European Platform to Enhance Cooperation in the Prevention and Deterrence of Undeclared Work

KEY FINDINGS

- The size of undeclared work remains difficult to measure as results considerably vary depending on the concepts and methods used at European and at national levels. In many EU countries the share of the shadow economy in GDP is estimated to be higher than in other developed countries (e.g. Japan, Canada, USA) equalling 18.4 % of GDP in 2012 or EUR 1.87 trillion. Vulnerable groups show the highest involvement in undeclared work (youth, unemployed, persons in a difficult financial situation).

- According to research, an effective coping strategy should comprise both, deterrence (control, sanctions) and enabling compliance (e.g. campaigns, information and advice, incentives, amnesties, new job categories). The latter have recently shown a wider take-up, whereas deterrence continues to prevail. Many, but not all responsible national authorities are labour inspectorates.

- In April 2014, the Commission proposed the establishment of a European Platform against undeclared work with mandatory membership to build up targeted cooperation of the Member States at EU level; with a particular view towards capacity-building and cross-border cooperation. In its general approach, the Council agreed with most key elements, but included a clause in the recital, stating that it is up to each Member (State) to decide upon the level of involvement. This could become problematic if too many activities are concerned.

- The European Parliament, in its ‘Resolution on effective labour inspections’ of January 2014, called for stronger cooperation and reinforcement of labour inspectorates to fight undeclared work. Apart from a number of European employer organisations, all other stakeholders and committees (social partners, the European Economic and Social Committee and the Committee of Regions) support the creation of an own platform, whilst more would like to be represented as a member or observer in the Platform.

- To maximise synergies, structured cooperation of the Platform at European and at national level with all relevant existing European networks will be key; in particular with the Senior Labour Inspectors Committee. To conclude from evaluation, European networks and mutual learning have a real impact. Supportive factors are continuity, ownership, a well-structured work programme, good dissemination and impact evaluation.

1. SIZE AND CHARACTERISTICS OF UNDECLARED WORK: NO RELEVANT IMPACT OF RECESSION, HIGHEST INVOLVEMENT OF VULNERABLE GROUPS

According to the definition used by the European Commission\(^1\), undeclared work encompasses "any paid activities that are lawful as regards their nature, but not declared to public authorities taking into account differences in the regulatory system of Member States". Forms of undeclared work include:

1. Provision of goods, services for neighbours, family members, friends or acquaintances,
2. Undeclared work in companies (envelope wages, i.e. payment in cash, full-time work despite part-time contract),
3. Bogus self-employment (for companies, households, etc.) which is de facto falsely declared employment.

Defining the accurate size of undeclared work in Europe remains a challenge, as figures considerably vary depending on the source used. Estimates based upon indirect methods of measurement (comparison of macroeconomic aggregates) tend to overestimate the extent of undeclared work, as all types of not declared income are included. Results from direct survey-based methods instead tend to under-report the phenomenon according to the Commission. In a recent study, ILO (2013) points out a need to develop an updated source at European level based upon common concepts for measuring the various forms of undeclared work, as each one requires a specific policy approach. An improvement of the evidence base would help to facilitate benchmarking across borders in Europe.

Available evidence suggests that the recession did not have a major impact and long-term trends show an on-going decline. A Eurofound study using estimates of the share of undeclared work in GDP states an on-going, incremental decline in all EU 27 Member States from the equivalent of 22.3% of the EU GDP in 2003 to 18.4% by 2012 – a trend which was only interrupted by a small increase as a short-term reaction to the crisis in 2008-2009 (Eurofound 2013). This is broadly in line with Eurobarometer surveys: data show that the overall share of respondents supplying and purchasing undeclared work has remained rather stable or declined since 2007 (supply of undeclared work: 4% in 2013 compared to 5% in 2007 in the EU; purchase of undeclared work: stable at 11% in both 2013 and 2007). An increase of supply was found only in Cyprus, the United Kingdom, Spain and Slovenia.

Nevertheless, the international comparison and the size of the shadow economy reveal a need for action. A recent study by the European Parliament (Policy Department A) reveals that most EU Member States have larger shadow economies (with approximately two thirds due to undeclared work) than other developed countries (Japan, Canada, USA). According to Schneider/ATKearney (2013), the shadow economy in the EU 27 is estimated to be equal to EUR 1.87 trillion in 2013.

