



Network Germany



Introducing EU's regulatory framework on human rights

Input at AIM-Progress event on 24th September 2026

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European road freight transport through a human rights lens

Subcontracting and algorithmic management in e-commerce are turning the logistics sector into a laboratory for labour abuses, warns academic Silvia Borelli ^[1]

Lorry drivers from outside EU 'exploited' in lockdown delivery surge ^[4]

Low pay, fuel fines, cramped cabs: drivers at haulier used by major retailers speak out ^[2]

DPD temporary workers may have missed out on sick pay and pensions, internal documents show ^[5]

Truckers strike against missing wages on German motorway ^[3]

The hidden reality for non-EU truck drivers in Europe ^[6]

Sources: [1] [Equal Times \(2025\)](#) [2] [The Guardian \(2023\)](#) [3] [Reuters \(2023\)](#) [4] [The Guardian \(2020\)](#) [5] [The Guardian \(2026\)](#) [6] [European Transport Workers' Federation \(2026\)](#)

In action: Human rights in EU's road freight transport

Truckers strike against missing wages on German motorway

By Reuters

July 27, 2023 12:08 AM GMT+2 · Updated July 27, 2023



Source: [Reuters](#), July 2023



Source: [Spiegel](#), April 2023

Main reported allegations in the case of the trucker strikes in Gräfenhausen:

- Outstanding and delayed wages
- Excessive working hours & little or no resting time
- Precarious working and living conditions of truck drivers

Who is responsible for human & labour rights risks along the transport supply chain?

Who has leverage?

Underlying structural challenges:

- No access to grievance mechanisms without fear of retaliation
- Impact of prices and delivery times on driver's working conditions
- Subcontracting arrangements leading to lack of transparency

Outcomes:

- 58 companies in scope of Germany's Supply Chain Act (LkSG) (in 2023) were affected¹
- Investigations into HREDD processes of affected customers under LkSG²
- Remediation of outstanding wages, in one case only after threat of penalties of involved customer³

1 [Deutsche Verkehrs-Zeitung](#), Oct 2023 2 [TableMedia](#), Oct 2023 3 [Hessenschau](#), Apr 2023, [taz](#), Sept 2023



Global Compact
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Human rights due diligence: from international standards to hard law

SOFT LAW · INTERNATIONAL STANDARDS

UN Guiding Principles on Business and Human Rights

OECD Guidelines for Multinational Enterprises on Responsible Business Conduct

OECD Due Diligence Guidance for Responsible Business Conduct

ILO Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy (MNE Declaration)

ILO Declaration on Fundamental Principles and Rights at Work

HARD LAW · EU LEVEL

EU CSDDD

Human rights + environmental due diligence (HREDD)

EFFECTIVE FROM 2029

EU CSRD

Reporting on HREDD

EFFECTIVE SINCE 2024 / FROM 2027

HARD LAW · NATIONAL LEVEL

German Supply Chain Act (LkSG)

IN FORCE SINCE 2023

French Loi de Vigilance

IN FORCE SINCE 2017

UK Modern Slavery Act

IN FORCE SINCE 2015

Swiss Due Diligence and Transparency Ordinance

IN FORCE SINCE 2022

EU CSDDD: EU-wide human rights due diligence requirements

Principle: Identify, prevent and mitigate human rights and environmental risks in own operations and supply chain

WHO IS DIRECTLY IN SCOPE?

