

Gradual integration of candidate countries into the European Union

Pushing the impossible, delaying the inevitable?

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Clingendael Report



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Executive summary

The gradual integration of candidate countries into the European Union (EU) could help sustain the renewed enlargement momentum that emerged after the Russian invasion of Ukraine, without compromising the EU's stringent accession criteria. This is true not only for gradual integration with Ukraine and Moldova, who were granted candidate status a few months after the invasion in 2022, but also for the Western Balkans which have long remained in the EU's waiting room.¹ The shifting geopolitical landscape, marked by an aggressive Russia and assertive China, has prompted the European Commission (and most Member States) to speed up the EU accession process. At present, however, the current candidate countries do not yet meet the so-called Copenhagen criteria for EU accession. The EU thus faces a significant dilemma: how can it sustain this renewed momentum without compromising its stringent accession criteria?

In this context, politicians, policymakers and researchers increasingly cite gradual integration as a promising solution. Building on the 2020 revised enlargement methodology, gradual integration allows aspiring EU Member States to progressively integrate into selected policy areas, either before or after achieving EU membership. By adopting this approach, the EU aims to break the enlargement stalemate and counteract enlargement fatigue in (mainly Western) EU Member States and reform fatigue in (Western Balkan) candidates. The latter are incentivised to accelerate their reform processes by gaining early access to specific pre-membership benefits. At the same time, the EU can strategically deprioritise more sensitive areas that might otherwise obstruct progress in the accession process.

1 These being: North Macedonia (EU candidate since 2005), Montenegro (candidate since 2010), Serbia (candidate since 2012), Albania (candidate since 2014) and Bosnia and Herzegovina (EU candidate since 2022). Georgia had been granted candidate status in 2023; yet for Georgia the accession process has been stalled due to recent political developments. Turkey has been a candidate country since 1999 and officially still in the running, but enlargement with Turkey is no longer likely, according to many experts. Kosovo applied for candidate status in 2022, but this has not yet been granted.

Gradual integration in exchange for reforms

This approach is certainly not new; market integration prior to full EU membership also took place in the Central and Eastern European countries that joined in the last three enlargement rounds. Similar principles are already being applied to current candidate countries. What is new, however, is that with the revised enlargement methodology, step-by-step integration into the Union is now linked to candidates' performance regarding the negotiation clusters. This means that countries will be allowed to take incremental steps toward integration if they perform well in terms of required reforms.

Given the critical importance that candidates fulfil all accession conditions (the so-called Copenhagen criteria), implementing gradual integration, however, may prove far more challenging in practice than on paper. Identifying policies where gradual integration is desirable and feasible, and where it offers sufficient incentives for candidates to implement reforms, is a complex endeavour. In addition, the feasibility of gradual integration may be challenged by the large bulk of EU legislation (the so-called *acquis*) that candidates will need to implement (even for partial participation), as well as by the need to enforce this legislation. Hence, while gradual integration could provide a solution to address the difficult trade-offs between advancing the EU's geopolitical interests and upholding its fundamental values, it is essential to carefully assess its potential risks and feasibility.

Two fields for gradual integration: transport and labour mobility

This report attempts to contribute to this endeavour by providing an in-depth analysis of the risks, opportunities, and feasibility of proposals for gradual integration in two key policy areas: transport and labour mobility. In the field of **transport**, the Commission has proposed several initiatives to accelerate integration – enabling candidate countries to already reap some benefits of the EU common transport area even before full accession. Moreover, as written in his famous report *The future of European competitiveness*, Mario Draghi advocates that gradual integration in transport could be a vector for integration across other policy areas closely linked with transport.

In contrast, the field of **labour mobility** within the EU reveals a more complex dynamic, characterised by the coexistence of conflicting approaches between

Member States, depending on socio-economic factors, demand for labour and public debates on migration. Some Member States, such as the Netherlands, may aim to *delay* the opening of their labour market to citizens of new Member States through so-called transitional agreements. Meanwhile, others, like Spain and Germany, may prioritise easing labour mobility driven by persistent labour market shortages. An example is easing the mutual recognition of skills and qualifications between the EU and the Western Balkans prior to accession, as proposed in the Commission's 2023 New Growth Plan for the Western Balkans. However, because of the political sensitivity of the topic of migration, Member States' positions on facilitating (or rather restricting) labour mobility are highly uncertain and depend on which parties are in government at that time.

Gradual integration as a solution to the enlargement stalemate?

This report identifies the opportunities and risks associated with gradual integration in the two selected policy areas. It poses the question of whether gradual integration could serve as a solution to the current stalemate by offering candidates incentives to implement reforms. The report further discusses whether proposals for gradual integration are merely an attempt to push what some might consider **impossible** – *allowing candidate countries to participate in specific EU policies prior to meeting all accession criteria to incentivise fundamental reforms* – while delaying the perhaps **inevitable** – *letting countries join despite fundamental (lingering) concerns about their readiness?*

Gradual integration could work, but only if conditions are met

The report concludes that the gradual integration of candidate countries in the areas of transport and labour mobility could help address the enlargement impasse. It could sustain the geopolitical momentum (without compromising on EU values), but only if specific vital prerequisites are met and negative side effects mitigated. For example, accelerated integration into the field of transport holds the potential to generate significant economic spillovers across the broader economy of the EU and the candidate, but only when institutions for functioning public administrations and the rule of law are in place, and if initiatives are accompanied by the necessary investments in infrastructure.

When it comes to candidates' gradual accession to the EU labour markets, this report recommends that initiatives be coordinated at the EU level to avoid competition between Member States for new labour forces. This specifically applies to delaying integration with transitional agreements. Moreover, the potential of such agreements depends on whether they are deployed with a well-balanced and targeted approach (for example by complementing them with sectoral exemptions and/or quotas) and take into account the temporary nature of transitional agreements and their possible unintended consequences.

No EU accession through the back door

Despite such opportunities, initiatives for gradual integration should not offer candidate countries a way to enter the EU through 'the back door' without fulfilling the conditions for EU accession. Also, partial participation in specific policy areas comes with risks if, for instance, conditions such as good governance and the rule of law, are not met. It is therefore important that these fundamentals are also ensured 'at the gate' of gradual entry steps to ensure that the inevitable becomes avoidable.

The need for an assessment framework

The opportunities and risks of gradual integration, however, vary between Member States (and candidate countries), given differences in respective countries' economies, public resources, demographic situations and labour markets. In addition, what could work for the EU as a whole might have a different impact on certain individual Member States. To determine whether gradual integration could break the enlargement stalemate in such a way that opportunities are maximised and risks mitigated, the concrete proposals – likely to be presented by the Commission in the coming months – must be carefully evaluated with a structured assessment framework. This framework – which may be different for each Member State – could include questions on the merits, risks, political impact and feasibility of each proposal. Such an approach will be invaluable for shaping government positions on EU enlargement in general and towards the gradual EU integration of candidate countries. A well-designed framework can help identify these trade-offs, allowing for a more balanced judgement and informed decision-making.

Relevance for the Netherlands

For the Dutch government, such a framework will be particularly important given its traditionally critical stance towards EU enlargement. A too critical position risks hindering a constructive approach towards potential proposals for gradual integration that could serve Dutch interests. An assessment framework that evaluates the individual merits of gradual integration proposals can help to disentangle these complexities by clearly identifying the interests of both Member States' candidate countries. For the Netherlands, adopting and utilising such a framework is not just a strategic necessity – it is an opportunity to lead the enlargement debate with clarity and purpose.

1 Introduction

Gradual integration has emerged as a buzzword in Brussels' corridors. It refers to the process by which countries seeking European Union (EU) membership progressively integrate into selected policy areas, either before or after the starting date of their official membership. While it may seem like a novel idea, it is not new. In previous accession rounds, accelerated economic integration occurred before countries officially joined the Union. Also, with current candidate countries accelerated integration into selected policy areas is already a standing practice. Conversely, in other areas – such as the free movement of workers – past acceding countries were not granted the full benefits of EU membership until after targeted transition periods. It is unclear whether the free movement of workers will also be postponed in the next round of enlargement, but the issue is certainly already on many domestic political agendas, especially in countries where migration is a sensitive issue, like the Netherlands.

Today, the geopolitical urgency surrounding EU enlargement with the Western Balkans² and the 'Eastern trio'³ has brought gradual integration to the forefront of the discussions. The issue gained prominence with the 2020 revised enlargement methodology, which aimed to provide more credible accession prospects for the Western Balkans, thereby enhancing Europe's influence in the region.⁴ Moreover, the Russian invasion of Ukraine has spurred on the intentions of both the Commission and most Member States to speed up the accession process of candidates in order to maintain political stability in the EU's neighbourhood region and enhance the Union's geopolitical clout. Yet, the EU's strict conditions before being able to join – also known as Copenhagen criteria – remain non-negotiable, as repeatedly emphasised by Commissioner Marta Kos.⁵ These criteria include adherence to democracy and the rule of law, having a functioning market economy and having the capacity to take on the obligations

2 These are: Albania, Bosnia and Herzegovina, Montenegro, North Macedonia and Serbia. Kosovo applied for candidate status in 2022, but this has not yet been granted.

3 These are: Ukraine, Moldova and Georgia (for which the accession process has been stalled due to recent political developments).

4 European Commission, "[Enhancing the accession process – A credible EU perspective for the Western Balkans](#)," Communication, 5 February 2020.

5 EWB, "[Marta Kos in AFET: There will be no geopolitical discount, enlargement remains a merit-based process](#)," *European Western Balkans*, 14 January 2025.

of membership, including implementation of the *acquis*.⁶ Compromising on these criteria imposes risks, as they are fundamental to the integrity of the single market and the functioning of the EU as a community of values.

However, many candidate countries are far from meeting all the necessary conditions, with reform processes advancing slowly. This creates a dilemma: the longer countries have to wait for EU accession, the less political and public appetite there might be for reform. This leads to the enlargement challenge for the European Commission and Member States: how to maintain the geopolitical momentum for enlargement without compromising the EU's accession criteria.⁷ The key questions addressed in this report are: what are the opportunities and risks associated with proposals for gradual integration? And, given its practical and political feasibility, could gradual integration offer a solution to the enlargement dilemma by accelerating candidates' participation in some EU policy areas and, possibly, delaying participation in others?

The Commission seems optimistic. By accelerating the participation of candidates in specific EU policy areas before achieving full membership, the Commission aims to deliver tangible benefits during the reform process.⁸ At the same time, delayed integration in more sensitive facets of EU membership – such as the free movement of people – can serve as a way to help manage potential challenges arising from enlargement. Postponing entry into such (politically sensitive) areas could give candidate countries additional time to meet essential preconditions while smoothening public opposition in some Member States, such as the Netherlands, without delaying EU accession altogether.

