BT4EUROPE WEBINAR SERIES

Europe on the Move A1 Simplification: From Breakthrough to Implementation

BT4Europe
European Network of Business Travel Associations

A1 certificate & the simplification of business mobility

Q&A overview, decision trees and glossary

A BT4Europe publication – the European network of business travel associations.

This document has been prepared by BT4Europe, as the independent voice of business travel buyers, users and their employers. The explanations, interpretations and decision trees are based on the BT4Europe webinar 'Europe on the Move – A1 simplification', the questions raised by participants, and publicly available sources on the EU agreement (including the Council of the European Union). This is not legal advice and does not replace a case-by-case assessment by the competent national authority or your own BT4Europe member association.

1. Q&A overview

This overview combines the questions put live during the webinar to Francesco Corti (Cabinet of Executive Vice-President Minzatu) and Odete Pimenta da Silva (BT4Europe), with the questions left by participants in the chat. Where necessary, this has been supplemented with publicly available information on the agreement. Where a question was not explicitly answered, this is indicated.

A. The new rules in brief

Question: What was the biggest problem with the current A1 system for businesses?

In principle, an A1 form had to be requested for every cross-border business trip, even for companies with thousands of travellers per day. This led to high administrative burdens for employers, employees and social security institutions alike, to delays for short-notice trips, to diverging interpretations between member states, and in some countries to fines when travellers could not show an A1. BT4Europe has raised these bottlenecks with policymakers for several years.

Question: What concretely changes with the agreement that has now been reached?

There will be three categories:

(1) genuine 'business trips' are fully exempt from the A1 notification obligation, with no duration limit;
(2) short-term postings that are not business trips are exempt from the notification obligation for up to 3 consecutive working days within 30 days (the '3/30 rule');
(3) for the construction sector, an A1 remains mandatory from day one, with no exception.

Question: How exactly is a 'business trip' defined?

A business trip is a temporary, work-related activity of an employee or self-employed person, carried out in the employer's interest, that does not involve the provision of services or delivery of goods. It includes, among other things, business meetings, cultural or scientific events, conferences, seminars, academic research and attending training.

Question: Is there still a maximum duration for a genuine business trip?

No. As long as the activity does not involve the provision of a service or good and remains temporary in nature, there is no fixed duration limit and no A1 notification is required.

B. The 3/30 rule for short-term postings

Question: What applies to short-term service provision that is still regarded as a posting (i.e. not a business trip)?

This is exempt from the notification obligation for up to 3 consecutive working days within a period of 30 consecutive days. If a service is provided for longer than 3 days, or if the 3 days are exceeded across several shorter periods within those 30 days, an A1 must still be requested – and this must happen before the activity starts (prior notification).

Question: What if someone travels twice for 3 days within the same 30-day period – is an A1 then required?

Yes. If someone works cross-border under the posting rules for a **total of more than 3 days within one 30-day period**, even if spread across two separate shorter trips, an A1 is required. The exemption applies to a maximum of 3 days per 30 days in total, not per individual trip. See the decision tree in chapter 2 for the steps.

Question: Does the A1 obligation then apply to both trips, or only to the trip that exceeds the 3-day threshold?

According to the explanation given during the webinar, the A1 is only needed for the trip that actually exceeds the 3-day threshold, typically the second, unplanned trip within that month, since this could not have been known at the time of the first trip. Note: because the A1 must now be requested before the activity starts, this requires careful planning and record-keeping in practice of earlier trips within the running 30-day period.

Question: Is there still no fixed 'safe' threshold under the current (old) rules, pending entry into force?

Under the current rules, there is no EU-wide harmonised minimum duration or '*safe number of days*' below which no A1 is needed. Some national authorities are pragmatic in practice for very short, non-productive trips, but BT4Europe advises employers not to rely on this blindly until the new rules are formally in force.

C. Construction, maintenance and installation

Question: How is the construction sector treated under the new rules?