Countries in the EU considerably vary with regard to the extent of undeclared work. Findings on a regional north-south or west-east divide are, however, inconsistent. The European Parliament study finds a clear north-south and east-west divide (<10% in Austria, Luxembourg and the Netherlands, > 25% in Cyprus, Latvia, Estonia, Lithuania, Malta, Romania and 31.9 % in Bulgaria). Results from the Eurobarometer survey on supply of undeclared work, however, shows a mixed pattern with a number of Western countries ranking high and a number of southern countries ranking low. The share of those having performed undeclared work ranges from 11% in Latvia, the Netherlands and Estonia, to a low of 2% in Germany, Portugal, Cyprus, Italy and Ireland, and 1% in Malta. This confirms that further analysis is needed to develop the evidence base for policy strategies at European level.

The Eurobarometer survey provides further information on socio-demographic characteristics, the place and sectors most affected, as well as the main reasons behind:

- **Vulnerable groups** are particularly involved: The share is highest among unemployed (9%), above all in southern Europe, and those suffering from a tight financial situation (7%), younger persons (7% aged 15-24%) and students (7%). Men are more frequently involved than women (5% compared to 3%).
- Most of undeclared work takes place in the context of personal relationships and is purchased from friends, colleagues or acquaintances (42%), relatives (9%) or neighbours (9%). At the same time, one in four (24%) reported having purchased undeclared work from firms or businesses which are in the focus of enforcement authorities; in particular through work place inspections.
- **With the exception of Nordic countries, undeclared work is concentrated in a few sectors with a tradition of undeclared work**: repairs and renovation (19%), gardening (14%), cleaning (12%) and working as waiting staff (11%). However, in Nordic countries, one in three (30%) indicated having carried out undeclared work in other areas.
Main drivers for the purchase of undeclared work are lower prices (60%). This broadly corresponds to the main reason indicated by those having performed undeclared work: namely mutual benefits (50%). Many replied that they could not find a regular job (21%), tax or security contributions (16%) and a lack of other sources of income (15%).

There are indications that a well-functioning welfare state (including effective social protection) may increase tax morale and thus reduce undeclared work (ESDR 2013). In line with this, countries which adopted social-democratic crisis measures (higher expenditure on labour market interventions, social protection, redistribution and equality) have smaller undeclared economies (Eurofound 2013).

Share of respondents who have performed undeclared work, 2007-2013

Source: Derived from the Employment and Social Development Report (ESDR) 2013, p. 238

2. COPING STRATEGIES: PREDOMINANCE OF DETERRENCE, INCREASING USE OF STRATEGIES TO ENCOURAGE COMPLIANCE

There is a widely-shared consensus across research and international organisations (e.g. Eurofound 2013, ILO 2013, Commission) that an effective mitigation strategy should comprise both measures to deter and measures enabling compliance, in order to address cultural, economic, social and institutional factors that have an influence on the purchase and supply of undeclared work.

Currently, a deterrence approach focusing on detection and sanctions is still predominant. However, recent research points to a wider take-up of enabling policies encouraging and offering incentives to join the formal economy (Eurofound 2013, ILO 2013).

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<tr>
<th>Approach</th>
<th>Method</th>
<th>Measures</th>
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| Deterrence          | Improve detection| Data matching and sharing
Strategy for coordinated detection (Measures: e.g. workplace inspection, use of peer to peer surveillance – telephone hotlines, registration of workers prior to starting work, certification of business, payments and social security contributions). |
|                     | Penalties        | Administrative and penal sanctions for purchasers and suppliers.          |
| Enabling compliance | Preventative     | • Simplification of regulations and administrative procedures (e.g. payment of taxes)
• Simplification of access to bank accounts and encouragement of electronic payment.
• Direct and indirect tax incentives. |
**Approach** | **Method** | **Measures**
--- | --- | ---
|  |  | • Smooth transition into self-employment.  
|  |  | • Introduction of new categories of work (e.g. simplification of seasonal employment, student jobs).  
| Curative | Purchaser incentives (e.g. service vouchers, specific tax regulations).  
|  |  | Amnesties for suppliers.  
| Fostering commitment | **Campaigns** to promote benefits of declared work, costs of undeclared work.  
|  |  | Education, **information and advice**.  
|  |  | Procedural and redistributive justice, social protection.

