	0.4 %	4.2 %	0.6 %	0.5 %	0.7 %	0.6 %
UK WA	0.1 %	0.8 %	0.1 %	0.3 %	0.7 %	0.2 %
UK	0.5 %	4.9 %	0.7 %	0.8 %	1.4 %	0.8 %

\* CY and HU: data 2021.

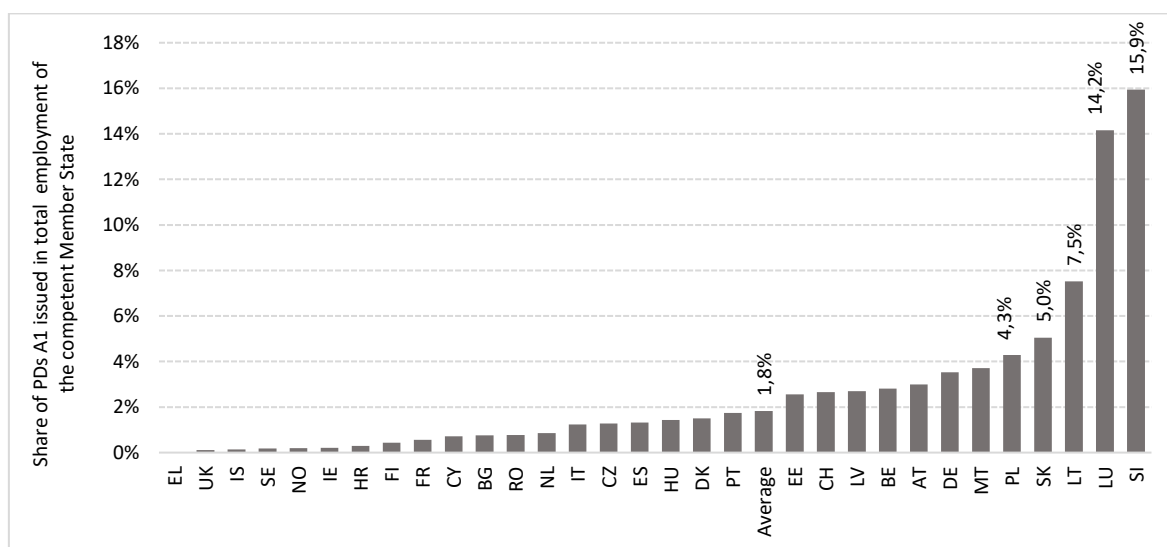
Source: Administrative data PD A1 Questionnaire 2023

## 2.2. Share in total EU employment

The total number of PDs A1 issued can be compared to the total number of employed persons in the issuing Member State. Although this gives a first idea of the relative volume, it is certainly not the best indicator to measure the impact on national labour markets, as in that case the number of forms issued are compared to the number of employed/self-employed persons. It is better to compare the total number of employed/self-employed persons with the number of individual persons involved, as several PDs A1 could be issued to the same person during the reference year. Such data are collected for both persons covered by Article 12 and persons covered by Article 13.

In 2022, a PD A1 was issued to an equivalent of 1.8 % of the employed population (*Figure 2*). Especially Luxembourg and Slovenia stand out with shares of 14.2 % and 15.9 % of the population respectively. Both Member States, together with Lithuania (7.5 %), Slovakia (5.0 %) and Poland (4.3 %) are the main sending Member States in relative terms. The main sending Member State in absolute terms, Germany, issued a PD A1 to 3.5 % of its workforce in 2022. Nevertheless, as already indicated, these figures should be considered as an overestimation of the real impact on national labour markets. In a later stage, they will be corrected based on the number of individual persons involved and the number of persons in full-time equivalents.

**Figure 2 - Share of PDs A1 in national employment of the sending Member State, 2022**



Source: Administrative data PD A1 Questionnaire 2023 and Eurostat [\[nama\\_10\\_a10\\_e\]](#)

## 2.3. Comparison with previous years

The summary of this report looks at the evolution and trend of the number of PDs A1 issued by Member States between 2010 and 2022. This section compares the data for 2022 with those for 2021 and discusses salient findings. The decline of the number of PDs A1 issued which started in 2020 has come to an end in 2022. While from 2020 to 2021 the overall number of PDs A1 issued decreased by around 116 000 or about 3 %, it has increased by almost 1 million or 27 % from 2021 to 2022 (*Table 4*). This is mainly due to the increase in Germany, which issued 610 853 more PDs A1 more in 2022 than in 2021, or a growth of 61 %. This is a higher number than in 2020, but still slightly lower than in 2019.

Most of the Member States knew an increase in the number of PDs A1 issued, namely 23 Member States. The most remarkable increase can be noted in Ireland (+217 %), which brings the number of PDs A1 issued almost back to the level before the COVID-19



pandemic. Furthermore, the increase in Norway and Switzerland surpassed 70 %. Only seven Member States experienced a decline in the number of PDs A1 issued, with especially Liechtenstein standing out (-66 %), although it should be noted that from 2020 to 2021 it knew a remarkable increase (+60 %). Furthermore, the number of PDs A1 issued by Greece dropped from 9 251 in 2018 to only 26 in 2022.

Out of the top issuing Member States, Poland, Slovenia, Italy, and Spain have been on the increase from 2020 onwards, while Germany only knew an increase from 2021 onwards. All five Member States except for Germany issued more PDs A1 in 2022 than 'pre-COVID' (reference year 2019). Nevertheless, the number of PDs A1 issued in Germany in 2022 (1.6 million) is not that much lower than the number issued in 2019 (1.8 million).

The total increase of PDs A1 issued (+27.3 %) is especially due to the increase in the EU-14 (+41.1 %) (and Germany in particular). Nevertheless, also in the EU-13 (+4.4 %) and EFTA (+70.5 %) an increase is noted.

**Table 4 - PDs A1 issued by the competent Member States, 2012-2022**

Sending MS	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	Change 2022 vs 2021	
												Numbers	%
EU-27	1 481 263	1 680 543	1 862 102	1 978 146	2 212 363	2 717 078	2 884 994	4 512 401	3 675 687	3 533 226	4 460 099	926 873	26.2 %
EU-28	1 524 363	1 721 592	1 895 194	2 022 478	2 261 573	2 766 574	2 934 219	4 570 675					
EU-14	839 011	935 821	998 841	1 035 468	1 132 760	1 392 689	1 600 478	3 108 956	2 372 793	2 101 161	2 964 466	863 305	41.1 %
EU-13	642 252	744 722	863 261	942 678	1 079 603	1 324 389	1 324 389	1 403 445	1 302 894	1 432 062	1 495 633	63 568	4.4 %
EFTA	760	19 902	24 792	26 714	29 603	36 705	36 705	79 067	49 777	84 830	144 629	59 799	70.5 %
Total	1 525 123	1 741 494	1 919 986	2 049 192	2 291 176	2 803 279	2 968 487	4 649 742	3 762 860	3 646 509	4 642 024	995 515	27.3 %
BE	59 832	83 582	79 771	86 218	104 307	134 398	137 022	150 677	123 839	128 293	143 137	14 844	11.6 %
BG	11 896	14 185	14 203	15 839	19 595	36 220	26 315	30 153	25 773	26 370	26 612	242	0.9 %
CZ	24 162	30 912	31 675	37 174	47 578	67 933	63 693	80 973	61 206	68 277	69 505	1 228	1.8 %
DK	19 592	25 220	20 409	30 031	29 595	37 848	47 453	53 269	43 589	38 056	47 455	9 399	24.7 %
DE	243 125	254 469	255 724	240 862	260 068	399 745	475 704	1 798 596	1 397 383	997 031	1 607 884	610 853	61.3 %
EE	18 606	15 927	15 054	15 363	17 953	18 977	19 862	23 060	22 206	21 006	17 114	-3 892	-18.5 %
IE	7 799	7 396	7 654	7 899	7 339	7 745	7 464	6 820	6 094	1 711	5 427	3 716	217.2 %
EL	1 889	2 131	3 608	4 789	6 924	7 204	9 251	9 251	9 251	9 251	26	-9 225	-99.7 %
ES	76 960	101 705	111 557	125 711	147 424	191 148	248 532	252 270	176 353	211 529	270 906	59 377	28.1 %
FR	140 805	130 435	125 203	139 040	135 974	111 659	119 516	126 485	61 677	102 088	166 408	64 320	63.0 %
HR		10 227	27 556	38 998	42 602	60 026	65 949	67 359	71 331	83 740	83 514	-226	-0.3 %
IT	52 237	59 114	74 431	91 740	114 515	152 528	169 774	215 628	215 628	274 789	315 052	40 263	14.7 %
CY	2 282	2 192	1 955	3 091	3 552	4 040	4 040	4 040	4 040	3 294	3 294	0	0.0 %
LV	5 402	7 425	6 656	7 738	10 830	20 689	20 199	23 271	23 758	23 855	23 723	-132	-0.6 %
LT	14 041	17 342	19 208	25 254	30 723	70 180	78 384	95 074	93 726	110 641	109 316	-1 325	-1.2 %
LU	44 256	32 472	62 141	62 947	68 725	73 875	79 831	92 350	67 818	65 737	71 147	5 410	8.2 %
HU	65 182	68 489	68 234	63 663	65 185	82 881	64 217	71 095	44 310	68 849	68 849	0	0.0 %
MT	327	322	324	228	504	1 388	2 655	4 082	6 998	6 965	10 523	3 558	51.1 %
NL	84 202	95 719	116 060	95 017	98 687	103 738	100 660	104 652	86 809	81 889	87 596	5 707	7.0 %
AT	40 038	42 171	48 815	64 373	75 132	68 956	110 687	197 627	104 796	106 766	139 994	33 228	31.1 %
PL	341 100	385 422	428 405	463 174	513 972	573 358	605 785	648 032	617 772	676 839	722 614	45 775	6.8 %
PT	55 901	82 851	75 577	64 970	64 459	85 074	74 109	77 389	60 832	67 173	88 274	21 101	31.4 %
RO	44 459	51 939	57 194	46 871	50 855	84 743	71 207	82 443	66 659	67 891	66 210	-1 681	-2.5 %
SI	65 871	83 898	103 303	126 902	164 226	190 976	127 059	146 157	156 871	168 126	171 865	3 739	2.2 %
SK	48 924	56 442	89 494	98 383	112 028	112 978	135 151	127 706	108 244	106 212	122 494	16 282	15.3 %
FI	6 223	6 892	6 940	9 369	8 155	8 061	9 882	10 328	8 628	9 232	11 916	2 684	29.1 %
SE	6 152	11 664	10 951	12 502	11 456	10 710	10 593	13 614	10 096	7 616	9 244	1 628	21.4 %
IS	306	277	245	283	239	293	245	288	214	216	295	79	36.6 %
LI	454	548	646	1 239	1 343	1 024	1 024	1 928	1 936	3 104	1 053	-2 051	-66.1 %
NO	n.a.	n.a.	3 252	3 887	4 134	4 097	4 357	4 614	2 553	3 347	5 792	2 445	73.1 %
CH	n.a.	19 077	20 649	21 305	23 887	31 291	28 642	72 237	45 074	78 163	137 489	59 326	75.9 %
UK	43 100	41 049	33 092	44 332	49 210	49 496	49 225	58 274	37 402	28 453	37 296	8 843	31.1 %

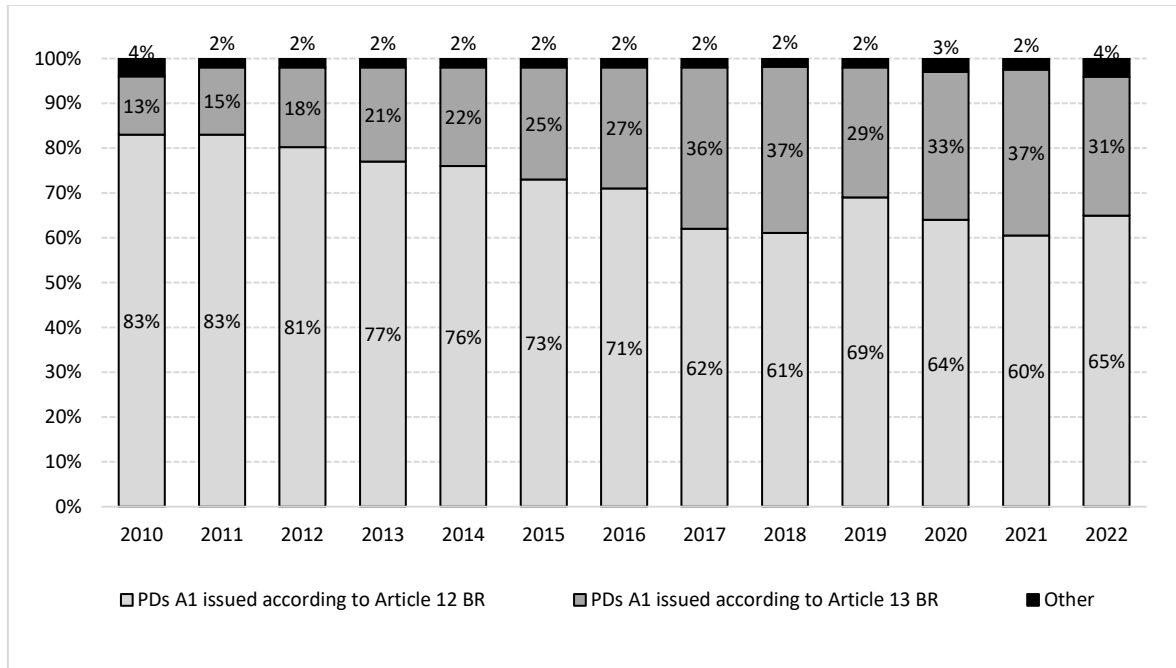
Source: Administrative data PD A1 Questionnaire 2023 and previous years

The increasing importance of PDs A1 issued under Article 13 for activities in two or more Member States is visualised in *Figure 3*. In the last decade, the share of PDs A1 issued under Article 13 in the total number of PDs A1 issued increased from 13 % in 2010 to 37 % in 2018, or a growth of 24 percentage points.<sup>29</sup> While this increase ended in 2019 (mainly due to the strong growth in the number of PDs A1 issued by Germany under Article 12), the relative importance of PDs A1 issued under Article 13 was 'back on track' with 37 % in 2021 but has recently decreased back to 31 % in 2022.

<sup>29</sup> The shift from Article 12 to Article 13 can also be observed in some Member States, such as Slovenia.

It should be noted that the distribution in *Figure 3* is based on the number of PDs A1 issued and not on the number of individual persons involved and the number of persons in full-time equivalents. One should keep in mind that under the current rules on social security coordination the period is set at a maximum of 24 months according to Article 12 of the Basic Regulation, while no maximum period for the employment or self-employment in two or more Member States has been determined by Article 13. Therefore, it can be expected that the number of persons pursuing activities in two or more Member States is at a similar or even at a higher level than the number of persons covered by Article 12.

**Figure 3 - Percentage in total number of PDs A1 issued, 2010-2022**



Source: Administrative data PD A1 Questionnaire 2023 and previous years

### 3. Persons covered by Article 12

In this chapter, data on the PDs A1 issued according to Article 12 are analysed. By comparing the data for 2022 with those of previous years, the evolution of the number of PDs A1 under Article 12 is analysed, for instance to determine whether there is still an impact of the COVID-19 pandemic to be noticed. The characteristics are described by making a breakdown by classification of the sending and receiving Member State, by status (employed or self-employed), and by sector of activity. Furthermore, data on the number of individual persons involved and the duration persons are active under Article 12 is reported, to gain a better understanding of the impact of this group of persons on national labour markets. As already pointed out, due to differences in the scope of posting between the Posting of Workers Directive and the Basic Regulation, this may not fully reflect the characteristics and the scale of posting under the Posting of Workers Directive in the EU.

#### 3.1. General

In total in 2022, 3.0 million PDs A1 were issued for persons covered by Article 12. The majority of these PDs A1 were granted by EU-14 Member States (2.3 million), and around 616 000 by EU-13 Member States. The remaining PDs A1 were issued by EFTA countries (108 000) and the United Kingdom (22 600). The main sending Member State is clearly Germany with around 1.4 million PDs A1, or 47.4 % of all PDs A1 issued under Article 12 (see also *Table A1* in *Annex I*). Additionally, Poland issued 242 000 PDs A1 under Article 12, or 8.0 % of the total number of PDs A1 issued under Article 12.

The detailed breakdown of the information provided by the Member States as a sending country, if exhaustively completed, results in a similar view by receiving Member State. However, Switzerland did not provide such breakdown and some Member States were not able to assign all PDs A1 issued under Article 12 to a particular host country. In total 110 176 PDs A1 fall in the category 'unknown', of which 105 189 issued by Switzerland. Despite these limitations, the main host countries can be determined. The main receiving Member States were Germany (16.0 % of all PDs A1 received under Article 12), France (11.0 %), and Austria (10.0 %), as well as Belgium (7.1 %), the Netherlands (5.7 %), and Switzerland (5.4 %) to a lesser extent (*Table 5* and *Table A2* in *Annex I*).

In absolute terms, the top 3 flows go from Germany to Austria (244 818 PDs A1 under Article 12), from Poland to Germany (136 686), and from Germany to France (109 741) (*Table 5*). Furthermore, more than 80 000 PDs A1 each under Article 12 were issued by Germany for activities in Switzerland, the Netherlands, and Spain. A flowchart of PDs A1 under Article 12 is provided in *Figure A4* in *Annex II*. Furthermore, a visual geographic representation of the top 10 flows of PDs A1 issued under Article 12 is provided in *Figure A5* in *Annex II*.

Some Member States grant more than half of the PDs A1 for postings to one specific Member State. More than half of the persons with a PD A1 from Croatia, Hungary, Austria, Poland, Slovenia, and Slovakia are sent to Germany (*Table A2* in *Annex I*). Furthermore, 57 % of persons with a PD A1 from Cyprus are sent to work in Greece, and 60 % of persons with a PD A1 from Estonia are sent to work in Finland.

**Table 5 - PDs A1 issued by competent Member States according to Article 12 of the Basic Regulation, breakdown by receiving Member State, 2022**

Receiving Member State	Issuing Member State																												Total										
	BE	BG	CZ	DK	DE	EE	IE	EL	ES	FR	HR	IT	CY*	LV	LT***	LU	HU*	MT	NL	AT	PL	PT	RO	SI***	SK***	FI	SE	IS		LI***	NO	CH**	UK TCA	UK WA	UK				
EU-27	76 023	11 717	7 259	6 956	1 215 544	4 077	2 747	26	139 016	130 800	48 994	173 474	75	3 686	29 849	58 912	40 256	753	22 455	66 256	237 212	58 427	34 656	96 969	85 936	4 351	1 363	105	544	1 831		18 878	3 401	22 279					
EU-14	74 199	10 794	5 877	5 978	849 514	4 005	2 605	25	129 231	119 421	45 269	151 758	68	2 929	29 352	57 788	38 151	703	21 536	57 277	227 171	57 910	32 534	91 946	74 568	3 987	1 267	101	490	1 780		17 587	3 096	20 683					
EU-13	1 824	923	1 382	978	366 030	72	142	<5	9 785	11 379	3 725	21 716	7	757	497	1 124	2 105	50	919	8 979	10 041	517	2 122	5 023	11 368	364	96	<5	54	51		1 291	305	1 596					
EFTA	2 063	412	239	2 659	154 671	53	97	0	4 985	13 694	622	43 039	<5	231	4 003	753	449	13	1 370	5 857	3 157	303	401	810	732	443	461	54	88	35	0	290	290						
Total	79 461	12 159	7 736	10 082	1 443 516	4 153	3 012	26	155 728	153 810	49 729	223 968	79	3 929	33 964	60 405	41 017	773	23 885	78 313	242 282	59 422	35 128	98 441	87 025	4 934	1 828	159	632	1 889	105 198	18 880	3 704	22 571	3 045 254				
BE		1 526	428	135	64 517	26	453	6	5 670	43 796	2 151	8 934	<5	49	2 243	22 920	1 205	9	9 779	1 314	18 530	15 056	3 746	7 542	3 561	113	56	<5	19	23		1 118	238	1 356	215 167				
BG	91		30	27	7 370	0	<5	0	545	514	9	629	0	<5	43	35	133	0	17	263	269	27	72	10	159	6	<5	0	0	<5		26	18	44	10 301				
CZ	225	45		60	53 755	<5	48	<5	1 379	1 642	148	2 090	0	<5	17	144	317	<5	105	1 702	3 466	50	152	853	6 545	26	14	0	8	0		263	27	290	73 088				
DK	645	310	64		27 996	40	380	0	1 643	1 539	112	2 855	0	33	1 030	129	257	12	417	387	3 323	200	183	153	416	136	196	<5	0	298		426	58	484	43 240				
DE	5 774	4 903	2 489	1 200		311	488	<5	26 400	21 012	33 808	33 494	11	1 198	11 716	11 115	25 046	58	3 766	41 287	136 686	3 809	13 478	58 151	48 667	497	149	10	216	47		2 805	584	3 389	489 178				
EE	101	0	22	23	57 248		<5	0	88	125	8	131	0	584	80	20	5	0	14	96	211	17	74	15	9	159	7	0	0	8		17	7	24	59 072				
IE	240	381	48	42	38 969	0		0	1 365	999	30	1 035	0	<5	52	163	17	10	220	204	492	116	16	150	116	12	<5	0	0	<5		70	96	166	44 848				
EL	244	287	160	196	11 593	<5	38		1 489	1 857	146	3 288	45	<5	16	214	52	31	265	319	257	107	41	106	74	124	13	<5	<5	22		463	93	556	21 547				
ES	2 501	1 054	241	1 038	87 275	43	153	<5		14 774	224	17 264	<5	25	163	925	355	93	1 542	1 587	2 522	12 945	464	246	483	673	115	7	<5	202		2 567	346	2 913	149 831				
FR	33 045	1 210	337	656	109 741	302	293	12	43 054		787	60 521	<5	66	2 770	19 212	1 356	217	2 601	3 289	20 043	19 995	5 868	1 511	2 767	388	218	34	79	235		5 307	680	5 987	336 595				
HR	85	244	45	12	7 329	0	12	0	415	496		2 523	6	19	<5	58	431	<5	45	681	346	8	569	2 707	274	15	<5	0	0	<5		70	8	78	16 405				
IT	2 361	276	349	197	75 371	56	195	<5	14 133	13 819	2 420		<5	32	91	1 162	685	230	1 205	4 378	2 905	819	4 552	3 321	1 064	384	168	24	40	79		1 942	378	2 320	132 741				
CY	18	32	15	26	1 278	0	<5	0	152	190	0	166		0	10	39	0	<5	55	182	69	13	5	<5	7	15	<5	0	0	7		145	9	154	2 445				
LV	19	0	20	32	2 047	15	0	0	82	130	0	184	0		199	6	6	<5	17	33	413	<5	7	<5	29	10	<5	0	0	0		8	5	13	3 269				
LT	81	28	42	92	4 058	45	6	0	192	264	0	250	0	94	15	32	6	5	13	109	940	9	6	<5	76	34	<5	<5	0	<5		18	20	38	6 442				
HU	8 207	5	35	11	27 636	<5	12	0	368	7 158	72	1 019	<5	<5	14		357	<5	151	284	431	1 079	110	558	281	8	<5	0	6	<5		65	13	78	47 889				
LU	228	114	135	93	28 408	<5	8	0	914	1 391	218	2 337	0	5	6	183		30	170	1 839	1 657	73	885	620	2 278	19	6	<5	6	6		341	49	390	42 022				
MT	122	<5	13	10	35 624	0	<5	0	316	394	19	1 197	<5	5	<5	23	0		23	61	102	<5	<5	26	38	6	<5	0	0	0		24	5	29	38 019				
NL	19 298	273	331	390	91 239	106	155	<5	6 333	5 097	1 253	6 647	<5	59	3 897	858	3 218	23		1 720	18 855	2 667	2 354	2 518	4 060	154	49	<5	33	24		1 501	286	1 787	173 403				
AT	686	292	678	213	244 818	6	80	0	1 664	2 057	2 549	11 150	0	22	88	392	4 983	9	1 082		6 772	724	623	16 303	9 589	74	30	<5	86	11		407	86	493	305 478				
PL	457	96	350	549	73 740	6	34	0	3 071	3 246	36	5 844	0	31	119	286	216	6	264	1 443		192	106	271	1 096	47	49	<5	20	9		241	112	353	91 938				
PT	464	31	38	835	23 510	0	30	0	23 273	4 477	6	2 233	<5	<5	20	287	25	<5	186	561	418		28	<5	95	110	20	5	0	10		198	71	269	56 935				
RO	255	242	80	29	23 466	<5	18	0	1 621	1 796	45	2 664	0	14	0	147	279	0	157	772	684	82		288	341	14	<5	0	7	15		93	29	122	33 143				
SI	85	54	48	12	19 170	<5	<5	0	308	289	3 201	1 611	0	<5	<5	58	338	<5	15	1 151	310	34	158	48	476	<5	0	0	0	<5		21	<5	0	27 399				
SK	57	66	582	13	52 537	0	<5	0	702	902	41	2 090	0	0	<5	93	374	<5	24	647	1 574	9	87	177	40	9	<5	0	13	0		24	16	40	60 088				
FI	139	110	378	119	16 043	2 488	20	0	1 275	1 006	463	1 185	0	387	1 255	134	135	<5	110	577	3 198	55	119	415	929		250	0	0	175		288	62	350	31 317				
SE	595	136	301	846	30 806	624	308	0	2 564	1 830	1 248	2 133	<5	1 050	5 997	277	460	6	212	1 370	12 739	338	952	971	2 466	1 314		10	8	651		430	105	535	70 748				
IS	140	14	15	27	17 882	7	<5	0	104	160	0	65	0	7	110	14	0	<5	21	44	64	7	0	<5	9	7	<5	0	0	<5		0	<5	<5	18 705				
LI	5	0	12	0	12 529	0	0	0	11	59	<5	69	0	0	0	19	0	0		505	32	0	<5	0	31	0	0	0	<5	0		0	<5	<5	13 278				
NO	303	275	52	02 546	29 260	31	21	0	1 486	967	396	1 266	0	118	3 872	140	80	6	114	392	1 673	41	323	90	51	355	408	54	0		0	149	149	44 469					
CH	1 615	123	160	86	95 000	15	75	0	3 384	12 508	223	41 639	<5	106	21	580	369	6	1 235	4 916	1 388	255	77	716	641	81	52	0	86	34		0	141	141	165 535				
UK	1 375	30	238	467	73 301	23	168	0	11 727	9 316	113	7 455	<5	12	112	740	312	7	60	1 224	1 913	692	71	662	357	140	<5	0	0	23				110 543					
unkn.																																				105 198	<5	<5	110 176