In November 2023, the Commission presented concrete areas for gradual (or step-by-step) integration in its New Growth Plan for the Western Balkans, including pre-enlargement initiatives for the Free Movement of Workers and Road Transport. A central pillar of the New Growth Plan is to promote greater regional economic integration in the Western Balkans, facilitating closer alignment with the EU's single market prior to enlargement, such as by

6 EUR-Lex, "[Accession criteria \(Copenhagen criteria\)](#)," accessed on 15 January 2025.

7 René Cuperus and Saskia Hollander, "[Beyond the EU enlargement paradox: Optimising opportunities and minimising risks](#)," Clingendael Institute, 14 March 2024; Wouter Zweers and Milena Rossokhatska, "[Breadcrumb Home Towards an EU geopolitical approach on transformative terms in the Western Balkans Policy](#)," 2 February 2025.

8 Peter Becker and Barbara Lippert, "[Acceding Countries' Gradual Integration into the EU Single Market Prerequisites, Opportunities and Hurdles](#)," SWP, 16 September 2024.

strengthening existing regional “stepping-stone” initiatives such as the Common Regional Market.⁹

In March 2024, the Commission elaborated on these proposals by presenting several avenues for gradual integration in its communication on pre-enlargement reforms.¹⁰ By December 2024, these proposals have gained support from Member States and candidate countries alike.¹¹ In its January 2025 *Competitiveness Compass*, the Commission once more emphasised the benefits of “early and gradual integration [...] into parts of the Single Market.”¹² Thus far, concrete examples include candidates’ integration into ‘Roam like at home’ – offering citizens the possibility to call, text and use mobile data without extra charges – and the *Single European Payment Area* (SEPA) – simplifying bank transfers in euros.¹³ However, except for these concrete initiatives, proposals for gradual sectoral integration do not go beyond mentioning policy areas where accelerated integration could work (such as transport where gradual integration already takes place through the Transport Community and so-called Green Lanes (see section 3)).¹⁴ The Commission will likely present more concrete and elaborated proposals in the coming months in the context of both plans for the

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- 9 European Commission, “[Communication from the Commission: New growth plan for the Western Balkans](#),” 8 November 2023, 4; The Common Regional Market (CRM), which was launched in 2020, is geared around aligning the four freedoms within the Western Balkans with the EU Single Market ahead of full accession, thereby facilitating the accession process (European Commission, [The Common Regional Market](#).)
- 10 Including the free movement of goods; free movement of services and workers (see section 4 of this report); SEPA; facilitation of road transport (see section 3 of this report); energy market; and the Digital Single Market, see: European Commission, “[Communication on pre-enlargement reforms and policy reviews](#),” 20 March 2024, 3-5.
- 11 Council of the European Union, “[Council conclusions on Enlargement](#),” 17 December 2024; and EU-Western Balkans Summit, “[Brussels Declaration](#),” 18 December 2024.
- 12 “The early and gradual integration of candidate countries into parts of the Single Market will allow companies to integrate in European value chains, facilitating the convergence process and enhancing investment, trade and competitiveness.” See: European Commission, “[A Competitiveness Compass for the EU](#),” 29 January 2025, 19.
- 13 Which Montenegro and Albania have already joined: European Commission, “[European Commission welcomes inclusion of Montenegro and Albania in the Single Euro Payments Area](#),” 21 November 2024.
- 14 The well-known reports by Enrico Letta and Mario Draghi too remain at the abstract level. While encouraging the practice of gradual integration, Letta does not go into detail of how to bring it into practice. See: Enrico Letta, “[Much more than a market](#),” April 2024, 13 + 139. Draghi goes one step further and makes a transport-specific proposal, but does not go into detail. See also section 3 of this report and: Mario Draghi, “[The future of European competitiveness](#),” September 2024, 224.

'Future of the EU' and the candidates' screening reports.¹⁵ As the debate unfolds, Member States, including the Netherlands, will need to carefully assess the merits and risks of these proposals to determine their viability.

This report contributes to this endeavour by assessing current and anticipated examples of gradual integration, analysing their associated risks and opportunities through the lenses of economic and security considerations, as well as their feasibility.¹⁶ This report does not discuss proposals for gradual *institutional* integration, such as the well-known *Template 2.0 for Staged Accession to the EU*.¹⁷ Although very relevant for discussions on the future of the EU, we chose to focus specifically on proposals for gradual *sectoral* integration. Ultimately, the success of gradual integration depends on whether these proposals gain acceptance by EU Member States and provide sufficient incentives for candidate countries to remain committed to the EU's enlargement process.

As one of the first analyses of gradual integration in specific policy areas, this report focuses on two domains: the field of **transport** – where accelerated integration has relatively broad support from the Commission and among Member States – and **labour mobility** – where enthusiasm is less evident, at least at the Member State level, as labour migration is a politically sensitive issue. On the one hand, concerns about uncertain labour market consequences and the highly politicised nature of migration create pressure for a more cautious approach. On the other hand, the growing recognition that many (Western)

15 In the cluster-specific screening reports per candidate country, the European Commission makes concrete proposals for gradual integration as laid out in the Commission's revised enlargement methodology: European Commission, "[Enhancing the accession process – A credible EU perspective for the Western Balkans](#)," Communication. 5 February 2020, 4.

16 While this report focuses on the various proposals currently presented in two selected policy areas, transport and labour mobility, we do not neglect that gradual integration is already an ongoing practice with current candidate countries on several other policy dimensions as well.

17 Milena Mihajlović, Steven Blockmans, Strahinja Subotić and Michael Emerson, "[Template 2.0 for Staged Accession to the EU](#)," Open Society Foundations Western Balkans, European Policy Centre and the Centre for European Policy Studies, 2023. See also: ESI, "[Offer the four freedoms to the Balkans, Ukraine, and Moldova For a merit-based EU accession process with a credible goal](#)," European Stability Initiative, accessed on 24 January 2025; ESI, "[Hamster in the Wheel](#)," 15 January 2020; Lukáš Macek, "[Advocating gradual accession to the European Union](#)," Jacques Delors Institut, May 2023; Matteo Bonomi and Raffaele Mastroiocco, "[Negotiating EU Enlargement: Scenarios for Future Integration](#)," Istituto Affari Internazionali, 2024.

EU Member States will need labour migrants to address ongoing shortages makes a case for accelerating labour mobility.

Following a discussion of the rationale behind gradual integration (section 2), this report outlines potential risks and opportunities, as well as the feasibility of proposals for gradual integration into the policy areas of transport (section 3) and labour mobility (section 4). This analysis is based on extensive desk research, insights from an expert roundtable organised in November 2024, and a series of interviews. Since some of the proposals discussed in this report are yet to be concretised and developed, this analysis is not yet exhaustive. The report therefore concludes with a call for, and a tentative outline of, an assessment framework that could further shape (Dutch) government positions in the ongoing Brussels debate on gradual integration (section 5).

2 Gradual integration as a solution to difficult enlargement trade-offs?

Proposals for the step-by-step integration of candidate countries into selected EU policy areas, either before or after their official membership, could potentially break the enlargement stalemate – that particularly applies to the Western Balkans. These countries have been in the waiting room for quite some time, with North Macedonia as a clear standout (EU candidate since 2005). Yet, also the patience of Montenegro (candidate since 2010), Serbia (candidate since 2012), and Albania (candidate since 2014) is being tested. Bosnia and Herzegovina has been a candidate country since 2022.¹⁸

As the accession process of these countries takes longer, there is a risk of further loss of enthusiasm by both citizens and political elites. Moreover, their enthusiasm to implement the difficult but necessary and required reforms could (further) deteriorate. Gradual integration could help maintain momentum in the reform process by offering some of the benefits of EU membership before full accession. This approach would also help the EU secure some of its geopolitical interests in the region, without compromising its credibility as a community of values. After all, countries are not yet full members of that community.

Most benefits candidates especially long for most relate to the single market – the cornerstone of the EU. This approach is certainly not new; market integration prior to full EU membership also took place in the Central and Eastern European countries that joined after 2004. Similar principles are now being applied to current candidate countries. For instance, building on the *Stabilisation and Association Agreements (SAAs)*, the Commission's *Growth Plan for the Western Balkans* of 2023 aims to bring these countries closer to the single market and align key economic sectors with EU standards, before their EU accession.¹⁹ Additionally, as part of the *Deep and Comprehensive Free Trade Area (DCFTA)*

18 In that year, also Kosovo applied for candidate status, but this has not yet been granted.

19 European Commission, "[New Growth Plan for the Western Balkans.](#)"

agreements between the EU on the one hand, and Georgia, Moldova, and Ukraine on the other, these countries have been granted limited access to the single market in selected sectors. The DCFTAs provide these countries with a framework for EU trade relations by phasing out customs tariffs and quotas and harmonising standards and regulations. Although these agreements were drafted at a time when these countries did not even have EU candidate status, they now serve as the foundation for shaping their pre-accession EU market integration.

What is new, however, is that with the new enlargement methodology of 2020 step-by-step integration into the Union became linked to candidates' performance within the six thematic policy clusters: (1) fundamentals, including rule of law, (2) internal market, (3) competitiveness and inclusive growth, (4) green agenda and sustainable connectivity, (5) resources, agriculture, and cohesion, and (6) external relations. Notably, the proposed process of gradual integration is merit-based and reversible, meaning countries will be allowed to take incremental steps in the process if they perform well in terms of implementing required reforms. This also implies the "phasing-in" into individual EU policies and the single market in order to provide "tangible incentives for reforms". On the other hand, if reform is too slow or stagnating, these benefits could, in theory, be reversed.²⁰

Making sure candidate countries continue their pre-accession is not only crucial for maintaining the EU's credibility as a community of values but also for safeguarding the integrity of the single market and the financial interests of its members.²¹ The economic criteria aim to enforce a certain degree of convergence (meaning the levelling of living standards between EU countries) and ensure a level playing field between existing and new Member States. Meanwhile, the political conditions are essential for establishing mutual trust in each other's legal systems – a prerequisite for the flourishing of the single market's 'four freedoms' (free movement of goods, capital, services and people). After all, for citizens (and businesses) to move to and settle freely within the EU, they must be confident that the *acquis* is applied and enforced uniformly across Member States. This includes the assurance they can rely on an independent court in case of mistreatment. Furthermore, the rule of law also plays a critical

20 European Commission, "[Enhancing the accession process – A credible EU perspective for the Western Balkans.](#)"

21 See also: Saskia Hollander, "[Economic governance and the rule of law in the European Union,](#)" Clingendael Institute (RED-SPINEL working paper), 11 June 2024.

role in preventing corruption and fraud, thereby protecting the overall financial interests of the EU.

However, given the critical importance of the accession criteria, gradual integration may prove far more challenging in practice than on paper. After all, most aspects of the single market only function effectively when participating countries meet all the basic criteria.²² Identifying the policies where compromises are feasible – without undermining or harming the integrity of the single market – while also ensuring they provide adequate incentives to push reform, will be difficult. In addition, integrating specific elements of the single market could already require harmonising a tremendous number of regulations, precisely because the single market is so heavily regulated. Importantly, these regulations can only achieve their intended goals if they are effectively and properly enforced across all Member States. The question is whether candidate countries will be able to provide such strict enforcement, especially given their public administrations are not fully up to par.