No exemption period applies to the construction sector: an A1 must be requested from day one, regardless of the duration of the activity. This is a deliberate choice by the legislator, given the higher fraud and workplace-accident risk in this sector.

Question: Do maintenance, installation and repair also fall under the construction sector obligation?

Yes, as a rule. Annex 6 of the regulation provides a broad, functional description of '*construction*': all work relating to the construction, repair, maintenance, alteration or demolition of buildings. This means that maintenance, installation and repair activities generally fall under this category, and therefore, just like construction, require an A1 from day one, even if the activity itself is short.

Question: Is supervising installation activities on a construction site a business trip, or does it fall under the construction/installation obligation?

Based on the webinar, supervising installation work on a construction site falls more readily under the '*maintenance/installation'* category (Annex 6), which, like construction, requires an A1 from day one, and therefore does not fall under the exempt 'business trip' category. See the decision tree in chapter 2 for a step-by-step check.

Not fully and explicitly answered in the recording – consult Annex 6 of the regulation for the precise scope, or raise specific cases with your own national BT4Europe member association or to Odete Pimenta da Silva, BT4Europe Teamlead WG A1

Question: Does visiting clients/prospects or the company's own local team count as an exempt business trip, even if it lasts longer than 3 days?

In the chat, it was suggested that a typical business visit to clients, prospects or the local team within the same company is not regarded as the provision of services or goods, and could therefore qualify as an exempt business trip with no duration limit.

BT4Europe recommends testing this on a case-by-case basis against the decision tree in chapter 2 and against the official definition in Article 15 and Annex 6.

D. Timeline and entry into force

Question: From when will these new rules apply?

Procedurally: **Coreper** confirmed the agreement on 29 April; the European Parliament's EMPL Committee approved it shortly afterwards; the legal-linguistic review was completed in early June; the formal vote in the European Parliament's plenary session is scheduled for 7 or 8 July 2026; formal approval by the Council is expected around September 2026. After approval, the regulation – specifically the article on applicable legislation – is expected to enter into force two years later, so around 2028.

Question: Isn't a two-year waiting period too long to abolish a burdensome rule?

The two years is the standard period given to member states to adapt their national administration, legislation and systems.

Question: What should companies already be doing, ahead of entry into force?

Don't wait. BT4Europe advises companies to start now, together with HR, tax advisers and travel managers, mapping their own travel process and identifying where A1 requirements play a role. Until the new rules actually take effect, the current A1 obligations and any fines for non-compliance remain in force. BT4Europe asks its member associations to press their national legislators for swift implementation.

E. Scope and enforcement

Question: In which countries does the A1 obligation (and, soon, the new exemptions) apply?

Social security coordination applies within the EU27, Iceland, Liechtenstein, Norway and Switzerland (EU + EEA + Switzerland). Separate arrangements have applied to the United Kingdom since Brexit: for people covered by the Withdrawal Agreement, existing rights remain protected; for other cases, the protocol to the Trade and Cooperation Agreement governs coordination. According to the BT4Europe position paper, this area covers 32 countries in total.

Question: Which countries are currently the strictest in applying the existing A1 rules?

No specific list of countries was given on this point during the webinar. It was noted in general terms that member states interpret the rules differently, and that some countries impose fines when a traveller cannot show an A1 certificate. Some national authorities are more lenient in practice for very short trips, but this varies considerably by country and is not guaranteed.

Question: Does this simplification lead to less protection for workers?

No, quite the opposite and this is a reassurance BT4Europe gives its members. Simplification goes hand in hand with strengthened social protection: a new, EU-wide definition of cross-border social security fraud is being introduced, along with a mandatory pre-affiliation period for postings (around three months in the current text) and a mandatory break of at least two months after 24 months of posting.

F. Next steps

Question: What are the next steps at EU level following this simplification?

A proposal for the full digitalisation of portable documents (including the A1) is expected in September 2026, linked to the European Social Security Pass (ESSPASS) initiative and the broader labour mobility package.