\* CY and HU: data 2021.

\*\* CH: no breakdown provided.

\*\*\* LT, SI, SK, and LI reported 15 PDs A1, 48 PDs A1, 40 PDs A1, and <5 PDs A1 respectively for which they were both the issuing and receiving Member State.

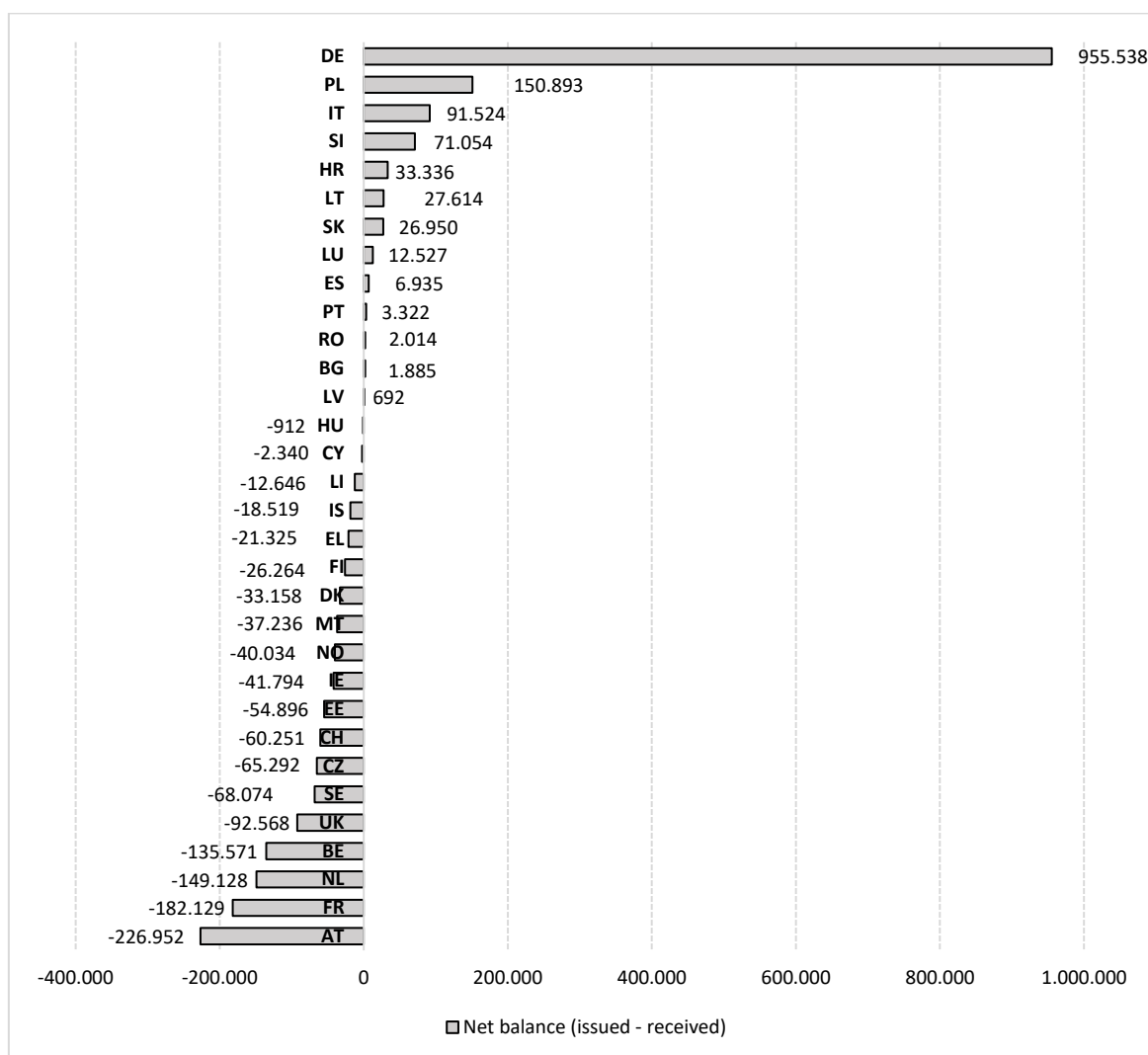
\*\*\*\*Total numbers in this table might differ from those reported in Table 1 because Member States report different totals, anonymised data (<5), or the sum of the breakdown does not match the total reported.

Source: Administrative data PD A1 Questionnaire 2023

Figure 4 gives an overview of the net balance per reporting Member State by showing the number of PDs A1 issued **minus** the number of PDs A1 received. Thirteen Member States are 'net senders' (i.e., more PDs A1 issued than received), particularly Germany, Poland, Italy, and Slovenia. The other 19 Member States are 'net recipients' (i.e., more PDs A1 received than issued), notable Austria, France, the Netherlands, and Belgium.

Until 2018, Germany was a net receiving Member State. This has completely changed due to the enormous growth in PDs A1 issued according to Article 12 in 2019. As a result, Germany is now the main sending Member State while until 2015, it was the main receiving Member State.

**Figure 4 - Net balance between the number of PDs A1 issued and received according to Article 12 of the Basic Regulation, 2022**



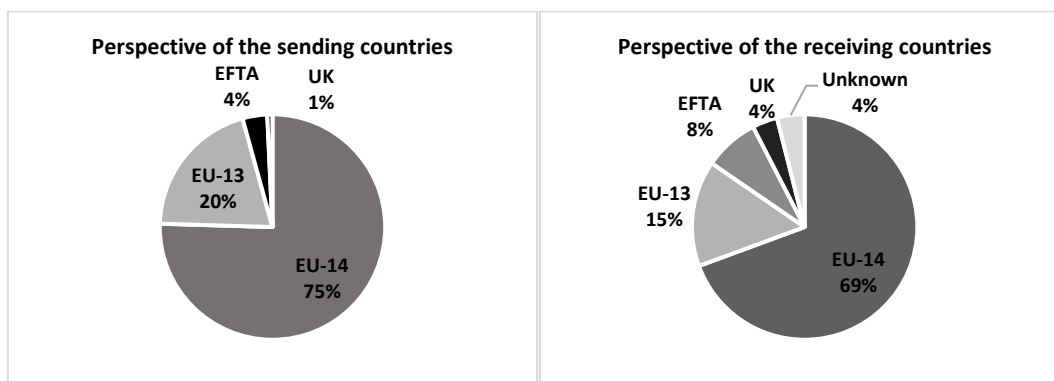
\*\* The receiving Member State is not known for 120 258 PDs A1 (of which 105 198 are issued by CH and 10 082 by DK).

Source: Administrative data PD A1 Questionnaire 2023

### 3.2. Mainly issued by and to EU-14 Member States

Some three quarters of PDs A1 issued according to Article 12 were granted by EU-14 Member States and one fifth by EU-13 Member States (*Figure 5 – at the left-hand side*). Furthermore, EU-14 Member States (*Figure 5 – at the right-hand side*) received some 69 % of the PDs A1 issued according to Article 12.

**Figure 5 - PDs A1 issued according to Article 12 of the Basic Regulation, breakdown by classification of the sending or the receiving Member State, total, 2022**



Source: Administrative data PD A1 Questionnaire 2023

### 3.3. Comparison with previous years

Tables 6 and 7 illustrate the evolution between 2010 and 2022 of the number of PDs A1 issued and received according to Article 12. These data make it possible to describe the trend over the past decade. From 2021 to 2022, the total number of PDs A1 issued under Article 12 grew by 808 406 certificates or 36.7 % (Table 6). This is mainly due to the large increase noted in Germany, namely an increase of 531 236 PDs A1 or 60.7 %. France also issued much more PDs A1 compared to 2021 (+54 723). As a result, the overall growth is also noticed more in the EU-14 (+47.4 %) compared to the EU-13 (+4.1 %). The rise for EFTA (+90.6 %) is considerable as well, mainly due to the strong growth in Switzerland (+91.1 % or + 50 149 PDs A1). The most impressive growth in relative terms is noted in Ireland (+265.5 %), which issued 3 012 PDs A1 according to Article 12 in 2022 compared to 824 in 2021. As a result, the number of PDs A1 issued is almost back at the level of pre-COVID-19, namely 3 383 in 2019. On the contrary, a strong decrease is noted in Greece (-99.6 % from 2018 to 2022).

Data on the number of PDs A1 issued according to Article 12 show an upward trend from 2010 to 2019, a downward trend from 2019 to 2021, and now an increase is noted again from 2021 to 2022 to a level which approaches the one from 2019. It can be assumed that the evolution of the number strongly depends on economic growth and in particular the evolution of cross-border trade in services. After all, trade in services may require the physical presence of workers crossing borders. Nonetheless, the relationship between the number of PDs A1 issued according to Article 12 and macro-economic variables such as the export of services might not be so strong. Other factors may have a stronger influence on the increase in the number of PDs A1 issued according to Article 12. For example, some Member States have laid down sanctions in their national legislation for not having a PD A1 and/or carry out far more inspections on having a PD A1. The communication of competent authorities concerning the application for a PD A1 when making a 'business trip' to another Member State can also have a direct impact on its evolution. Consequently, estimates of the actual volume of 'postings' under Article 12 are probably somewhat more reliable today than they were a decade ago. Nevertheless, it may still be an underestimation of the true scale.

**Table 6 - PDs A1 according to Article 12 of the Basic Regulation issued by sending Member State, 2010-2022**

Sending MS	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	Change 2021-2022	
														Number	%
EU-27	1 023 896	1 162 056	1 197 285	1 300 598	1 416 864	1 452 627	1 578 130	1 682 304	1 759 461	3 135 123	2 378 832	2 131 338	2 883 368	752 030	35.3 %
EU-28	1 056 005	1 197 424	1 230 433	1 330 533	1 440 365	1 484 335	1 611 777	1 716 084	1 796 651	3 177 941					
EU-14	634 659	680 493	676 578	719 113	777 195	800 906	869 837	976 557	1 133 885	2 485 358	1 813 724	1 534 044	2 261 310	727 266	47.4 %
EU-13	389 237	481 563	520 707	581 485	639 669	651 721	708 293	702 659	625 576	649 765	565 108	597 294	622 058	24 764	4.1 %
EFTA	2 309	2 603	459	10 734	14 332	10 972	11 918	17 566	17 478	30 294	21 137	56 613	107 889	51 276	90.6 %
Total	1 058 314	1 200 027	1 230 892	1 341 267	1 454 697	1 495 307	1 623 695	1 733 650	1 814 129	3 208 235	2 426 979	2 205 434	3 013 841	808 407	36.7 %
BE	49 862	55 931	56 103	58 522	58 611	63 467	69 836	76 719	76 596	85 870	60 803	66 004	79 461	13 457	20.4 %
BG	5 734	7 429	11 091	12 861	13 275	14 811	15 656	14 781	13 731	14 792	11 863	10 911	12 159	1 248	11.4 %
CZ	15 829	16 102	15 358	13 155	10 380	10 799	11 145	11 806	10 255	10 644	6 242	7 941	7 736	-205	-2.6 %
DK	9 262	11 491	6 176	5 320	3 869	7 288	6 508	8 250	9 181	10 211	6 141	6 644	10 082	3 438	51.7 %
DE	201 436	226 850	221 650	227 008	232 776	218 006	231 766	332 091	409 340	1 678 407	1 234 203	875 809	1 407 045	531 236	60.7 %
EE	13 580	15 322	14 889	11 689	7 147	5 415	6 327	6 305	6 915	7 200	6 254	5 890	4 153	-1 737	-29.5 %
IE	1 935	3 106	3 512	3 457	3 261	3 616	3 303	3 222	3 687	3 383	2 669	824	3 012	2 188	265.5 %
EL	642	888	1 661	1 688	2 325	2 908	3 941	4 253	6 583	6 583	6 583	6 583	26	-6 557	-99.6 %
ES	44 087	48 479	48 132	63 519	76 286	86 943	100 469	110 868	123 670	136 096	81 862	114 473	155 728	41 255	36.0 %
FR	133 896	144 256	130 247		119 727	130 468	132 012	109 168	117 739	122 552	60 279	99 089	153 812	54 723	55.2 %
HR				8 716	24 060	33 381	36 142	41 253	48 613	46 299	50 056	54 563	49 729	-4 834	-8.9 %
IT	35 430	35 611	48 369	55 509	69 279	83 277	106 395	129 732	148 863	175 908	175 908	189 953	223 348	33 395	17.6 %
CY*	81	38	35	66		96	169	81	81	81	81	79	79		
LV	3 424	4 287	2 846	3 237	1 655	1 801	2 446	1 629	812	2 629	4 282	4 290	4 014	-276	-6.4 %
LT	6 462	9 515	11 306	14 105	16 683	21 430	25 371	26 548	30 801	32 005	31 100	32 807	34 046	1 239	3.8 %
LU	55 852	39 385	39 758	28 481	50 345	50 440	55 364	58 686	64 301	75 131	54 090	54 323	60 405	6 082	11.2 %
HU*	40 640	57 848	63 742	66 415	65 655	59 711	61 365	62 873	54 326	57 454	37 043	46 491	46 491		
MT	442	318	327	322	145	88	110	145	252	305	295	534	773	239	44.8 %
NL	15 190	25 986	24 199	25 429	37 775	27 141	28 394	22 305	26 597	25 074	18 502	16 785	23 885	7 100	42.3 %
AT	25 957	28 806	35 671	36 959	41 114	55 320	62 526	50 303	88 117	98 965	53 602	41 095	78 313	37 218	90.6 %
PL	221 126	227 930	246 214	262 714	266 745	251 107	259 999	235 836	238 525	246 849	207 964	223 293	242 282	18 989	8.5 %
PT	58 923	54 043	54 580	81 687	74 735	64 020	62 005	64 320	51 905	58 887	53 798	57 443	59 422	1 979	3.4 %
RO	29 730	59 363	44 318	51 739	57 194	46 871	48 710	46 733	41 950	44 864	37 559	31 208	35 128	3 920	12.6 %
SI	23 944	42 485	65 727	83 659	102 920	126 153	150 922	163 876	85 999	95 339	98 340	100 824	98 443	-2 381	-2.4 %
SK	28 245	40 926	44 854	52 807	73 810	80 058	89 931	90 793	93 316	91 304	74 029	78 463	87 025	8 562	10.9 %
FI	2 187	2 668	3 181	3 332	2 786	3 725	3 707	3 541	4 293	4 428	3 334	3 624	4 934	1 310	36.1 %
SE		2 993	3 339	4 622	4 306	4 287	3 611	3 099	3 013	3 863	1 950	1 395	1 837	442	31.7 %
IS	376	377	293	269	140	179	126	162	151	197	122	108	159	51	47.2 %
LI	61	63	166	119	89	65	65	32	32	229	367	452	632	180	39.8 %
NO	1 872	2 163	n.a.	n.a.	3 252	n.a.	n.a.	2 100	1 479	1 940	1 304	1 004	1 900	896	89.2 %
CH			n.a.	10 346	10 851	10 728	11 727	15 272	15 816	27 928	19 344	55 049	105 198	50 149	91.1 %
UK	32 109	35 368	33 148	29 935	23 501	31 708	33 647	33 780	37 190	42 818	27 010	17 483	22 584	5 101	29.2 %

\* CY and HU: data 2021

Source: Administrative data PD A1 Questionnaire 2023 and previous years

The total number of PDs A1 received has increased by 37.2 % (Table 7). The numbers of issued and received PDs A1 are slightly diverging as the sum of the breakdown by Member State sometimes does not correspond to the total reported, or the totals reported under different questions are diverging.

The most noticeable increases of PDs A1 received under Article 12 are found in Estonia (+2 205.7 %), Iceland (+1 671.3 %), and Malta (+1 486.1 %). This is caused by the increase of PDs A1 received by these Member States from Germany. In Estonia, from 2021 to 2022, the number of PDs A1 under Article 12 received from Germany increased from 1 181 to 57 248, in Iceland from 692 to 17 882, and in Malta from 1 222 to 35 624. Furthermore, growths of more than 100 % are noted in Ireland, Slovenia, Slovakia, Liechtenstein, Norway, and the United Kingdom. None of the Member States has experienced a drop in the number of PDs A1 received under Article 12, most likely due to the increase of the number of PDs A1 issued by Germany.

From 2010 to 2022, six Member States have almost consistently been the main receiving Member States, being Germany, France, Austria, Belgium, the Netherlands, and Switzerland.



**Table 7 - PDs A1 issued according to Article 12 of the Basic Regulation, by receiving Member State, 2010-2022**

Receiving MS	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	Change 2021-2022	
														Number	%
EU-27	952 145	1 077 135	1 068 846	1 153 158	1 235 467	1 269 951	1 379 339	1 481 663	1 550 740	2 773 734	2 129 020	1 923 086	2 582 548	659 462	34.3 %
EU-28	1 056 005	1 197 424	1 230 433	1 330 533	1 440 365	1 484 335	1 611 777	1 716 084	1 796 651	3 177 941					
EU-14	880 962	1 001 589	990 508	1 074 897	1 154 693	1 180 849	1 278 775	1 365 030	1 410 109	2 369 924	1 900 347	1 694 054	2 118 917	424 863	25.1 %
EU-13	71 183	75 546	78 338	78 261	80 774	89 102	100 564	116 633	140 631	403 810	228 673	229 032	463 631	234 599	102.4 %
EFTA	71 848	94 423	81 973	98 201	109 497	124 070	130 354	131 025	142 179	291 578	205 802	178 020	241 987	63 967	35.9 %
<b>Total</b>	<b>1 058 314</b>	<b>1 208 805</b>	<b>1 191 185</b>	<b>1 294 881</b>	<b>1 395 857</b>	<b>1 448 365</b>	<b>1 566 919</b>	<b>1 672 275</b>	<b>1 753 751</b>	<b>3 197 822</b>	<b>2 397 193</b>	<b>2 139 446</b>	<b>2 935 078</b>	<b>795 632</b>	<b>37.2 %</b>
BE	90 540	125 107	125 264	134 340	159 749	156 556	178 319	167 335	156 695	218 230	168 880	174 157	215 167	41 010	23.5 %
BG	4 483	4 006	3 896	3 805	3 267	3 325	3 867	3 508	4 665	13 840	6 015	6 467	10 301	3 834	59.3 %
CZ	15 892	17 144	17 808	18 603	17 165	19 144	22 743	24 227	30 557	101 502	60 485	54 284	73 088	18 804	34.6 %
DK	9 608	11 002	11 044	10 763	10 869	13 352	15 698	15 592	20 337	46 282	35 210	31 096	43 240	12 144	39.1 %
DE	250 054	311 361	335 862	373 666	414 220	418 908	440 065	427 175	428 935	505 737	410 908	429 749	489 178	59 429	13.8 %
EE	1 235	1 904	2 325	2 998	2 951	2 315	3 733	3 025	3 175	5 023	2 728	2 562	59 072	56 510	2205.7 %
IE	5 014	6 084	4 674	5 556	3 973	4 039	5 760	6 171	7 816	17 158	8 178	6 132	44 848	38 716	631.4 %
EL	10 656	7 763	6 795	4 820	4 692	5 683	6 383	8 109	11 214	17 437	11 381	13 152	21 547	8 395	63.8 %
ES	63 304	47 640	46 075	46 507	44 825	47 369	52 353	60 488	63 939	177 082	82 296	88 320	149 831	61 511	69.6 %
FR	160 532	161 954	156 490	182 219	190 848	184 695	203 019	241 363	262 126	450 220	307 679	308 008	336 595	28 587	9.3 %
HR				1 753	4 560	7 139	9 835	12 791	9 844	20 821	11 734	13023	16405	3 382	26.0 %
IT	60 460	64 223	48 663	47 445	52 481	59 095	61 321	64 669	73 927	173 727	90 860	107 791	132 741	24 950	23.1 %
CY	1 702	1 042	1 106	956	944	716	972	1 256	1 666	2 677	1 931	1 644	2 445	801	48.7 %
LV	1 851	1 788	1 516	1 235	1 504	1 431	1 080	1 356	2 200	5 178	2 634	2 202	3 269	1 067	48.5 %
LT	1 850	2 248	3 497	2 274	1 930	2 404	2 018	2 261	3 035	10 103	4 657	4 403	6 442	2 039	46.3 %
LU	27 730	24 295	19 741	20 503	21 763	21 749	26 591	32 664	36 479	52 863	47 456	43 884	47 889	4 005	9.1 %
HU	8 457	9 924	9 900	8 887	8 955	8 743	11 312	12 924	17 090	56 902	29 463	38 329	42 022	3 693	9.6 %
MT	1 308	1 449	1 052	952	1 062	1 453	2 318	2 513	2 636	5 001	2 631	2 397	38 019	35 622	1486.1 %
NL	91 560	105 885	99 416	100 423	87 817	89 411	90 873	111 522	126 342	219 276	390 002	153 203	173 403	20 200	13.2 %
AT	59 642	76 335	76 445	88 596	101 015	108 627	120 150	141 046	119 907	320 480	232 003	220 629	305 478	84 849	38.5 %
PL	12 877	16 013	16 033	14 387	14 521	17 897	17 818	20 620	26 714	93 630	58 963	58 024	91 938	33 914	58.4 %
PT	12 193	13 345	11 422	10 696	12 833	15 374	18 109	22 639	28 964	50 453	29 157	36 220	56 935	20 715	57.2 %
RO	9 445	10 476	11 224	10 894	9 717	10 709	10 028	12 036	15 883	38 774	17 983	18 466	33 143	14 677	79.5 %
SI	3 391	2 676	3 340	4 507	6 550	5 685	5 146	6 357	9 173	17 205	11 319	12 782	27 399	14 617	114.4 %
SK	8 692	6 876	6 641	7 010	7 648	8 141	9 694	13 759	13 993	33 154	18 130	14 449	60 088	45 639	315.9 %
FI	20 205	22 183	22 522	19 917	16 589	18 618	21 014	22 252	19 579	35 529	24 885	23 774	31 317	7 543	31.7 %
SE	19 464	24 412	26 095	29 446	33 019	37 373	39 120	44 005	53 849	85 450	61 452	57 939	70 748	12 809	22.1 %
IS	543	559	385	392	338	608	1 373	1 739	982	2 136	872	1056	18705	17 649	1671.3 %
LI	572	763	510	925	417	803	842	715	818	4 311	2 748	2780	13278	10 498	377.6 %
NO	18 771	30 523	16 170	18 778	21 250	24 958	23 844	22 882	26 570	38 170	25 040	21 397	44 469	23 072	107.8 %
CH	51 962	62 578	64 908	78 106	87 492	97 701	104 295	105 689	113 809	246 961	177 142	152 787	165 535	12 748	8.3 %
UK	34 321	37 247	40 366	43 522	50 893	54 344	57 226	59 587	60 832	132 510	62 371	38 340	110 543	72 203	188.3 %

Source: Administrative data PD A1 Questionnaire 2023 and previous years

### 3.4. Breakdown by type: employed or self-employed persons

Data on the number of posted employed workers versus posted self-employed persons temporarily working in another Member State are reported below. As mentioned earlier, self-employed persons do not fall under the scope of the Posting of Workers Directive.