**Source:** Eurofound 2013, Schneider 2013, European Parliament 2013, adjustments by the author

As the planned European Platform is envisaged to be a network of (enforcement) authorities, only a few of the measures listed above are within their direct remits. In the area of deterrence, enforcement authorities collect and match data, operate work place inspections and the following procedure for sanctioning. They have also a role to play in enabling compliance, for example through awareness raising campaigns and telephone hotlines for citizens to indicate cases of undeclared work. Work place inspections in companies can serve to systematically inform and advise on tax regulations, relevant social security regulations or incentives; such tax regulations and amnesties.

All the same, the responsible enforcement authorities have an important function in the policy process: They are bodies for policy implementation, which can report back to policymakers on progress and problems on the ground to feed into further policy development and legislation.

In the above-mentioned study, draws on results from a workshop with labour inspectors ILO and identifies a number of fields in which cooperation and exchange at European level could help to further develop national policies and practices in order to better combat undeclared work:

- A national enabling institutional and legislative framework defining the roles of the central and other concerned bodies.
- Design of coordination mechanisms to enhance cooperation between different national authorities including issues of data protection.
- Adequate staffing including staff training, above all in southern Europe where financial and human resources have been reduced.
- Effectiveness of inspection visits.
- Use of information technologies.
- Mechanisms to increase the effectiveness of sanctions.
- Design of bilateral agreements and guides for joint cross-border inspections.
- Organisation of awareness raising campaigns.

In many, but not all countries, labour inspectorates are the responsible authority as undeclared work lies with social security inspectorates, tax authorities or customs (e.g. Germany), which are not covered by the existing Senior Labour Inspectors Committee (SLIC).

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<tr>
<th>Labour Inspectorate</th>
<th>Social Security Inspectorate</th>
<th>Tax authority or other</th>
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</thead>
<tbody>
<tr>
<td>Bulgaria, Cyprus, Czech Republic, France, Greece, Hungary, Ireland, Luxembourg, Italy, Latvia, Lithuania, Netherlands, Poland, Portugal, Romania, Slovakia, Slovenia</td>
<td>Belgium, Spain</td>
<td>Austria, Denmark, Estonia, Finland, Germany, Sweden, UK</td>
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**Source:** European Commission (MEMO/14/272)
3. THE COMMISSION PROPOSAL AND CHANGES IN THE COUNCIL'S GENERAL APPROACH

Commission Proposal: An own EU platform with mandatory membership

In order to enhance cooperation in the prevention and deterrence of undeclared work the European Commission submitted a proposal\textsuperscript{10} for a Decision of the European Parliament and of the Council on establishing a European platform on 9 April 2014. It is envisaged that all Member States will be represented as part of a network with mandatory membership. According to the proposal, joint action and targeted coordination at European level is necessary to more effectively address undeclared work as all EU Member States are affected and in particular with a view to cross-border issues.

The legal basis is Art. 153 (2) (a) TFEU in the area of social policy: 'The European Parliament and the Council may adopt measures designed to encourage cooperation between Member States ... excluding any harmonization' in areas, such as working conditions and combatting social exclusion.

As a result of the Commission's impact assessment\textsuperscript{11}, a separate European instrument with mandatory membership is considered the most suitable option, as undeclared work is a problem common to all EU Member States; including cross-border aspects. Currently, no targeted cooperation of different enforcement bodies exists at European level. The platform can also help to foster coordination of enforcement authorities within the Member States.

The Commission proposal provides for the following objectives and tasks:

- **improve cooperation** between different enforcement authorities at EU level and explore national and European instruments to combat common problems (e.g. bogus self-employment and illegal work in supply chains);
- provide a **forum and tools for capacity-building** where professionals develop common concepts and measurement tools, share information, follow progress and exchange good practices (e.g. comparative analysis on the basis of defined indicators, systematic impact analysis of policy measures, peer reviews to follow Member States' progress and the establishment of a knowledge bank on procedures and measures, such as bilateral agreements);
- adopt **European tools**, such as non-binding guidelines for inspectors, handbooks of good practices and common principles of inspections;
- tackle **cross-border aspects of undeclared work** by improving Member States' different enforcement authorities' technical capacity (e.g. **common framework for joint operations for inspections and data sharing**; including the use of the Internal Market Information System (IMI)\textsuperscript{12} and the Electronic Exchange of Social Security Information (EESSI\textsuperscript{13});
- develop **training capacity for enforcement authorities** (e.g. common framework for joint trainings);
- raise public awareness for the problem (e.g. European campaigns, regional, sectoral or EU wide strategies).