Delaying the granting of *all* freedoms could offer a solution to challenges that arise when countries have not yet met all criteria. For example, a period between a new Member State's EU accession and its accession to the Schengen Area allows it to meet the strict Schengen accession criteria, such as those related to the protection of external borders. In the same vein, opening the labour market at a later stage for new members allows economies and labour markets to adjust. This could prevent potential unfair competition on wages, which may arise because new members lag economically behind the rest of the EU.

Delaying integration in sensitive policy areas could also help garner public support for enlargement in existing Member States where such support is currently lacking. In the Netherlands, for example, public enthusiasm for enlargement is lukewarm, and the debate – to the extent that it actually takes place – is mainly framed around concerns about the impact on EU decision-making, the rule of law in candidate countries, and, notably, (labour) migration.²³

22 Peter Becker and Barbara Lippert, "[Acceding Countries' Gradual Integration into the EU Single Market Prerequisites, Opportunities and Hurdles.](#)"

23 René Cuperus and Saskia Hollander, "[Beyond the EU enlargement paradox: Optimising opportunities and minimising risks.](#)"; Saskia Hollander, "[In waarden verenigd of verdeeld? De impact van EU-uitbreiding op de democratie en rechtsstaat in de Unie en haar lidstaten.](#)" Clingendael Institute, December 2024.

However, at the same time, delays could also harm the functioning of the single market. After all, as one of its founding principles, the free movement of workers strengthens the single market and generates overall economic benefits for both Member States (and their citizens).²⁴

While gradual integration could – at least in theory – provide a solution to the difficult trade-offs – such as balancing the EU’s geopolitical interests and upholding its fundamental values – it is essential to carefully assess the potential risks. In the following sections, we examine these risks regarding proposals in two policy areas: first transport, and then labour mobility. We provide an overview of both concrete and more ambiguous proposals put forward (by the Commission and others), highlighting their associated opportunities and risks. Each policy section concludes with a discussion of the feasibility of these proposals, taking into account the identified opportunities and risks.

24 Ruben Atoyan et al. “[Emigration and its Economic Impact on Eastern Europe](#),” IMF Staff Discussion Note 16/07, 2016, 30; SER, “[Arbeidsmobiliteit in de EU](#),” SER-advies 4, 16 February 2001, 92.

3 Gradual integration into the field of transport

Transport is a key component of the EU's single market and central to the free movement of goods, capital, services and persons. Transport harmonisation between EU Member States and candidates enhances overall connectivity, fosters trade and drives economic growth, both for the EU and its Member States and for candidate countries. This is the reason behind proposals related to transport for candidate countries' gradual integration. Because of the importance of transport for the overall economy, such proposals could offer candidates significant incentives to accelerate reforms in fundamental domains. Transport is, as Mario Draghi puts it: "a vector of integration".²⁵

Gradual integration into the field of transport is not new. The Transport Community has, since its establishment in 2017, been assisting candidates' adoption and implementation of EU transport legislation.²⁶ In addition, since the COVID-19 pandemic, so-called Green Lanes have been established both within the Western Balkan region and at the region's external borders with the EU. These Green Lanes are designated routes and border crossing points equipped with advanced technology to streamline customs procedures and accelerate the (more efficient) movement of goods between the EU and Western Balkan countries, including the sharing of pre-arrival data which allows for targeted risk assessments.²⁷ Moreover, since the Russian invasion of Ukraine, Solidarity Lanes provided alternative transport routes to help Ukraine export goods and import essential supplies amidst the disruptions caused by the invasion. Before delving into the proposals currently on the table and the opportunities and risks they offer, the next section elaborates on the overall impact of enlargement on the transport sector(s) in the EU and candidate countries.

25 Mario Draghi, "[The future of European competitiveness](#)," 224 (proposal 8a).

26 Transport Community, "[About us](#)," accessed on 24 January 2025.

27 Transport Community, "[Green Lanes](#)," accessed on 10 February 2025.

3.1 The impact of EU enlargement on transport

Growth of trade and GDP...

EU accession offers significant benefits for the transport sectors of the candidate countries, including better access to the EU market, reduced transport costs, as well as improved infrastructure and connectivity. Joining the EU single market will greatly simplify trade and transport arrangements, thereby connecting candidates to EU and international supply chains.²⁸ This would grant citizens of the candidate countries access to a wider range of (safe) products.²⁹ Such positive impacts can be reaped especially as soon as countries also join the Schengen Area – in which countries have abolished their internal borders to allow the free and unrestricted movement of people. The harmonisation of regulations and, especially, the absence of border controls will significantly speed up the transit of goods and lower logistics costs, thereby boosting trade and overall economic growth. It has been estimated that reducing border crossing times by three hours could result in long-term GDP growth of up to three per cent in the six Western Balkan countries.³⁰ EU enlargement could also benefit the transport sectors of current EU Member States and overall economic growth, although this impact is likely to be smaller for current Member States than for the candidates as it depends on both the level of trade between current and candidate countries and the size of the candidate countries.

...but risking an uneven playing field

At the same time, EU enlargement could lead to an uneven playing field between the transport sectors of current and new Member States. The economies of the current candidates are weak and hardly competitive with the EU's economy. This means that labour costs are significantly lower in candidate countries, making it more attractive for companies to work with transport companies and drivers from these countries than from current Member States. Joining the single market at this level of economic divergence could therefore lead to skewed growth between the transport sectors of current and new Member States. According to the Dutch Business Association for the Logistics and Transport sector, this also happened during the previous enlargement rounds involving Central and Eastern

28 European Commission, "[2024 Communication on Enlargement Policy \(Enlargement Package\)](#)," 30 October 2024.

29 European Commission, "[Enlargement Package 2024](#)," 4.

30 Connecting The Region, "[Reduced Waiting Times, Increased GDP](#)," accessed on 17 December 2024.

European countries, which led to a decline in market share and loss of revenue for the Dutch transport sector.³¹

Gradual integration into the field of transport could maximise the enlargement benefits and bring such benefits to candidates (and the EU) prior to their accession. In addition, it could minimise potential negative side effects by ensuring that countries are already largely compliant with the EU *acquis* upon their full entry into the single market. At the same time, proposals for gradual integration also come with risks.

3.2 Accelerated integration into the field of transport

Proposals for gradual integration into the field of transport that are proposed by the Commission can be divided into four categories: 1) The harmonisation of road transport legislation in the Western Balkans (Box 1); 2) The integration of candidate countries into Trans-European Transport Networks TEN-T (Box 2); 3) The free movement of goods with the Western Balkans by streamlining customs procedures, for example through already existing Green Lanes (Box 3); and 4) The strengthening of current Solidarity Lanes with Ukraine and Moldova in order to streamline border procedures (Box 4).

Opportunities: spill-overs, enhanced trade, competitiveness and security

Accelerated integration of candidates into the field of transport offers opportunities for candidate countries, but also for the economies of the Member States and the EU's overall competitiveness. In addition, enhanced connectivity could also contribute to the EU's (internal and external) security. First, (further) gradual integration of candidates into the field of transport generates benefits extending beyond transport itself, given the strong interconnectivity with other sectors. For instance, agriculture stands to gain significantly, as improved transport facilitates the export of crops, dairy and agricultural equipment. Similarly, the military would benefit from enhanced transport, especially relevant for candidate countries that are NATO members. Better connected infrastructure would streamline defence cooperation and improve military mobility. With these

31 Transport en Logistiek Nederland, "Tien jaar na de EU uitbreiding van Gevolgen van de EU uitbreiding voor de Nederlandse transport en logistieksector," 2014.

spillovers in mind, it is not remarkable that precisely transport is the field in which the proposals for gradual integration are already most extensively elaborated.

Second, while this report does not aim to make economic predictions, it is safe to argue that gradual integration into the field of transport will lead to a higher degree of trade activity between candidate countries and the rest of the EU due to improved physical and economic connectivity. (Early) harmonisation of transport legislation will significantly lower the costs of transport (and, hence, trade), since it reduces waiting times for truck drivers, simplifies overall trade processes and makes overall supply chains more efficient. This benefits both businesses and consumers.³² For instance, initiatives such as the EU-Western Balkans Green Lanes (see Box 3) will particularly help to make border crossings “faster, more efficient, safe and secure,” as noted in the Brussels Declaration during the EU-Western Balkans Summit on 18 December 2024.³³ Early participation in, for example, the TEN-T will facilitate early implementation of the transport acquis, thereby contributing to a smoother integration into the single market.

Box 1: Harmonisation of road transport legislation in the Western Balkans

1a: Supporting the Western Balkan countries in integrating their transport systems within the region, based on the adoption of the relevant EU acquis before their EU accession.³⁴

Opportunities	Risks
<ul style="list-style-type: none"> - Lower costs and strengthened connectivity - Economic benefits of increased trade - Spillover to other economic sectors 	<ul style="list-style-type: none"> - Non-enforcement of regulations - Road unsafety in case of non-compliance - Insufficient Infrastructure - Capacity shortages

1b: Granting Western Balkan partners access to relevant EU information systems (Internal Market Information Systems (IMI), European Register of Road Transport Undertakings (ERRU)).³⁵

Opportunities	Risks
<ul style="list-style-type: none"> - Lower costs and strengthened connectivity - Economic benefits of increased trade - Spillovers to other economic sectors 	<ul style="list-style-type: none"> - Data insecurity and privacy issues - Technological incompatibility - Uncertainty regarding policy alignment

32 European Commission, “Pre-enlargement reforms and policy reviews,” 7.

33 EU-Western Balkans Summit, “Brussels Declaration,” 6.

34 European Commission, “New Growth Plan for the Western Balkans,” 3-4.

35 Ibid., 3-4.

Box 2: Integration into the Trans-European Transport Networks (TEN-T)

Integration of candidate countries into the Trans-European Transport Networks (TEN-T). ³⁶	
Opportunities	Risks
<ul style="list-style-type: none"> - Optimising transport connections between candidates and the EU - Support with implementing the EU transport <i>acquis</i> - Increased competitiveness of the EU by strengthened internal market 	<ul style="list-style-type: none"> - Insufficient Infrastructure. - Political and administrative resistance (local) - Road unsafety in case of non-compliance - Insufficient resources for necessary investments

Box 3: Free movement of goods

The New Growth Plan for the Western Balkans proposes several transport-related initiatives concerning the free movement of goods, including: enhanced customs and tax cooperation to streamline customs procedures and reduce border waiting times; participation of the Western Balkan partners in the Common Transit Convention; and the implementation of EU-Western Balkans Green Lanes.	
Opportunities	Risks
<ul style="list-style-type: none"> - Increased and simplification trade - Lower prices - More efficient supply chains - Faster border crossings - Safer border crossing 	<ul style="list-style-type: none"> - Non-enforcement of regulations - Smuggling and human trafficking - Unfair competition - Infrastructure shortages - Capacity shortages