On average 5.3 % of the persons covered by Article 12 were self-employed in 2022 (Table 8), this is a slight decrease compared to 2021 (5.6 %). However, there are some strong differences between the sending Member States. Especially Slovakia (50.7 %), Iceland (37.7 %), and the United Kingdom (35.1 %) granted a high percentage of PDs A1 under Article 12 to self-employed persons. Additionally, more than one in ten PDs A1 issued under Article 12 by Czechia, Cyprus (data 2021), and the Netherlands are for posted self-employed persons. For Slovakia in particular, the share of self-employed in total increased by 16 percentage points between 2014 (35 %) and 2022 (51 %).

From a receiving perspective, especially Switzerland (11.1 %), Germany (8.1 %), Slovakia (6.7 %), and Austria (5.7%) received a relatively high share of posted self-employed persons.



**Table 8 - Number of PDs A1 according to Article 12 of the Basic Regulation issued to employed and self-employed persons, 2022**

	Issued				Received			
	Employed		Self-employed		Employed		Self-employed	
	Number	% Row	Number	% Row	Number	% Row	Number	% Row
BE	74 261	93.5 %	5 200	6.5 %	203 965	95.4%	9 846	4.6%
BG	12 031	98.9 %	128	1.1 %	10 083	98.3%	174	1.7%
CZ	6 206	80.2 %	1 530	19.8 %	70 500	96.8%	2 298	3.2%
DK	9 823	97.4 %	259	2.6 %	41 489	97.0%	1 267	3.0%
DE	1 358 274	96.5 %	48 771	3.5 %	446 476	91.9%	39 313	8.1%
EE	4 130	99.4 %	23	0.6 %	56 796	96.2%	2 252	3.8%
IE	2 790	92.6 %	222	7.4 %	42 771	95.7%	1 911	4.3%
EL	26	100.0 %	0	0.0 %	20 380	97.1%	611	2.9%
ES	146 579	94.1 %	9 149	5.9 %	142 923	97.3%	3 995	2.7%
FR	151 822	98.7 %	1 990	1.3 %	315 746	95.5%	14 862	4.5%
HR	49 572	99.7 %	157	0.3 %	15 560	95.3%	767	4.7%
IT	209 436	93.8 %	13 912	6.2 %	124 289	95.3%	6 132	4.7%
CY*	71	89.9 %	8	10.1 %	2 218	96.8%	73	3.2%
LV	4 011	99.9 %	<5	0.1 %	3 123	95.9%	133	4.1%
LT	33 882	99.5 %	164	0.5 %	6 219	97.1%	185	2.9%
LU	60 017	99.4 %	388	0.6 %	45 853	95.9%	1 958	4.1%
HU*	46 054	99.1 %	437	0.9 %	40 492	97.3%	1 140	2.7%
MT	715	92.5 %	58	7.5 %	37 349	98.3%	641	1.7%
NL	20 439	85.6 %	3 446	14.4 %	163 313	95.2%	8 303	4.8%
AT	73 398	93.7 %	4 915	6.3 %	287 552	94.3%	17 433	5.7%
PL	228 683	94.4 %	13 599	5.6 %	89 391	97.6%	2 194	2.4%
PT	59 205	99.6 %	217	0.4 %	54 875	96.8%	1 791	3.2%
RO	35 075	99.8 %	53	0.2 %	32 480	98.4%	541	1.6%
SI	96 368	97.9 %	2 075	2.1 %	26 729	97.6%	649	2.4%
SK	42 906	49.3 %	44 119	50.7 %	56 019	93.3%	4 029	6.7%
FI	4 638	94.0 %	296	6.0 %	29 603	95.6%	1 364	4.4%
SE	1 695	92.3 %	142	7.7 %	66 246	94.4%	3 967	5.6%
IS	99	62.3 %	60	37.7 %	18 421	98.5%	284	1.5%
LI	630	99.7 %	<5	0.3 %	12 972	97.7%	306	2.3%
NO	1 749	92.1 %	151	7.9 %	43 445	97.9%	950	2.1%
CH	104 416	99.3 %	782	0.7 %	147 114	88.9%	18 280	11.1%
UK	14 657	64.9 %	7 927	35.1 %	107 639	97.4%	2 904	2.6%
<b>Total</b>	<b>2 853 658</b>	<b>94.7 %</b>	<b>160 183</b>	<b>5.3 %</b>				

\* CY and HU: data 2021.

Source: Administrative data PD A1 Questionnaire 2023

### 3.5. Breakdown by sector of economic activity

Only 21 Member States could provide a detailed overview on the sector of economic activity. Nevertheless, the main sending Member States Germany and Poland were able to provide this information, which makes the breakdown representative.

Table A3 in Annex I presents a distribution by sector of activity of the PDs A1 issued according to Article 12. The table shows, *inter alia*, that approximately 106 088 PDs A1 issued by Poland according to Article 12 concern a situation in which services are provided abroad in the construction sector. More than half of these PDs A1 (54 991) are received by Germany.<sup>30</sup> The other main flows in the top 10 in the construction sector are from Slovakia to Germany (24 920 PDs A1), from Germany to Austria (21 781), from Slovenia to Germany (20 352), from Croatia to Germany (17 855), from Luxembourg to Belgium (11 554), from Poland to Belgium (10 365), from Portugal to Belgium (10 217), from Slovenia to Austria (10 010), and from Poland to France (9 779).

The row percentages in Table 9 show both the total with and without Germany, as before reference year 2020, data for Germany were not available, and this has a considerable impact. This is especially the case for PDs A1 issued in the construction sector. While in

<sup>30</sup> Based on the reported figures by sending Member State. Detailed figures describing the flow of PDs A1 between sending and receiving Member States by sector of activity are not included in this report.

total 'only' 21.9 % of PDs A1 under Article 12 are issued in the construction sector, the share increases to 36.7 % when Germany is not taken into account. This implies that for Germany as an issuing Member State, the construction sector is not the most important sector. Especially EU-13 Member States issue a high share of PDs A1 in the construction sector (46.8 %) as opposed to EU-14 Member States (12.3 %). For example, Estonia (52.5 %), Portugal (56.0 %), and Slovenia (57.3 %) issue more than one in two PDs A1 for activities in the construction sector.

In general, the EU-13 issued most PDs A1 in the industry sector (72.1 %), while for the EU-14 it is more equally divided between the industry (55.1 %) and services sector (44.5 %). Persons with a PD A1 from Belgium, France, Cyprus (data 2021), Latvia, Lithuania, Luxembourg, Malta, the Netherlands, Finland, Iceland, and Liechtenstein mainly provide activities in the service sector. A more detailed distribution of the service sector illustrates that temporary employment agencies employ a high percentage of persons from Belgium, Luxembourg, the Netherlands, Portugal, and Liechtenstein falling under Article 12. A high percentage of PDs A1 are issued by Iceland for persons providing education, health and social work, arts, and other services.

**Table 9 - PDs A1 issued according to Article 12 of the Basic Regulation, from a sending perspective, breakdown by sector of activity, 2022 (row %)**

Sending MS	Agriculture, hunting and fishing NACE A	Industry NACE B to F		Services NACE G to T								
		Industry Total	of which Construction NACE F	Services Total	Wholesale and retail trade NACE G	Accommodation and food service activities NACE I	Transportation and storage; Information and communication NACE H and J	Freight transport by road NACE H - Group 49.4	Financial and insurance; Real estate; Professional, scientific and technical activities; Administrative and support service activities NACE K, L, M, and N	Temporary employment agency NACE N - Group 78.2	Education, health and social work, arts and other services NACE P, Q, R, and S	Human health and social work activities NACE Q
BE	0.4 %	30.5 %	18.7 %	69.1 %	4.7 %	0.7 %	6.5 %	0.7 %	34.1 %	21.1 %	25.6 %	0.3 %
BG												
CZ	0.8 %	63.0 %	40.2 %	36.2 %	3.5 %	0.6 %	7.3 %	0.3 %	27.4 %	0.0 %	0.0 %	0.0 %
DK												
DE	0.4 %	57.0 %	8.4 %	42.5 %	7.4 %	0.6 %	7.3 %	2.5 %	17.1 %	1.3 %	17.4 %	1.3 %
EE	2.6 %	80.4 %	52.5 %	17.0 %	1.0 %	0.1 %	3.2 %	0.8 %	4.2 %	1.1 %	8.5 %	2.8 %
IE												
EL												
ES												
FR	0.0 %	48.9 %	10.3 %	51.0 %	5.9 %	0.9 %	6.9 %	0.0 %	18.1 %	0.0 %	19.1 %	0.2 %
HR	0.1 %	86.5 %	48.0 %	13.4 %	2.4 %	0.4 %	1.7 %	0.2 %	7.7 %	4.4 %	1.6 %	0.6 %
IT												
CY*	0.0 %	21.5 %	5.1 %	78.5 %	30.4 %	6.3 %	6.3 %	0.0 %	30.4 %	0.0 %	2.5 %	0.0 %
LV	0.4 %	48.3 %	38.0 %	51.2 %	21.5 %	0.2 %	10.5 %	1.7 %	10.9 %	5.9 %	0.5 %	0.0 %
LT	0.1 %	45.8 %	36.1 %	54.2 %	1.9 %	32.9 %	2.5 %	0.9 %	15.1 %	0.0 %	1.8 %	0.0 %
LU	0.1 %	49.8 %	32.0 %	50.1 %	5.7 %	0.1 %	2.6 %	0.7 %	37.2 %	14.0 %	3.8 %	0.3 %
HU												
MT	0.3 %	14.6 %	14.6 %	85.1 %	0.1 %	4.3 %	1.8 %	0.0 %	68.4 %	0.0 %	10.2 %	0.3 %
NL	0.9 %	29.3 %	7.5 %	69.8 %	6.9 %	1.3 %	2.0 %	0.8 %	26.8 %	26.1 %	32.7 %	0.4 %
AT	0.2 %	66.1 %	30.2 %	33.7 %	2.3 %	0.3 %	0.8 %	0.0 %	0.7 %	0.0 %	29.5 %	0.0 %
PL	2.7 %	60.9 %	43.8 %	36.5 %	1.3 %	0.3 %	1.6 %	0.6 %	14.4 %	9.8 %	18.8 %	8.3 %
PT	0.3 %	83.0 %	56.0 %	16.8 %	1.7 %	0.2 %	0.4 %	0.1 %	13.6 %	10.7 %	0.8 %	0.4 %
RO	0.7 %	80.0 %	49.3 %	19.4 %	0.7 %	0.5 %	1.4 %	0.0 %	12.4 %	0.0 %	4.3 %	0.0 %
SI	0.2 %	99.2 %	57.3 %	0.6 %	0.4 %	0.1 %	0.0 %	0.0 %	0.0 %	0.0 %	0.0 %	0.0 %
SK	1.1 %	81.6 %	49.7 %	17.3 %	0.6 %	0.1 %	1.9 %	0.0 %	0.8 %	0.0 %	13.9 %	3.9 %
FI	0.8 %	46.6 %	13.6 %	52.6 %	1.1 %	0.1 %	10.4 %	5.5 %	10.5 %	1.2 %	30.4 %	1.1 %
SE	0.4 %	57.3 %	22.3 %	42.4 %	7.2 %	0.4 %	5.3 %	0.1 %	15.5 %	0.4 %	13.7 %	0.4 %
IS	6.3 %	3.2 %	0.6 %	90.5 %	0.6 %	0.0 %	1.3 %	0.0 %	30.4 %	0.0 %	58.2 %	0.0 %
LI	0.0 %	30.2 %	11.1 %	69.8 %	0.8 %	1.9 %	0.0 %	0.0 %	10.2 %	55.9 %	1.1 %	0.0 %
NO												
CH												
UK												
Total	0.7 %	59.8 %	21.9 %	39.5 %	5.2 %	1.1 %	5.2 %	1.5 %	16.3 %	3.9 %	15.5 %	1.9 %
Total (excl. DE)	1.0 %	62.9 %	36.7 %	36.2 %	2.8 %	1.6 %	3.0 %	0.4 %	15.4 %	6.7 %	13.4 %	2.7 %
EU-14	0.4 %	55.1 %	12.3 %	44.5 %	6.7 %	0.6 %	6.6 %	1.9 %	18.8 %	3.5 %	17.2 %	1.0 %
EU-13	1.5 %	72.1 %	46.8 %	26.4 %	1.4 %	2.3 %	1.7 %	0.4 %	9.7 %	4.9 %	11.3 %	4.4 %

\* CY: data 2021.

\*\* For many Member States, the breakdown is not available for all the PDs A1 issued according to Art. 12. This is especially the case for AT, where the breakdown is not available for 85.7 % of PDs A1.

\*\*\* How is this data calculated? See *Table A1 in Annex I* for the complete data. For instance, Austria issued 24 PDs A1 for agriculture, hunting and fishing. This is divided by the total number of PDs A1 issued for which the sector was available, in this case 11 217 (this is the sum of agriculture hunting, and fishing (24); Industry total (7 414); and Services total (3 779)). As a result, 0.2 % of PDs A1 are issuing for agriculture, hunting and fishing.

Source: Administrative data PD A1 Questionnaire 2023

By using the detailed figures reported by 21 sending Member States a fragmented picture can be presented of the activities carried out in the receiving Member States by persons falling under Article 12. It is worth noting that due to the limited number of reporting Member States, an incomplete dataset from the perspective of the receiving Member State is obtained. Nonetheless, these fragmented data present an interesting view on the distribution of persons falling under Article 12 by sector of activity in the receiving Member States.

In most Member States, incoming workers with a PD A1 under Article 12 are active in the industry and the service sector. More than one out of four workers received by Belgium, Germany, Croatia, Luxembourg, and Sweden are providing activities in the construction sector. In Germany the share even amounts to 41.7 % and in Luxembourg to 40.7 %. The figures also indicate that a relatively high percentage of persons with a PD A1 under Article 12 (over 11 %) providing activities in France and the Netherlands are employed by a temporary employment agency.

Only Germany receives more than 5 % of PDs A1 in the human health sector. Poland is by far the main 'sending' Member State of health workers. This is probably the result of the high number of 'live-in carers' (persons providing long-term care services while living in a private residence with the care receiver) coming from Poland and working in Germany.

**Table 10 - PDs A1 issued according to Article 12 of the Basic Regulation, from a receiving perspective, breakdown by sector of activity, 2022 (row %)**

Receiving MS	Agriculture, hunting and fishing NACE A	Industry NACE B to F		Services NACE G to T								
		Industry Total	Construction NACE F	Services Total	Wholesale and retail trade NACE G	Accommodation and food service activities NACE I	Transportation and storage; Information and communication NACE H and J	Freight transport by road NACE H - Group 49.4	Financial and insurance; Real estate; Professional, scientific and technical activities; Administrative and support service activities NACE K, L, M, and N	Temporary employment agency NACE N - Group 78.2	Education, health and social work, arts and other services NACE P, Q, R, and S	Human health and social work activities NACE Q
BE	0.3%	65.5%	32.5%	34.3%	3.3%	0.6%	3.5%	1.4%	16.7%	5.1%	11.3%	0.5%
BG	0.1%	54.6%	5.8%	45.3%	7.0%	0.1%	7.9%	0.8%	14.8%	0.8%	19.3%	2.7%
CZ	0.4%	66.7%	12.8%	32.9%	6.6%	0.3%	7.2%	1.9%	14.5%	1.7%	15.8%	1.1%
DK	0.6%	59.3%	22.1%	40.1%	6.8%	0.9%	8.1%	2.8%	19.6%	1.5%	17.9%	1.0%
DE	1.2%	69.0%	41.7%	29.8%	2.0%	1.9%	1.7%	0.4%	9.7%	5.3%	14.3%	6.7%
EE	0.3%	57.3%	2.1%	42.4%	5.6%	0.3%	4.2%	0.7%	9.4%	0.6%	12.8%	0.8%
IE	0.4%	45.4%	2.6%	54.2%	7.2%	0.4%	4.2%	0.6%	13.7%	0.7%	17.5%	1.2%
EL	0.1%	28.7%	4.1%	71.3%	4.7%	2.9%	9.8%	0.8%	24.5%	1.1%	26.4%	1.8%
ES	1.1%	53.9%	17.2%	45.0%	7.3%	1.4%	7.5%	0.8%	20.8%	1.7%	17.9%	0.9%
FR	0.4%	56.2%	24.9%	43.3%	4.3%	0.5%	5.9%	2.8%	23.8%	11.6%	16.9%	0.4%
HR	0.3%	61.9%	30.5%	37.9%	4.2%	1.0%	7.9%	1.6%	20.2%	0.7%	16.9%	2.0%
IT	0.5%	57.4%	12.7%	42.1%	7.4%	0.9%	6.6%	1.0%	19.3%	1.3%	19.7%	1.0%
CY	1.1%	33.4%	4.4%	65.5%	5.1%	0.9%	12.9%	1.0%	21.5%	0.9%	28.8%	1.9%
LV	0.5%	55.5%	21.4%	43.9%	6.8%	2.4%	8.1%	1.4%	12.8%	0.4%	17.0%	0.7%
LT	0.7%	60.2%	19.0%	39.1%	5.3%	0.2%	6.2%	2.3%	14.0%	1.5%	17.7%	0.5%
LU	0.3%	65.0%	40.7%	34.7%	6.0%	0.3%	6.5%	2.4%	16.3%	2.8%	13.4%	0.5%
HU	0.3%	72.6%	9.6%	27.1%	3.8%	0.3%	6.5%	0.8%	14.3%	1.0%	12.5%	0.3%
MT	2.1%	42.0%	3.3%	55.9%	8.3%	1.2%	4.9%	1.6%	12.6%	1.0%	16.5%	1.5%
NL	2.5%	52.9%	21.9%	44.6%	5.9%	1.1%	7.7%	3.8%	28.0%	11.6%	13.1%	1.3%
AT	0.4%	62.1%	22.8%	37.5%	8.5%	1.2%	7.1%	2.5%	16.7%	2.5%	16.9%	1.5%
PL	0.3%	60.2%	5.1%	39.4%	7.5%	0.2%	7.0%	1.9%	16.4%	0.9%	14.8%	1.1%
PT	0.3%	42.6%	3.3%	57.0%	7.2%	1.0%	6.8%	0.6%	20.3%	1.2%	22.8%	1.4%
RO	0.2%	65.3%	3.4%	34.5%	4.7%	0.1%	4.4%	0.4%	15.3%	1.0%	13.1%	0.4%
SI	0.1%	56.1%	10.9%	43.8%	4.4%	0.2%	3.1%	0.7%	13.8%	3.4%	16.0%	0.7%
SK	0.2%	52.0%	3.9%	47.7%	6.7%	0.4%	5.0%	0.9%	12.5%	0.5%	16.3%	0.9%
FI	0.6%	66.0%	20.6%	33.4%	3.0%	2.4%	3.9%	0.6%	14.6%	1.2%	11.9%	0.5%
SE	0.2%	73.5%	37.5%	26.4%	2.7%	3.6%	3.3%	0.7%	11.5%	1.1%	9.7%	0.3%
IS	0.1%	45.6%	6.5%	54.2%	6.1%	0.9%	6.0%	0.6%	19.8%	1.3%	18.3%	1.0%
LI	0.1%	58.1%	2.0%	41.8%	5.6%	0.2%	2.7%	0.5%	9.8%	0.9%	12.4%	0.9%
NO	0.3%	59.6%	2.4%	40.1%	4.7%	0.3%	2.2%	0.4%	10.4%	0.5%	11.3%	0.6%
CH	0.1%	51.8%	10.5%	48.0%	4.0%	4.3%	6.4%	1.3%	14.4%	0.7%	15.5%	0.8%
UK	0.2%	57.9%	14.8%	41.8%	6.9%	0.6%	8.5%	2.0%	18.2%	0.9%	23.4%	0.8%

Source: Administrative data PD A1 Questionnaire 2023

### 3.6. The number of individual persons involved

The number of PDs A1 issued according to Article 12 is not necessarily equal to the number of persons involved. Twenty-two Member States, including Germany, reported figures on the number of individual persons involved. The number of individual persons involved is some 60 % of the number of PDs A1 issued for these persons (*Table 11*). This means that one person falling under Article 12 is sent abroad 1.7 times per year on average.

