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Building labour power in the platform economy: A comparative analysis of worker struggles in German and Norwegian food and grocery delivery

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Abstract

This study undertakes a comparative analysis of delivery workers' struggles in Norway and Germany. Through the theoretical lens of the power resources approach, we analyse how delivery workers in Berlin and Oslo combine associational, structural, institutional, coalitional and discursive power resources, responding to different institutionalised frameworks of industrial relations. We make three contributions to debates on worker agency and resistance in the platform economy. First, we show that delivery workers need to actively combine different power resources to overcome barriers to organising and exercising structural power, resulting from platforms' model of work organisation. Second, we highlight the role of institutional contexts in shaping workers' collective organising strategies. Finally, our analysis stresses that the power resources that food delivery workers have built are often contested and circumvented by counter-practices from the platform companies.

KEYWORDS
food delivery, Foodora, gig work, Gorillas, labour agency, platform economy, power resources

INTRODUCTION

App-based food and grocery delivery has grown exponentially in Europe since 2020. Providing income opportunities for people facing barriers to traditional labour markets, work via delivery platforms is often characterised by low income, lack of employment benefits and unsafe working conditions. Platform companies often rely on outsourcing costs and risks to workers by engaging them as independent contractors or on zero-hour contracts with a piece rate pay for each delivery (Mendonça et al., 2023; Wood, 2019). In addition, delivery workers' spatial dispersal, the high share of migrant workers and lack of clarity on employment classification pose challenges for collective organising, rendering platform workers vulnerable to exploitation (Tassinari & Maccarrone, 2020; van Doorn et al., 2022).

Nevertheless, we have witnessed (wildcat) strikes, protests and other forms of collective action by delivery workers in Europe and beyond (Bessa et al., 2022; Woodcock, 2021). While platform workers in several countries have achieved collective rights through collective action (Borghi et al., 2021; Riesgo Gómez, 2023), this action has been characterised by heterogeneous forms of organising. In some countries, platform workers have organised in established trade unions (Jesnes et al., 2021), while in others, activism has been led by grassroots worker collectives (Cini et al., 2022). In the latter case, community and migrant organisations have frequently played a central role (Joyce et al., 2023; Orth, 2022).

Extant scholarship on delivery workers' struggles has highlighted that workers' organising practices are shaped not only by factors internal to the labour process but also by the place-specific social, political and regulatory environment (see e.g. Alyanak et al., 2023; Cini & Goldmann, 2020). These studies have argued that pre-existing social and cultural ties, political traditions and institutional contexts 'shape [...] the resources and opportunities available to [platform workers], with an impact on their organisational practices' (Cini et al., 2022, p. 346; see also Cini & Goldmann, 2020). However, no in-depth study exists on how institutional contexts in different countries interact with worker strategies. In this article, we explore how platform workers' organising strategies, and their outcomes, are shaped by industrial relations frameworks, which provide uneven access to institutional power resources for workers.

We draw on the power resources approach (PRA) (Refslund & Arnholtz, 2022; Schmalz et al., 2018; Wright, 2000) to examine delivery worker protests in Norway and Germany. These cases were chosen because both countries are categorised as highly institutionalised labour markets with a long tradition of social partnership, and where employment contracts are more prevalent among delivery workers than in other countries. Still, important differences can be observed in delivery workers' collective action strategies and outcomes. In Norway, Foodora delivery workers on part-time employment contracts in Oslo began to organise with the Transport Workers Union in 2017, which later merged with the union Fellesforbundet (Jesnes, 2024). With Fellesforbundet, they negotiated a company collective agreement in 2019, which included increased hourly wages, a supplement for equipment and distance travelled, and a collectively agreed early retirement scheme (Eurofound, 2021). In Germany, by contrast, traditional trade unions have played less of a role in organising delivery workers.

An exception is the food industry and gastronomy union Gewerkschaft Nahrung-Genuss-Gaststätten (NGG), which was present in early organising and works council formation processes at Deliveroo and Lieferando. Since 2019, a new wave of independent worker organising has been observed in Berlin. Here, grassroots worker collectives have taken the lead in mobilising delivery workers from various platforms, including Gorillas, focusing on forming works councils.

Two research questions guide our analysis of delivery workers' struggles in Germany and Norway:

1. How are barriers and opportunities for building delivery workers' collective power vis-à-vis platforms shaped by institutionalised industrial relations frameworks?
2. How do workers in the German and Norwegian delivery industries build and strategically combine different power resources in their struggles?

Our paper makes three contributions to the literature on worker resistance in the platform economy. First, we highlight the barriers for delivery workers to organise and exercise structural power resulting from platform companies' model of work organisation, which makes it even more important for delivery workers to combine different power resources, especially coalitional and institutional power resources. Here, we challenge arguments that have attributed higher structural power to delivery workers compared to other groups of platform workers (Vandaele, 2022). Second, we provide further insights into how industrial relations provide different institutional power resources for delivery workers and shape workers' collective action strategies. One important difference is that Gorillas workers in Germany turned to works councils, while in Norway, representation through a union was the preferred option. Third, we show that to make effective use of these institutional power resources, workers need specific capabilities – e.g., knowledge of bureaucratic processes, as well as persistence and adaptability – which can be challenging for migrant workers, particularly in a context where platform companies consistently challenge the power resources of workers.