The Commission proposal contains the following provisions on funding and relations with related expert committees:

**Members:** Each Member State appoints a **single point of contact** as a member (labour inspectorates, social security, tax authorities or other) to liaise with and coordinate all enforcement authorities within the Member State concerned.

**Observers:** Representatives of social partners at cross-industry level (max. 8) and from sectors with a high incidence of undeclared work (max. 10), Eurofound, European Agency for Safety and Health at Work (EU-OSHA), the International Labour Organisation (ILO) and representatives of EEA states to be appointed according to the Platform’s Rules of Procedure. In total, approximately **60 persons would participate at a Platform meeting**.
Chair and coordination: The platform would be chaired and coordinated by the Commission with help from a secretariat provided by the Commission. This is different from the recently established Public Employment Services (PES) network, which is chaired by a PES director.

Funding is provided by EaSI (European Union Programme for Employment and Social Innovation) about EUR 2.1 million annually.

Cooperation with other committees: is envisaged in particular with SLIC (Senior Labour Inspectors Committee), which focuses on compliance with regulations for health and safety at work, the Committee of Experts on Posting of Workers, the Administrative Commission for Social Security Coordination, the Working Group on Administrative Cooperation in the field of direct taxation, the Employment Committee and the Social Protection Committee.

Changes in the Council's general approach: Support, but level of involvement to be decided upon by each Member State

During the negotiations at the Social Questions Working Party (SQWP), a number of delegations expressed reservations and need for further scrutiny. As the progress report to the Council (EPSCO - Employment, Social Policy, Health and Consumer Affairs) in June 2014 shows, these reach from general scrutiny reservations (Czech Republic and Malta) through reservations regarding the legal basis (Malta and United Kingdom) to parliamentary scrutiny reservations (France, Malta, Poland and United Kingdom).

On 16 October 2014, the Council (EPSCO) agreed a general approach on the establishment of the EU Platform against undeclared work; maintaining most of the key elements as proposed by the Commission. However, according to an amendment in the recital the level of involvement is left to each Member State. In response, the European Commission underlined in its press release: ‘it is essential that all Member States actively participate’.

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<tr>
<th>Main points for debate</th>
<th>The Council’s general approach compared with the Commission’s proposal</th>
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<tr>
<td>Legal base</td>
<td>Article 153(2a) has been maintained after an examination by the Council Legal Service. The concrete fields for encouraging cooperation have been added in conjunction with Art. 153(1): b - working conditions, h - integration of people excluded from the labour market, j - combatting of social exclusion.</td>
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<td>Members to be nominated</td>
<td>These are ‘relevant authorities, in particular enforcement authorities’, which cover a broader range than the Commission proposal (‘national enforcement authorities’).</td>
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<td>Involvement in Platform initiatives</td>
<td>A paragraph has been added in the recital (11a) saying that ‘Member States remain competent to decide on their level of involvement in the initiatives approved at plenary level by the Platform.’ This may weaken the achievement of the objectives if too many activities are concerned (e.g. definition of indicators, data delivery and measurement).</td>
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<td>Decision on initiatives</td>
<td>The clause on participation has to be seen in light of another article which has been added on the rules for decision: Decisions on Platform initiatives ‘shall be taken by simple majority at the plenary of the Platform’, Art. 7(2a).</td>
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<tr>
<td>Concretisation EU-cooperation</td>
<td>The Council’s general approach specifies the character of cooperation – ‘cooperation between Member States at Union level’ (Commission proposal: platform to enhance ‘EU-cooperation’, Art. 1(1).</td>
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<td>Objectives: Differentiation</td>
<td>The Council approach takes a more comprehensive and at the same time more result-oriented perspective than the Commission proposal, as the Platform ‘shall contribute to more effective union and national actions ..., including better enforcement ...’ (Commission proposal: ‘shall contribute to better enforcement of EU and national law ... ’). The Council approach includes bogus self-employment as ‘falsely declared work associated with undeclared work’, thus systematically differentiating between ‘effectively undeclared’ and ‘falsely declared’ work (Art. 2(a) and Art. 6).</td>
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Source: Author’s own elaboration
4. POSITION OF THE EUROPEAN PARLIAMENT, COMMITTEES AND SOCIAL PARTNERS