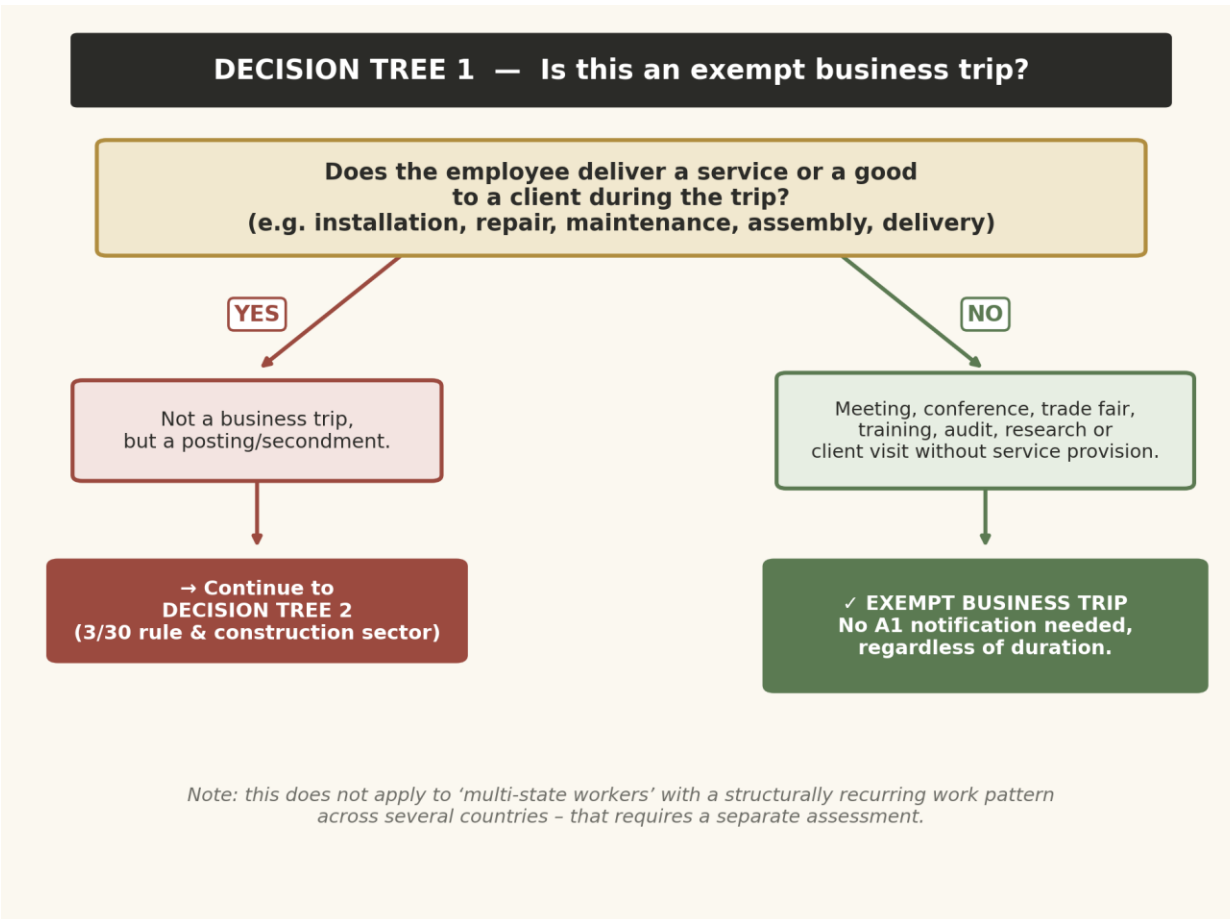
Question: What are BT4Europe's next priorities?

Further harmonisation of implementation between member states, removing the remaining administrative barriers, and critically following the digitalisation agenda – with the aim of making Europe the simplest and best place in the world for legitimate business travel.