As *Table 11* shows, the relationship between the PDs A1 and the persons involved differs markedly among the reporting Member States. In Slovenia (31 %), Luxembourg (32 %), Belgium (40 %), and Italy (47 %) the share of persons on number of PDs A1 is less than 50 %, which indicates that posted persons under Article 12 are sent abroad (at least) two times per year. On the contrary, in Greece, Iceland, Portugal, Sweden, and Norway, the share lies close to 100 %, indicating that the number of individual persons involved is (almost) equal to the number of PDs A1 issued by these Member States. Figures for Poland show that on average, one individual employed/self-employed person was sent abroad 1.3 times in 2022.

These kinds of figures are important to calculate the impact of posting on national employment, as they constitute a better numerator than the number of forms granted. Moreover, it is also useful to make an estimation of the total number of individual persons covered by Article 12. Based on the reported figures it is estimated that in 2022 more than 1.8 million individual persons received a PD A1 according to Article 12.<sup>31</sup>

**Table 11 - Number of individual persons who received a PD A1 according to Article 12 of the Basic Regulation, 2022**

	Individual number of persons who received a PD A1 (A)	Number of PDs A1 issued (B)	A/B	B/A
BE	31 734	79 461	40 %	2.5
BG	8 709	12 159	72 %	1.4
CZ	6 483	7 736	84 %	1.2
DK	7 821	10 082	78 %	1.3
DE	851 647	1 407 045	61 %	1.7
EE	3 288	4 153	79 %	1.3
IE	2 577	3 012	86 %	1.2
EL	26	26	100 %	1.0
ES				
FR	97 018	153 812	63 %	1.6
HR	32 358	49 729	65 %	1.5
IT	104 259	223 348	47 %	2.1
CY				
LV	3 008	4 014	75 %	1.3
LT				
LU	19 428	60 405	32 %	3.1
HU				
MT				
NL				
AT				
PL	188 877	242 282	78 %	1.3
PT	54 730	59 422	92 %	1.1
RO				
SI	30 614	98 443	31 %	3.2
SK	58 419	87 025	67 %	1.5
FI	4 150	4 934	84 %	1.2
SE	1 622	1 837	88 %	1.1
IS	159	159	100 %	1.0
LI				
NO	1 660	1 900	87 %	1.1
CH				
UK TCA	15 122	18 880	80 %	1.2
UK WA	3 095	3 703	84 %	1.2
UK	18 217	22 584	81 %	1.2
<b>Total reported</b>	<b>1 526 804</b>	<b>2 533 568</b>	<b>60 %</b>	<b>1.7</b>
<b>Estimate total individual*</b>	<b>1 816 231</b>			

\* Total applicable to all EU/EFTA countries and the UK. Figure obtained by applying the percentage of 60 % to all missing Member States.  
Source: Administrative data PD A1 Questionnaire 2023

<sup>31</sup> This was estimated by assuming that, for those Member States that did not provide data on the number of persons involved, on average one individual person was sent abroad 1.7 times in 2022.

### 3.7. The average duration

The period persons can pursue an activity under Article 12 is set at a maximum of 24 months. This does not necessarily imply that this is also the real duration. Twenty sending Member States reported figures on the average duration for 2022. Germany provided such figures for the first time.

The average duration persons are active under Article 12 was 60 days in 2022 (*Table 12*). The unweighted average amounts to 142 days. The weighted average in 2022 is remarkably lower than in previous years (always around 100 days). The main reason is that this average for 2022 also takes into account the average duration reported by Germany, which is the main issuing Member State of PDs A1 under Article 12. The low average duration of 21 days reported by Germany strongly reduces the total average.

The period differs strongly between the reporting Member States. The average duration per posting is less than 35 days in Belgium, Germany, France, and Luxembourg. On the other hand, it exceeds 250 days in Estonia, Croatia<sup>32</sup>, and Iceland. The average duration for Poland amounts to 200 days.

By multiplying the average duration by the number of times a person is sent during the year, it is possible to estimate the average duration an individual person covered by Article 12 was temporarily employed or self-employed in another Member State. The fact that the average duration is 60 days, and that the person is sent 1.7 times per year implies that an individual person is abroad 99 days per year on average.

**Table 12 - Average duration of the period that persons are active under Article 12, in days, from a sending perspective, 2022**

	Average duration per PD A1 issued according to Art. 12 BR (A)	Number of times sent abroad during the year (B)*	Average duration per individual person involved (A*B)
BE	29	2.5	73
BG			
CZ	153	1.2	183
DK	38	1.3	49
DE	21	1.7	35
EE	254	1.3	321
IE	225	1.2	263
EL			
ES			
FR	26	1.6	41
HR	314	1.5	483
IT	88	2.1	189
CY			
LV	196	1.3	262
LT			
LU	10	3.1	31
HU			
MT			
NL			
AT			
PL	200	1.3	257
PT	90	1.1	98
RO			
SI	60	3.2	193
SK	143	1.5	213
FI	120	1.2	143
SE	129	1.1	146
IS	444	1.0	444
LI			
NO	177	1.1	203
CH			
UK TCA	128	1.2	160
UK WA	195	1.2	233
UK	139	1.2	172
<b>Total**</b>	<b>60</b>	<b>1.7</b>	<b>99</b>

\* See last column of *Table 11*.

\*\* The total unweighted average duration per PD A1 issued according to Article 12 is 142 days.

Source: Administrative data PD A1 Questionnaire 2023

<sup>32</sup> The average duration reported by Croatia was only 31 days in 2019, although it amounted to 302 days in 2020, and 298 in 2021.

### 3.8. The impact on national labour markets

The total number of PDs A1 issued according to Article 12 can be compared to the total number of employed persons. Although this gives a first idea of the relative volume, it is certainly not the best indicator to measure the impact on national labour markets, as in that case the number of forms issued are compared to the number of employed/self-employed persons. Therefore, it is better to compare the total number of employed/self-employed persons with the number of individual persons involved, as several PDs A1 could be issued to the same person during the reference year. Even then, the impact may still be overestimated. This is because the number of individual persons with a PD A1 is measured over a full year while total employment in a Member State is measured at one or more specific moments during the year. Ideally, both variables have the same 'unit of measurement', which assumes that data on the number of persons with a PD A1 working abroad at a specific moment in the year should be collected. The objective must be to make the best possible estimate of the actual employment in a Member State at a given time, considering all forms of temporary and permanent labour mobility.

In 2022, an equivalent of 0.5 % of EU employment could be related to the employment of persons covered by Article 12 (*Table 13*). In most Member States, only a limited proportion of the working population was sent abroad based on Article 12. Only in Luxembourg (3.9 %), Slovenia (3.2 %), Slovakia (2.3 %), Croatia (1.9 %), Poland (1.2 %), and Portugal (1.2 %) more than 1 % of the employed population was sent abroad in 2022.

**Table 13 - Share of persons falling under Article 12 of the Basic Regulation in national employment, by sending Member State, 2022**

	Total employed persons (in ,000)**	Forms	% of employed persons	Persons	% of employed persons	Persons in FTE***	% of employed persons in FTE
BE	4 921	79 461	1.6%	31 734	0.6%	7 156	0.2%
BG	3 053	12 159	0.4%	8 709	0.3%		
CZ	5 022	7 736	0.2%	6 483	0.1%	3 676	0.1%
DK	2 864	10 082	0.4%	7 821	0.3%	1 181	0.0%
DE	40 992	1 407 045	3.4%				
EE	637	4 153	0.7%	3 288	0.5%	3 276	0.6%
IE	2 446	3 012	0.1%	2 577	0.1%	2 105	0.1%
EL	4 030	26	0.0%				
ES	20 082	155 728	0.8%				
FR	27 816	153 812	0.6%	97 018	0.3%	12 486	0.0%
HR	1 671	49 729	3.0%	32 358	1.9%	32 358	1.9%
IT	22 413	223 348	1.0%	104 259	0.5%	61 134	0.3%
CY*	435	79	0.0%				
LV	840	4 014	0.5%	3 008	0.4%	2 445	0.3%
LT	1 354	34 046	2.5%				
LU**	503	60 405	12%	19 428	3.9%	1 876	0.4%
HU*	4 586	46 491	1.0%				
MT	276	773	0.3%				
NL	9 234	23 885	0.3%				
AT	4 357	78 313	1.8%				
PL	16 301	242 282	1.5%	188 877	1.2%	150 486	0.9%
PT	4 699	59 422	1.3%	54 730	1.2%	16 609	0.4%
RO	7 728	35 128	0.5%				
SI	967	98 443	10.2%	30 614	3.2%	18 343	2.0%
SK	2 560	87 025	3.4%	58 419	2.3%	38 648	1.5%
FI	2 526	4 934	0.2%	4 150	0.2%	1 839	0.1%
SE	4 993	1 837	0.0%	1 622	0.0%	736	0.0%
IS	199	159	0.1%	159	0.1%	219	0.1%
LI							
NO	2 729	1 900	0.1%	1 660	0.1%	1 044	0.0%
CH	4 542	105 198	2.3%				
UK	31 382	22 584	0.1%	18 217	0.1%	11 327	0.0%
<b>Total****</b>	<b>236 159</b>	<b>3 013 209</b>	<b>1.3 %</b>		<b>0.5 %</b>		<b>0.3 %</b>

\* CY and HU: data 2021.

\*\* The total number of employed persons (in ,000) is retrieved from Eurostat [lfsa\_epgaed]. It concerns the total number of employed persons between 15 and 64 years old. LU: incl. frontier workers.

\*\*\* In order to estimate the number of persons in FTEs, the average duration was converted to working days by multiplying it by 5/7. Thereafter, this period was divided by 230 days, the number of working days generally considered in one calendar year, taking into account holidays etc. Afterwards, this was multiplied by the number of PDs A1 issued.

\*\*\*\* Average calculated for the reporting Member States. The EU averages are therefore not perfectly comparable.

Source: Administrative data PD A1 Questionnaire 2023 and Eurostat [lfsa\_epgaed]

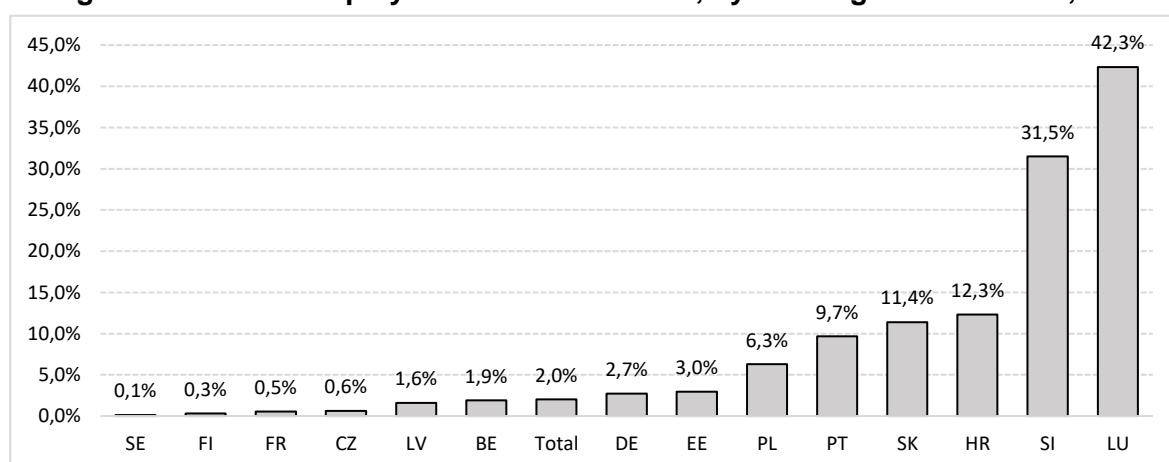


By using the additional data on the duration this group of persons is active in another Member State, the relative weight of such activities on the labour market in terms of full-time equivalents (FTEs)<sup>33</sup> is estimated. Such data are only available for 19 Member States. In 2022, an equivalent of 0.3 % of employment in FTEs could be related to persons covered by Article 12 (weighted average) (*Table 13*). This low percentage is caused by the fact that persons covered by Article 12 stay abroad only for a short period (see *section 3.7*). For example, the share of persons covered by Article 12 in the Luxembourg workforce falls sharply when the impact is expressed in FTEs (from 3.9 % to 0.4 %). The same observation applies to the results for Slovakia for instance.

Based on the data by sector of activity a more detailed analysis is made of the share of persons with a PD A1 issued according to Article 12 in national employment by sector of activity. The findings for the construction sector, one of the most popular sectors for such activities, are shown in *Figure 6* for 15 reporting Member States from a sending perspective. The reported figures are calculated based on the reported number of persons involved and not on the number of PDs A1 issued.

Mainly the Luxembourg (42 %) and Slovenian (32 %) construction sector, and to a lesser extent the Croatian (12 %) and Slovakian (11 %) construction sector sent a high percentage of persons abroad in 2022. Furthermore, some 6 % of the workers employed in the Polish construction sector provided services abroad.

**Figure 6 - Estimated share of individual persons falling under Article 12 of the Basic Regulation in total employment in construction, by sending Member State, 2022**



Source: Administrative data PD A1 Questionnaire 2023 and Eurostat [\[lfsa\\_egan2\]](#) data 2022

From the perspective of the receiving Member State, the impact of persons covered by Article 12 on national labour markets could be estimated as well, based on the number of PDs A1 issued according to Article 12 received and the breakdown by sector of activity. However, there are some important caveats. Firstly, the estimate would be based on the number of forms received and not on the number of individual employed/self-employed persons involved. This implies an overestimation of the share of persons covered by Article 12. Secondly, only the impact of activities according to Article 12 on receiving Member States would be described. No such data exist for persons active in two or more Member States according to Article 13. Finally, the distribution by sector of activity is not available for all reporting Member States. Therefore, data on incoming posting undertakings and posted workers registered by national declaration tools are preferred to calculate the impact on the receiving Member States.

<sup>33</sup> "A full-time equivalent is a unit to measure employed persons in a way that makes them comparable although they may work a different number of hours per week. For example, a part-time worker employed for 20 hours a week where full-time work consists of 40 hours, is counted as 0.5 FTE" (source: Eurostat).

## 4. Persons covered by Article 13

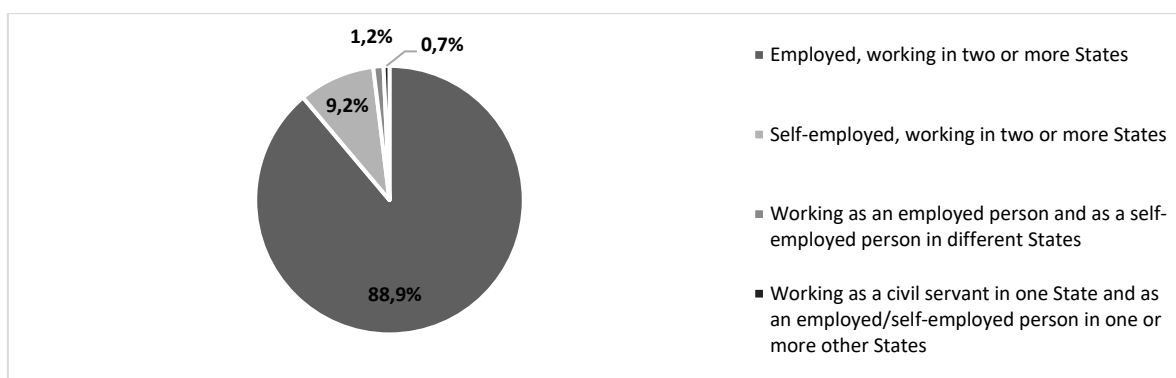
In this chapter, detailed figures on persons who are active in two or more Member States (i.e., persons covered by Article 13) are reported. The need emerged for a more detailed profile of persons active in two or more Member States, as the number of PDs A1 issued to this group of persons has strongly increased over the past few years (see for instance *Figure 3* in *Chapter 2*). Moreover, in some cases persons covered by Article 13 might also be posted under the conditions of the Posting of Workers Directive. It should be recalled that no information is produced concerning the place of cross-border activities under Article 13, hence no data is available regarding the receiving Member States.

### 4.1. Breakdown by type of activity

In total, 1.4 million PDs A1 were issued to persons covered by Article 13 in 2022. Almost one third of these PDs A1 were issued by Poland (467 255 PDs A1) (*Table 14*). Spain, Italy, Germany, Lithuania, and Slovenia issued more than 70 000 PDs A1 under Article 13 each.

The type of activity of the persons to whom a PD A1 under Article 13 is issued, can be looked at in more detail. *Figure 7* indicates that almost nine in ten PDs A1 were for employed persons working in two or more Member States. Furthermore, 9.2 % of certificates were for self-employed persons working in two or more Member State. Only a minority of PDs A1 under Article 13 were issued for those working as an employed person and a self-employed person in different Member States (1.2 %). Finally, 0.7 % of forms were issued to persons who were active as a civil servant in one Member State and as an employed or self-employed person in one or more other Member States.

**Figure 7 - Total number of PDs A1 issued for persons active in two or more Member States, breakdown by type of activity, 2022**



Source: Administrative data PD A1 Questionnaire 2023

Almost all Member States issued the majority of PDs A1 for persons active in two or more Member States to employed persons working in two or more Member States. The only exception is Iceland, which issued 47 % of the PDs A1 under Article 13 to working as an employed and self-employed person in different Member States (*Table 14*). Furthermore, Czechia, Slovakia, Iceland, and the United Kingdom issued over one fifth of PDs A1 under Article 13 for self-employed persons. Member States which issued a relatively high share to those working as an employed and self-employed person in different Member States (over 15 %) are Iceland and Norway. Finally, only Austria, Sweden, and Liechtenstein issued more than 10 % of forms under Article 13 to persons working as a civil servant in one Member State and as an employed/self-employed person in one or more other Member States.



**Table 14 - Total number of PDs A1 issued for persons active in two or more Member States by the sending Member State, breakdown by type of activity, 2022**

	Employed, working in two or more States		Self-employed, working in two or more States		Working as an employed person and as a self-employed person in different States		Working as a civil servant in one State and as an employed/self-employed person in one or more other States		Total active in two or more States	
	Number	Row %	Number	Row %	Number	Row %	Number	Row %	Number	Row %
BE	57 923	93.3 %	2 934	4.7 %	616	1.0 %	601	1.0 %	62 074	100 %
BG	13 355	96.9 %	130	0.9 %	298	2.2 %	<5	0.0 %	13 784	100 %
CZ	43 381	71.4 %	13 614	22.4 %	3 700	6.1 %	76	0.1 %	60 771	100 %
DK	32 453	98.2 %	433	1.3 %	72	0.2 %	80	0.2 %	33 038	100 %
DE	76 139	93.3 %	2 645	3.2 %	1 796	2.2 %	986	1.2 %	81 566	100 %
EE	12 686	99.4 %	39	0.3 %	40	0.3 %	<5	0.0 %	12 767	100 %
IE	1 786	87.1 %	208	10.1 %	48	2.3 %	9	0.4 %	2 051	100 %
EL	0		0		0		0		0	
ES	102 339	94.4 %	5 951	5.5 %	92	0.1 %	6	0.0 %	108 388	100 %
FR	11 056	90.7 %	849	7.0 %	274	2.2 %	16	0.1 %	12 195	100 %
HR	28 724	97.2 %	524	1.8 %	286	1.0 %	11	0.0 %	29 545	100 %
IT	83 329	93.3 %	4 809	5.4 %	855	1.0 %	316	0.4 %	89 309	100 %
CY*	2 288	98.5 %	20	0.9 %	15	0.6 %	0	0.0 %	2 323	100 %
LV	16 967	98.4 %	182	1.1 %	95	0.6 %	<5	0.0 %	17 245	100 %
LT	74 350	99.8 %	78	0.1 %	67	0.1 %	0	0.0 %	74 495	100 %
LU	6 484	83.2 %	243	3.1 %	1 056	13.6 %	10	0.1 %	7 793	100 %
HU*	21 003	96.1 %	229	1.0 %	619	2.8 %	<5	0.0 %	21 853	100 %
MT	424	87.1 %	39	8.0 %	23	4.7 %	<5	0.2 %	487	100 %
NL	55 881	89.2 %	6 111	9.8 %	633	1.0 %	41	0.1 %	62 666	100 %
AT	51 980	85.8 %	896	1.5 %	1 063	1.8 %	6 661	11.0 %	60 600	100 %
PL	397 798	85.1 %	68 970	14.8 %	367	0.1 %	120	0.0 %	467 255	100 %
PT	26 275	91.3 %	2 487	8.6 %	5	0.0 %	0	0.0 %	28 767	100 %
RO	30 584	100.0 %	11	0.0 %	0	0.0 %	0	0.0 %	30 595	100 %
SI	67 983	94.3 %	2 674	3.7 %	1 332	1.8 %	67	0.1 %	72 056	100 %
SK	22 490	63.7 %	11 383	32.3 %	1 406	4.0 %	13	0.0 %	35 292	100 %
FI	4 877	90.2 %	402	7.4 %	61	1.1 %	65	1.2 %	5 405	100 %
SE	4 605	83.3 %	156	2.8 %	209	3.8 %	560	10.1 %	5 530	100 %
IS	13	19.7 %	18	27.3 %	31	47.0 %	<5	6.1 %	66	100 %
LI	282	71.4 %	18	4.6 %	52	13.2 %	43	10.9 %	395	100 %
NO	1 888	67.3 %	244	8.7 %	572	20.4 %	102	3.6 %	2 806	100 %
CH	22 411	84.3 %	2 588	9.7 %	1 215	4.6 %	363	1.4 %	26 577	100 %
UK TCA	4 790	63.9 %	2 467	32.9 %	234	3.1 %	<5	0.0 %	7 493	100 %
UK WA	2 752	60.7 %	1 114	24.6 %	667	14.7 %	<5	0.0 %	4 534	100 %
UK	7 542	62.7 %	3 581	29.8 %	901	7.5 %	<5	0.0 %	12 027	100 %
<b>Total</b>	<b>1 279 296</b>	<b>88.9 %</b>	<b>132 466</b>	<b>9.2 %</b>	<b>17 799</b>	<b>1.2 %</b>	<b>10 160</b>	<b>0.7 %</b>	<b>1 439 721</b>	<b>100 %</b>

\* CY and HU: data 2021.

Source: Administrative data PD A1 Questionnaire 2023

## 4.2. Comparison with previous years

The total number of PDs A1 issued under Article 13 increased by 6.6 % in 2022 compared to 2021 (*Table 15*). Especially the growth for EFTA Member States (+28.3 %) is remarkable, compared to the growth for EU-14 Member States (+9.7 %) and EU-13 Member States (+3.8 %). The total number of PDs A1 covered by Article 13 is now the highest it has ever been, so surpassing the pre-COVID-19 level (from 2019 to 2022 there is a growth of 5.7 %). Although the number of PDs A1 issued under Article 12 is 'back on track' as well, it has not yet reached the pre-COVID-19 level (see *Table 6* in *section 3.3*).