Box 4: Strengthened and permanent Solidarity Lanes between the EU and Ukraine and Moldova

Strengthening the Solidarity Lanes between the EU, Ukraine and Moldova by investing in land and river infrastructure and ensuring streamlined border procedures. ³⁷ Solidarity Lanes are alternative transport routes established by the EU to help Ukraine export goods and import essential supplies amidst the disruptions caused by Russia's invasion.	
Opportunities	Risks
<ul style="list-style-type: none"> - Sustaining Ukrainian economic activities - Improved connectivity - Global food security - Improved military mobility 	<ul style="list-style-type: none"> - Infrastructure deficiencies - Funding and resources - Security risks linked to smuggling and human trafficking

36 European Commission, "Pre-enlargement reforms and policy reviews," 9.

37 European Commission, "EU-Ukraine Solidarity Lanes," accessed on 12 November 2024.

Third, although the economies of the candidates – except for Ukraine – are relatively small, (further) gradual integration into the field of transport could enhance the EU's overall competitiveness. The harmonisation of transport legislation and the accession of candidates to the TEN-T, for instance, will significantly improve connectivity between candidate countries and the EU. As mentioned above, this will boost trade opportunities.³⁸ This will also foster economic growth in new Member States, leading to increased purchasing power, which, in turn, will drive integration, creating mutual economic benefits for both new and existing EU members.³⁹ A larger and more connected transport area could as such increase the EU's global market power. Trade and commerce advantages outlined earlier will eventually contribute to a stronger position internationally. While the gradual integration of a single candidate country, such as Montenegro, may not have a drastic impact, incorporating the transport systems of all current candidate countries into the EU's internal transport market would substantially enhance the EU's collective market power.⁴⁰

Finally, (further) gradual (or accelerated) integration of candidates in the transport sector could create significant opportunities in the realm of internal and external security. Internally, the (early) harmonisation of transport legislation could enhance road safety throughout Europe, since candidates will have to apply to strict EU regulations. It could also lead to safer border crossings between candidates and EU Member States. Especially the Solidarity Lanes with Ukraine and Moldova have had significant security benefits. Due to improved connectivity, they have enhanced the export and security of goods, and not least importantly, food (see Box 4). Externally, the Lanes offer ways to sustain the economic activity of Ukraine and Moldova, thereby safeguarding global food security as well. According to the Commission, the Lanes have enabled Ukraine to export roughly 54% of its grain since the start of the war. In addition, the Lanes have also enhanced military mobility and ensured the input of vital (military and non-military) goods and humanitarian aid. Finally, as Mario Draghi elaborates in his report on the EU's competitiveness, early integration of EU candidates into the

38 Netherlands' Minister of Foreign Affairs Hanke Bruins Slot, "[Geannoteerde agenda voor de informele Raad Algemene Zaken van 29 en 30 april 2024](#)," 19 April 2024, 9; Hanke Bruins Slot, "[Kabinetsappreciatie uitbreidingspakket 2023 en Groeiplan voor de Westelijke Balkan](#)," 1 December 2023, 28.

39 Hanke Bruins Slot, "[Geannoteerde agenda informele RAZ van 29 en 30 april 2024](#)," 9.

40 This includes the production of aircraft, cars, trucks, and rolling stock, the production of sustainable fuels, logistics and transportation services, including military mobility.

field of transport also offers a pathway to enhance cooperation in the defence industry, thereby contributing to Europe's overall external security.⁴¹

Risks: market distortions, security threats, lacking resources and corruption

While early integration into the field of transport can bring benefits – both for candidate countries and current Member States – there are also some risks. Several of these derive from candidate countries being insufficiently prepared concerning the fundamental conditions essential for EU accession, such as adequate public administration, institutions that guarantee the rule of law, and anti-corruption policies. Additionally, the substantial costs associated with infrastructure could hamper effective implementation.

First, when countries are unprepared when it comes to meeting the fundamental conditions (such as a functioning public administration, the rule of law and anti-corruption policies), this could undermine the effective implementation and enforcement of EU regulations and policies. Non-compliance with regulations could lead to market distortions since countries, businesses and investors are unable to rely on internal market rules being upheld as strictly as in current Member States. For example, transport companies that do not comply with strict EU regulations (for example, when it comes to work and safety requirements), could offer cheaper services, thereby potentially leading to an uneven playing field. This could undermine the integrity of the internal market and erode trust, which is crucial for a healthy business and investment climate.

Additionally, non-compliance with EU transport regulations paired with enhanced cooperation poses significant security risks, including threats to road safety in the EU. For example, it enhances the risk that truck drivers exceed legal driving hours or operate without the appropriate licenses, in violation of EU rules. In addition, also data security could be at risk. If candidate countries fail to meet compliance standards at an appropriate level when (gradually) integrating into EU transport systems, critical EU information could be leaked through data breaches. Another associated risk of non-enforcement of EU regulations (paired with enhanced cooperation) is related to human trafficking or other forms of organised crime. After all, when crossing the border becomes easier for goods and people, this also applies to illegal and criminal activities. Of course, this is

41 Mario Draghi, "[The future of European competitiveness](#)," 224.

a general risk associated with having open borders. However, it becomes more pressing when countries are allowed to participate (albeit partially), without sufficiently complying with fundamental conditions, for example, in terms of tackling organised crime, or without being sufficiently able to enforce EU rules. This illustrates the interconnected nature of transport with other critical areas, such as the EU's internal security.

Early integration into the transport area will require large-scale investments, for example, for both soft and hard infrastructure development, and for making the transport sector meet the sustainability requirement of the EU. Yet, securing sufficient financing for the necessary investments remains a key challenge. The Commission calls for mobilising “considerable public and private investments” through various Global Gateway initiatives to support the candidate countries.⁴² However, it does not specify who will fund the substantial investments required, whether there is sufficient political will to do so in current Member States and/or whether companies and investors have sufficient incentives to invest in candidate countries.

Weak public institutions in candidate countries further complicate this effort, due to the heightened risk of corruption.⁴³ Corruption often leads to the misallocation of funds, discouraging and deterring potential investors – both businesses and countries – from making investments. This creates a significant barrier to successful gradual integration, especially in the transport sector, where the scale of required investments for infrastructure and modernisation is particularly substantial. Furthermore, current Member States will seek reassurances that EU funds are spent appropriately before approving any expenditure.

3.3 Feasibility of gradual integration into the field of transport

While accelerated integration of candidate countries in the transport sector has the potential to yield significant positive spillover effects for the broader economy – both of candidates and Member States – the above analysis indicates that there are also notable risks involved. How feasible are current proposals and their potential benefits?

42 European Commission, “[Pre-enlargement reforms and policy reviews](#),” 9.

43 European Commission, “[Enlargement Package 2024](#).”

Practical feasibility

For one, the feasibility of proposals for gradual integration into the field of transport depends largely on the availability and quality of 'hard' infrastructure, such as roads and railways, as well as 'soft' infrastructure, such as the harmonisation of customs and tax procedures, and the administrative capacity to manage cross-border flows efficiently. Equally important is the capacity of candidates to enforce these standards effectively. Without these prerequisites, both the integrity of the EU's internal market and its internal security could be at risk.

Hence, gradual integration into the field of transport might not be as feasible as it appears on paper. This report recommends that proposals for gradual integration into the field of transport include measures that mitigate the negative side effects and ensure that candidate countries can comply with and enforce EU rules. For example, simplifying existing rules will play a critical role. However, without the needed investments for infrastructure and capacity for enforcement, it will be a long road to success.

Border controls hamper positive impact

Crucially, the benefits of integration into the field of transport become more substantial when border controls are removed – hence when countries join Schengen. Hence the sooner countries join Schengen, the sooner the benefits of transport integration can be maximised. Yet, this depends not only on when countries fulfil the Schengen conditions but also on the political will among current Member States to actually let them join once proven ready. This latter question is not straightforward. The countries that joined the EU in 2004 joined Schengen three years later – except for non-Schengen member Cyprus. Yet, Croatia became part of Schengen ten years after its EU-accession. And, notably, Bulgaria and Romania joined Schengen no less than eighteen years after their EU accession, as their Membership was long being blocked by Austria and the Netherlands. The economic impact of not joining Schengen has been significant. It is estimated that companies operating in Bulgaria and Romania lost billions of euros annually due to higher logistics costs, delays in the delivery of goods and equipment, higher fuel costs and higher wage costs of drivers.⁴⁴

44 European Economic and Social Committee, "[De kosten van het niet deel uitmaken van het Schengengebied voor de interne markt / Bulgarije en Roemenië.](#)" November 2024.

Nevertheless, although the economic benefits of having no border controls are evident, the Schengen Area is currently already under pressure due to the reintroduction of (temporary) internal border controls (including by Germany, France, Austria and the Netherlands). EU enlargement could exacerbate these pressures by expanding and shifting the external borders, potentially intensifying negative consequences such as migration, human trafficking and organised crime. In this context, Member States, including the Netherlands, have called for a strict application of the Schengen conditions, thereby also including conditions related to the rule of law.⁴⁵

As a result, it is likely that current candidate countries will face a similar fate to Bulgaria and Romania and will have to wait a long time before gaining Schengen membership. Although understandable from an internal security perspective, prolonged delays in Schengen accession could hamper the economic growth of candidate countries and hamper the overall economic benefits associated with their market integration. This especially applies to the transport sector, which is directly affected by border controls.

45 Hanke Bruins Slot, “Geannoteerde agenda informele RAZ van 29 en 30 april 2024,” 13.

4 Gradual accession to EU labour markets

The free movement of workers – defined as “the abolition of all discrimination based on nationality among EU workers concerning employment, remuneration, and other working conditions” – is one of the key principles and achievements of the single market.⁴⁶ As such, promoting labour mobility opportunities can be viewed as a policy approach with strong incentives to pursue reforms in candidate countries. For this reason, the Commission is keen on offering candidate countries more opportunities for labour mobility before accession. However, as seen in previous enlargement rounds, there is also the possibility of delaying labour mobility by imposing transitional agreements that temporarily restrict labour market access following EU accession, either in some or all economic sectors.

To maximise the benefits and mitigate the risks of enhanced labour mobility following EU enlargement, two main approaches have been proposed: 1) temporarily delaying labour migration; and 2) facilitating (certain forms of) labour mobility prior to accession. While both strategies aim to address potential negative effects, improper implementation could introduce additional risks. The following sections describe the impact of EU enlargement on intra-EU labour mobility, review gradual integration proposals – both from previous enlargement rounds alongside new proposals – and analyse their associated opportunities and risks.