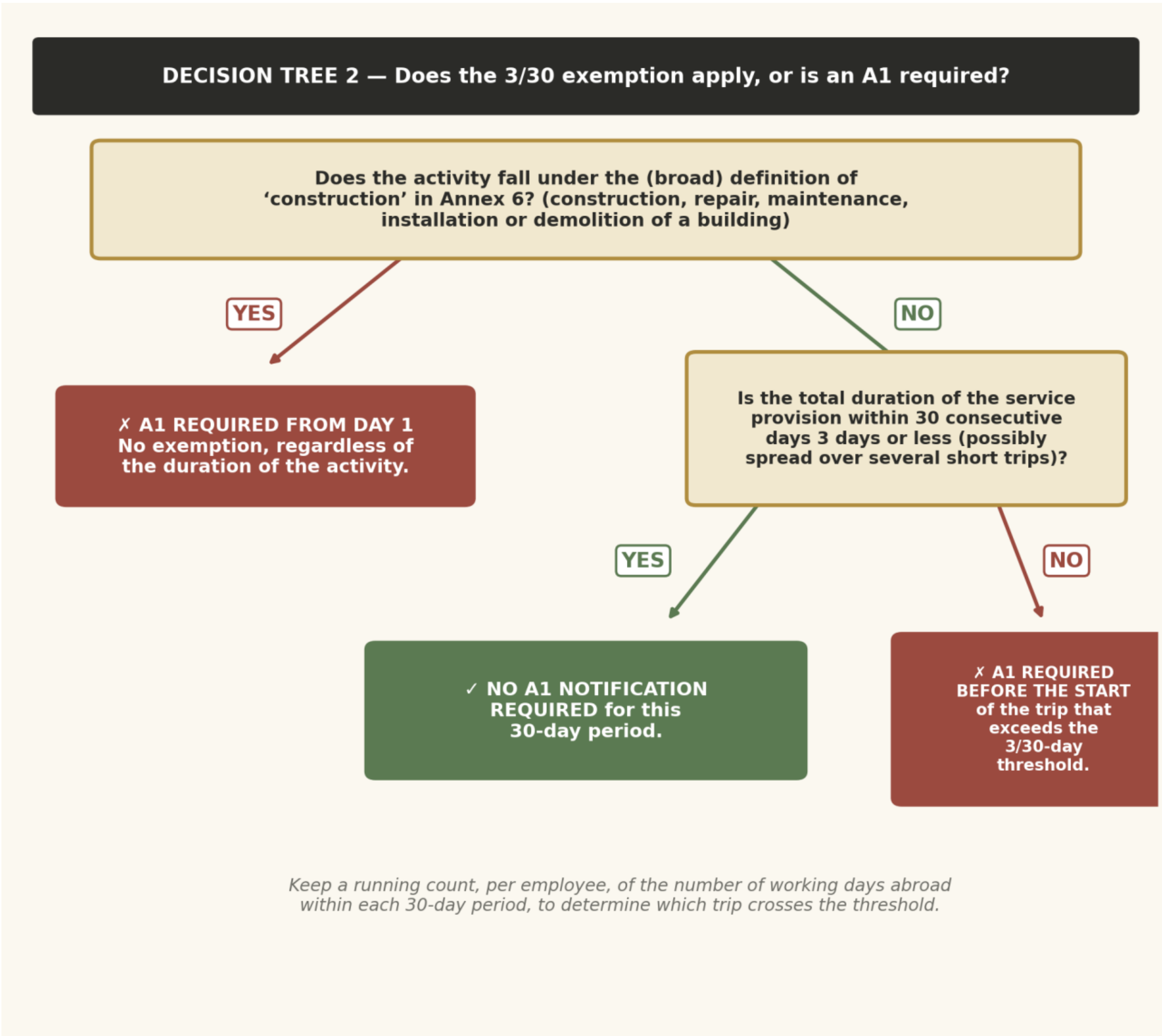
2. Decision trees

The decision trees below have been prepared by BT4Europe as a practical tool for members to quickly assess whether a planned trip falls under the exemption. They are simplified representations based on the current state of the agreement; the final legal text and the interpretation of the competent national authority remain decisive.

