



Mr Kaare Dybvad Bek
Minister of Immigration and Integration
of Denmark

Holmens Kanal 20
1060 København K
Denmark

28 November 2025

Dear Minister,

We are writing to you as the coming days are decisive for the future of eDeclaration.

Employers have welcomed the idea of eDeclaration from the start. For us **eDeclaration is an important proposal to create a simplified notification process** while posting workers abroad and to promote Single Market for businesses and workers alike. It is also a great example of how digital tools can make employer's life easier by making the notification process more transparent and less burdensome, while contributing to the protection of posted workers' rights

However, the quality of eDeclaration and the employers' appetite to use it will depend on the **final shape of the list of required information points**. This list must be smart, concise and should include those information points that are crucial for notification process. It shall refrain from gathering data that is not essential for notification procedure and burdensome for companies to provide.

Employers support the content of the eDeclaration proposed by the Expert Group referred to in the Commission proposal of November 2024 and the idea to further establish it by way of implementing acts. This initial proposal was further developed in the Council's General Approach of May 2025. This proposal can still be supported by employers; however, some information points are adding complexity to the notification process.

The most elaborated version proposed by the European Parliament in the form of an Annex was published in September 2025. The proposed list of data points is too long, vague and includes information difficult to obtain. This can lead to the practical failure of the proposed digital solution: formal adoption, but lack of uptake in real life.

Our message is clear: **sticking to the Council's General Approach will make eDeclaration a success story**. Should the co-legislators consider a more elaborated version of Annex 1, employers' views need to be taken into account. We enclose Annex 1 as proposed by the European Parliament with employers' amendments to show which information points should be deleted or amended to ensure that administrative burden for companies is kept to a minimum.

We count on you to make the simplification and competitiveness agenda a reality!

Yours sincerely,



Markus J. Beyrer
Director General



Points to be deleted from **ANNEX I - Standard Form** proposed by the European Parliament if the trilogue would not lead to approval of the content of the eDeclaration as proposed by the Commission in November 2024 or expand the content of Art. 4 of the Council's General Approach of May 2025

ANNEX I - Standard Form

A. INFORMATION RELATED TO THE SERVICE PROVIDER

1. Identity of the person submitting the declaration (name, telephone, e-mail)
2. Type of posting
 - a) Posting under a contract for service,
 - b) Intra-group posting, or
 - c) Posting by a temporary work agency

~~For each type of posting, whether posting is:~~

~~(a) as a subcontractor [yes] [no]~~

~~(b) if the answer to point (a) is 'yes': the business registration number of the main contractor~~

~~(c) a chain/double posting [yes] [no]~~

3. Name of the posting company
4. Country of establishment of the posting company
5. Full postal address of the posting company (street, house number, town, postal code, country)
6. Contact details of the posting company (phone, e-mail) [General phone and email, not contact person]
- ~~7. Field of business (According to applicable national classification scheme or, if no applicable scheme, NACE classification with free text to identify NACE classification)~~
- ~~8. [If applicable] EU VAT identification number, or~~
- ~~7. business registration number of posting company in the Member State of establishment~~
 - a) if applicable, any other registration number required by a given Member States in accordance with specific national and sectoral regulations
- ~~9.8. [If applicable] Number of the authorisation to carry out temporary employment agency Activities~~

B. INFORMATION RELATED TO THE POSTED WORKER

1. First name and surname
- ~~2. Job title or description of the job required to perform during the posting~~
- ~~3. Professional qualifications~~
- 4.2. Date of birth
- ~~5.3. Passport number or National Identity Card number (must correspond to the form of identification used by the individual during their stay in the receiving Member State)~~
- ~~6.4. Personal identification number, such as a tax or sSocial security number~~
- ~~7.5. Third country national Nationality [yes] [no]~~
- ~~8. If yes: Nationality~~
- ~~9. Starting date of the employment relationship in the Member State of habitual work~~
- 10.6. Member State of affiliation for social security purposes
- 11.7. Phone number & Email address of posted worker



C. INFORMATION RELATED TO THE POSTING

1. Beginning and end date of the posting OR Beginning date and anticipated duration of posting (automatic calculation of the other)
2. The nature of the service provided / nature of the activity (According to applicable national classification scheme or, if no applicable scheme, NACE classification with free text to identify NACE classification)
3. Address(es) of the workplace:
 - (a) address of the service recipient as workplace and/or
 - (b) other workplace(s) (street, house number, postal code, town or geographical coordinates)

~~To be filled in for all workers or individually for each worker~~

~~4. Anticipated weekly work hours and resting periods:~~

~~— Usual start and end time of work~~

~~— Days off per week~~

~~5. Rate of pay or bonus~~

~~6. Travel expenses paid (yes) (no)~~

~~7. Meals expenses paid (yes) (no)~~

~~8. Accommodation expenses paid (yes) (no)~~

~~9. Collective lodgings (Yes) (No)~~

~~— If yes: Address (street, house number, postal code, town or geographical coordinates)~~

~~10.4. Availability of documents:~~

- (a) from the person to liaise with the competent national authorities, or
- (b) at the workplace, or
- (c) other location (street, house number, postal code, town), or
- (d) electronically

D. INFORMATION RELATED TO THE PERSON(S) TO LIAISE WITH THE COMPETENT AUTHORITIES IN THE HOST MEMBER STATE (ART. 9 (1) (E) AND/OR (F) OF DIRECTIVE 2014/67/EU)

1. Indication if contact person is either:
 - (a) other person, or
 - (b) company
2. If (a)
 - First name and surname ~~and personal identification number, such as a tax or social security number, Passport number or Identity card number~~
 - If (b)
 - Company name ~~and business registration number~~
3. Phone and E-mail
4. Address (street, house number, town, postal code, country)

E. INFORMATION RELATED TO THE SERVICE RECIPIENT

If in Section A, point 2 one of the following types of posting has been indicated:

- posting under a contract for service
- intra-group posting



1. Type of the service recipient:
 - (a) company, or
 - (b) private person
2. Name of the service recipient (if company)
3. Address and contact details of the service recipient (if company) (street, house number, postal code, town, e-mail and phone number)
4. Business identification number of the service recipient in the host Member State (if company)

If in Section A, point 2 the following type of posting has been indicated:

- posting by a temporary work agency

1. Name of the user undertaking
2. Address and contact details of the user undertaking (street, house number, postal code, town, e-mail and phone number)
- ~~3.~~ Business identification number of the user undertaking in the host Member State

~~In case of a double or chain posting~~

- ~~4.3. Name of the user undertaking and identity of the legal representative or other person representing the service recipient in administrative and legal proceedings (Full name, date and place of birth, identity card number)~~