European Parliament: Support for stronger cooperation, preference for integration into Eurofound

In its Resolution ‘On effective labour inspections as a strategy to improve working conditions in Europe’ of 14 January 2014, the European Parliament welcomed the Commission’s initiative to create a European Platform for labour inspectors on undeclared work; calling upon the Commission to integrate the Platform into Eurofound as additional task for the agency, with the remit to organise the work of the platform.

In its Resolution, the European Parliament elaborated on core principles for effective labour inspection (e.g. adequate funding and staffing, definition of criteria for employment to better detect bogus self-employment) and lists a number of points with regard to combating undeclared work: draw up national action plans in the Member States, limit the cooperation between labour inspectors and immigration authorities to the identification of employers abusing migrant workers, develop specific training modules on undeclared work and consider the introduction of systems of general contract liability in supply chains in all Member States. Furthermore, it calls upon the Commission to develop a EU-wide further training programme for inspectorates, a forgery-proof social security card or other EU-wide electronic document, and to carry out a pilot project for a European early-warning system comparable to RAPEX in the area of consumer protection.

As concerns the integration of the Platform into Eurofound, the Commission stated in its Impact Assessment that ‘Eurofound tasks are limited to research and to development of projects to provide knowledge and support of EU policies’, nevertheless considering the ‘involvement of Eurofound … an essential element’.

The Commission proposal stipulates a basic involvement of the European Parliament in the work of the Platform. The European Parliament and the Council will be regularly informed about the activities of the Platform (Art. 7(5)). In addition, four years after its entry into force the Commission shall submit a report on the application of this Decision to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions. However, the Commission proposal does not stipulate whether this would take place on an annual or other basis; nor does it foresee the possibility that the Platform would inform the European Parliament upon its request; as provided for in the Decision on the PES Network.

European Economic and Social Committee (EESC) and Committee of Regions (CoR): calling for an observer status

Both EESC and CoR welcome the proposal to establish a European Platform and claim an observer status due to own previous work (EESC) and the important role of regional and local authorities (CoR). The Commission proposal ensures a minimal level of involvement, as the Platform shall submit its four-year report also to the EESC and the CoR.

The EESC in its opinion of 10 September 2014 proposes to consider an expansion of the Platform’s remit to making recommendations on legislation at EU or Member State level; such as tighter cross-border cooperation on inspection work. Indeed, this implementation-oriented network may be able to draw conclusions on gaps identified which could feed into policy development.

The CoR in its opinion of 8 October 2014 regrets that the Commission proposal does not mention the importance of local and regional authorities or of the Committee of Regions and proposed a number of amendments aiming at a stronger involvement of local and regional authorities by the Member States, e.g. when appointing the „single point of contact”.

Results from Social Partners’ consultations: support for a Platform, though not from employer associations

According to the Commission’s summary of the two consultations of social partners (July-October 2013, end of January – March 2014), there is a shared consensus that additional action at EU level is justified; most consider that this could take the form of a platform and also, that social partners could be involved as observers.

However, opinions with regard to the type of structure, initiatives and participation of social partners differ:

- Most of the employer organisations do not support the creation of a separate structure, but recommend better coordination of existing groups or the creation of a new sub-group (FIEC – European Construction Industry Federation; BusinessEurope, CEEP – European Centre of Employer and Enterprises providing Public services; UNI Europe – EuroCommerce, HOTREC – European Association of Hotels, Restaurants and Cafes, Geopa-Copa – Employers’ Group of Professional Agricultural Organisations). However, UEAPME (European Association of Craft, Small and medium-sized enterprises) welcomes the EU initiative stressing that SMEs are disproportionately affected by undeclared work which is taking on an increasingly cross-border dimension. Some employer organisations (BusinessEurope, UEAPME, CEEP, HOTREC) consider the development of common principles or standards not to be suitable.