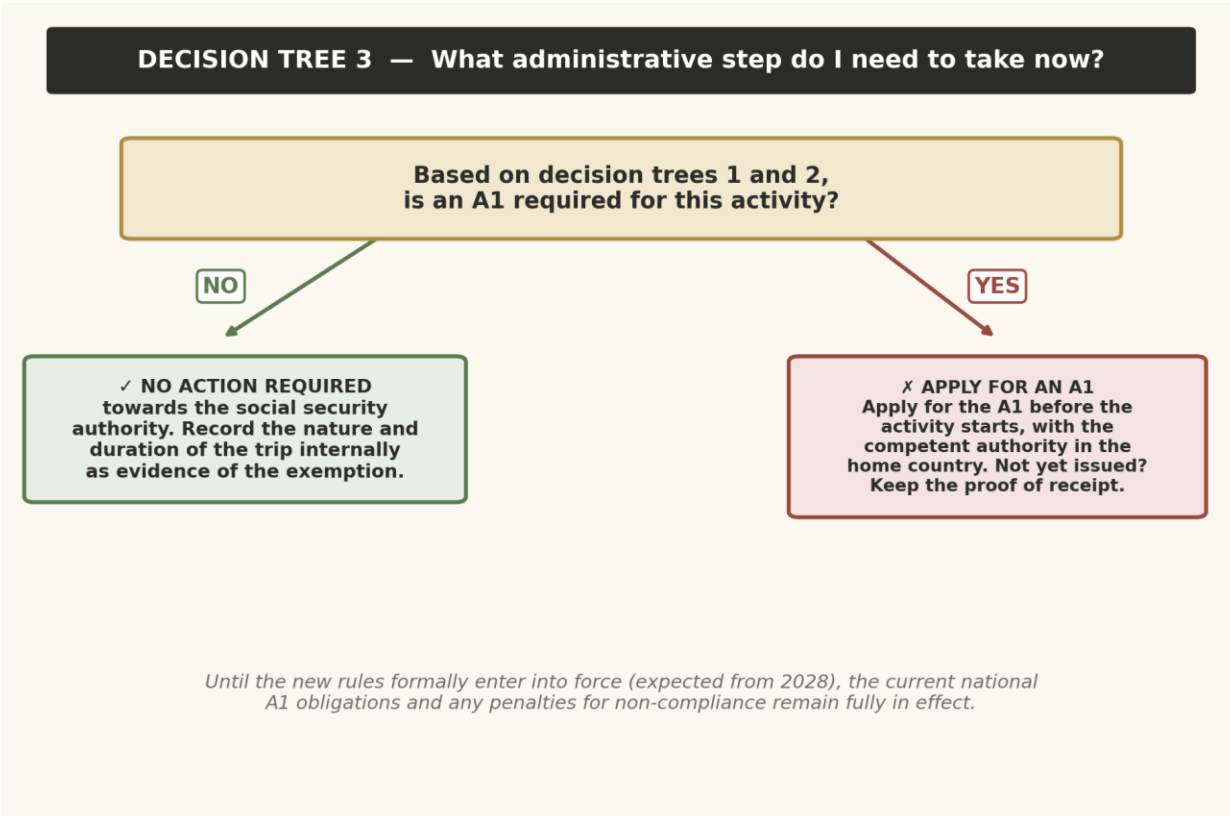
Decision tree — Is my trip covered by the exempt 'business trip' category?



Decision tree — Posting/secondment: does the 3/30 exemption apply, or is an A1 required?



Decision tree — What administrative step do I need to take now?



3. Glossary

Below is an explanation of the key terms used in this dossier.