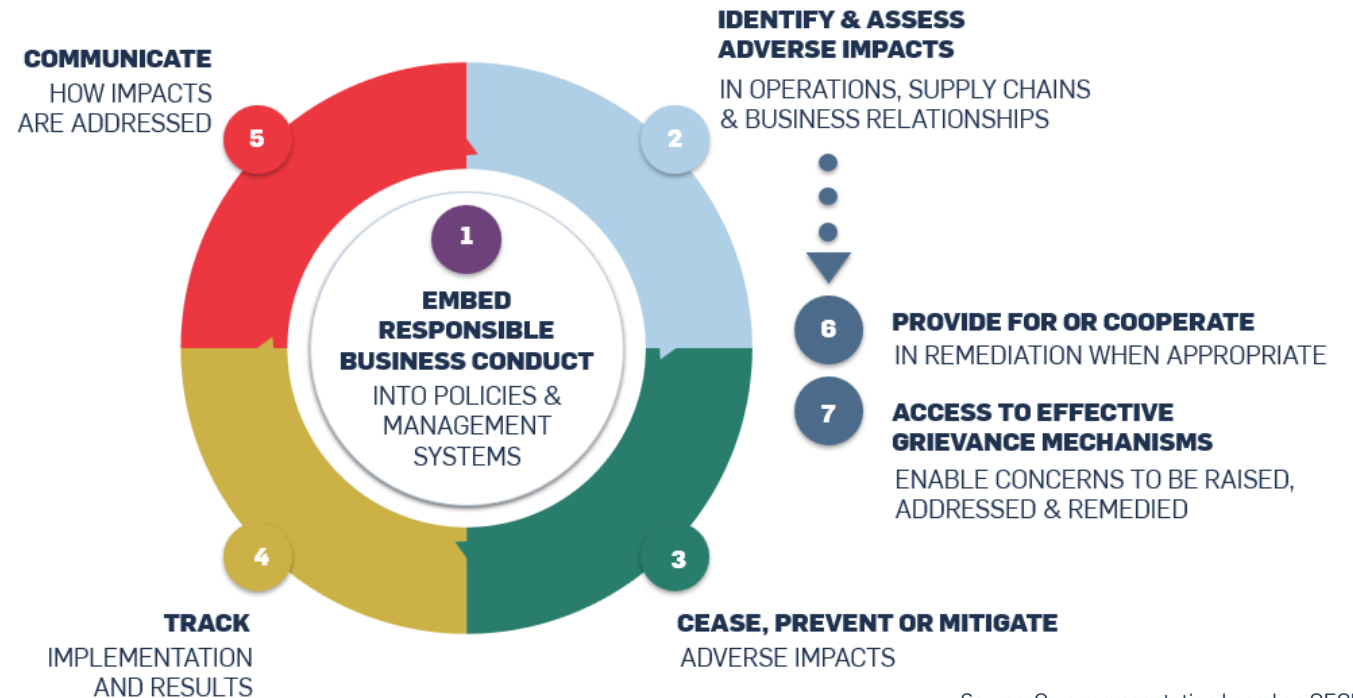
EU companies

More than 5,000 employees and €1.5bn net turnover

Third-country companies

At least €1.5bn net turnover in the EU

EXPECTED APPLICATION FROM JULY 2029



Source: Own representation based on OECD (2018).

➔ No direct application to most (smaller) logistics companies, but will **shape customer expectations** on transparency and decent working conditions in their chain of activities

EU Mobility Package I: Sector-specific requirements

Goal: a safer, more efficient and socially responsible road freight transport sector