- The European Trade Union Confederation (ETUC) would prefer the involvement of social partners as member and HOTREC as voluntary members. EFCI (European Federation of Cleaning Industries) and UNI Europa (European Trade Union Federation of service and skills sectors) point out that the European social partners should decide on their representatives.

All proposals for an increase in the number of members and observers should be analysed against the main objective, which is to set up an effective working structure to achieve the envisaged outcomes.

5. OTHER EUROPEAN NETWORKS AND PLATFORMS – NEED FOR STRUCTURED COOPERATION AND LESSONS TO BE LEARNT

With regard to composition, content and working methods, the proposed European Platform against undeclared work is closest to the Senior Labour Inspectors Committee (SLIC). As in many EU Member States labour inspectorates are responsible for combating undeclared work. The planned European Platform can build upon the experience and products of SLIC (e.g. common principles for labour inspection) and other networks:

**SLIC – Senior Labour Inspectors Committee**

The Committee is a formal expert group, which was established by Commission decision in 1995 (informal expert group since 1982). It is mandated to enhance the enforcement of Community law on health and safety at work. It consists of one representative per Member State (Director, CEO of labour inspection) and can set up working groups on specific topics. Upon request by the Commission, it adopted an Opinion supporting the establishment of a platform with a clearly defined scope and systematic coordination with existing initiatives at EU level in 2012.

**Main initiatives** are: opinions on problems relating to enforcement of Community law; review of OSH directives; common principles of labour inspection (2004); (non-binding) guides for labour inspectors on specific topics; national labour inspections evaluations according to Common Principles (by evaluation teams appointed from Members); guidelines for evaluation; labour inspectors’ exchange programme; adoption of a campaign; a knowledge-sharing system; and thematic days.
The work of three other working groups at Union level shows relevant links to undeclared work, thus calling for systematic cooperation as all groups have a specific focus:

- **Working Group on Administrative Cooperation in the field of direct taxation** is a formal Commission expert group established in 2005, which aims to facilitate the exchange of information, experience and good practices in the area of mutual assistance for direct taxation.

- **Expert Committee on the Posting of Workers** is a formal Commission expert group established in 2008 and deals with undeclared work in the context of posting workers and cross-border supply chains.

- **Administrative Commission for social security coordination** is investigating amongst other tasks the uniform application of Community law, and also facilitates the realisation of cross-border cooperation activities.

The European Platform might also consider seeking cooperation with the **Public Employment Services Network**, which was equally established on the basis of a legal decision by the European Parliament and the Council in May 2014. A recent mutual learning workshop on combatting long-term unemployment has shown a need for cooperation of PES with labour inspectorates to better detect cases of social fraud due to undeclared work and to encourage the transition to formal employment.

Finally, preparing a decision on the establishment of a new European platform (or network) raises the question of what can be learnt from other networks to achieve good results and a real impact. Some conclusions can be drawn from evaluation and a brief comparison of the working methodology of selected European networks. Despite a similar name, the European Platform against Poverty is not a network of Member States and therefore not comparable.

The external evaluation of PROGRESS (Programme for Employment and Solidarity 2007-2013) shows that structured and targeted mutual exchange has an impact:

- Participants show high levels of satisfaction and many identify concrete learning points.
- Many participants disseminate the information and documentation to other colleagues and sometimes also to other institutions.
- Events have supported consensus-framing among participants (e.g. in Social Protection and Social Inclusion Peer Reviews).
- Surveys among participants showed policy changes due to the participation in mutual learning. For example, 16 countries reported having adjusted the way they draw up individual action plans for unemployed as a result of the PES to PES Dialogue as part of the Annual Work Programme of the PES network.

To conclude from the experience of selected networks (SLIC, PES network, European Lifelong Guidance Policy Network - ELGPN), the following factors can be considered as key to effectiveness:

- Continuity of the network and of membership;
- Ownership of the network by its members;
- Structured annual work programme defining the planned outputs;
- Development of (non-binding) European visions, frameworks, guidelines and tools; as well as indicators for measuring policy/organisational achievements by the network (with support from experts, if necessary);
- Mutual exchange; including a dissemination strategy of good practices at national and European level, monitoring and analysing successful transfer.