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MISSING VOICE**
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ANCHOR THE EU
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POLICY PAPER

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This policy paper is one in a series presenting the key recommendations based on a comparative study, collective bargaining boost workshops and scientific seminars carried out in Bulgaria, Czechia, Croatia, Estonia, Latvia, Lithuania, Hungary, Poland, Romania, Serbia, Slovakia and Slovenia as part of the project CEE CAW ‘Challenges for Organising and Collective Bargaining in Care, Administration and Waste collection sectors in Central and Eastern European Countries’, which was led by the Institute of Public Affairs (Warsaw). The other partners were the: Bulgarian Academy of Sciences (Sofia), Central European Labour Studies Institute (Bratislava), Lithuanian Centre of Social Sciences (Vilnius), Centre for Democracy Foundation (Belgrade) and European Federation of Public Service Unions (Brussels).



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The European Union's ambitious transition to a circular economy requires more than just technological innovation and informed consumers. It depends critically on the workers who collect, process, and manage waste. Yet these workers remain largely invisible in policy debates, underrepresented in labour organisations, and excluded from key frameworks for social dialogue and collective bargaining. This invisibility is especially acute in Central and Eastern European (CEE) countries, where trade union density is low, employer associations in the sector are weak or non-existent, and public awareness of the role of waste workers in the green transition is minimal.

This policy paper argues that without recognising and improving the conditions of waste sector workers, particularly through the development of robust collective bargaining structures, the EU's green transformation risks being socially unjust and structurally incomplete. The policy paper proposes a series of policy interventions to embed labour justice and sectoral bargaining into circular economy strategies, drawing on both CEE-specific challenges and broader EU-level dynamics.

Labour in the Waste Sector: The Missing Link in the Circular Economy Discourse

While the circular economy has become a key pillar of EU environmental strategy, the role of labour in this system is underexplored. The dominant narrative focuses on consumer responsibility ("reduce, reuse, recycle") and technical efficiency. Public campaigns and policy documents stress the need for better waste sorting, smarter packaging, and reduced landfill use. Yet they rarely mention the workers who make these goals achievable or the absence of collective frameworks that shape their working conditions.

Academic literature reflects this imbalance. Research on green jobs tends to prioritise renewable energy, construction, and digital green skills. Studies dedicated specifically to working conditions in the waste sector are rare. The EPSU's 2017 report remains one of the few documents linking circular economy goals to labour rights. Even then, the focus is often on Western and Northern Europe, while CEE countries are underrepresented or absent. CEDEFOP and ETUI analyses on green transition often omit low-prestige, high-risk jobs like waste collection from their core focus.

The recent 2024 *Global Waste Management Outlook* by the UNEP confirms this imbalance on a global scale. While the report discusses informal labour and the need for decent work in waste management, it predominantly focuses on environmental, infrastructural, and health aspects, not on labour organisation, unionisation, or sectoral bargaining. It does, however, offer important reinforcement for our thesis: that working in waste often involves hazardous conditions and that these workers are crucial for delivering on the Sustainable Development Goals (SDGs), especially Goals 1, 3, 8, and 13.

A recent EU-wide modelling study by Albizzati et al. (2024) further highlights the job-creation potential of circular waste management. **The study estimates that over 200,000 new full-time equivalent jobs could be generated across the EU through improved collection and recycling systems.** It also shows a correlation between higher recycling rates and greater employment intensity per tonne of waste. This offers a compelling quantitative rationale for making job creation, alongside environmental performance, a core dimension of waste policy. Crucially, these jobs must be integrated into systems of social dialogue and collective bargaining.

This absence is not benign. Without labour visibility, there is no pressure to improve wages, ensure safety, support unionisation, or promote collective bargaining. Without data, there are no metrics to evaluate whether the green transition is also fair. Without narratives of contribution, there is no public recognition of these workers' role in building Europe's environmental future.

What We Know from Central and Eastern Europe

The recent comparative report by Barbara Surdykowska (2025) documents the extremely low level of trade union organisation among waste sector workers in 12 CEE countries. In most cases, there are no dedicated structures within national trade unions for this sector. Workers are either scattered among broader public service unions or entirely outside any formal representation. Employers' associations in waste management are similarly weak, fragmented, or non-existent. As a result, collective bargaining, particularly at the sectoral level, is virtually absent.

This structural void deprives workers of a basic mechanism for negotiating wages, improving health and safety standards, and securing training and career development opportunities. In many countries, the sector is

⁴ [Barbara Surdykowska](#)

characterised by subcontracting, outsourcing, and short-term contracts, which further hinder the establishment of collective frameworks. Capacity-building for both trade unions and employer organisations is essential to enable the emergence of functional collective bargaining systems.

European-level structures also face challenges. Sectoral social dialogue at the EU level in waste management is practically non-existent. While the EPSU has taken steps to include the issue of waste workers in its broader just transition agenda, there is still a need to explore **new pathways of engagement**, including cross-sectoral cooperation, closer alignment with environmental NGOs, and initiatives that elevate the voices of workers in underorganised segments of essential services. The absence of a coordinated strategy for worker inclusion in the circular economy reflects a deeper institutional void which demands innovative, inclusive approaches from all actors involved.