4.1 The impact of EU enlargement on intra-EU labour mobility

The facilitation of intra-labour mobility in the EU offers various opportunities as well as risks. However, due to the overall sensitivity of migration and its prominent role in political and societal debates in (Western) EU Member States, these risks often carry greater weight in public and political discourse. For example, in Dutch debates, it is frequently emphasised that the number of labour migrants that came to the Netherlands during the previous ‘Big Bang’ enlargement round

46 SER, “[Arbeidsmobiliteit in de EU](#),” SER-advies 4, 16 February 2001, 47.

of 2004/2007 – when 10 Central and Eastern European countries (plus Malta and Cyprus) joined – exceeded initial expectations.⁴⁷ However, despite this, the ‘Big Bang’ enlargement did not result in a mass influx of labour migrants.⁴⁸ One key reason is that many people from neighbouring EU countries who had the desire (or need) to migrate for work had already done so before EU enlargement. Additionally, statistics show that increased labour migration did not lead to a significant rise in social expenditures in existing EU Member States.⁴⁹ Nevertheless, migration from these countries did have a profound impact on the Dutch economy and society, both positively (for example, the availability of relatively cheap labour) and negatively (for example, the exploitation of migrants by employers and employment agencies and public nuisances stemming from this).

When assessing the risks and opportunities of the next EU enlargement in terms of labour migration, a nuanced approach is essential as a direct comparison to previous enlargement rounds does not entirely hold. This is due to the significant differences between current candidate countries and those that joined the EU in the past—particularly in terms of population size, demographic trends, and economic conditions. To better understand the potential impact of future enlargement on current Member States, it is crucial to examine the specific circumstances of each candidate country and the underlying drivers of migration. Key push and pull factors influencing migration—such as demographic trends, political conditions, diaspora networks, and job opportunities in both origin and host countries—must be taken into account (see Appendix).

While this report does not project potential migratory flows, it highlights that, except for Ukraine, the candidate countries have relatively small populations. Moreover, it is important to note that labour migration from EU candidate countries is already taking place under existing regulatory frameworks and pathways and is even actively encouraged by some EU Member States. For example, in June 2024, Germany introduced an ‘opportunity card’ scheme for skilled workers from non-EU countries, including EU candidate countries.

47 Centraal Planbureau, “[Economische dynamiek en migratie](#),” April 2024.

48 European Commission, “[Verslag over het functioneren van de overgangsregelingen als vastgesteld in het Toetredingsverdrag van 2003 \(periode 1 mei 2004 - 30 april 2006\)](#),” 8 February 2006, 5-6; European Commission, “[De EU vijf jaar na de uitbreiding – Economische prestaties en uitdagingen](#),” 20 February 2009, 7.

49 European Commission, “[Verslag over het functioneren van de overgangsregelingen 2003 \(periode 1 mei 2004 - 30 april 2006\)](#),” 5-6.

Additionally, Germany doubled the annual quota under the Western Balkans Regulation, which facilitates access to its labour market for workers from the region, increasing the limit from 25,000 to 50,000 workers per year.⁵⁰ Since opportunities exist for candidates to access EU labour markets, these pathways may limit the scale of post-accession labour migration.

Economic opportunities...

Despite the aforementioned nuances in terms of the scale of migration, previous enlargement rounds have demonstrated that the free movement of workers brought significant economic benefits to the EU in general, as well as to both new and old current Member States.⁵¹ As a way of reducing income disparities between new and current Member States, the free movement of workers played (and continues to play) a key role in supporting and fostering economic convergence between EU Member States. Intra-EU migration following the 2004 enlargement enhanced the allocation of human capital across the EU, thereby significantly boosting overall GDP in the EU and individual Member States (albeit differences between Member States).⁵² For example, the United Kingdom estimated that in 2006, the net economic gain from labour migration from the then-new EU Member States in the first eleven months after accession amounted to approximately 500 million pounds.⁵³ Furthermore, the (expansion of the) free movement of workers has played a role in addressing demographic challenges faced by various EU countries, by filling open vacancies, particularly in sectors with prolonged labour shortages. Given the current labour shortages across the EU, it can be assumed that a new round of enlargement could likewise contribute to labour market shortages in current Member States.

...but societal challenges

Despite the aforementioned economic benefits, there are several important caveats and societal challenges to consider. First, labour migration often tends to be temporary, with migrants ageing over time and often placing greater

50 German Federal Ministry of the Interior and Community, "[More incentives for urgently needed skilled workers: Points system for the "opportunity card" \(Chancenkarte\) valid from tomorrow,](#)" 31 May 2024.

51 Martin Kahanec and Klaus F. Zimmermann, "[Migration in an enlarged EU: A challenging solution?](#)" European Commission, March 2009, 37.

52 European Commission, "[Five years of the enlarged EU: Economic achievements and challenges,](#)" 20 February 2009.

53 Michael Heinen and Anna Pegels, "[What Effect Have EU8 Labour Migrants Had on the Economy?,"](#) Bundeszentrale für politische Bildung, 1 July 2006.

demands on social services due to the physically demanding nature of their work and their higher risk of unemployment. Thus, while intra-EU labour migration may provide short-term relief to current Member States, it is unlikely to address the long-term demographic challenges posed by ageing populations.⁵⁴ Additionally, many of the current candidate Member States are already grappling with ageing populations and labour shortages (see Appendix), meaning that labour mobility is unlikely to result in a net positive balance for the EU as a whole in terms of demographic or labour supply benefits.

Secondly, labour migration from new to current Member States can put pressure on public resources and social services, especially in smaller, densely populated countries such as the Netherlands. Yet again, due to demographic differences between current and previous EU candidate countries, such risks should not be overestimated.

EU enlargement could also lead to disruptions of the labour markets of current Member States, due to a sudden influx of cheap(er) labour coming from economically weaker candidate countries. This is closely tied to the phenomenon of social dumping – where the movement of workers is used to undermine labour standards to gain a competitive advantage. In The Netherlands, the so-called *host country principle* – which stipulates that the law of the country where the labour is performed applies – offers some protection against unfair competition. It ensures that workers are subject to the rules and collective wage agreements of the host country, including minimum wage requirements and basic working conditions. However, this principle only applies to legal employment and fails to address the exploitation of labour migrants by employment agencies – a persistent and serious issue particularly tied to the inconsistent enforcement of the EU Posting of Workers Directive in the framework of the free movement of services.⁵⁵

Such exploitation not only harms migrants but also exacerbates challenges faced by overburdened host communities, for example, related to the (tight)

54 The Netherlands State Committee for Demographic Development 2050 states that almost three quarters of labour migrants have left the Netherlands after 10 years, see: The Netherlands State Committee for Demographic Development 2050, "[Gematigde Groei](#)," 2024, 91.

55 The posting of workers aims to "ensure the protection of posted workers during their posting in relation to the freedom to provide services, by laying down mandatory provisions regarding working conditions and the protection of workers' health and safety that must be respected." ([Directive 96/71/EC of the European Parliament and of the Council of 16 December 1996](#))

housing markets or general public nuisance.⁵⁶ Deregulation has worsened this, as it has given employment agencies more opportunities to hire low-wage labour, particularly from newly admitted EU Member States.⁵⁷

A final risk is posed by brain drain, not only to the new EU Member States but also to the internal market as a whole, as this could deepen disparity rather than convergence between the EU Member States.

4.2 Opportunities and risks of delaying labour mobility

During previous enlargement rounds, the Accession Treaties allowed for the implementation of transitional agreements on a discretionary basis. Such agreements temporarily restrict labour mobility from new Member States for a maximum of seven years. These agreements were often further customised and individually tailored by Member States through sectoral exemptions and/or quotas, balancing the restrictions with specific needs.⁵⁸

Transitional agreements

In general, transitional agreements (see Box 5) serve as a way to temporarily mitigate the negative side effects of expanding the free movement of workers in both the economy and society. This is particularly relevant for risks associated with labour migrants employed through agencies in often low-paying sectors. These transitional agreements also help to alleviate immediate pressure on labour markets. For instance, the United Kingdom, one of the few countries that immediately allowed the free movement of workers following the 2004 enlargement, experienced a significant influx of workers from the newly admitted EU Member States.⁵⁹ In addition, given the societal and political sensitivities

56 The exploitation of labour migrants includes underpayment, dismissal disputes, inadequate access to healthcare; and poor housing conditions arranged by employers. This leads to disturbances in the communities where labour migrants live in. For example, if labour migrants lose their job, they often disappear under the radar, leading to further complications. Hendriksma, M., & Enneking, K., "[Gemeenten willen meer grip op arbeidsmigrant](#)," *Binnenlands Bestuur*, November 2024; Aanjaagteam Bescherming Arbeidsmigranten, "[Geen tweederangsburgers](#)," October 2020, 16.

57 Martin Hendriksma and Koen Enneking, "[Gemeenten willen meer grip op arbeidsmigrant](#)," *Binnenlands Bestuur*, November 2024; The Netherlands State Committee for Demographic Development 2050, "[Gematigde Groei](#)," 2024, 92.

58 Martin Kahaneč and Klaus F. Zimmermann, "[Migration in an enlarged EU: A challenging solution?](#)"

59 Michael Heinen and Anna Pegels, "[The Results Two Years after Enlargement: Preliminary Results](#)."

surrounding migration in some current Member States, delaying the free movement of workers after enlargement could additionally curb public opposition by offering a sense of control – a recurring concern in migration debates.

However, it is critical to note that transitional agreements are inherently temporary, meaning they can only delay potential risks of liberalised labour migration, not eliminate them. As the then UK Home Secretary remarked during the 2004 enlargement, “a restrictive scheme could buy the government short-term political cover but would only be storing up more deep-seated political difficulties in the very near future.”⁶⁰

Furthermore, they come with their own set of risks. First, they risk creating a perception among newly admitted EU citizens of being treated like ‘second-class citizens’, as they are denied access to one of the four fundamental principles and key benefits of EU membership. This, in turn, could fuel public discontent and hinder the reform process.

Box 5: Transitional Agreements

Bilateral transitional agreements to temporarily restrict the free movement of workers on EU labour markets. In past enlargement rounds, these could be applied for a maximum period of up to seven years.

Opportunities	Risks
<ul style="list-style-type: none"> – Delaying the influx of labour migrants from the new EU Member States. – Delaying immediate labour market adjustments has possible negative consequences for both the economy and society.⁶¹ – Delaying the free movement of workers after enlargement could curb public opposition – in current EU Member States – by offering a sense of control over who enters the country. 	<ul style="list-style-type: none"> – Transitional agreements are only temporary and cannot prevent labour migration. – Transitional agreements may foster a perception of second-class citizenship among newly admitted EU citizens, denying them a key benefit of EU membership and potentially fuelling public discontent and hindering reform. – Restrictions on the free movement of workers can be harmful to the economy. – A rise in ‘creative’, semi-legal and even illegal labour migration flows.

60 Sammy Gecsoyler, “Senior Labour figures urged Tony Blair to delay arrival of EU citizens in UK,” The Guardian, 31 December 2024.