The main issuing Member State of PDs A1 under Article 13, Poland, has once again seen an increase of forms issued of around 23 240 certificates or 5.2 %. This means that the number has continuously been on the rise from 2010 to 2022, even during the COVID-19 pandemic. Other remarkable growers are France (+538.5 %), Portugal (+200.6 %), and Ireland (+174.6 %), as the number of certificates issued by these Member States more than doubled compared to 2021. France is particularly notable here as very few PDs A1 were granted under Article 13 in the past. Finally, the number of PDs A1 issued for persons active

in two or more Member States most notably decreased in Greece (-100 % compared to 2018) and Liechtenstein (-84.8 %).

**Table 15 - Total number of PDs A1 issued for persons active in two or more Member States by the sending Member States, 2010-2022**

Sending MS	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	Change 2021 vs 2022	
														Numbers	%
EU-27	163 548	218 531	261 531	349 873	414 161	490 890	597 759	994 404	1 074 063	1 300 341	1 206 049	1 317 953	1 397 850	79 897	6.1 %
EU-28	168 107	224 585	269 774	359 116	421 488	501 279	611 237	1 008 242	1 084 618	1 314 085					
EU-14	108 538	124 660	143 062	194 818	201 108	213 127	241 716	395 772	441 776	573 872	493 546	509 826	559 382	49 556	9.7 %
EU-13	55 010	93 871	118 469	155 055	213 053	277 763	356 043	598 632	632 287	726 469	712 503	808 127	838 468	30 341	3.8 %
EFTA	172	140	291	8 017	8 908	10 510	12 541	17 135	14 417	47 375	26 891	23 260	29 844	6 584	28.3 %
Total	168 279	224 725	270 065	367 133	430 396	511 789	623 778	1 025 377	1 099 035	1 361 460	1 241 521	1 350 103	1 439 721	89 618	6.6 %
BE	18 208	19 857	2 320	23 714	20 146	21 181	33 414	57 273	59 451	62 863	61 792	61 050	62 074	1 024	1.7 %
BG	n.a.	n.a.	577	1 093	833	737	3 593	21 106	12 283	15 044	13 521	15 034	13 784	-1 250	-8.3 %
CZ	4 099	4 770	8 520	17 435	20 859	25 442	35 672	55 700	52 723	69 465	53 723	59 112	60 771	1 659	2.8 %
DK	5 027	5 336	11 043	17 744	15 999	21 924	22 288	27 688	34 496	39 932	34 492	29 281	33 038	3 757	12.8 %
DE	16 799	21 631	15 229	21 651	16 445	16 962	22 778	62 877	60 785	89 747	114 997	81 169	81 566	397	0.5 %
EE	2 297	3 159	3 511	4 048	7 654	9 672	11 411	12 456	12 713	15 592	15 821	14 940	12 767	-2 173	-14.5 %
IE	556	1 036	4 061	3 822	4 177	3 875	3 694	4 180	3 435	3 210	3 060	747	2 051	1 304	174.6 %
EL	0	7	228	443	1 273	1 854	2 932	2 926	2 647	2 647	2 647	2 647	0	-2 647	-100.0 %
ES	13 718	17 776	26 633	36 152	33 496	36 957	44 340	77 663	121 713	112 839	91 325	93 390	108 388	14 998	16.1 %
FR	897	5 540	9 367	5 792	4 451	7 667	3 259	916	359	2 866	443	1 910	12 195	10 285	538.5 %
HR	n.a.	n.a.	n.a.	662	927	1 516	2 581	14 023	13 451	17 137	18 366	25 178	29 545	4 367	17.3 %
IT	1 619	1 813	2 112	2 041	2 932	5 755	5 458	20 359	18 401	37 132	37 132	82 887	89 309	6 422	7.7 %
CY*	515	1 497	2 244	2 113	1 830	2 795	3 263	3 868	3 868	3 868	3 868	2 323	2 323		
LV	273	523	1 657	3 095	3 001	3 877	6 602	17 289	17 681	18 671	17 814	17 611	17 245	-366	-2.1 %
LT	2 061	1 457	2 141	2 611	2 012	3 288	4 738	43 099	46 825	62 764	62 163	77 172	74 495	-2 677	-3.5 %
LU	4 987	4 206	4 323	3 802	11 376	11 773	12 629	14 238	14 345	15 581	12 284	9 378	7 793	-1 585	-16.9 %
HU*	<5	66	1 339	1 920	1 930	3 470	3 498	19 540	9 751	13 187	6 732	21 853	21 853		
MT	<5	<5	0	0	115	77	219	827	1 202	1 130	790	730	487	-243	-33.3 %
NL	44 822	44 788	58 569	68 554	75 236	65 359	68 377	79 823	73 095	78 414	67 304	63 878	62 666	-1 212	-1.9 %
AT	n.a.	n.a.	3 606	4 258	6 392	8 137	11 624	17 810	20 973	97 516	50 164	64 723	60 600	-4 123	-6.4 %
PL	44 018	81 770	94 877	118 599	156 452	207 947	248 214	324 999	351 439	387 402	399 738	444 015	467 255	23 240	5.2 %
PT	24	31	981	878	257	347	892	20 070	21 452	18 136	6 851	9 570	28 767	19 197	200.6 %
RO	n.a.	n.a.	73	109	1 171	646	1 428	37 470	29 129	37 214	28 309	36 420	30 595	-5 825	-16.0 %
SI	429	66	127	208	210	406	13 132	26 559	39 788	49 099	57 773	66 159	72 056	5 897	8.9 %
SK	1 311	561	3 403	3 162	16 059	17 890	21 692	21 696	41 434	35 896	33 885	27 580	35 292	7 712	28.0 %
FI	1 881	1 911	1 953	2 181	2 532	3 928	3 230	3 314	4 109	4 651	4 120	4 285	5 405	1 120	26.1 %
SE	n.a.	728	2 637	3 786	6 396	7 408	6 801	6 635	6 515	8 338	6 935	4 911	5 530	619	12.6 %
IS	34	15	6	8	102	69	70	95	51	37	38	43	66	23	53.5 %
LI	138	125	285	423	548	1 174	1 278	976	976	1 656	1 525	2 607	395	-2 212	-84.8 %
NO	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.	1 829	2 279	2 150	840	1 596	2 806	1 210	75.8 %
CH	n.a.	n.a.	n.a.	7 586	8 258	9 267	11 193	14 235	11 111	43 532	24 488	19 014	26 577	7 563	39.8 %
UK	4 559	6 054	8 243	9 243	7 327	10 389	13 478	13 838	10 555	13 744	8 581	8 890	12 027	3 137	35.3 %

\* CY and HU: data 2021.

Source: Administrative data PD A1 Questionnaire 2023 and previous years

### 4.3. Breakdown by sector of economic activity

Detailed information has been collected on the sector of activity of those persons who are covered by Article 13. Nevertheless, only 15 Member States were able to provide this information, so general conclusions cannot be drawn. Absolute numbers are presented in *Annex I – Table A5*, which shows a distribution by economic sector of the PDs A1 granted by the sending Member States to persons covered by Article 13. The table shows, *inter alia*, that some 229 595 PDs A1 are provided by Poland to persons employed in the freight transport sector by road.

The percentage distribution by economic activity is shown in *Table 16*. Almost two thirds of the PDs A1 under Article 13 are granted to persons in the services sector, more specifically 45.3 % of forms go to persons active in road freight transport. Especially in Croatia, Latvia, Lithuania, Malta, Poland, Slovakia, and Liechtenstein, more than one third of forms are issued for activities in road freight transport. In Lithuania and Malta, the share even exceeds 50 %. Poland makes up the lion's share in absolute terms (229 595 out of 360 424 PDs A1, see *Table A5 in Annex I*) – in line with the importance of international road freight transport in the country's economy.

The reader will have noticed that the distribution by sector of activity strongly differs from the one for persons covered by Article 12. For instance, 'only' 22.5 % of the forms issued to persons covered by Article 13 are applicable to the construction sector (compared to 46.8 % according to Article 12 – see *Table 9 in section 3.5*).

**Table 16 - Total number of PDs A1 issued for persons active in two or more Member States, breakdown by economic activity, from a sending perspective, 2022 (row %)**

Sending MS	Agriculture, hunting and fishing NACE A	Industry NACE B to F		Services NACE G to T								
		Industry Total	Construction NACE F	Services Total	Wholesale and retail trade NACE G	Accommodation and food service activities NACE I	Transportation and storage; Information and communication NACE H and J	Freight transport by road NACE H - Group 49.4	Financial and insurance; Real estate; Professional, scientific and technical activities; Administrative and support service activities NACE K, L, M, and N	Temporary employment agency NACE N - Group 78.2	Education, health and social work, arts and other services NACE P, Q, R, and S	Human health and social work activities NACE Q
BE	0.6 %	32.0 %	17.7 %	67.4 %	7.8 %	0.1 %	35.1 %	28.1 %	20.2 %	9.2 %	9.3 %	0.5 %
BG												
CZ												
DK												
DE	4.3 %	78.7 %	53.6 %	17.0 %	1.1 %	0.3 %	7.6 %	6.9 %	5.3 %	0.7 %	2.7 %	1.2 %
EE												
IE												
EL												
ES												
FR												
HR	0.4 %	43.9 %	21.7 %	55.7 %	2.2 %	0.3 %	45.4 %	33.6 %	6.2 %	1.9 %	1.6 %	0.7 %
IT												
CY*	0.0 %	46.1 %	6.5 %	53.9 %	0.6 %	10.2 %	40.0 %	4.4 %	2.8 %	1.5 %	0.3 %	0.0 %
LV	0.5 %	38.9 %	28.4 %	60.5 %	5.7 %	0.3 %	42.4 %	38.5 %	10.6 %	1.1 %	1.7 %	0.1 %
LT	0.7 %	22.3 %	21.3 %	77.0 %	0.0 %	9.6 %	60.7 %	60.6 %	0.1 %	0.0 %	6.6 %	0.0 %
LU	1.7 %	25.2 %	9.2 %	73.2 %	3.8 %	0.3 %	49.2 %	28.1 %	19.3 %	0.0 %	0.3 %	0.2 %
HU												
MT	0.2 %	0.0 %	0.0 %	99.8 %	0.0 %	0.0 %	0.0 %	89.9 %	8.6 %	0.0 %	1.2 %	0.0 %
NL												
AT	0.1 %	39.6 %	10.6 %	60.3 %	8.2 %	0.5 %	12.0 %	0.0 %	1.2 %	0.0 %	38.5 %	0.0 %
PL	0.7 %	30.7 %	25.7 %	68.6 %	1.8 %	0.1 %	49.1 %	47.5 %	3.7 %	1.6 %	13.4 %	9.5 %
PT												
RO												
SI	0.1 %	67.1 %	0.3 %	32.8 %	0.1 %	0.0 %	32.7 %	0.0 %	0.0 %	0.0 %	0.0 %	0.0 %
SK	0.5 %	37.1 %	30.1 %	62.4 %	0.4 %	0.2 %	41.5 %	39.6 %	1.3 %	0.0 %	19.1 %	0.6 %
FI	0.5 %	66.0 %	12.0 %	33.5 %	1.1 %	0.2 %	10.6 %	8.7 %	5.9 %	0.8 %	15.7 %	1.8 %
SE	0.6 %	50.8 %	14.4 %	48.6 %	9.3 %	0.4 %	5.3 %	1.3 %	16.7 %	1.3 %	19.2 %	10.7 %
IS												
LI	0.0 %	28.1 %	2.3 %	71.9 %	0.3 %	0.8 %	56.7 %	45.3 %	10.1 %	1.0 %	4.1 %	0.0 %
NO												
CH												
UK												
<b>Total</b>	<b>0.7 %</b>	<b>22.5 %</b>	<b>7.4 %</b>	<b>64.0 %</b>	<b>2.1 %</b>	<b>1.1 %</b>	<b>45.3 %</b>	<b>40.0 %</b>	<b>4.6 %</b>	<b>1.8 %</b>	<b>11.0 %</b>	<b>5.8 %</b>

\* CY: data 2021.

\*\*\* How is this data calculated? See *Table A5 in Annex I* for the complete data. For instance, Austria issued 10 PDs A1 for agriculture, hunting and fishing. This is divided by the total number of PDs A1 issued for which the sector was available, in this case 12 664 (this is the sum of agriculture hunting, and fishing (10); Industry total (5 014); and Services total (7 640)). As a result, 0.1 % of PDs A1 are issued for agriculture, hunting and fishing.

Source: Administrative data PD A1 Questionnaire 2023

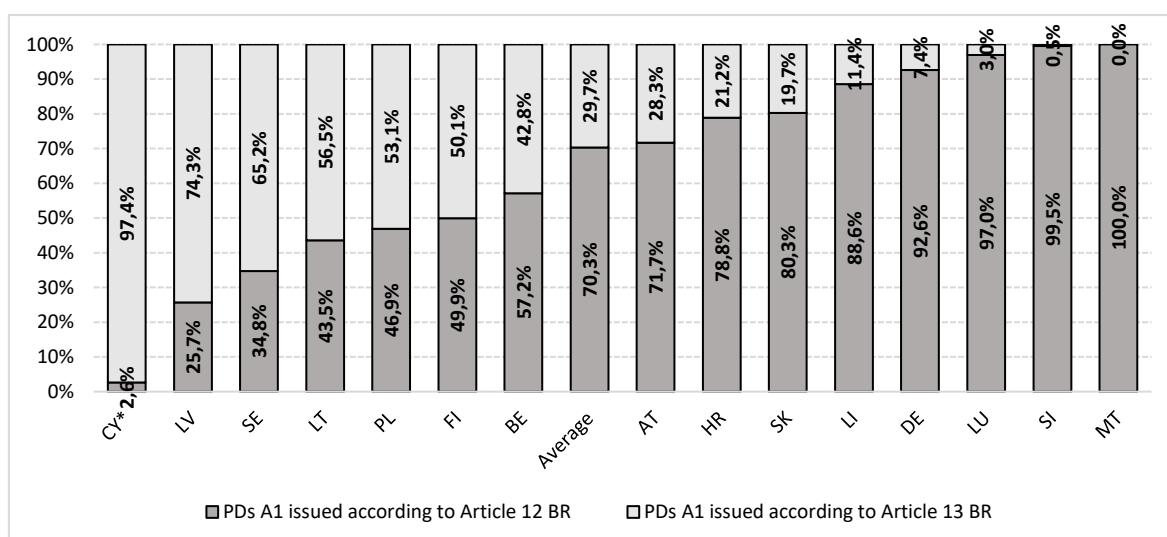
For the construction sector specifically, the distribution between PDs A1 issued under Article 12 and Article 13 is analysed for 15 Member States. *Figure 8* shows that on average 70 % of PDs A1 granted to persons employed in the construction sector are issued to persons covered by Article 12 and 30 % of PDs A1 to persons covered by Article 13.

However, in terms of individual persons and the volume of work the difference between Article 12 and Article 13 is (much) smaller.<sup>34</sup>

Belgium, Austria, Croatia, Slovakia, Liechtenstein, Germany, Luxembourg, Slovenia, and Malta issued a higher number of PDs A1 to persons employed in the construction sector on the basis of Article 12. The opposite holds true in Cyprus (data 2021), Latvia, Sweden, Lithuania, Poland, and Finland, which issue the majority of PDs A1 in the construction sector under Article 13.

In general, the share of Article 13 seems to fluctuate between one fourth and one third in recent years (24% in 2017, 28% in 2018, 32% in 2019, 35% in 2020, 26 % in 2021, and 30 % in 2022). However, as the number of reporting Member States is limited, it is difficult to draw general conclusions. Although for some Member States, the importance of Article 13 does seem to have increased. For example, in 2016, 73% of PDs A1 issued by Poland for activities in the construction sector were granted on the basis of Article 12 while in 2022, this had fallen to 47%.

**Figure 8 - Share of Articles 12 and 13 of Regulation (EC) No 883/2004 in total number of PDs A1 issued to persons employed in the construction sector, 2022**



\* CY: data 2021.

Source: Administrative data PD A1 Questionnaire 2023

#### 4.4. The number of individual persons involved

The number of PDs A1 issued according to Article 13 is not necessarily equal to the number of persons involved. Several PDs A1 could be issued to the same person during the reference year. In addition, as Article 13 sets no maximum period for the employment or self-employment in two or more Member States, a person could be active in two or more Member States for several years. Therefore, both the number of PDs A1 issued in 2021 to persons covered by Article 13 and the number of PDs A1 in circulation for this group of persons are interesting indicators. This remark also holds for Article 12.

Based on data reported by 21 Member States, the number of individual persons active in two or more Member States is some 88.9 % of the number of PDs A1 issued for these persons (*Table 17*). This means that one person received around 1.1 PDs A1 during reference year 2022. In Lithuania and the Netherlands, the number of individual persons is equal to the number of PDs A1 issued by these Member States. As the main issuing Member State of PDs A1 under Article 13, Poland issued some 467 000 certificates to

<sup>34</sup> Such calculations are not included in this report as only a very limited number of countries reported all the requested data.

around 438 000 persons covered by Article 13. Based on the reported figures it can be estimated that some 1.3 million individual persons received a PD A1 according to Article 13 in 2022.<sup>35</sup>

**Table 17 - Number of individual persons employed in two or more Member States, 2022**

Sending MS	Individual number of persons (A)*	Number of PDs A1 issued (B)	A/B	B/A
BE	44 796	62 074	72.2%	1.4
BG	12 150	13 784	88.1%	1.1
CZ	54 238	60 771	89.2%	1.1
DK	27 089	33 038	82.0%	1.2
DE				
EE	10 430	12 767	81.7%	1.2
IE	1 819	2 051	88.7%	1.1
EL	0	0		
ES				
FR				
HR	26 272	29 545	88.9%	1.1
IT	78 357	89 309	87.7%	1.1
CY				
LV	15 201	17 245	88.1%	1.1
LT	74 495	74 495	100.0%	1.0
LU	7 013	7 793	90.0%	1.1
HU				
MT				
NL	62 666	62 666	100.0%	1.0
AT				
PL	437 613	467 255	93.7%	1.1
PT				
RO				
SI	47 270	72 056	65.6%	1.5
SK	32 248	35 292	91.4%	1.1
FI	5 145	5 405	95.2%	1.1
SE	5 172	5 530	93.5%	1.1
IS	42	66	63.6%	1.6
LI				
NO	2 490	2 806	88.7%	1.1
CH				
UK TCA	6 897			
UK WA	4 082			
UK	10 979	12 027	91.3%	1.1
<b>Total reported</b>	<b>958 741</b>	<b>1 078 170</b>	<b>88.9%</b>	<b>1.1</b>
<b>Estimate total individual*</b>	<b>1 287 831</b>			

\* Total applicable to all EFTA/EU countries and the UK. Figure obtained by applying the percentage of 88.9 % to all missing Member States.

Source: Administrative data PD A1 Questionnaire 2023

## 4.5. The average duration

As mentioned earlier, no maximum period for the employment or self-employment in two or more Member States is set by Article 13. A total of 16 Member States were able to provide figures on the average duration persons are active in two or more Member states.

The average duration of persons covered by Article 13 was 318 days per PD A1 in 2022 (Table 18). Nonetheless, the average duration per PD A1 varies markedly among the reporting Member States from some 189 days in Czechia to some 848 days in Luxembourg. By multiplying the average duration by the number of times a person has received a PD A1 (see Table 17) it is possible to estimate the average duration a person is active in two or more Member States. On average, an individual person is active during almost a complete year in two or more Member States.

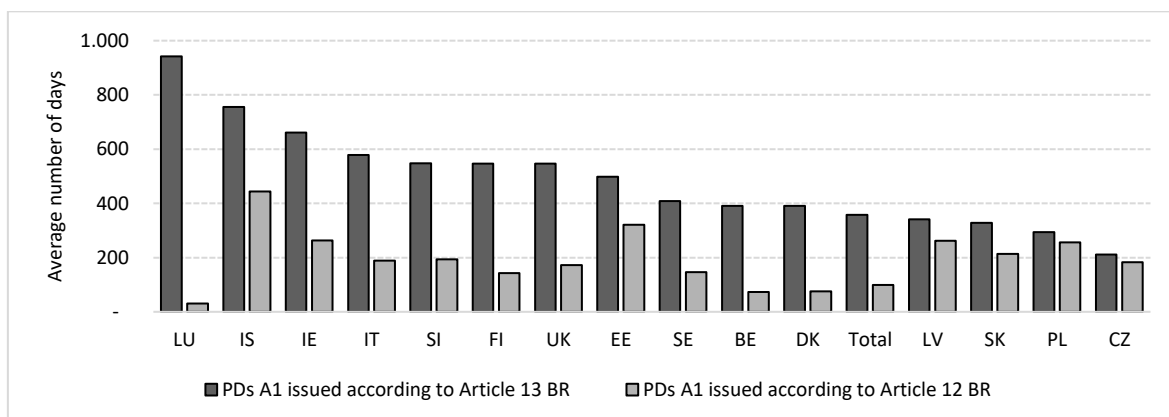
<sup>35</sup> This is calculated by assuming for those Member State that did not provide data on the number of persons involved that on average one individual person was sent abroad 1.1 times.

**Table 18 - Average duration of employment or self-employment in two or more Member States, in days, from a sending perspective, 2022**

	Average duration per form (A)	Number of forms issued per individual (B)	Average duration per individual worker (A*B)
BE	282	1.4	391
BG			
CZ	189	1.1	212
DK	320	1.2	390
DE			
EE	407	1.2	498
IE	586	1.1	661
EL			
ES			
FR			
HR	360		
IT	508	1.1	579
CY			
LV	301	1.1	341
LT			
LU	848	1.1	943
HU			
MT			
NL			
AT			
PL	275	1.1	294
PT			
RO			
SI	359	1.5	548
SK	300	1.1	329
FI	520	1.1	546
SE	382	1.1	408
IS	481	1.6	756
LI			
NO			
CH			
UK TCA	472		
UK WA	542		
UK	498	1.1	546
Total	318	1.1	357

Source: Administrative data PD A1 Questionnaire 2023

In general, the average period (strongly) varies between persons covered by Article 12 and persons covered by Article 13 (*Figure 9*). For all reporting Member States, the average period during which persons covered by Article 12 are active in another Member State is lower than the period during which persons are active in two or more Member States.

**Figure 9 - Average duration in days, persons covered by Article 12 versus persons covered by Article 13, 2022**

\* Figures from the last column of *Tables 12 and 18*.

Source: Administrative data PD A1 Questionnaire 2023



## 4.6. The impact on national labour markets

The number of individual persons covered by Article 13 can be compared to the total number of employed persons in the sending Member States to grasp the relative importance of this activity. The impact on the receiving Member States cannot be calculated as no further breakdown of individual persons by receiving Member State was included in the PD A1 Questionnaire. By using the additional data about the duration, the relative weight of persons covered by Article 13 on the labour market of some reporting Member States in terms of full-time equivalents (FTE) can be estimated.

In 2022, an equivalent of 0.4 % of EU employment could be related to the employment of persons active in two or more Member States (*Table 19*). Only in Lithuania (5.5 %), Slovenia (4.9 %) and Poland (2.7 %), more than 2 % of the employed population is active in two or more Member States.