Importantly, these gaps must be addressed in light of the obligations under Article 4(2) of Directive 2022/2041. Member States with collective bargaining coverage below 80%, including all CEE countries, are required to develop National Action Plans (NAPs) to promote collective bargaining. This paper contributes directly to such strategic thinking, and we call for the waste management sector to be explicitly included as a priority in these national strategies.

Systemic Blind Spots in EU Waste and Labour Policy

EU policy-making still treats the environmental and social dimensions of transition to a circular economy as separate silos. The Circular Economy Action Plan (CEAP) and Waste Framework Directive contain few, if any, references to employment conditions, trade union rights, or collective bargaining. Similarly, labour market policies do not specifically address the needs of waste workers or link vocational training pathways to circular economy goals.

The lack of coordination between the Directorate-General for Environment (DG ENV) and the Directorate-General for Employment, Social Affairs and Inclusion (DG EMPL), the limited cross-referencing of labour rights in green funding criteria, and the near-total absence of labour indicators in CE monitoring frameworks reflect a systemic failure. As a result, socially precarious work continues to underpin environmental goals. In CEE, this translates into

job insecurity, poor safety standards, limited training, and weak bargaining power. A circular economy built on such foundations is neither resilient nor just.

Currently, the CEAP monitoring framework focuses almost exclusively on material flows, emissions reduction, and resource efficiency. It tracks the tonnes of waste prevented, the percentage of recycling achieved, and the volumes of secondary raw materials reintegrated into production. However, it remains silent on the quality of jobs created or transformed by these processes.

This is a critical omission. A circular economy that produces low-wage, precarious employment or unsafe working conditions cannot be considered truly sustainable. If the EU is serious about delivering a **just transition**, it must embed **labour quality indicators** into the very heart of how progress in circular economy policies is measured. Tracking whether jobs are decent, stable, fairly paid, collectively negotiated, and safe should become as important as tracking how many tonnes of waste are recycled.

Crucially, employment generation potential must be recognised as an explicit objective of circular economy policies. **This should be operationalised through formal monitoring indicators that not only track the number of jobs created but also assess whether those jobs are covered by collective bargaining agreements. The goal is not only quantity but also quality, and quality depends on a structured voice and negotiations.**

As highlighted by the Green Economy Coalition, the EU's circular economy strategy must also avoid reproducing a "circularity divide" whereby wealthier economies externalise costs to the Global South. Embedding collective bargaining into green value chains also means ensuring that decent work becomes a standard globally, not a privilege regionally.

The concept of an "eco-social policy mix" (Mandelli 2022) offers a useful framework to rethink labour policy in the circular economy. Waste sector strategies must go beyond skills investment and include coordinated instruments and governance mechanisms that embed collective bargaining, promote social dialogue, and guarantee structural protections for workers.

Green Jobs Are Human Jobs: Principles for a New Approach

The digitalisation and automation of waste management from AI-based sorting systems to smart bins also requires a renewed focus on skills, job security, and a collective voice.

A fair and effective circular economy requires that waste sector jobs be recognised as essential green jobs. This means:

- Embedding labour rights and decent work standards into circular economy funding, regulation, and monitoring.
- Recognising the strategic role of waste workers in achieving recycling and landfill reduction targets.
- Supporting the organisation and representation of workers through sector-specific trade union initiatives.
- Promoting public narratives that link environmental sustainability with labour dignity.
- Prioritising collective bargaining structures, especially at the sectoral level, as a core mechanism for improving wages, safety, and the voice in the green transition.
- Include employment generation potential as a formal indicator in EU Circular Economy Monitoring Frameworks and link this explicitly to collective bargaining coverage and sectoral agreements.
- Strengthen partnerships with social enterprises and reuse/repair networks to jointly expand inclusive employment opportunities in circular sectors and promote alternative, socially embedded models of organising waste work.
- Ensure that new regulatory and financial instruments (e.g. green public procurement) are explicitly tied to compliance with collective labour standards, including sectoral agreements.

The EPSU, in partnership with national affiliates and employer organisations, should consider developing a model National Action Plan for the waste

management sector under Article 4(2) of Directive 2022/2041. This would serve as a pilot framework for rebuilding collective bargaining coverage in one of the most fragmented yet essential green sectors in the EU.

As Mandelli (2022) shows, National Energy and Climate Plans across the EU, especially in CEE, largely fail to address the labour-related risks of industrial decarbonisation. This omission further reinforces the importance of Article 4(2) of Directive 2022/2041, which requires Member States with low collective bargaining coverage to develop National Action Plans. These plans must fill the governance and social policy voids left by existing green strategies.