61 European Commission, “Verslag over het functioneren van de overgangsregelingen 2003 (periode 1 mei 2004 - 30 april 2006),” 14.

Secondly, such agreements can complicate and hinder economic development. Delaying the integration of new EU Member States into the single market slows the convergence process, thereby limiting their associated economic benefits. Transitional agreements also fail to align with the economic interests of existing Member States, which have largely benefited from liberalised labour migration. Moreover, prolonged transitional agreements can reduce the likelihood that workers will secure jobs that match their skills and that the Netherlands will attract the type of labour migrants it seeks – such as those for sectors with persistent shortages or knowledge migrants.

Finally, transitional periods can give rise to ‘creative’, semi-legal and even illegal migration flows.⁶² When legal labour migration options are restricted and individuals remain determined to migrate, alternative pathways inevitably emerge – a phenomenon known as the ‘waterbed effect.’ Moreover, the restrictions on free movement in transitional agreements are easily circumvented, as they only apply to the movement of workers and not to the free movement of services under the EU Posting of Workers Directive.⁶³ This became evident in earlier EU enlargement rounds, which saw an “exceptionally large influx of seconded workers or self-employed workers” into current EU Member States.⁶⁴ Notably, after the Netherlands opened its labour market to citizens of Member States that joined in 2004, cases of illegal work among workers from these countries decreased, demonstrating that opening legal pathways can reduce irregular migration flows.

Sectoral exemptions and quotas

During previous enlargement rounds, certain countries incorporated specific sectoral exemptions within their transitional agreements (see Box 6). For example, while Germany implemented transitional agreements in both the 2004 and 2007 enlargement rounds, it also allowed access to specific (seasonal) sectors and skilled individuals deemed essential for maintaining the competitiveness of crucial companies.⁶⁵ Additionally, while Austria implemented

62 Patrick Loobuyck, [“Arbeidsmigratie binnen en naar de EU,”](#) *Samenleving & Politiek*, Jaargang 16, (nr. 7), 2009, 59-68.

63 Tesseltje de Lange, [“Interventie Prof Dr. T. De Lange Tweede Kamercommissie Europese Zaken,”](#) 6 November 2024.

64 European Commission, [“Verslag over het functioneren van de overgangsregelingen 2003 \(periode 1 mei 2004 - 30 april 2006\),”](#) 5.

65 Timo Baas & Herbert Brücker, [“Labour mobility within the EU in the context of enlargement and the functioning of the transitional arrangements,”](#) Institute for Employment Research, 2007; Denis Macshane, [“Blair was right to let in the Polish plumbers,”](#) *The Article*, 1 January 2025.

lengthy transitional agreements during prior EU enlargement rounds, it allowed the issuing of temporary work permits based on labour market-based needs tests.⁶⁶ Such exemptions could mitigate risks associated with transitional agreements, by allowing countries to target sectors with high demand, such as healthcare, technology, and construction. As such, sectoral exemptions facilitate a more targeted migration policy to address labour shortages in key industries. Furthermore, they provide a legal migration pathway, thereby reducing the incentive for irregular migration to countries where the free movement of workers is restricted under transitional agreements.

Box 6: Sectoral exemptions during transitional agreements

Sectoral exemptions during transitional agreements – entailing a list of shortage occupations and/or desired (skilled) jobs, for which citizens from new EU Member States can obtain a work permit even when the free movement of workers is officially restricted through transitional agreements.⁶⁷

Opportunities	Risks
<ul style="list-style-type: none"> – Mitigating negative risks of transitional agreements. – Allowing for targeted labour migration policy. – Addressing labour shortages in existing EU countries in key industries like healthcare, technology, and construction, thereby promoting economic growth. – Policy measures that highlight and clarify the demand for certain professions can improve the success of attracting skilled migrants. 	<ul style="list-style-type: none"> – Brain drain in the newly EU-admitted countries, harming the EU’s convergence process. – Since many candidate countries face similar labour shortages, such measures might only shift resources, benefiting current Member States in the short term but failing to contribute to overall EU growth. – Sustaining sectors that rely solely on (excessively) low-paid labour.

Similarly, sectoral quotas (Box 7) offer a controlled and targeted approach to labour migration. The Dutch Migration Advisory Council and the State Committee for Demographic Developments 2050 have recommended the usage of quotas to enhance the efficiency of (labour) migration policies, with the latter advising that long-term (demographic) implications to be considered when determining

66 Magdalena Ulceluse and Martin Kahanec, “[Eastward enlargements of the European Union, transitional arrangements and self-employment](#),” *Journal of Population Economics*, 36:2, 7 May 2022.

67 Patrick Loobuyck, “[Arbeidsmigratie binnen en naar de EU](#)”; Tesseltje de Lange, “[Interventie bij Tweede Kamercommissie Europese Zaken](#)”; SER, “[Arbeidsmobiliteit in de EU](#),” SER-advies 4, 16 February 2001, 90.

their scale.⁶⁸ By implementing sectoral quotas, Member States can better align migration flows with specific labour market needs,⁶⁹ potentially alleviating public concerns about increased labour migration.

Box 7: Sectoral quotas during transitional agreements

The implementation of specific sectoral quotas during transitional agreements.	
Opportunities	Risks
<ul style="list-style-type: none"> - Allowing for targeted labour migration. - Preventing immediate disruptions to the labour market. 	<ul style="list-style-type: none"> - Non-enforcement of quotas could lead to creative or (semi)-illegal migration and abuse. - Sustaining sectors that rely solely on (excessively) low-paid labour.

However, exemptions and quotas also come with risks. For instance, they could contribute to a brain drain in new Member States, leading to a loss of necessary labour force that hampers local economic growth, and, in turn, undermines the EU’s convergence process. Since many candidate countries face labour shortages in sectors similar to those in existing Member States, such measures might only relocate resources without contributing to overall growth. While this could benefit current Member States in the short term, the EU, as a whole, may not gain. There is also the potential for abuse if sectoral quotas are not properly enforced, thereby facilitating creative and potentially (semi)-illegal migration flows. Additionally, both policies might inadvertently foster reliance on (excessively) low-wage labour.⁷⁰

4.3 Opportunities and risks of accelerating labour mobility

In contrast to proposals that restrict and delay the free movement of labour, two proposals advocate for facilitating labour mobility before EU accession, including the mutual recognition of skills and qualifications between the EU and the Western Balkans (Box 8) and the bilateral proposals to allow for labour migration from Ukraine (Box 9).

68 Adviesraad Migratie, “[Afgewogen Arbeidsmigratie](#),” September 2024, 2; The Netherlands State Committee for Demographic Development 2050, “[Gematigde Groei](#).”

69 Rijksoverheid, “[Regeerprogramma](#),” 13 September 2024, 5.

70 The Netherlands State Committee for Demographic Development 2050, “[Gematigde Groei](#),” 197.

Box 8: Mutual recognition of skills and qualifications between the EU and the Western Balkans

The ‘New Growth Plan for the Western Balkans’ proposes the mutual recognition of skills and qualifications between the EU and the Western Balkans prior to accession.⁷¹

Opportunities	Risks
<ul style="list-style-type: none"> – Facilitating targeted labour migration. – Preventing brain waste; better alignment of skills with available vacancies.⁷² 	<ul style="list-style-type: none"> – Brain drain in the newly EU-admitted countries, harming the EU’s convergence process. – The recognition of skills and qualifications may progress unevenly, leading to inequalities.

Box 9: Bilateral mobility agreements with Ukraine

Changing the status of Ukrainians who have a job from a humanitarian status (under the Temporary Protection Directive (TPD)) to an economic one prior to full accession.⁷³

– Some EU countries have already introduced alternative residence statuses beyond the TPD. For example, since October 2024, Austria has offered Ukrainians an alternative residence status, the Red-White-Red Card. This status is granted under strict requirements, such as “being fully insured, having basic knowledge of German, securing adequate housing, and being financially independent, to ensure that the program does not place additional pressure on the welfare state.”⁷⁴

Opportunities	Risks
<ul style="list-style-type: none"> – Smoother transitional to regular labour migration status. – Gradual reduction of public (financial) support associated with the humanitarian TPD status. 	<ul style="list-style-type: none"> – Political pushback from other EU candidate countries. – Encouraging legally employed Ukrainians to remain in current Member States could lead to a brain drain in Ukraine.

By aligning the recognition of skills and qualifications prior to EU accession between the EU and candidate countries, as proposed in the New Growth Plan for the Western Balkans, labour mobility post-accession would be significantly enhanced—not only by streamlining the process but also by ensuring smoother

71 European Commission, “[New Growth Plan for the Western Balkans](#),” 4.

72 Karel Berkhout and Sezen Moeliker, “[Ingenieur in Syrië, werkloos in Nederland: hoe de talenten van hoogopgeleide migranten massaal onbenut blijven](#),” NRC, 8 January 2025.

73 Tesseltje de Lange, “[Interventie bij Tweede Kamercommissie Europese Zaken](#).”

74 Anouk Pronk et al., “[De strijd om Oekraïne en zijn ontheemden – Duivelse dilemma’s op komst](#),” Clingendael Institute, December 2024, 37.

integration. This builds upon the “mobility agreements agreed in the context of the Common Regional Market.”⁷⁵ Supported by tools like the European Qualifications Framework, this approach could prevent ‘brain waste’⁷⁶ by facilitating a better match of skills with available vacancies, ultimately leading to more efficient labour mobility and increased employment opportunities. Similarly, the proposal for Ukrainians to transition from their Temporary Protection Directive (TPD) status to regular labour migration status would ensure a smoother integration into the Dutch labour market, boosting productivity and reducing the financial burden on welfare systems as Ukrainians become more self-sufficient.

However, both proposals come with risks. The mutual recognition of qualifications could lead to a brain drain in candidate countries, exacerbating regional challenges and potentially undermining the EU’s single market by hampering the convergence process. Lastly, the process of recognising qualifications while Western Balkan countries remain EU candidates might progress unevenly, limiting its effectiveness. Transitioning Ukrainians to regular labour status holders could face political opposition from other EU candidate countries. Furthermore, encouraging skilled workers to remain in current Member States may inadvertently hinder Ukraine’s long-term reform process and aspirations for EU membership by contributing to a brain drain.

4.4 Feasibility of gradual accession to EU labour markets

Both accelerating labour mobility before EU accession (for example through the mutual recognition of skills) and delaying it after EU accession (for example by imposing temporary restrictions to the free movement of workers) raise questions as to how feasible it is, in both practical and political terms.

Practical feasibility

Given that many of the examples of gradual integration in the field of labour mobility, such as transitional agreements, have already been implemented during previous enlargement rounds, answering the question of their practical feasibility can be informed by lessons learned.