**Table 19 - Share of persons employed in two or more Member States in national employment, from a sending perspective, 2022**

Sending MS	Total employed persons (in ,000)* (A)	Forms (B)	% Of employed persons (B/(A*1 000))	Persons (C)	% Of employed persons (C/(A*1 000))	Persons in FTE** (D)	% Of employed persons in FTE** (D/A)
BE	4.921	62.074	1,3%	44.796	0,9%	44.796	1,0%
BG	3.053	13.784	0,5%	12.150	0,4%	11.996	0,4%
CZ	5.022	60.771	1,2%	54.238	1,1%	35.670	0,7%
DK	2.864	33.038	1,2%	27.089	0,9%	27.089	1,1%
DE	40.992	81.566	0,2%				
EE	637	12.767	2,0%	10.430	1,6%	10.430	1,8%
IE	2.446	2.051	0,1%	1.819	0,1%	1.819	0,1%
EL	4.030	0	0,0%				
ES	20.082	108.388	0,5%				
FR	27.816	12.195	0,0%				
HR	1.671	29.545	1,8%				
IT	22.413	89.309	0,4%	78.357	0,3%	78.357	0,4%
CY	435	2.323	0,5%				
LV	840	17.245	2,1%	15.201	1,8%	15.201	1,9%
LT	1.354	74.495	5,5%	74.495	5,5%	64.831	4,9%
LU	415	7.793	1,9%	7.013	1,7%	7.013	1,7%
HU	4.586	21.853	0,5%				
MT	276	487	0,2%				
NL	9.234	62.666	0,7%	62.666	0,7%	54.536	0,8%
AT	4.357	60.600	1,4%				
PL	16.301	467.255	2,9%	437.613	2,7%	399.053	2,5%
PT	4.699	28.767	0,6%				
RO	7.728	30.595	0,4%				
SI	967	72.056	7,5%	47.270	4,9%	47.270	5,1%
SK	2.560	35.292	1,4%	32.248	1,3%	32.248	1,3%
FI	2.526	5.405	0,2%	5.145	0,2%	5.145	0,2%
SE	4.993	5.530	0,1%	5.172	0,1%	5.172	0,1%
IS	199	66	0,0%	42	0,0%	42	0,0%
LI							
NO	2.729	2.806	0,1%	2.490	0,1%		
CH	4.542	26.577	0,6%				
UK	31.382	12.027	0,0%	10.979	0,0%		
<b>Total***</b>	<b>236.071</b>	<b>1.439.326</b>	<b>0,6%</b>		<b>0,4%</b>		<b>0,4%</b>

\* The total number of employed persons (in ,000) is retrieved from Eurostat [lfsa\_egan2]. It concerns the total number of employed persons between 15 and 64 years old. LU: incl. frontier workers.

\*\* In order to estimate the number of persons in FTEs, the average duration was converted to working days by multiplying it by 5/7 (max. 230). Thereafter, this period was divided by 230 days, the number of working days generally considered in one calendar year, taking into account holidays etc. Afterwards, this was multiplied by the number of PDs A1 issued.

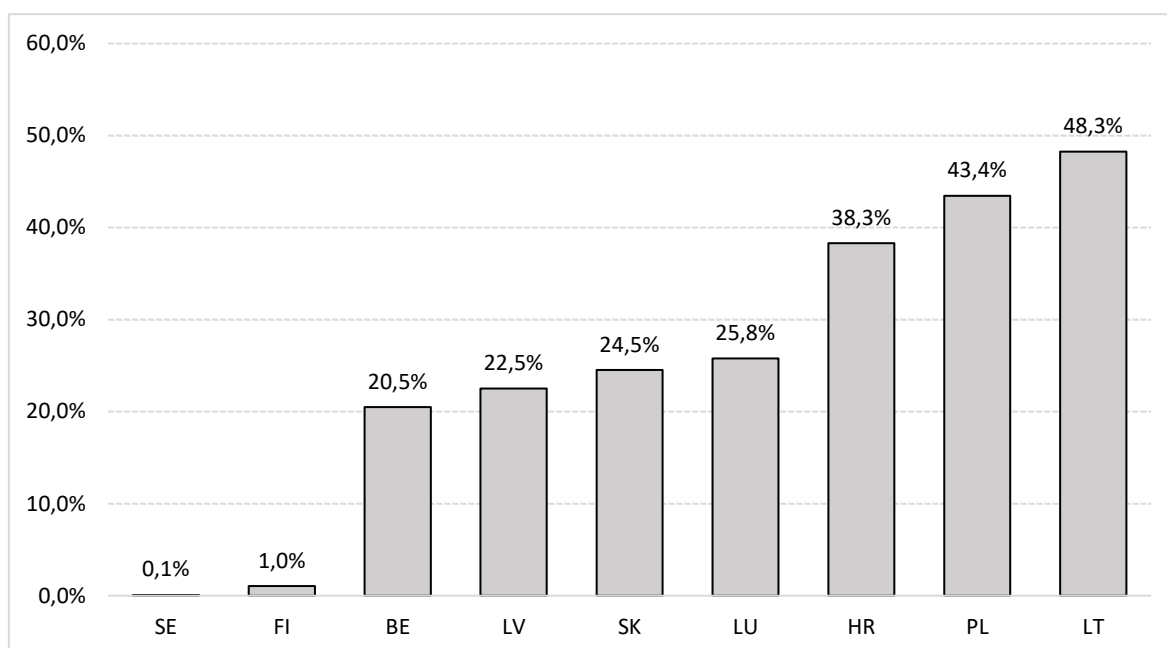
\*\*\* Average calculated for the reporting Member States. The EU averages are therefore not perfectly comparable.

Source: Administrative data PD A1 Questionnaire 2023 and Eurostat [lfsa\_egan2]

By using the additional data about the sector of activity, a more detailed analysis is carried out of the share of persons employed in two or more Member States in total employment of the road freight transport sector (*Figure 10*). It is clear that a high percentage of truck drivers

employed in Lithuania, Poland and Croatia are active in two or more Member States, namely around four out of ten truck drivers.

**Figure 10 - Estimated share of persons employed in two or more Member States in freight transport by road, 2022**



Source: Administrative data PD A1 Questionnaire 2023 and Eurostat [\[sbs na 1a se r2\]](#) data 2020

## 5. Fraud and error

In total 14 Member States provided statistics. Firstly, some data is provided from the point of view of the receiving Member State (5.1) and afterwards from the point of view of the sending Member State (5.2).

### 5.1. As receiving Member State

Only a limited number of Member States (BE, FR, ES, and NL) provided data regarding their efforts on detecting inappropriate use of the PD A1. For instance, in 2022, around 3 200 investigations were carried out by 65 inspectors in Belgium. In total, 213 cases of fraud and error were detected, amounting to EUR 31.5 million. *Table 20* provides figures on the number of detected cases. Most cases were reported by Belgium, France and the Netherlands. Furthermore, data was reported on the number of requests to withdraw a PD A1. Belgium asked to withdraw 154 PDs A1 and the Netherlands 66 PDs A1.

**Table 20 - Number of cases of inappropriate use of applicable legislation (PD A1), as a receiving Member State, 2022**

	Description	Number of cases	Amount involved (in €)
BE	Obtaining a PD A1 while not meeting criteria	85	EUR 236 644
	Penal	22	
IE	None detected	None detected	None detected
ES	Some undertakings owned by a Spanish company of the road transport sector. Many workers of those undertakings are not registered under the Spanish social security system, but according to the data of the Spanish Tax Administration their residence is in Spain. We are exchanging data with the authorities of the country of origin in a long and exhaustive process in order to determine the real place of residence.	1	Around 1.000 workers are affected by the investigation but the amount involved has not been calculated because it depends on several factors which will be determined at the end of the process.
	An undertaking created by a Spanish company active in the road transport sector in another country. Drivers are travelling from Spain to Germany and there is no activity in the country where the undertaking has the headquarter. We are negotiating within ELA's framework to organise joint inspection visits to the undertaking's headquarter in that country and the undertaking's workplace of the company in Spain.	1	Around 50 workers can be involved, the amount has not been calculated yet
FR		22	EUR 10 544 741
NL		66	unknown
SK	Cases of manipulation of the PD A1	N/A	N/A
	Purpose-made conclusion of employment contracts by self-employed persons in such a way that the performance of activities in accordance with Art. 13 (3) of the basic Regulation, contributions were paid in a preferable social security system	N/A	N/A
FI		14	

Source: Administrative data PD A1 Questionnaire 2023

## 5.2. As sending Member State

In addition to the cases of inappropriate use encountered as a receiving Member State, the questionnaire also asked about the situations of inappropriate use encountered as a sending Member State. Most of the competent Member States reported no or only a limited number of cases of inappropriate use. Bulgaria identified 529 cases of fraud or error, amounting to EUR 408 000. Furthermore, 1 454 cases of fraud or error were detected by Germany, 567 cases by Poland, 31 cases by Ireland and finally 28 cases by Spain. Furthermore, 663 PDs A1 were withdrawn by Slovakia, 485 PDs A1 by Poland and 21 PDs A1 by Bulgaria.

# Annex I Additional tables

**Table A1 - PDs A1 issued by the sending Member States according to Article 12 of the Basic Regulation, breakdown by receiving Member State, 2022 (row %)**

		Sending Member State																												Total							
		BE	BG	CZ	DK	DE	EE	IE	EL	ES	FR	HR	IT	CY*	LV	LT**	LU	HU*	MT	NL	AT	PL	PT	RO	SI**	SK**	FI	SE	IS		LI**	NO	CH	UK TCA	UK WA	UK	
Receiving MS	BE		0.7%	0.2%	0.1%	30.0%	0.0%	0.2%	0.0%	2.6%	20.4%	1.0%	4.2%	0.0%	0.0%	1.0%	10.7%	0.6%	0.0%	4.5%	0.6%	8.6%	7.0%	1.7%	3.5%	1.7%	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.5%	0.1%	0.6%	100%
	BG	0.9%		0.3%	0.3%	71.5%	0.0%	0.0%	0.0%	5.3%	5.0%	0.1%	6.1%	0.0%	0.0%	0.4%	0.3%	1.3%	0.0%	0.2%	2.6%	2.6%	0.3%	0.7%	0.1%	1.5%	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.3%	0.2%	0.4%	100%
	CZ	0.3%	0.1%		0.1%	73.5%	0.0%	0.1%	0.0%	1.9%	2.2%	0.2%	2.9%	0.0%	0.0%	0.0%	0.2%	0.4%	0.0%	0.1%	2.3%	4.7%	0.1%	0.2%	1.2%	9.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.4%	0.0%	0.4%	100%	
	DK	1.5%	0.7%	0.1%		64.7%	0.1%	0.9%	0.0%	3.8%	3.6%	0.3%	6.6%	0.0%	0.1%	2.4%	0.3%	0.6%	0.0%	1.0%	0.9%	7.7%	0.5%	0.4%	0.4%	1.0%	0.3%	0.5%	0.0%	0.0%	0.7%	0.0%	1.0%	0.1%	1.1%	100%	
	DE	1.2%	1.0%	0.5%	0.2%		0.1%	0.1%	0.0%	5.4%	4.3%	6.9%	6.8%	0.0%	0.2%	2.4%	2.3%	5.1%	0.0%	0.8%	8.4%	27.9%	0.8%	2.8%	11.9%	9.9%	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.6%	0.1%	0.7%	100%	
	EE	0.2%	0.0%	0.0%	0.0%	96.9%		0.0%	0.0%	0.1%	0.2%	0.0%	0.2%	0.0%	1.0%	0.1%	0.0%	0.0%	0.0%	0.0%	0.2%	0.4%	0.0%	0.1%	0.0%	0.0%	0.3%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	100%	
	IE	0.5%	0.8%	0.1%	0.1%	86.9%	0.0%		0.0%	3.0%	2.2%	0.1%	2.3%	0.0%	0.0%	0.1%	0.4%	0.0%	0.0%	0.5%	0.5%	1.1%	0.3%	0.0%	0.3%	0.3%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.2%	0.2%	0.4%	100%	
	EL	1.1%	1.3%	0.7%	0.9%	53.8%	0.0%	0.2%		6.9%	8.6%	0.7%	15.3%	0.2%	0.0%	0.1%	1.0%	0.2%	0.1%	1.2%	1.5%	1.2%	0.5%	0.2%	0.5%	0.3%	0.6%	0.1%	0.0%	0.0%	0.1%	0.0%	2.1%	0.4%	2.6%	100%	
	ES	1.7%	0.7%	0.2%	0.7%	58.2%	0.0%	0.1%	0.0%		9.9%	0.1%	11.5%	0.0%	0.0%	0.1%	0.6%	0.2%	0.1%	1.0%	1.1%	1.7%	8.6%	0.3%	0.2%	0.3%	0.4%	0.1%	0.0%	0.0%	0.1%	0.0%	1.7%	0.2%	1.9%	100%	
	FR	9.8%	0.4%	0.1%	0.2%	32.6%	0.1%	0.1%	0.0%	12.8%		0.2%	18.0%	0.0%	0.0%	0.8%	5.7%	0.4%	0.1%	0.8%	1.0%	6.0%	5.9%	1.7%	0.4%	0.8%	0.1%	0.1%	0.0%	0.0%	0.1%	0.0%	1.6%	0.2%	1.8%	100%	
	HR	0.5%	1.5%	0.3%	0.1%	44.7%	0.0%	0.1%	0.0%	2.5%	3.0%		15.4%	0.0%	0.1%	0.0%	0.4%	2.6%	0.0%	0.3%	4.2%	2.1%	0.0%	3.5%	16.5%	1.7%	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.4%	0.0%	0.5%	100%	
	IT	1.8%	0.2%	0.3%	0.2%	56.8%	0.0%	0.1%	0.0%	10.6%	10.4%	1.8%		0.0%	0.0%	0.1%	0.9%	0.5%	0.2%	0.9%	3.3%	2.2%	0.6%	3.4%	2.5%	0.8%	0.3%	0.1%	0.0%	0.0%	0.1%	0.0%	1.5%	0.3%	1.7%	100%	
	CY	0.7%	1.3%	0.6%	1.1%	52.3%	0.0%	0.1%	0.0%	6.2%	7.8%	0.0%	6.8%		0.0%	0.4%	1.6%	0.0%	0.1%	2.2%	7.4%	2.8%	0.5%	0.2%	0.1%	0.3%	0.6%	0.2%	0.0%	0.0%	0.3%	0.0%	5.9%	0.4%	6.3%	100%	
	LV	0.6%	0.0%	0.6%	1.0%	62.6%	0.5%	0.0%	0.0%	2.5%	4.0%	0.0%	5.6%	0.0%		6.1%	0.2%	0.2%	0.0%	0.5%	1.0%	12.6%	0.1%	0.2%	0.1%	0.9%	0.3%	0.0%	0.0%	0.0%	0.0%	0.0%	0.2%	0.2%	0.4%	100%	
	LT	1.3%	0.4%	0.7%	1.4%	63.0%	0.7%	0.1%	0.0%	3.0%	4.1%	0.0%	3.9%	0.0%	1.5%	0.2%	0.5%	0.1%	0.1%	0.2%	1.7%	14.6%	0.1%	0.1%	0.0%	1.2%	0.5%	0.0%	0.0%	0.0%	0.0%	0.0%	0.3%	0.3%	0.6%	100%	
	LU	17.1%	0.0%	0.1%	0.0%	57.7%	0.0%	0.0%	0.0%	0.8%	14.9%	0.2%	2.1%	0.0%	0.0%	0.0%		0.7%	0.0%	0.3%	0.6%	0.9%	2.3%	0.2%	1.2%	0.6%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.1%	0.0%	0.2%	100%	
	HU	0.5%	0.3%	0.3%	0.2%	67.6%	0.0%	0.0%	0.0%	2.2%	3.3%	0.5%	5.6%	0.0%	0.0%	0.0%	0.4%		0.1%	0.4%	4.4%	3.9%	0.2%	2.1%	1.5%	5.4%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.8%	0.1%	0.9%	100%	
	MT	0.3%	0.0%	0.0%	0.0%	93.7%	0.0%	0.0%	0.0%	0.8%	1.0%	0.0%	3.1%	0.0%	0.0%	0.0%	0.1%	0.0%		0.1%	0.2%	0.3%	0.0%	0.0%	0.1%	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.1%	0.0%	100%	
	NL	11.1%	0.2%	0.2%	0.2%	52.6%	0.1%	0.1%	0.0%	3.7%	2.9%	0.7%	3.8%	0.0%	0.0%	2.2%	0.5%	1.9%	0.0%		1.0%	10.9%	1.5%	1.4%	1.5%	2.3%	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.9%	0.2%	1.0%	100%	
	AT	0.2%	0.1%	0.2%	0.1%	80.1%	0.0%	0.0%	0.0%	0.5%	0.7%	0.8%	3.7%	0.0%	0.0%	0.0%	0.1%	1.6%	0.0%	0.4%		2.2%	0.2%	0.2%	5.3%	3.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.1%	0.0%	0.2%	100%	
	PL	0.5%	0.1%	0.4%	0.6%	80.2%	0.0%	0.0%	0.0%	3.3%	3.5%	0.0%	6.4%	0.0%	0.0%	0.1%	0.3%	0.2%	0.0%	0.3%	1.6%		0.2%	0.1%	0.3%	1.2%	0.1%	0.1%	0.0%	0.0%	0.0%	0.0%	0.3%	0.1%	0.4%	100%	
	PT	0.8%	0.1%	0.1%	1.5%	41.3%	0.0%	0.1%	0.0%	40.9%	7.9%	0.0%	3.9%	0.0%	0.0%	0.0%	0.5%	0.0%	0.0%	0.3%	1.0%	0.7%		0.0%	0.0%	0.2%	0.2%	0.0%	0.0%	0.0%	0.0%	0.0%	0.3%	0.1%	0.5%	100%	
	RO	0.8%	0.7%	0.2%	0.1%	70.8%	0.0%	0.1%	0.0%	4.9%	5.4%	0.1%	8.0%	0.0%	0.0%	0.0%	0.4%	0.8%	0.0%	0.5%	2.3%	2.1%	0.2%		0.9%	1.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.3%	0.1%	0.4%	100%	
	SI	0.3%	0.2%	0.2%	0.0%	70.0%	0.0%	0.0%	0.0%	1.1%	1.1%	11.7%	5.9%	0.0%	0.0%	0.0%	0.2%	1.2%	0.0%	0.1%	4.2%	1.1%	0.1%	0.6%	0.2%	1.7%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.1%	0.0%	0.1%	100%	
	SK	0.1%	0.1%	1.0%	0.0%	87.4%	0.0%	0.0%	0.0%	1.2%	1.5%	0.1%	3.5%	0.0%	0.0%	0.0%	0.2%	0.6%	0.0%	0.0%	1.1%	2.6%	0.0%	0.1%	0.3%	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.1%	100%	
	FI	0.4%	0.4%	1.2%	0.4%	51.2%	7.9%	0.1%	0.0%	4.1%	3.2%	1.5%	3.8%	0.0%	1.2%	4.0%	0.4%	0.4%	0.0%	0.4%	1.8%	10.2%	0.2%	0.4%	1.3%	3.0%		0.8%	0.0%	0.0%	0.6%	0.0%	0.9%	0.2%	1.1%	100%	
	SE	0.8%	0.2%	0.4%	1.2%	43.5%	0.9%	0.4%	0.0%	3.6%	2.6%	1.8%	3.0%	0.0%	1.5%	8.5%	0.4%	0.7%	0.0%	0.3%	1.9%	18.0%	0.5%	1.3%	1.4%	3.5%	1.9%		0.0%	0.0%	0.9%	0.0%	0.6%	0.1%	0.8%	100%	
	IS	0.7%	0.1%	0.1%	0.1%	95.6%	0.0%	0.0%	0.0%	0.6%	0.9%	0.0%	0.3%	0.0%	0.0%	0.6%	0.1%	0.0%	0.0%	0.1%	0.2%	0.3%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	100%	
	LI	0.0%	0.0%	0.1%	0.0%	94.4%	0.0%	0.0%	0.0%	0.1%	0.4%	0.0%	0.5%	0.0%	0.0%	0.0%	0.1%	0.0%	0.0%	0.0%	3.8%	0.2%	0.0%	0.0%	0.0%	0.2%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	100%	
	NO	0.7%	0.6%	0.1%	5.7%	65.8%	0.1%	0.0%	0.0%	3.3%	2.2%	0.9%	2.8%	0.0%	0.3%	8.7%	0.3%	0.2%	0.0%	0.3%	0.9%	3.8%	0.1%	0.7%	0.2%	0.1%	0.8%	0.9%	0.1%	0.0%		0.0%	0.0%	0.3%	0.3%	100%	
CH	1.0%	0.1%	0.1%	0.1%	57.4%	0.0%	0.0%	0.0%	2.0%	7.6%	0.1%	25.2%	0.0%	0.1%	0.0%	0.4%	0.2%	0.0%	0.7%	3.0%	0.8%	0.2%	0.0%	0.4%	0.4%	0.0%	0.0%	0.0%	0.1%	0.0%		0.0%	0.1%	0.1%	100%		
UK	1.2%	0.0%	0.2%	0.4%	66.3%	0.0%	0.2%	0.0%	10.6%	8.4%	0.1%	6.7%	0.0%	0.0%	0.1%	0.7%	0.3%	0.0%	0.1%	1.1%	1.7%	0.6%	0.1%	0.6%	0.3%	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	100%		
unkn.	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	4.5%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	95.5%	0.0%	0.0%	0.0%	100%		
<b>Total</b>	2.6%	0.4%	0.3%	0.3%	47.4%	0.1%	0.1%	0.0%	5.1%	5.1%	1.6%	7.4%	0.0%	0.1%	1.1%	2.0%	1.3%	0.0%	0.8%	2.6%	8.0%	2.0%	1.2%	3.2%	2.9%	0.2%	0.1%	0.0%	0.0%	0.1%	3.5%	0.6%	0.1%	0.7%	100%		

\* CY and HU: data 2021.

\*\* LT, SI, SK, and LI reported 15 PDs A1, 48 PDs A1, 40 PDs A1, and <5 PDs A1 respectively for which they were both the issuing and receiving Member State.