Policy Recommendations

For EU institutions:

- Integrate labour quality indicators into the monitoring of the Circular Economy Action Plan (CEAP) implementation.
- Require social conditionalities (e.g. collective agreements, OSH standards, training schemes) in EU-funded waste management projects.
- Strengthen coordination between DG ENV and DG EMPL to ensure coherence between environmental and employment policies.
- Include employment generation potential as a formal indicator in EU Circular Economy Monitoring Frameworks and link this explicitly to collective bargaining coverage and sectoral agreements.
- Support the establishment of sectoral collective bargaining frameworks in CEE waste management through targeted capacity-building of social partners.
- Promote the implementation of Article 4(2) of Directive 2022/2041 by designating waste management as a priority sector in National Action Plans on collective bargaining.
- Fund cross-sectoral pilot programmes (e.g. Just Waste Alliances) involving trade unions, municipalities, and civil society actors.

For the EPSU and European trade union structures:

- Establish a dedicated platform for waste sector workers within the EPSU's green transition strategy.
- Initiate joint campaigns with environmental NGOs and reuse/repair networks to promote worker visibility and rights.
- Facilitate cross-country exchange of good practices in organising and bargaining in the waste sector.
- Provide technical assistance and training to national affiliates to support the negotiation of collective agreements.
- Collaborate with employer organisations to jointly develop a model NAP for waste management under Article 4(2) of Directive 2022/2041.

For CEE national governments:

- **Designate the waste management sector as a priority area** in National Action Plans on collective bargaining under Article 4(2) of Directive 2022/2041, including a roadmap for building sectoral dialogue structures.
- **Establish or reactivate bipartite or tripartite bodies** at the sectoral or regional level (e.g. sectoral councils, advisory groups), with mandates to address employment quality and collective bargaining in the circular economy.
- **Introduce financial and regulatory incentives** for companies in the waste sector that are covered by collective agreements, e.g. through tax reliefs, public procurement preferences, or access to green innovation funds.
- **Strengthen labour inspectorates and social dialogue units** within ministries of labour or environment, with specific capacity to monitor working conditions in circular economy sectors and support collective bargaining processes.

- **Integrate labour-related criteria** into public tenders in waste services at municipal and national levels, ensuring that the contracting authorities give preference to providers covered by collective agreements.
- **Develop targeted training and certification programmes** for waste workers, co-designed with trade unions and employers and linked to recognised qualifications under national qualifications frameworks.
- **Ensure meaningful participation of social partners** in the planning and implementation of EU-funded green transition and circular economy programmes (e.g. Cohesion Policy, Just Transition Fund).

For CEE trade unions

- **Make the voice of waste management workers more audible** within the trade union movement itself. This requires building sector-specific structures beyond the company level, enabling better coordination, representation, and visibility of these workers' demands across regions and countries.
- **Develop concrete policy demands** targeted at public authorities concerning the specific working conditions of waste workers. This includes advocating for the introduction of sector-relevant indicators (e.g. exposure to bacteriological hazards during collection and sorting) in occupational health and safety regulations and embedding these in both national labour standards and procurement rules.
- **Establish targeted organising strategies for waste workers employed by private companies**, including those operating under subcontracting arrangements. Given the fragmentation of the sector, trade unions must proactively develop outreach tools, alliances, and campaigns tailored to this workforce.

Conclusions

The EU's circular economy cannot succeed if it relies on invisible, underpaid, and underprotected labour. Waste workers are not ancillary to the green transition, they are central to it. Recognising this is not only a matter of justice but of strategic necessity. If Europe wants a green future, it must build it with green workers at the core.

A socially just green transition means connecting the dots between sustainability and labour rights. But this connection must be institutionalised through **sectoral collective bargaining**. Without it, efforts to improve working conditions and environmental performance will remain fragmented and vulnerable. This policy paper calls for a new agenda: one that places waste sector workers in CEE and across Europe at the heart of the circular economy narrative and gives them the tools, rights, and recognition they deserve. Above all, the right to negotiate collectively.

The weaknesses identified by Mandelli (2022) in national energy and climate plans, particularly the lack of integrated social strategies, further support the need to embed employment-focused objectives into collective bargaining action plans mandated by Article 4(2) of Directive 2022/2041.

The waste management sector, despite being central to circular economy goals, is fully absent from most eco-social transition plans in Europe. A rebalancing of EU and national strategies is urgently needed - one that moves from fragmented green growth logics toward integrated eco-social policy mixes that embed collective bargaining and employment protections.

National Energy and Climate Plans (NECPs), the key documents guiding green transition at the national level, often remain silent on labour market dislocations, bargaining structures or workers' voice in the transition process. As documented by Mandelli (2022), eco-social policy mixes are rare and tend to rely on growth-centred investment tools, leaving social protection and structural labour dialogue unaddressed.

The EU's circular economy will fail if built on invisible labour. Waste workers are not an externality to the green transition, they are its condition of possibility. Rebuilding collective bargaining in this sector is not only a matter of fairness, but a structural necessity. There is no green deal without a bargaining deal.

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