75 European Commission, “[New Growth Plan for the Western Balkans](#),” 4.

76 Karel Berkhout and Sezen Moeliker, “[Ingenieur in Syrië, werkloos in Nederland: hoe de talenten van hoogopgeleide migranten massaal onbenut blijven.](#)”

For instance, transitional agreements were widely adopted in previous enlargement rounds with each EU Member State having the discretion to apply restrictions for up to seven years. However, the number of countries using transitional agreements differed per previous enlargement round, just like the period in which they were enforced. In 2004, all Member States except the UK, Ireland and Sweden applied transitional restrictions (thus 12 out of 15).⁷⁷ In 2007 – when Bulgaria and Romania joined – transitional restrictions were applied by 10 of the 25 Member States.⁷⁸ And, in 2013 – when Croatia joined – 13 of the 27 Member States applied them.⁷⁹ Yet, despite differences in implementation – driven by varying labour market structures, migration expectations and political considerations, expectations regarding migration flows, and political considerations – several countries consistently applied transitional agreements since 2004, notably the six founding Member States and Austria.

This report has analysed that transitional agreements may offer a sense of control over migration flows, as it allows countries sceptical voters that accession will not result in immediate disruptions to labour markets or trigger significant migration flows. However, crucially, these restrictions are inherently short-term solutions. As such, they fail to address the underlying issue of increased pressure on public resources or disruptions to the labour markets. Rather than mitigating these challenges, transitional agreements may inherently alter migration patterns, pushing migration into more informal and creative channels. In this sense, such agreements can be viewed more as a symbolic measure of restrictive migration governance, which might harm the economy in the long term by limiting the influx of skilled workers the Member States – often facing labour shortages – need. Even proponents of extended restrictive periods must acknowledge that the free movement of workers is a fundamental principle of the EU's internal market and therefore cannot be fully suspended.

77 Meghan Benton and Milica Petrovic, "[How free is free movement? Dynamics and drivers of mobility within the European Union](#)," Migration Policy Institute, 2013.

78 Austria, Belgium, Germany, France, Ireland, Italy, Luxembourg, Malta, the Netherlands, and the UK; European Commission, "[Report from the Commission to the Council on the Functioning of the Transitional Arrangements on Free Movement of Workers from Bulgaria and Romania](#)," 11 November 2011.

79 Austria, Belgium, Cyprus, France, Germany, Greece, Italy, Luxembourg, Malta, the Netherlands, Spain, Slovenia and the UK; European Commission, 2015, "[Report from the Commission to the Council on the Functioning of the Transitional Arrangements on Free Movement of Workers from Croatia](#)," 29 May 2015.

With this in mind, sectoral exemptions could offer a targeted approach – limiting general overall labour mobility while facilitating it in sectors with high demand. Implementing these exemptions will require significant resources to design and execute an effective strategy. This involves identifying the sectors that should be exempt and determining the appropriate scale for quotas, offering a way to manage necessary labour migration and demographic growth in a controlled and strategic manner.⁸⁰

Similarly, proposals aimed at facilitating accelerated labour mobility – such as transitioning Ukrainians from TPD status to regular labour status – would place substantial demands on national immigration executive agencies, such as the Netherlands' IND, which are already operating under strain. The criteria for granting legal labour status – such as economic contribution and skill verification – would require extensive resources for processing and verification, as evidenced by the Austrian example. To address these challenges, a more streamlined approach should be considered, which could involve grouping Ukrainians under a broader exemption category, regularising those who contribute directly to the economy. This could simplify administrative procedures while ensuring that essential and valuable workers contributing to the economy are retained. Additionally, to mitigate the potential for brain drain in countries like Ukraine, Member States should consider policies aimed at supporting the development of skilled workers in these countries, such as investing in training and education to create a sustainable talent pipeline.

On the other hand, EU-wide initiatives, such as the mutual recognition of skills and qualifications, could be slowed by bureaucratic hurdles, as these processes take time to establish. Therefore, it would be beneficial to begin with this effort now. While implementation will require time, initiating the process at this stage could help streamline future integration, with relatively straightforward and manageable actions that could yield significant benefits in the long term.

Political feasibility

The political feasibility is even more uncertain as the likely approach of EU Member States towards facilitating labour migration after enlargement presents a diverse picture across the EU. These differences are informed by recent migration policy reforms and shaped by the unique national context of each

80 The Netherlands State Committee for Demographic Development 2050, "[Gematigde Groei](#)."

Member State, where factors such as political sentiment, demographic trends, economic conditions and demand for public services play a critical role in shaping their stance. Together, these elements influence the political feasibility of gradual integration proposals.

On the one hand, some Member States, including those that have used transitional restrictions in the past – such as Spain and Germany, are more likely to align with the Commission and support reports like those by Enrico Letta and Mario Draghi, which advocate for easing labour mobility.⁸¹ This is due to ongoing and persistent national labour market shortages. Efforts to secure much-needed (skilled) labour are already ongoing, with Spain, for example, committing to regularising 300,000 undocumented immigrants per year by 2027.⁸² Similarly, Germany, which faces a demand for around 300,000 workers each year, introduced reforms in 2023 to make it “easier and more attractive for qualified foreign workers to take up positions in Germany.”⁸³

In contrast, the Netherlands, for example, will likely adopt a more restrictive approach as it has done in previous enlargement rounds, advocating for (prolonged) transitional periods. This stance is driven by domestic concerns over the significant pressure on housing, healthcare and education, despite the country’s labour shortages. This depicts a complex clash between the need to address the persistent labour shortages and the growing political pushback against immigration.⁸⁴

This divergence in political attitudes across Member States underscores the challenge of achieving an advised coordinated EU approach. The ‘waterbed effect’ – where closing one border leads (labour) migrants to simply move to another Member State – illustrates the risks of an uncoordinated approach. For instance, if the Netherlands were the only EU Member State to implement transitional agreements, skilled migrants would bypass the country in favour of other EU Member States or even non-EU destinations. This could result in the

81 Theresia Töglhofer, “[Widening Without Falling Apart: Germany’s EU Enlargement Policy](#), Swedish Institute for European Policy Studies,” May 2024.

82 European Commission, “[Spain: New immigration reform to enhance migrant integration](#),” 21 November 2024.

83 DW, “[Germany: 288,000 foreign workers needed annually until 2040](#),” 26 November 2024.

84 Anchal Vohra, “[EU clash between worker shortages, anti-immigrant politics](#),” DW, 20 November 2024.

Netherlands losing out on the economic and social benefits associated with skilled migration.

Thus, while a coordinated European approach may ideal, the diverse national interests and concerns make it unlikely. Each country must carefully assess its national circumstances and weigh the economic and social consequences of these proposals. Lessons learned from past enlargements should guide this decision-making process to ensure that the benefits of labour mobility are maximised while minimising the negative impacts.

5 Conclusion: the need for an assessment framework to shape (Dutch) government positions

The gradual integration of candidate countries into the EU is increasingly coined as the panacea for the current enlargement impasse. As geopolitical pressure on the EU to enlarge increases – and speeding up the accession processes might be attractive – most candidate countries are not likely to be sufficiently prepared to join the EU in the foreseeable future. At the same time, in the Western Balkan countries, enthusiasm for necessary political and economic reforms is waning due to the long absence of a clear EU membership perspective. Could allowing candidates to participate in key areas *before* their actual EU accession provide a solution to the current stalemate by offering them incentives for reform? And could *postponing* candidates' full participation in other politically sensitive areas – for example, Schengen or labour mobility – help ease political and public scepticism about EU enlargement among some of the current (mainly Western European) Member States? Or is step-by-step EU integration merely an attempt to push the impossible – *early participation in EU policies prior to meeting all accession criteria to incentivise fundamental reforms* – and delay the perhaps inevitable – *letting countries join despite fundamental concerns about their readiness?*

This report provides one of the first in-depth analyses of the impact and feasibility of gradual integration in specific policy areas, focusing on **transport** and **labour mobility**. It concludes that gradual integration in these areas could help address the enlargement impasse – provided that key prerequisites are met and potential negative side effects are effectively mitigated. In that way, gradual integration could contribute to tackling the EU's enlargement dilemma of how to sustain the renewed focus on enlargement and (geopolitical) momentum without compromising its stringent accession criteria.

If executed appropriately, *accelerated* transport integration (of which this report analysed various examples) could enable the EU to maintain the geopolitical

momentum and keep candidate countries close by. By offering candidate countries concrete benefits the EU would walk its enlargement talk. At the same time, strategically *delaying* labour mobility after EU accession (as one form of gradual labour market integration that this report analysed) could provide a temporary mechanism to manage labour migration and ease electoral and economic pressures in current Member States, thereby also maintaining the geopolitical momentum. After all, it may be politically easier to maintain support for enlargement if sceptical voters can be reassured that accession will not result in immediate disruptions to labour markets or trigger significant migration flows.

Nevertheless, as previously mentioned, a set of key prerequisites must be met for gradual integration proposals to be feasible and effective. For **transport**, these include:

- A functioning rule of law and anti-corruption mechanisms in order to ensure a level playing field.
- A functioning public administration that is ready and reliable to enforce EU legislation, comply with regulations and enable businesses and Member States to rely on and trust that internal market rules will be upheld.
- Large-scale investments in both soft and hard infrastructure development. Whether Member States, businesses and investors have sufficient incentives to invest will largely depend on the above prerequisites.

Moreover, while not being an absolute prerequisite, an important caveat is that the benefits of gradual transport integration will – at least in part – be limited since border controls will remain without **Schengen** accession.

For **labour mobility**, the key prerequisites include:

- A well-balanced and targeted approach that takes into account the temporary nature of transitional agreements and unintended consequences. Such an approach could, for example, involve bilateral sectoral exemptions and quotas allowing labour mobility in critical sectors while maintaining restrictions elsewhere.
- Sectoral exemptions and quotas should also take into account potential negative side-effects for the labour market and other policy areas (such as the housing market). They must be strategically designed to address labour market needs, demographic trends, pressures on public resources, and public concerns over migration.

- EU cooperation and coordination in the field of securing workers' rights and employment standards in order to prevent exploitation, wage dumping and unfair competition.
- Substantial administrative and human resources for processing, enforcement, and monitoring of relevant bilateral agreements and/or EU legislation.
- Prevention of negative side-effects for candidate countries, such as brain drain.

Collectively, these sets of vital prerequisites for gradual transport integration and gradual integration in the area of labour mobility will determine the feasibility and success of proposals in these respective policy areas.

Despite the opportunities that initiatives for gradual integration could offer, it is essential to note that these do not offer candidate countries a way to enter the EU through 'the back door' without fulfilling the conditions for EU accession. As consistently emphasised by the Commission, gradual integration can only happen when the relevant *acquis* is implemented and remains reversible in the event that countries backslide on reforms. After all, even *partial* participation in specific policy areas poses risks – for example, to the Single Market – if vital conditions like good governance and the rule of law are not met.