Source: Administrative data PD A1 Questionnaire 2023

**Table A2 - PDs A1 issued by the sending Member States according to Article 12 of the Basic Regulation, breakdown by receiving Member State, 2022 (column %)**

		Sending Member State																												Total					
		BE	BG	CZ	DK	DE	EE	IE	EL*	ES	FR	HR	IT	CY*	LV	LT**	LU	HU*	MT	NL	AT	PL	PT	RO	SI**	SK**	FI	SE	IS		LI**	NO	CH	UK TCA	UK WA
Receiving MS	BE		12.6%	5.5%	1.3%	4.5%	0.6%	15.0%	23.1%	3.6%	28.5%	4.3%	4.0%	1.3%	1.2%	6.6%	37.9%	2.9%	1.2%	40.9%	1.7%	7.6%	25.3%	10.7%	7.7%	4.1%	2.3%	3.1%	1.9%	3.0%	1.2%	5.9%	6.4%	6.0%	7.1%
	BG	0.1%		0.4%	0.3%	0.5%	0.0%	0.1%	0.0%	0.3%	0.3%	0.0%	0.3%	0.0%	0.1%	0.1%	0.3%	0.0%	0.1%	0.3%	0.1%	0.0%	0.2%	0.0%	0.2%	0.1%	0.2%	0.0%	0.0%	0.1%	0.1%	0.5%	0.2%	0.3%	
	CZ	0.3%	0.4%		0.6%	3.7%	0.0%	1.6%	3.8%	0.9%	1.1%	0.3%	0.9%	0.0%	0.1%	0.1%	0.2%	0.8%	0.3%	0.4%	2.2%	1.4%	0.1%	0.4%	0.9%	7.5%	0.5%	0.8%	0.0%	1.3%	0.0%	1.4%	0.7%	1.3%	2.4%
	DK	0.8%	2.5%	0.8%		1.9%	1.0%	12.6%	0.0%	1.1%	1.0%	0.2%	1.3%	0.0%	0.8%	3.0%	0.2%	0.6%	1.6%	1.7%	0.5%	1.4%	0.3%	0.5%	0.2%	0.5%	2.8%	10.7%	1.3%	0.0%	15.8%	2.3%	1.6%	2.1%	1.4%
	DE	7.3%	40.3%	32.2%	11.9%		7.5%	16.2%	11.5%	17.0%	13.7%	68.0%	15.0%	13.9%	30.5%	34.5%	18.4%	61.1%	7.5%	15.8%	52.7%	56.4%	6.4%	38.4%	59.1%	55.9%	10.1%	8.2%	6.3%	34.2%	2.5%	14.9%	15.8%	15.0%	16.1%
	EE	0.1%	0.0%	0.3%	0.2%	4.0%		0.1%	0.0%	0.1%	0.1%	0.0%	0.1%	0.0%	14.9%	0.2%	0.0%	0.0%	0.0%	0.1%	0.1%	0.1%	0.0%	0.2%	0.0%	0.0%	3.2%	0.4%	0.0%	0.0%	0.4%	0.1%	0.2%	0.1%	1.9%
	IE	0.3%	3.1%	0.6%	0.4%	2.7%	0.0%		0.0%	0.9%	0.6%	0.1%	0.5%	0.0%	0.1%	0.2%	0.3%	0.0%	1.3%	0.9%	0.3%	0.2%	0.2%	0.0%	0.2%	0.1%	0.2%	0.1%	0.0%	0.0%	0.1%	0.4%	2.6%	0.7%	1.5%
	EL	0.3%	2.4%	2.1%	1.9%	0.8%	0.0%	1.3%		1.0%	1.2%	0.3%	1.5%	57.0%	0.1%	0.0%	0.4%	0.1%	4.0%	1.1%	0.4%	0.1%	0.2%	0.1%	0.1%	2.5%	0.7%	0.6%	0.2%	1.2%	2.5%	2.5%	2.5%	0.7%	
	ES	3.1%	8.7%	3.1%	10.3%	6.0%	1.0%	5.1%	3.8%		9.6%	0.5%	7.7%	1.3%	0.6%	0.5%	1.5%	0.9%	12.0%	6.5%	2.0%	1.0%	21.8%	1.3%	0.2%	0.6%	13.6%	6.3%	4.4%	0.3%	10.7%	13.6%	9.3%	12.9%	4.9%
	FR	41.6%	10.0%	4.4%	6.5%	7.6%	7.3%	9.7%	46.2%	27.6%		1.6%	27.0%	1.3%	1.7%	8.2%	31.8%	3.3%	28.1%	10.9%	4.2%	8.3%	33.6%	16.7%	1.5%	3.2%	7.9%	11.9%	21.4%	12.5%	12.4%	28.1%	18.4%	26.5%	11.1%
	HR	0.1%	2.0%	0.6%	0.1%	0.5%	0.0%	0.4%	0.0%	0.3%	0.3%		1.1%	7.6%	0.5%	0.0%	0.1%	1.1%	0.1%	0.2%	0.5%	0.9%	0.1%	0.0%	1.6%	2.7%	0.3%	0.3%	0.1%	0.0%	0.0%	0.2%	0.4%	0.2%	0.5%
	IT	3.0%	2.3%	4.5%	2.9%	5.2%	1.3%	6.5%	7.7%	9.1%	9.0%	4.9%		3.8%	0.8%	0.3%	1.9%	1.7%	29.8%	5.0%	5.6%	1.2%	1.4%	13.0%	3.4%	1.2%	7.8%	9.2%	15.1%	6.3%	4.2%	10.3%	10.2%	10.3%	4.4%
	CY	0.0%	0.3%	0.2%	0.3%	0.1%	0.0%	0.1%	0.0%	0.1%	0.1%	0.0%	0.1%		0.0%	0.1%	0.0%	0.3%	0.2%	0.2%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.3%	0.2%	0.0%	0.0%	0.4%	0.8%	0.2%	0.7%	0.1%
	LV	0.0%	0.0%	0.3%	0.3%	0.1%	0.4%	0.0%	0.0%	0.1%	0.1%	0.0%	0.1%	0.0%		0.6%	0.0%	0.0%	0.1%	0.1%	0.0%	0.2%	0.0%	0.0%	0.0%	0.0%	0.2%	0.1%	0.0%	0.0%	0.0%	0.1%	0.1%	0.1%	
	LT	0.1%	0.2%	0.5%	0.9%	0.3%	1.1%	0.2%	0.0%	0.1%	0.2%	0.0%	0.1%	0.0%	2.4%	0.0%	0.1%	0.0%	0.6%	0.1%	0.1%	0.4%	0.0%	0.0%	0.0%	0.1%	0.7%	0.1%	1.3%	0.0%	0.1%	0.1%	0.5%	0.2%	0.2%
	LU	10.3%	0.0%	0.5%	0.1%	1.9%	0.0%	0.4%	0.0%	0.2%	4.7%	0.1%	0.5%	1.3%	0.1%	0.0%		0.9%	0.3%	0.6%	0.4%	0.2%	1.8%	0.3%	0.6%	0.3%	0.2%	0.1%	0.0%	0.9%	0.1%	0.3%	0.4%	0.3%	1.6%
	HU	0.3%	0.9%	1.7%	0.9%	2.0%	0.0%	0.3%	0.0%	0.6%	0.9%	0.4%	1.0%	0.0%	0.1%	0.0%	0.3%		3.9%	0.7%	2.3%	0.7%	0.1%	2.5%	0.6%	2.6%	0.4%	0.3%	0.6%	0.9%	0.3%	1.8%	1.3%	1.7%	1.4%
	MT	0.2%	0.0%	0.2%	0.1%	2.5%	0.0%	0.1%	0.0%	0.2%	0.3%	0.0%	0.5%	1.3%	0.1%	0.0%	0.0%	0.0%		0.1%	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.1%	0.1%	0.0%	0.0%	0.0%	0.1%	0.1%	0.1%	1.2%
	NL	24.3%	2.2%	4.3%	3.9%	6.3%	2.6%	5.1%	3.8%	4.1%	3.3%	2.5%	3.0%	3.8%	1.5%	11.5%	1.4%	7.8%	3.0%		2.2%	7.8%	4.5%	6.7%	2.6%	4.7%	3.1%	0.6%	5.2%	1.3%	8.0%	7.7%	7.9%	5.7%	
	AT	0.9%	2.4%	8.8%	2.1%	17.0%	0.1%	2.7%	0.0%	1.1%	1.3%	5.1%	5.0%	0.0%	0.6%	0.3%	0.6%	12.1%	1.2%	4.5%		2.8%	1.2%	1.8%	16.6%	11.0%	1.5%	1.6%	2.5%	13.6%	0.6%	2.2%	2.3%	2.2%	10.0%
	PL	0.6%	0.8%	4.5%	5.4%	5.1%	0.1%	1.1%	0.0%	2.0%	2.1%	0.1%	2.6%	0.0%	0.8%	0.4%	0.5%	0.5%	0.8%	1.1%	1.8%		0.3%	0.3%	0.3%	1.3%	1.0%	2.7%	0.6%	3.2%	0.5%	1.3%	3.0%	1.6%	3.0%
	PT	0.6%	0.3%	0.5%	8.3%	1.6%	0.0%	1.0%	0.0%	14.9%	2.9%	0.0%	1.0%	1.3%	0.0%	0.1%	0.5%	0.1%	0.1%	0.8%	0.7%	0.2%		0.1%	0.0%	0.1%	2.2%	1.1%	3.1%	0.0%	0.5%	1.0%	1.9%	1.2%	1.9%
	RO	0.3%	2.0%	1.0%	0.3%	1.6%	0.0%	0.6%	0.0%	1.0%	1.2%	0.1%	1.2%	0.0%	0.4%	0.0%	0.2%	0.7%	0.0%	0.7%	1.0%	0.3%	0.1%		0.3%	0.4%	0.3%	0.2%	0.0%	1.1%	0.8%	0.5%	0.8%	0.5%	1.1%
	SI	0.1%	0.4%	0.6%	0.1%	1.3%	0.0%	0.0%	0.0%	0.2%	0.2%	6.4%	0.7%	0.0%	0.1%	0.0%	0.1%	0.8%	0.3%	0.1%	1.5%	0.1%	0.1%	0.4%	0.0%	0.0%	0.5%	0.1%	0.0%	0.0%	0.1%	0.1%	0.0%	0.9%	
	SK	0.1%	0.5%	7.5%	0.1%	3.6%	0.0%	0.1%	0.0%	0.5%	0.6%	0.1%	0.9%	0.0%	0.0%	0.0%	0.2%	0.9%	0.1%	0.1%	0.8%	0.6%	0.0%	0.2%	0.2%	0.0%	0.2%	0.0%	2.1%	0.0%	0.1%	0.4%	0.2%	2.0%	
	FI	0.2%	0.9%	4.9%	1.2%	1.1%	59.9%	0.7%	0.0%	0.8%	0.7%	0.9%	0.5%	0.0%	9.8%	3.7%	0.2%	0.3%	0.3%	0.5%	0.7%	1.3%	0.1%	0.3%	0.4%	1.1%	13.7%	0.0%	0.0%	9.3%	1.5%	1.7%	1.6%	1.0%	
	SE	0.7%	1.1%	3.9%	8.4%	2.1%	15.0%	10.2%	0.0%	1.6%	1.2%	2.5%	1.0%	1.3%	26.7%	17.7%	0.5%	1.1%	0.8%	0.9%	1.7%	5.3%	0.6%	2.7%	1.0%	2.8%	26.6%	6.3%	1.3%	34.5%	2.3%	2.8%	2.4%	2.3%	
	IS	0.2%	0.1%	0.2%	0.3%	1.2%	0.2%	0.0%	0.0%	0.1%	0.1%	0.0%	0.0%	0.0%	0.2%	0.3%	0.0%	0.0%	0.1%	0.1%	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.1%	0.1%	0.0%	0.0%	0.1%	0.0%	0.0%	0.6%	
	LI	0.0%	0.0%	0.2%	0.0%	0.9%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.6%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.3%	0.0%	0.0%	0.0%	0.0%	0.4%	
	NO	0.4%	2.3%	0.7%	25.3%	2.0%	0.7%	0.7%	0.0%	1.0%	0.6%	0.8%	0.6%	0.0%	3.0%	11.4%	0.2%	0.2%	0.8%	0.5%	0.5%	0.7%	0.1%	0.9%	0.1%	0.1%	7.2%	22.3%	34.0%	0.0%	0.0%	4.0%	0.7%	1.4%	
	CH	2.0%	1.0%	2.1%	0.9%	6.6%	0.4%	2.5%	0.0%	2.2%	8.1%	0.4%	18.6%	3.8%	2.7%	0.1%	1.0%	0.9%	0.8%	5.2%	6.3%	0.6%	0.4%	0.2%	0.7%	0.7%	1.6%	2.8%	0.0%	13.6%	1.8%	0.0%	3.8%	0.6%	5.4%
	UK	1.7%	0.2%	3.1%	4.6%	5.1%	0.6%	5.6%	0.0%	7.5%	6.1%	0.2%	3.3%	1.3%	0.3%	0.3%	1.2%	0.8%	0.9%	0.3%	1.6%	0.8%	1.2%	0.2%	0.7%	0.4%	2.8%	0.2%	0.0%	0.0%	1.2%	0.0%	0.0%	3.6%	
unkn.																				6.4%															3.6%
<b>Total</b>	<b>100%</b>	<b>100%</b>	<b>100%</b>	<b>100%</b>	<b>100%</b>	<b>100%</b>	<b>100%</b>	<b>100%</b>	<b>100%</b>	<b>100%</b>	<b>100%</b>	<b>100%</b>	<b>100%</b>	<b>100%</b>	<b>100%</b>	<b>100%</b>	<b>100%</b>	<b>100%</b>	<b>100%</b>	<b>100%</b>	<b>100%</b>	<b>100%</b>	<b>100%</b>	<b>100%</b>	<b>100%</b>	<b>100%</b>	<b>100%</b>	<b>100%</b>	<b>100%</b>	<b>100%</b>	<b>100%</b>	<b>100%</b>	<b>100%</b>	<b>100%</b>	<b>100%</b>

\* CY and HU: data 2021.

\*\*\* LT, SI, SK, and LI reported 15 PDs A1, 48 PDs A1, 40 PDs A1, and <5 PDs A1 respectively for which they were both the issuing and receiving Member State.

Source: Administrative data PD A1 Questionnaire 2023

**Table A3 - PDs A1 issued by the sending Member States according to Article 12 of the Basic Regulation, from a sending perspective, breakdown by sector of activity, 2022**

Sending MS	Agriculture, hunting and fishing NACE A	Industry NACE B to F		Services NACE G to T								
		Industry Total	Construction NACE F	Services Total	of which					of which		
					Wholesale and retail trade NACE G	Accommodation and food service activities NACE I	Transportation and storage; Information and communication NACE H and J	Freight transport by road NACE H - Group 49.4	Financial and insurance; Real estate; Professional, scientific and technical activities; Administrative and support service activities NACE K, L, M, and N	Temporary employment agency NACE N - Group 78.2	Education, health and social work, arts and other services NACE P, Q, R, and S	Human health and social work activities NACE Q
BE	307	22 890	14 071	51 943	3 495	525	4 865	522	25 653	15 871	19 222	198
BG												
CZ	56	4 604	2 933	2 643	253	43	535	19	2 000		0	
DK												
DE	4 228	578 960	85 687	431 667	74 692	6 410	73 624	25 010	173 550	13 234	176 923	12 759
EE	110	3 337	2 181	706	40	<5	132	33	173	44	352	115
IE												
EL												
ES												
FR	26	75 250	15 772	78 471	9 003	1 354	10 607		27 890		29 291	334
HR	60	43 018	23 887	6 651	1 201	196	837	107	3 819	2 171	794	274
IT												
CY*	0	17	<5	62	24	5	5	0	24	0	<5	0
LV	18	2 073	1 628	2 198	923	10	450	74	469	252	20	0
LT	24	15 539	12 250	18 401	636	11 179	850	318	5 112	0	624	0
LU	72	29 297	18 844	29 470	3 365	67	1 559	395	21 908	8 241	2 209	157
HU												
MT	<5	113	113	658	<5	33	14		529		79	<5
NL	185	5 990	1 538	14 264	1 419	261	410	168	5 482	5 328	6 692	86
AT	24	7 414	3 390	3 779	258	35	89		83		3 314	
PL	6 477	147 485	106 088	88 320	3 232	616	3 902	1 531	34 919	23 669	45 440	20 009
PT	159	46 707	31 503	9 437	980	102	246	32	7 670	6 049	439	205
RO	233	28 046	17 280	6 796	255	186	480		4 355		1 520	
SI*	134	72 617	41 931	434	261	78	31		34		30	17
SK	985	71 019	43 253	15 021	498	91	1 659	25	712	<5	12 061	3 394
FI	38	2 122	619	2 394	50	6	472	249	480	54	1 386	52
SE	6	959	373	710	120	6	89	<5	260	7	229	7
IS	10	5	<5	143	<5	0	<5	0	48	0	92	0
LI	0	190	70	440	5	12	0	0	64	352	7	0
NO												
CH												
UK												
Total	13 154	1 157 652	423 416	764 608	100 712	21 218	100 858	28 485	315 234	75 275	300 726	37 609
Total (excl. DE)	8 926	578 692	337 729	332 941	26 020	14 808	27 234	3 475	141 684	62 041	123 803	24 850

\* CY: data 2021.

\*\* For many Member States, the breakdown is not available for all the PDs A1 issued according to Art. 12. This is especially the case for AT, where the breakdown is not available for 85.7 % of PDs A1.

Source: Administrative data PD A1 Questionnaire 2023



**Table A4 - PDs A1 issued according to Article 12 of the Basic Regulation, from a receiving perspective, breakdown by sector of activity, 2022**

Receiving MS	Agriculture, hunting and fishing NACE A	Industry NACE B to F		Services NACE G to T								
		Industry Total	of which Construction NACE F	Services Total	Wholesale and retail trade NACE G	Accommodation and food service activities NACE I	Transportation and storage; Information and communication NACE H and J	of which Freight transport by road NACE H - Group 49.4	Financial and insurance; Real estate; Professional, scientific and technical activities; Administrative and support service activities NACE K, L, M, and N	of which Temporary employment agency NACE N - Group 78.2	Education, health and social work, arts and other services NACE P, Q, R, and S	of which Human health and social work activities NACE Q
BE	476											
BG	10	3 643	386	3 019	470	9	528	52	991	53	1 289	180
CZ	223	33 167	6 352	16 335	3 265	130	3 604	924	7 204	846	7 840	561
DK	176	16 652	6 217	11 272	1 911	249	2 285	777	5 514	415	5 030	294
DE	4 131	235 294	142 253	101 494	6 877	6 468	5 953	1 215	33 192	18 077	48 789	22 896
EE	226	38 371	1 398	28 358	3 724	171	2 831	483	6 265	411	8 577	518
IE	162	19 949	1 157	23 802	3 172	179	1 863	252	6 012	294	7 703	509
EL	10	3 490	503	8 680	575	359	1 188	99	2 985	138	3 214	217
ES	776	38 161	12 193	31 833	5 197	983	5 296	585	14 734	1 175	12 676	650
FR	719	92 563	40 957	71 313	7 022	763	9 720	4 610	39 150	19 042	27 883	675
HR	22	5 246	2 590	3 212	359	86	671	137	1 715	63	1 430	167
IT	379	43 254	9 557	31 716	5 551	687	4 969	786	14 559	1 005	14 877	736
CY	15	480	63	941	74	13	185	14	309	14	414	27
LV	12	1 283	495	1 016	158	55	188	33	295	8	392	16
LT	32	2 844	897	1 845	250	11	295	110	660	69	836	23
LU	120	25 399	15 918	13 568	2 351	100	2 556	946	6 383	1 092	5 256	186
HU	63	17 742	2 345	6 625	919	63	1 586	200	3 494	246	3 063	77
MT	895	17 674	1 386	23 492	3 473	523	2 076	676	5 302	407	6 950	619
NL	2 863	60 438	25 079	51 036	6 732	1 229	8 843	4 316	31 982	13 259	14 986	1 540
AT	781	118 523	43 565	71 503	16 312	2 259	13 597	4 750	31 876	4 682	32 295	2 869
PL	190	34 504	2 933	22 581	4 310	139	3 987	1 094	9 390	497	8 490	616
PT	78	9 737	742	13 022	1 641	225	1 562	138	4 637	278	5 203	322
RO	47	14 269	743	7 549	1 028	23	956	85	3 339	228	2 859	96
SI	19	13 294	2 586	10 391	1 033	50	739	157	3 265	796	3 787	164
SK	124	28 475	2 124	26 117	3 686	194	2 762	474	6 824	270	8 918	510
FI	142	15 469	4 819	7 840	695	571	910	140	3 430	281	2 783	115
SE	87	36 476	18 601	13 086	1 352	1 774	1 629	341	5 704	552	4 804	142
IS	107	33 020	4 717	39 208	4 407	627	4 372	442	14 308	920	13 242	735
LI	11	12 434	435	8 944	1 192	40	585	102	2 089	192	2 657	183
NO	44	8 450	341	5 676	667	36	317	62	1 467	67	1 599	84
CH	50	19 742	3 994	18 287	1 532	1 621	2 441	482	5 487	264	5 921	318
UK	163	42 163	10 772	30 432	4 996	467	6 188	1 489	13 224	688	17 041	614
<b>Total</b>	<b>13 154</b>	<b>1 157 652</b>	<b>423 416</b>	<b>764 608</b>	<b>100 712</b>	<b>21 218</b>	<b>100 858</b>	<b>28 485</b>	<b>315 234</b>	<b>75 275</b>	<b>300 726</b>	<b>37 609</b>

Source: Administrative data PD A1 Questionnaire 2023

**Table A5 - Total number of PDs A1 issued for persons active in two or more Member States, breakdown by economic activity, from a sending perspective, 2022**