Term	Explanation
A1 certificate (PD A1)	The portable document that shows which country's social security system applies to an employee or self-employed person while they are temporarily working in another country. Legal basis: Regulation (EC) 883/2004 and Implementing Regulation (EC) 987/2009, in force since May 2010.
Business trip	A temporary, work-related activity carried out in the employer's interest that does not involve the provision of a service or the delivery of goods – for example meetings, conferences, trade fairs, training or scientific events. Following the reform, a genuine business trip is subject to no duration limit and no A1 notification obligation.
Posting / secondment	The temporary sending of an employee to another country to provide a service or deliver goods there. Depending on the duration and the sector, an A1 application remains mandatory for this.
3/30 rule	The core rule of the reform: short-term, non-construction-related postings are exempt from the A1 notification obligation for up to 3 consecutive working days within a period of 30 consecutive days. Beyond that, an A1 is still required.
Prior notification obligation	The obligation to submit an A1 application to the competent authority before the activity starts. If this is not done, the host member state may impose sanctions, and an A1 must still be obtained – often retroactively.
Construction sector exception	The construction sector is excluded from the 3/30 exemption: an A1 remains mandatory from day one, because of the higher fraud and workplace-accident risk in the sector. Annex 6 of the regulation gives a broad, functional description of 'construction': all building work relating to the construction, repair, maintenance, alteration or demolition of buildings – so not just physical construction itself, but also, for example, installation and maintenance work that falls under this category.
Pre-affiliation period	A new minimum period (around three months in the current text) of prior social security coverage in the home country, intended to prevent someone from being hired and posted abroad the very next day.
Mandatory break after 24 months	A mandatory break of at least two months after 24 months of posting, intended to prevent consecutive postings without interruption.

Term	Explanation
Cross-border social security fraud	A newly, EU-wide defined concept for the first time, part of the tightened anti-fraud measures introduced alongside the simplification.
Frontier worker	An employee who works in a different country from the one in which they live. As a result of the reform, responsibility for unemployment benefits shifts from the country of residence to the country of employment.
Multi-state worker	Someone who structurally works in several countries (for example, on a fixed weekly pattern). The 3/30 exemption for business trips does not apply to this situation – it remains a separate assessment.
ESSPASS (European Social Security Pass)	An EU initiative to fully digitalise portable documents such as the A1 and make them faster and more securely exchangeable between member states.
Applicable legislation (Article 15)	The article in the implementing regulation that governs which social security system applies to cross-border work, and which contains the definition of 'business trip'.
Geographic scope	The coordination rules apply within the EU27, Iceland, Liechtenstein, Norway and Switzerland (EU + EEA + Switzerland). Separate rules apply to the United Kingdom, based on the Withdrawal Agreement or the protocol to the Trade and Cooperation Agreement, depending on the situation.
Coreper	The Committee of Permanent Representatives of the member states to the EU, which confirms provisional agreements on behalf of the Council – in this dossier, this happened on 29 April.
EMPL Committee	The European Parliament's Committee on Employment and Social Affairs, responsible for this dossier.
Trilogue	Informal three-way negotiations between the Council, the European Parliament and the European Commission to reach a provisional agreement before the formal votes follow.
FTE (Full-Time Equivalent)	A unit that expresses the workload of a group of employees (full-time and part-time combined) as the number of 'whole' full-time jobs – used by BT4Europe to quantify the administrative burden of A1 applications.
Single Market	The European internal market, within which goods, services, capital and people can move freely between member states.

Sources: transcript of the BT4Europe webinar 'Europe on the Move – A1 simplification' (30 June 2026) and the associated webinar chat; the BT4Europe position paper 'Reducing Administrative Burden for Short-Term Business Travel within the EU'; the Council of the European Union, 'EU rules on coordination of social security systems', and the press release on the provisional agreement of 29 April 2026.

Disclaimer

This publication has been prepared by BT4Europe for general information purposes only. It reflects BT4Europe's understanding of the political agreement and other publicly available information at the date of publication. It does not constitute legal, tax or other professional advice and should not be relied upon as such.

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