Opportunities and risks associated with gradual integration initiatives vary between Member States (and candidate countries), given differences in the economy, public resources, demography and labour markets. In addition, what could work for the EU in general, could have a negative impact on individual Member States. Therefore, this report recommends that Member States, like the Netherlands, assess each proposal for gradual integration on its merits, risks, feasibility, and potential impact across different policy areas. This requires weighing up a plethora of questions about the potential opportunities, risks, political impact and feasibility. In this report, we have done so for existing proposals for gradual integration into the policy areas of transport and labour mobility. Based on this analysis, we identify the following – yet non-exhaustive – list of questions that could be part of an assessment framework and which can give Member States some guidance in assessing each individual proposal the Commission might present:

Opportunities:

- ✓ What opportunities does it offer for candidate countries, the EU in general and individual Member States?
- ✓ Does it allow for positive spillover effects to other sectors or policy domains?

Risks:

- ✓ What are the risks involved, for candidate countries, the EU in general and individual Member States?
- ✓ What are the (economic and security) risks if regulations are not harmonised or enforced?
- ✓ What are the negative side effects?

Feasibility:

- ✓ How much resources are needed for its implementation and who is able and willing to pay?
- ✓ How much of the EU acquis does the candidate country need to adopt to implement it?
- ✓ Does the candidate country have the administrative and legal capacity to enforce (all the related) regulations in place?
- ✓ Is there sufficient public support for it in both candidate and current Member States?

Impact:

- ✓ Can it be implemented without harming the integrity of the internal market?
- ✓ Does it allow for a level playing field between current Member States and the candidate(s)?
- ✓ What is the impact on candidate countries and does this offer sufficient incentives to implement fundamental reforms?

The analysis presented in this report on the opportunities and risks of proposals for step-by-step integration in the policy areas of transport and labour mobility was focused predominantly on *economic* and *security* impacts. Yet, EU enlargement – and by extension – a proposal for gradual enlargement, will have far-reaching implications for a wide range of policy areas, including climate, EU governance and the budget. In order to achieve a comprehensive assessment that encompasses these various policy areas, it is recommended that various government departments be included in the development of an assessment framework.

Such a framework will be invaluable for shaping government positions on EU enlargement in general and towards the gradual EU integration of candidate countries. This requires a constant balancing act between, on the one hand, the geopolitical urgency of enlargement and, on the other hand, the vital importance of the EU accession criteria. EU enlargement inherently involves trade-offs, and proposals for gradual integration are no exception. A well-designed framework can help identify these trade-offs, allowing for more balanced judgement and informed decision-making.

What does this mean for the Netherlands?

For the Dutch government, navigating this will be particularly important given the difficult position in which it finds itself. With its traditionally critical stance towards EU enlargement, the Netherlands risks isolating itself at the EU level. In the past, the Dutch government has – albeit sometimes reluctantly – supported most steps in the EU enlargement process. Yet, domestically, the Dutch government faces an electorate that remains sceptical of EU enlargement. Currently, the enlargement debate – to the extent that it actually takes place – is narrowly framed around concerns about the impact on EU decision-making, the rule of law in candidate countries, and (labour) migration – often overshadowing other critical (potential) aspects.

This report emphasises that an overly critical stance by the Dutch government could risk hindering a constructive approach towards (present and future) initiatives for gradual sectoral integration – an approach that holds the potential to serve Dutch interests as well. An assessment framework can help to disentangle these complexities by identifying opportunities and assessing proposals for gradual integration based on their individual merits. For the Netherlands, adopting and utilising such a framework is not just a strategic necessity – it is an opportunity to lead the enlargement debate with clarity and purpose.

Appendix 1: Drivers of migration

Population size

One of the unique aspects to consider within the potential future enlargement rounds is that the current EU candidate countries, with the exception of Ukraine, generally have relatively small populations, which is likely to reduce the flow of labour migrants in comparison to previous EU enlargements. Excluding Ukraine,⁸⁵ the total population of the candidate countries is 20.650 million. This is already less than the combined total population of Bulgaria and Romania; the two countries that acceded to the EU in 2007.

Country ⁸⁶	Population
Albania	2.7 million
Bosnia and Herzegovina	3.2 million
Georgia	3.7 million
Moldova	2.5 million
Montenegro	0.6 million
North Macedonia	1.8 million
Serbia	6.6 million
Ukraine	37.0 million

Demographics

The demographic situation in the candidate countries is key a driver of migration, with most of these nations facing ageing populations. The demographic situations are especially precarious in Ukraine, Moldova and Georgia, and the Western Balkans possibly leading to migration to the EU and the Netherlands.⁸⁷

85 Considering that many Ukrainians are (temporarily) displaced in the EU under the TPD due to the Russian aggression on Ukraine.

86 For Georgia the accession process has been stalled due to recent political developments. Turkey has been a candidate country since 1999 and officially still in the running, but enlargement with it is no longer likely, according to many experts. Kosovo applied for candidate status in 2022, but this has not yet been granted and has thus not been included to this overview.

87 Saskia Hollander et al., "[Geopolitieke contexten als oorzaken van migratie naar Nederland – Een focus op landen van herkomst](#)," Clingendael Institute, December 2023, 13; and Tim Judah, "[Kosovo's Demographic Destiny Looks Early Familiar](#)," Balkan Insight, 7 November 2019.

On the one hand, an ageing population may result in reduced migration flows from these countries. However, on the other hand, it can lead to increased migration, as declining public services and an associated growing sense of hopelessness within the country pay to push younger generations to seek better opportunities in other EU Member States following accession.⁸⁸

Diaspora communities

Family ties and the presence of long-established diaspora communities serve as influential pull factors of migration.⁸⁹ As of the first of January 2024, the following numbers of individuals with a migration background from EU candidate country resided in the Netherlands:⁹⁰

Country of origin	Diaspora in the Netherlands	
	People born in the Netherlands	People born outside the Netherlands
Albania	1,397	3,892
Bosnia and Herzegovina	16,060	23,769
Georgia	1,404	4,471
Moldova	957	6,862
Montenegro	1,204	1,634
North Macedonia	3,170	5,001
Serbia	8,343	11,773
Ukraine	7,130	114,673

Except for Ukraine and Bosnia and Herzegovina, these numbers suggest that there is not a significant diaspora community from the candidate countries in the Netherlands. As a result, it is unlikely that the diaspora will be a major driver of migration to the Netherlands from these countries.

88 Saskia Hollander et al., “Geopolitieke contexten als oorzaken van migratie naar Nederland.”; The Netherlands State Committee for Demographic Development 2050, “Gematigde Groei,” 2024.

89 Mihail Arandarenko et al., “Multiple criteria decision aiding as a prediction tool for migration potential of regions, *European Journal of Operational Research*,” 284:3, August 2020, 109.

90 CBS, “Bevolking; geslacht, leeftijd, herkomstland en geboorteland (ouders), 1 jan,” accessed on 12 November 2024.

Politics

Conflict, the threat of violence, and persecution based on political beliefs, identity or religion are important political reasons for people to flee their country.⁹¹ Specifically, in the Western Balkans, lack of democratic improvement and political corruption are deemed as drivers of migration.⁹²

The consequences of the Russian aggression in Ukraine have already led to the significant displacement of many Ukrainians across various EU Member States. Whether more Ukrainians will arrive or if they will return largely depends on the evolving situation in Ukraine. However, some estimates have been made; the Ukrainian government projects that 1.3 to 1.5 million Ukrainians will remain in the EU after the war.⁹³ Most recent estimates suggest that, if all travel restrictions would be lifted, one-fifth (21%) of Ukrainians would be willing to migrate permanently, potentially resulting in up to six million people relocating to the EU.⁹⁴ The war-torn country is furthermore grappling with internal corruption, which Ukrainians consider a “key issue even during the war”,⁹⁵ and can hinder reconstruction efforts, further prompting potential migration.

The consequences of the Russian aggression extend beyond Ukraine to neighbouring countries such as Moldova. Other candidate countries, including Bosnia and Herzegovina, Georgia, Moldova and Serbia have been described as being caught in “Europe’s arc of instability” between the EU and Russia, making them vulnerable to Russian influence. In line with this, is that as countries geographically closer to Russia move towards EU membership, the risk increases that migration could be used as a tool to create further instability within the EU. This has already been

91 Saskia Hollander et al., [“Geopolitieke contexten als oorzaken van migratie naar Nederland.”](#)

92 Ana Isabel López García & Barry Maydom, “Frontline corruption and emigration in the Western Balkans,” *Migration Studies*, 11:4, December 2023.

93 Government of Ukraine, [“Кабінет Міністрів України,”](#) 30 September 2024.

94 Ilko Kucheriv Democratic Initiatives Foundation (DIF), [Україна єдина: національна належність, ідентичність, мова та державні атрибути — всеукраїнське опитування,](#) 21 January 2025.

95 Kateryna Odarchenko, and Oleksandr Poznii, [“Ukrainians See Corruption as a Key Issue Even during the War,”](#) Wilson Center, 31 July 2024.

seen in the instrumentalisation of migrants in Belarus, Lithuania, Latvia and Poland.⁹⁶

Economy

Pull factor: “Migration is largely determined by the demand for labour” in the host country.⁹⁷ Many EU Member States are experiencing labour shortages, prompting the EU to develop an action plan in March 2024 to “tackle labour and skills shortages in the EU.”⁹⁸ This plan includes measures to attract non-EU talent while enhancing fair intra-EU labour mobility. For example, the Netherlands is facing urgent and persistent labour shortages, particularly in the healthcare, education, ICT, and engineering sectors.⁹⁹ While there has been a slight decrease in work pressure, the strain on the labour market remains high, increasing the demand for workers from candidate countries.¹⁰⁰

Push factor: On the other hand, the labour market in many Western Balkan countries and other candidate countries such as Ukraine, Moldova and Georgia are characterised by high unemployment, low wages and limited employment opportunities.¹⁰¹ At the same time, the Balkans are also facing labour shortages, particularly in skilled sectors such as IT and healthcare.¹⁰² Despite this, the prospect of better employment opportunities in existing EU Member States, such as the Netherlands, makes it more attractive for individuals seeking better economic prospects.

96 For more information on the instrumentalisation of migrants see: Monika Sie Dhian Ho and Myrthe Wijnkoop, “[The instrumentalization of migration: A geopolitical perspective and toolbox](#),” Clingendael Institute, December 2022.

97 Centraal Planbureau, “[Economische dynamiek en migratie](#),” 3.

98 European Commission, DG Communication, “[Tackling labour and skills shortages in the EU](#),” 20 March 2024.

99 UWV, “[Arbeidsmarkt koelt verder af in 2024, maar ook blijvende tekorten](#),” December 2023.

100 CBS, “[Spanning op de Arbeidsmarkt](#),” accessed on 12 November 2024.

101 Saskia Hollander et al., “[Geopolitieke contexten als oorzaken van migratie naar Nederland](#),” 13.

102 Ghodsi et al., “[The impact of migration to the EU on labour shortages in the Western Balkans: Policy implications](#),” The Vienna Institute for International Economic Studies, Policy Notes and Reports 87, December 2024.