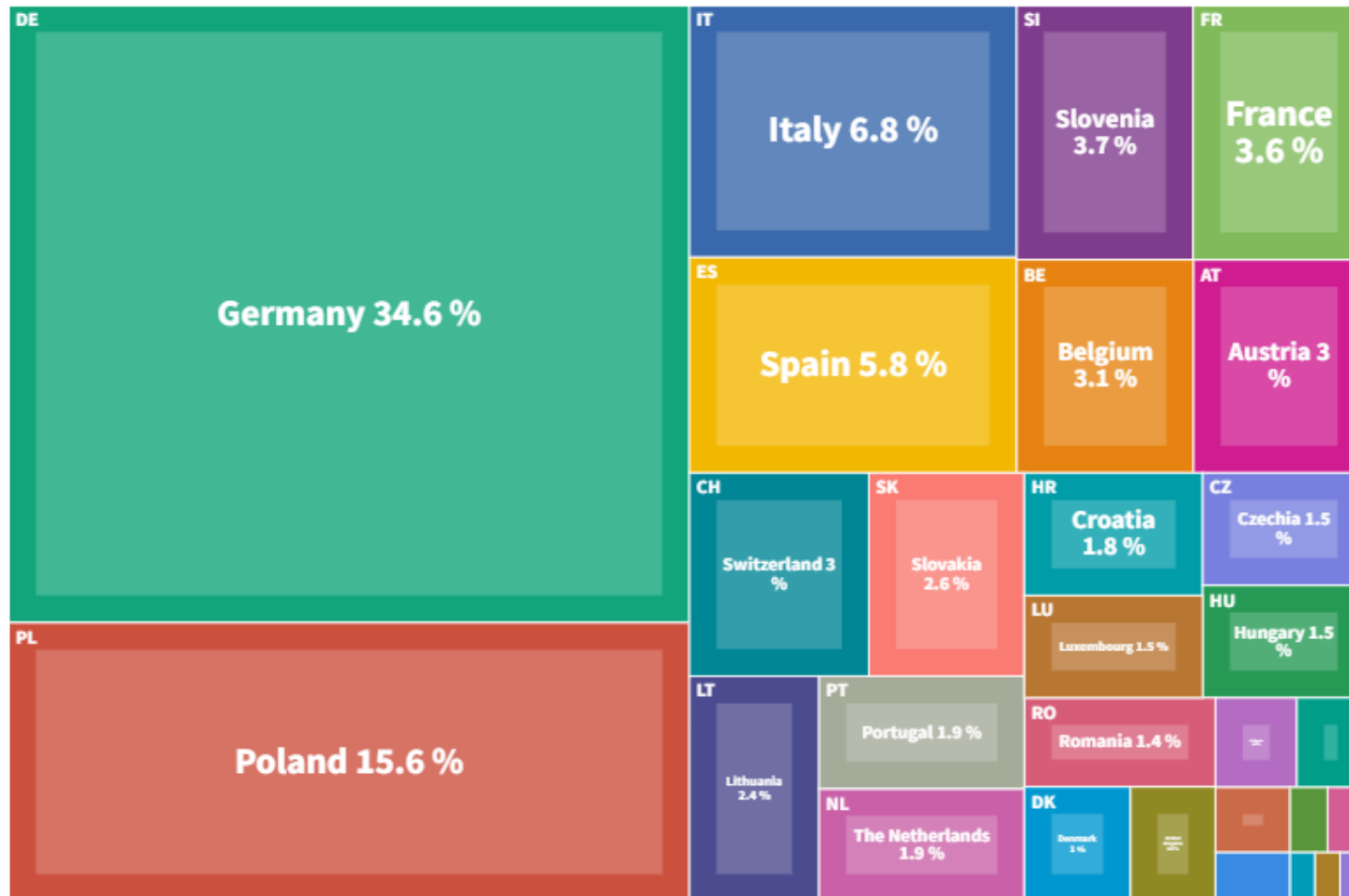
Sending MS	Agriculture, hunting and fishing NACE A	Industry NACE B to F		Services NACE G to T								
		Industry Total	of which Construction NACE F	Services Total	Wholesale and retail trade NACE G	Accommodation and food service activities NACE I	Transportation and storage; Information and communication NACE H and J	of which Freight transport by road NACE H - Group 49.4	Financial and insurance; Real estate; Professional, scientific and technical activities; Administrative and support service activities NACE K, L, M, and N	of which Temporary employment agency NACE N - Group 78.2	Education, health and social work, arts and other services NACE P, Q, R, and S	of which Human health and social work activities NACE Q
BE	384	19 067	10 543	40 157	4 629	70	20 902	16 746	12 068	5 502	5 539	309
BG												
CZ												
DK												
DE	549	10 046	6 848	2 172	141	32	973	880	671	86	346	150
EE												
IE												
EL												
ES												
FR												
HR	122	12 953	6 409	16 459	635	101	13 407	9 918	1 844	550	472	218
IT												
CY		1 070	150	1 251	14	237	929	101	65	35	6	
LV	88	6 446	4 706	10 018	951	53	7 025	6 378	1 758	174	282	11
LT	500	16 647	15 889	57 348	8	7 162	45 183	45 181	75		4 920	
LU	107	1 608	591	4 675	246	19	3 142	1 797	1 235	0	19	10
HU												
MT	<5	0	0	486	0	0	0	438	42	0	6	
NL												
AT	10	5 014	1 339	7 640	1 036	60	1 518	0	150	0	4 876	0
PL	3 319	143 536	120 081	320 400	8 379	537	229 595	222 029	17 251	7 464	62 772	44 442
PT												
RO												
SI	84	45 357	195	22 153	51	17	22 085		0		0	0
SK	160	13 097	10 637	22 035	140	68	14 636	13 990	459	6	6 732	201
FI	25	3 407	621	1 728	57	11	547	448	305	40	808	91
SE	27	2 467	700	2 362	454	18	258	64	811	62	930	522
IS												
LI	0	111	9	284	<5	<5	224	179	40	<5	16	
NO												
CH												
UK												
<b>Total</b>	<b>5 376</b>	<b>280 826</b>	<b>178 718</b>	<b>509 168</b>	<b>16 742</b>	<b>8 388</b>	<b>360 424</b>	<b>318 149</b>	<b>36 774</b>	<b>13 923</b>	<b>87 724</b>	<b>45 954</b>

\* CY: data 2021.

Source: Administrative data PD A1 Questionnaire 2023

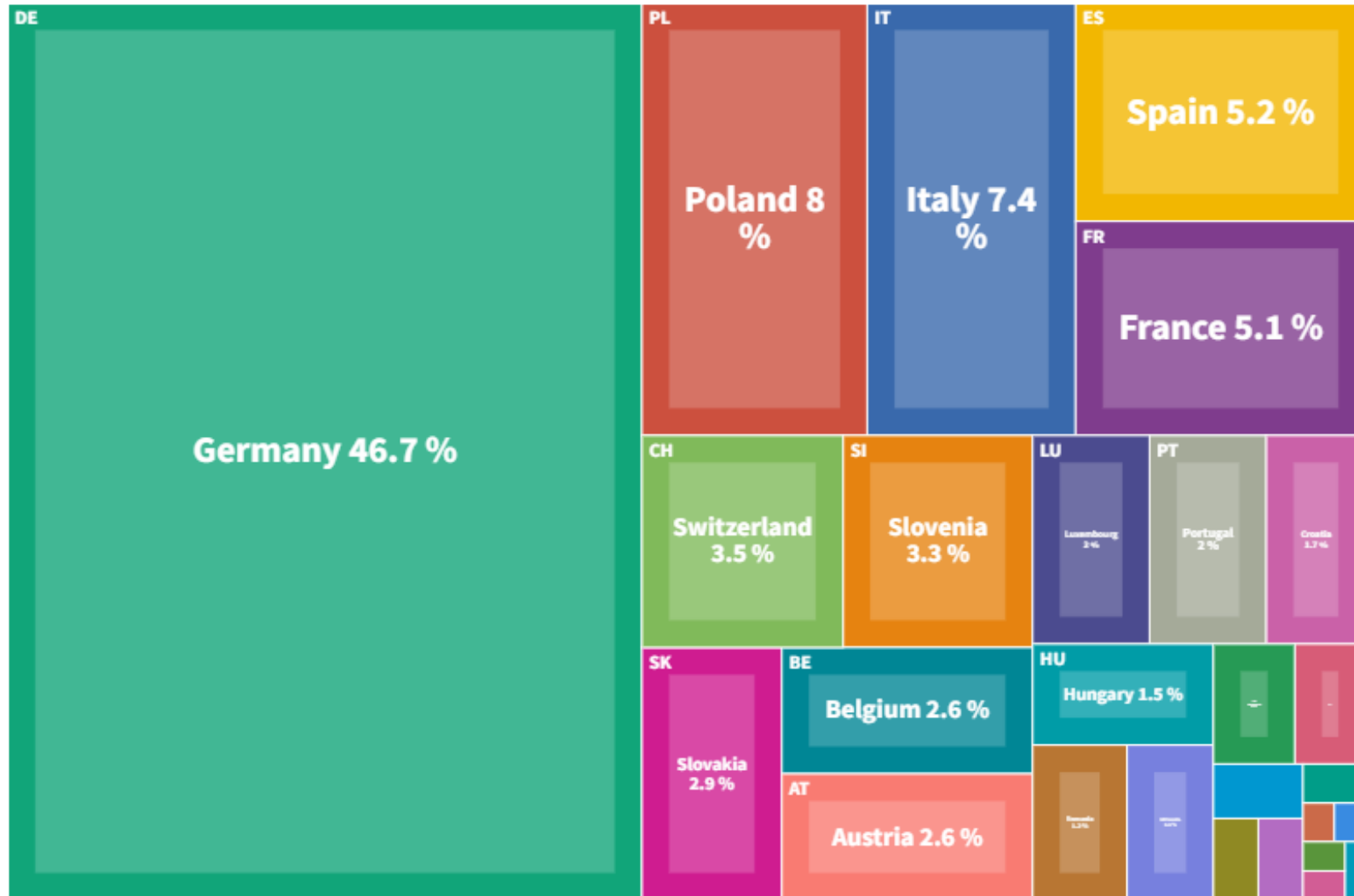
## Annex II Additional visualisations

Figure A1 - Share of PDs A1 issued in total number of PDs A1 issued, 2022



\* CY and HU: data 2021.

Figure A2 - Share of PDs A1 issued under Article 12 in total number of PDs A1 issued under Article 12, 2022



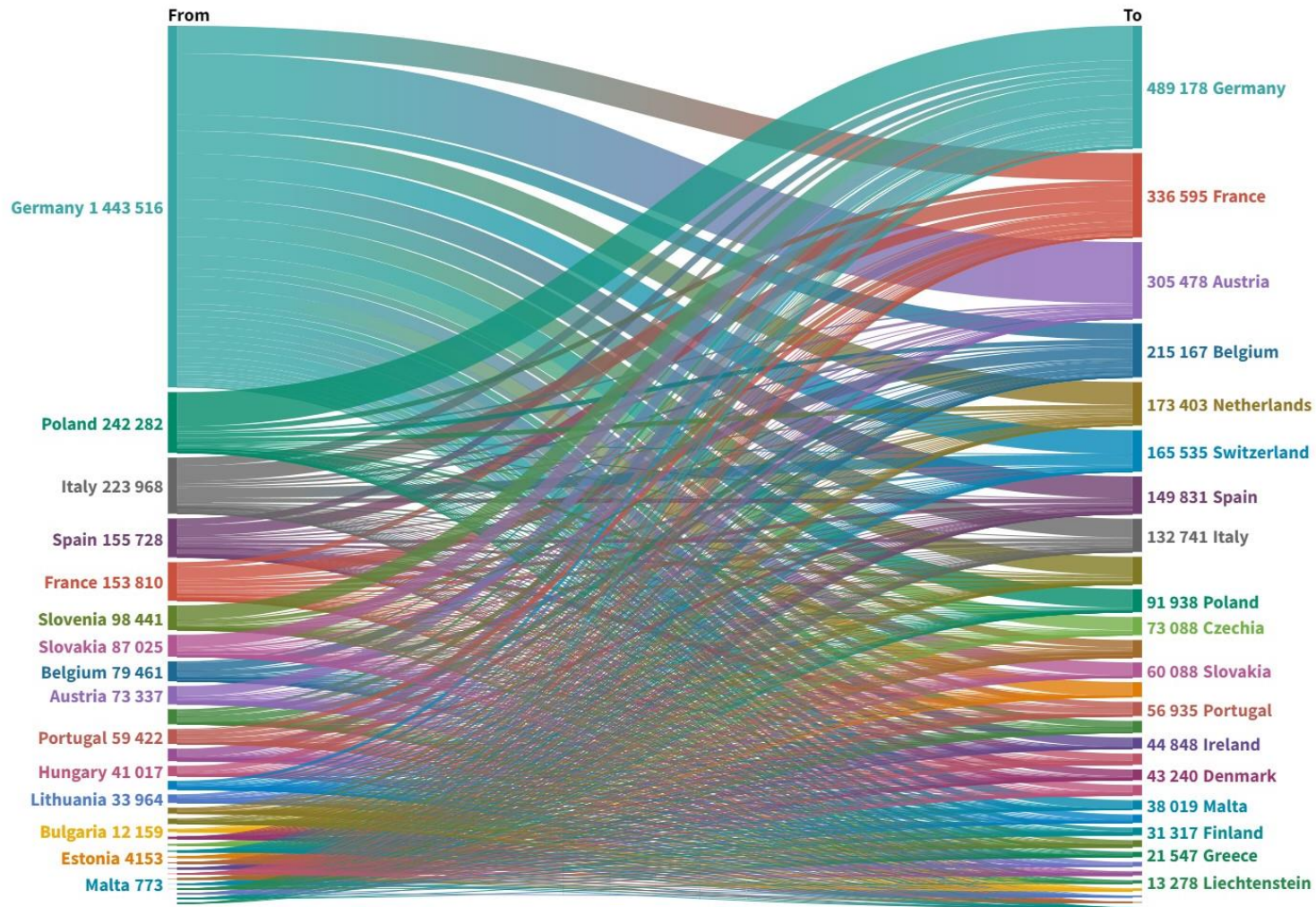
\* CY and HU: data 2021.

Figure A3 - Share of PDs A1 issued under Article 13 in total number of PDs A1 issued under Article 13, 2022



\* CY and HU: data 2021.

Figure A4 - Total number of PDs A1 issued under Article 12, 2022

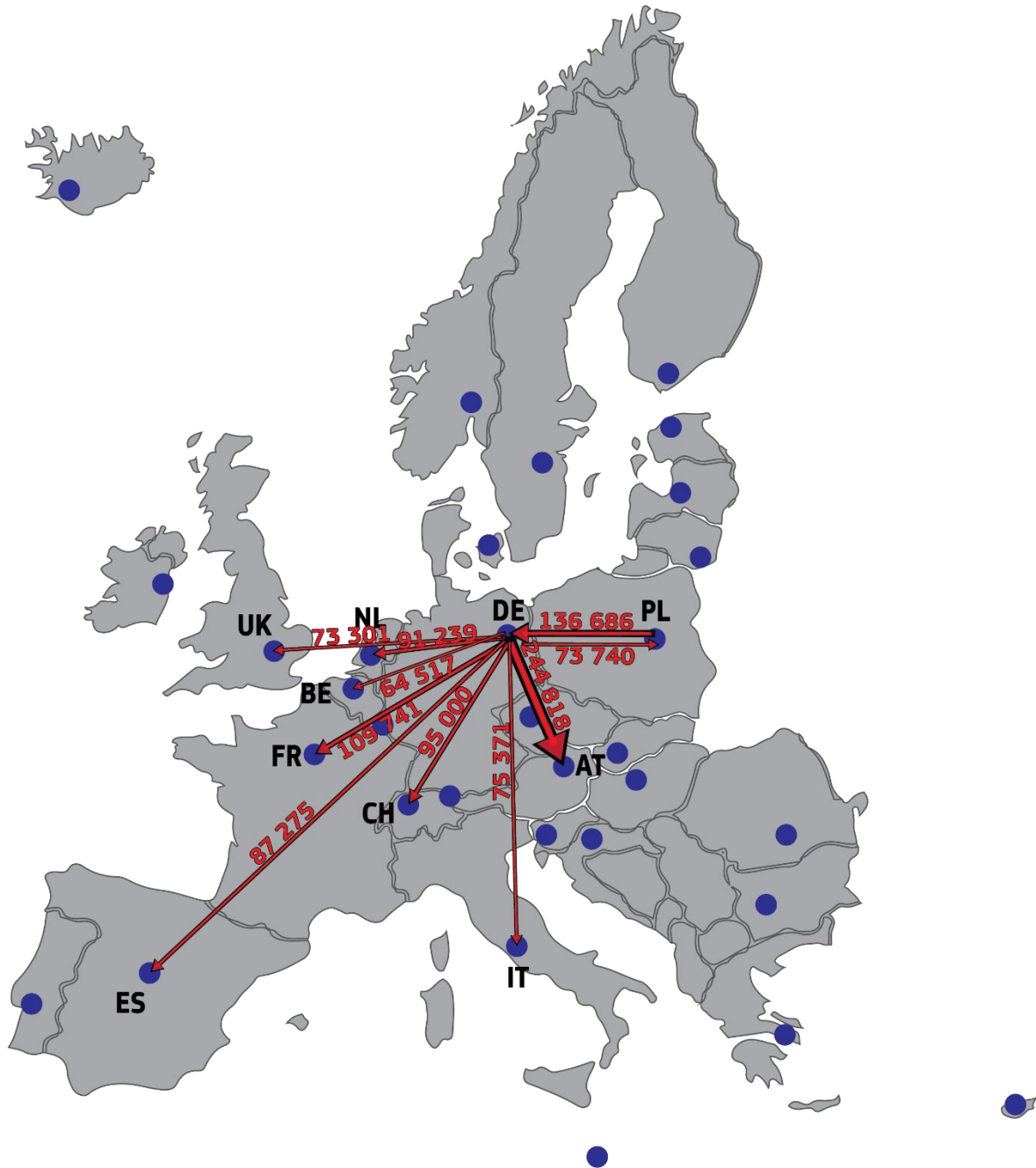


\* CY and HU: data 2021.

\*\* Data for CH as an issuing Member State are not available (105 198 PDs A1 issued according to Article 12 in 2022).



Figure A5 - Top 10 flows of PDs A1 issued under Article 12, 2022



\* The top 10 flows which are visualised are the following: 1) from Germany to Austria (244 818 PDs A1); 2) from Poland to Germany (136 686); 3) from Germany to France (109 741); 4) from Germany to Switzerland (95 000); 5) from Germany to the Netherlands (91 239); 6) from Germany to Spain (87 275); 7) from Germany to Italy (75 371); 8) from Germany to Poland (73 740); 9) from Germany to the United Kingdom (73 301); and 10) from Germany to Belgium (64 517). In total these 10 flows amount to 1 051 688 issued PDs A1 under Article 12 out of the total of 2 924 996 PDs A1 issued under Article 12, or 36.0 % of all issued PDs A1 under Article 12.

# Annex III PD A1 Questionnaire

Number of PD A1 <u>issued</u> according to Regulation (EC) No 883/2004 on the coordination of social security systems	
Categories (corresponding to field 3 of PDA1 concerning the status of the holder)	Number of PD A1 <u>issued</u>
3.1 Posted employed person	
3.2 Employed, working in two or more States	
3.3 Posted self-employed person	
3.4 Self-employed, working in two or more States	
3.5 Civil servant	
3.6 Contract staff	
3.7 Mariner	
3.8 Working as an employed person and as a self-employed person in different States	
3.9 Working as a civil servant in one State and as an employed/self-employed person in one or more other States	
3.10 Flight or cabin crew member	
3.11 Exception	
3.12 Working as an employed / self-employed person in only one Member State	
<b>Total</b>	

Number of PD A1 issued by sector of economic activity according to <u>Art. 12</u> of Regulation (EC) No 883/2004 on the coordination of social security systems:															Number of 'unique' persons who received a PD A1 (of total)	Average duration in days of all PD A1 issued (of total)
Employed Art 12 (1) [box 3.1 of PDA1]	Self-employed Art 12 (2) [box 3.3 of PDA1]	Total	Sectors of economic activity (of total)													
			Agriculture, hunting and fishing NACE A	Industry NACE B to F		Services Total	Services NACE G to T					Human health and social work activities NACE Q				
<b>Receiving country (single destination only)</b>																
Belgium																
Bulgaria																
Czech Republic																
Denmark																
Germany																
Estonia																
Ireland																
Greece																
Spain																
France																
Croatia																
Italy																
Cyprus																
Latvia																
Lithuania																
Luxembourg																
Hungary																
Malta																
Netherlands																
Austria																
Poland																
Portugal																
Romania																
Slovenia																
Slovak Republic																
Finland																
Sweden																
United Kingdom																
Iceland																
Liechtenstein																
Norway																
Switzerland																
<b>Total postings</b>	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

Number of PD A1 issued by sector of economic activity according to <u>Art. 13</u> of Regulation (EC) No 883/2004 on the coordination of social security systems:															Number of 'unique' persons who received a PD A1 (of total)	Average duration in days of all PD A1 issued (of total)
Total	Agriculture, hunting and fishing NACE A	Sectors of economic activity (of total)														
		Industry Total	Construction NACE F	Services Total	Wholesale and retail trade NACE G	Accommodation and food service activities NACE I	Transportation and storage, information and communication NACE H and J	Freight transport by road NACE H - Group 49.4	Financial and insurance, Real estate, Professional, scientific and technical activities, Administrative and support service activities NACE K, L, M and N	Temporary employment agency NACE N - Group 78.2	Education, health and social work, arts and other services NACE P, Q, R and S	Human health and social work activities NACE Q				
Employed, working in two or more States (box 3.2 of PD A1)		<b>Please leave this space empty</b>														
Self-employed, working in two or more States (box 3.4 of PDA1)																
Working as an employed person and as a self-employed person in different States (box 3.8 of PDA1)																
Total number of PD A1 issued according to Art. 13 (boxes 3.2 + 3.4 + 3.8)	0															

## Annex IV Portable Document A1

Coordination of Social  
Security Systems

A1

Certificate concerning the Social Security  
legislation which applies to the holder

EU Regulations 883/2004 and 987/2009 (\*)

## INFORMATION FOR THE HOLDER

This certificate concerns the social security legislation which applies to you and confirms that you have no obligations to pay contributions in another State.

Before you leave the State where you are insured to go to another State to work, make sure you have the documents which entitle you to receive the necessary benefits in kind (e.g. medical care, treatment in hospital, and other) in the State where you are working.

- if you are staying temporarily in the State where you are working, ask your health care institution for the European Health Insurance Card (EHIC). You must show this card to your health care provider if you need benefits in kind during your stay.
- if you are going to be living in the State where you are working, ask your health care institution for the S1 document and submit it as soon as possible to the competent health care institution of the place you are going to work (\*\*).

Provisionally the insurance institution in the State of stay will also provide special benefits in the event of an accident at work or an occupational disease.

## 1. PERSONAL DETAILS OF THE HOLDER

1.1	Personal Identification Number	<input type="checkbox"/> Female	<input type="checkbox"/> Male
1.2	Surname		
1.3	Forenames		
1.4	Surname at birth (***)		
1.5	Date of birth	1.6	Nationality
1.7	Place of birth		
1.8	Address in the State of residence		
1.8.1	Street, N°	1.8.3	Post code
1.8.2	Town	1.8.4	Country code
1.9	Address in the State of stay		
1.9.1	Street, N°	1.9.3	Post code
1.9.2	Town	1.9.4	Country code

## 2. MEMBER STATE LEGISLATION WHICH APPLIES

2.1	Member State		
2.2	Starting date	2.3	Ending date
<input type="checkbox"/>	2.4 The certificate applies for the duration of the activity		
<input type="checkbox"/>	2.5 The determination is provisional		
<input type="checkbox"/>	2.6 Transitional rules apply as provided for by Regulation (EC) No 883/2004		

(\*) Regulations (EC) No 883/2004, Articles 11 through 16 and Regulation (EC) No 987/2009, Article 19.

(\*\*) For Spain, Sweden and Portugal, the certificate must be handed over to, respectively, the head provincial offices of social security National Institute (INSS), the social insurance institution and the social security institution of the place of residence.

(\*\*\*) Information given to the institution by the holder when this is not known by the institution.

1/3

A1



Certificate concerning the Social Security legislation which applies to the holder

3. STATUS CONFIRMATION OF YOUR POSITION

- 3.1 Posted employed person
- 3.2 Employed, working in two or more States
- 3.3 Posted self-employed person
- 3.4 Self-employed, working in two or more States
- 3.5 Civil servant
- 3.6 Contract staff
- 3.7 Mariner
- 3.8 Working as an employed person and as a self-employed person in different States
- 3.9 Working as a civil servant in one State and as an employed/self-employed person in one or more other States
- 3.10 Flight or cabin crew member
- 3.11 Exception
- 3.12 Working as an employed / self-employed person in the State referred to under 2.1

4. DETAILS OF EMPLOYER / SELF-EMPLOYMENT

- 4.1.1 Employee
- 4.1.2 Self-employed activity
- 4.2 Employer/self-employed activity code
- 4.3 Name or business name
- 4.4 Registered address
- 4.4.1 Street, N°
- 4.4.2 Country code
- 4.4.3 Town
- 4.4.4 Post code

5. DETAILS OF EMPLOYER / SELF-EMPLOYMENT WHEN AN ACTIVITY IS PURSUED

5.1 Name(s) or business name(s) and code(s) of the firm(s) or ship(s) or the home base(s) where you will be employed




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