SOCIAL LEGISLATION FOR DRIVERS

1 Driving times
Limits on time behind the wheel

2 Breaks & rest
Regular breaks and weekly rest

3 Return home
Regular return home or to employer location

4 Remuneration
Prohibition to base it on distance travelled or goods carried

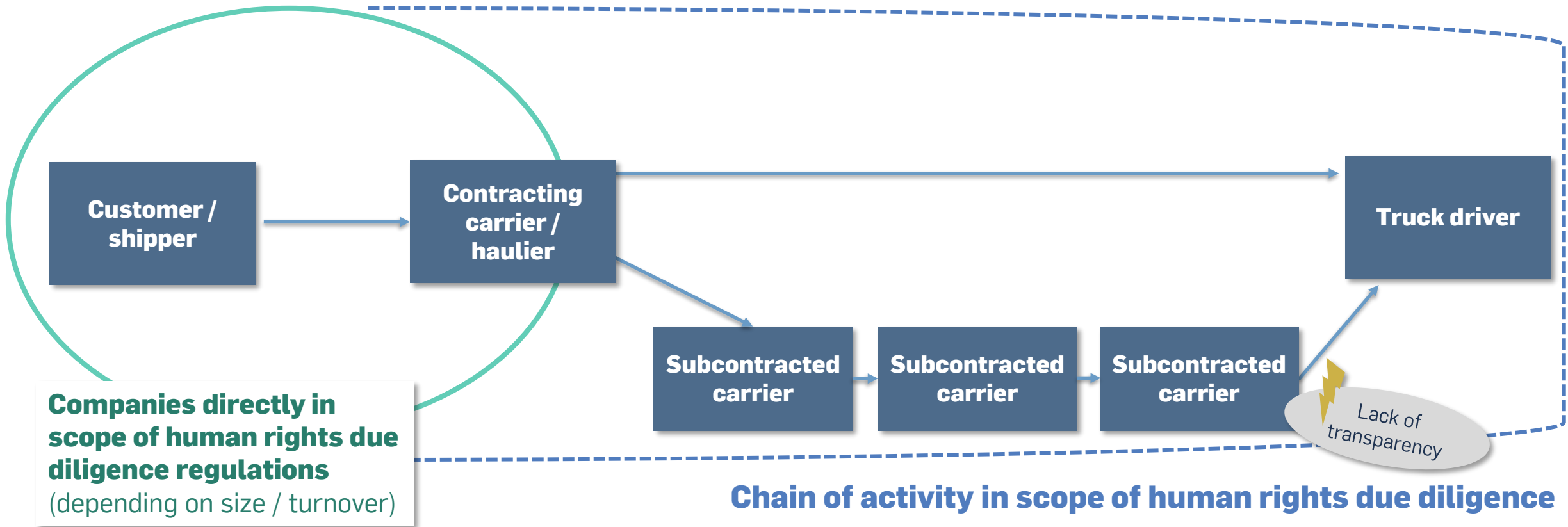
CABOTAGE & POSTING RULES *(selected provisions)*

Cross-border transport must not shift the higher cost of delivery onto drivers.

Fair pay when posted
Compensation according to the conditions of the country of posting

➔ Not an HREDD regulation, however, sector-specific legal framework in the context of human rights risks

Transport supply chain & scope of due diligence requirements



EU Mobility Package – regulatory basis

What does this mean for the European road transport sector?



More attention to human rights risks in logistics from European buyers, incl. contractual provisions requiring and facilitating human rights and environmental due diligence



Increased transparency requests from buyers.

More focus on identifying sub-contracted carriers and understanding working conditions



Increased verification and assurance requests from buyers. Provision of safe and decent working conditions and ability to demonstrate them = competitive advantage.

The German Sector Dialogue Automotive Industry



Multi-stakeholder initiative to jointly address structural challenges and improve human rights conditions along global value chains of the German automotive industry.

Collective measure to improve working conditions in road freight transport in Germany and Europe

Currently working on:

- An awareness raising campaign on truck driver's rights and grievance channels
- Improved grievance handling
- Planned: A cross-sector assessment standard for road freight transport suppliers (in collaboration with AIM-Progress)

Members:



VOLKSWAGEN
AKTIENGESELLSCHAFT



PORSCHE



Mercedes-Benz Group



→ **Collaboration with German Sector Dialogue Food Retail & Food Industry**

SECTOR DIALOGUE
Food Retail & Food Industry



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SECTOR DIALOGUE
AUTOMOTIVE INDUSTRY

The Sector Dialogue Food Retail & Food Industry

The Signatories of the Food Retail & Food Industry Sector Dialogue

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SECTOR DIALOGUE
Food Retail & Food Industry



Companies



ROSSMANN



FERRERO



REWE
GROUP

SÜDZUCKER
GROUP

Business associations



Non-governmental organisations



National human rights institution



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Thank you!
Please get in touch
if you would like to
know more.

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