BUILDING LABOUR POWER IN THE PLATFORM ECONOMY: ANALYSING WORKERS' STRUGGLES THROUGH THE LENS OF THE POWER RESOURCES APPROACH

The PRA argues that labour can successfully 'defend its interests by collective mobilisation of power resources' (Schmalz et al., 2018, p. 115). Korpi defined power resources as 'the properties of an actor that provide the ability to reward or punish another actor' (Korpi, 1978, p. 35). The approach has traditionally highlighted structural and associational power as two central power resources of workers. Wright (2000) defined structural power as power deriving from workers' position within the economic system as opposed to associational power deriving from workers' capacity to form collective organisations. Silver (2003) then refined the notion of structural power, distinguishing between marketplace and workplace bargaining power. Marketplace bargaining power accrues to workers in tight labour markets where companies' ability to replace workers is lower (e.g., due to job profiles requiring specialised skill sets), or where workers have access to alternative means of subsistence (e.g., social security or strike funds), enabling them to withdraw from the labour market. Workplace bargaining power, in turn, is high when localised work stoppages can cause disruptions to the company (Silver, 2003).

Brookes (2013) and Schmalz et al. (2018) later introduced institutional power as a third power resource, which workers derive from labour laws and institutionalised industrial relations frameworks gained by previous generations of workers' struggles.

The PRA has found widespread application in various disciplines. However, it has also faced criticism for its static understanding of power and its focus on unionised workers from the Global North who have traditionally possessed strong structural, associational and institutional power resources (Nowak, 2018). Little attention, however, has been paid to precarious workers in informal(ised) sectors with a high level of workforce fragmentation and union-busting by companies, such as the platform economy (Alyanak et al., 2023). Seeking to address this gap, a second wave of PRA scholars has introduced several 'new' types of power resources on which workers, who from the outset possess low associational, structural and institutional power, can draw. Coalitional power is introduced by scholars like Brookes (2013) and Schmalz et al. (2018) as a power resource that workers may activate through building solidarity with activists, organisations or other social movements. Discursive power, in turn, results from workers' ability to discursively frame labour issues and solutions 'in line with prevailing views of morality' and thereby attract public support for their interests (Schmalz et al., 2018, p. 123).

Second-wave PRA scholars emphasise viewing workers' power not as fixed structures but as resources they can develop to exert influence over capital (Nowak, 2018; Refslund & Arnholtz, 2022). They thereby analytically prioritise workers' capabilities to build, enact and maintain different power resources rather than ascribing specific power resources to groups of workers because of their structural embeddedness. This also introduces greater sensitivity to possible interactions between power resources, which 'may be complementary, but [...] also [...] substitutes' (Refslund & Arnholtz, 2022, p. 1,962).

In this article, we follow this constructivist understanding of workers' power resources and apply it to the platform economy. The platform economy provides a special context for worker organising, differing from traditional sectors due to the organisation of a large pool of workers on atypical contracts through apps and algorithms and the companies' bypassing of established regulations. Here, we focus on app-based food and grocery delivery, where platform companies connect clients with delivery workers on bikes through a digital interface. Delivery workers – often known as 'riders' or 'couriers' – usually work under an independent contractor model, meaning they do not have access to social contributions, paid holidays, sick leave, or collective labour rights (however, there are exceptions, such as in Norway and Germany). As a result, labour relations in food and grocery delivery are characterised by a high level of individualisation and fragmentation (Heiland, 2021). Through algorithms, platforms manage a large labour force by automatically assigning orders to workers and calculating optimal delivery routes.

Moreover, workers' performance is tightly monitored through the app, which collects information on the number of deliveries, speed and customer ratings (Griesbach et al., 2019). These metrics, which are often opaque to workers, influence workers' opportunities on the platform, including income, promotions and job allocation (Gandini, 2019). While the use of algorithms is the same in food and grocery delivery, levels of workers' spatial atomisation are more pronounced in food than in grocery delivery. Warehouses in grocery delivery provide a meeting place, but couriers delivering food from restaurants have fewer chances for regular encounters or for blocking the entrance and exercising structural power.

Few studies have systematically assessed delivery workers' strategies for engaging with and combining different types of power resources. Existing studies have argued that delivery

workers possess relatively high levels of structural power, resulting from their capacity to disrupt platforms' 'on demand' business models through strikes and work stoppages (Vandaele, 2022; Webster et al., 2021). However, critics argue that 'it is questionable whether couriers' direct actions [in the form of strikes or work stoppages] are generating enough leverage over the platforms, given the asymmetrical power relations in the platform economy' (Vandaele, 2022, p. 5). Other studies have highlighted the obstacles that platform workers face in building associational and exercising structural power, including limited resources and institutional support; a heterogeneous workforce (Dunn, 2020); resistance from platform companies (Orth, 2022); and algorithmic management, which fuels competition and reduces communication between workers (Heiland, 2021). Against this background, Vandaele (2022) and Però and Downey (2024) stress the importance of delivery workers using discursive and coalitional power through public campaigns and alliances.

One query largely neglected by PRA-guided analyses is the role of institutional frameworks such as national labour legislation or industrial relations for delivery workers' capacity to exercise power (Cini et al., 2022). This lacuna may be attributed to the fact that in many countries, platform workers are considered by the companies as self-employed and therefore not (yet) covered by institutional frameworks for collective labour representation (De Stefano & Aloisi,, 2019). However, governments in Europe, Latin America and Asia have started implementing new regulations, strengthening platform workers' collective rights. In many European countries, delivery platforms employ workers, allowing them to access collective bargaining frameworks (Lamannis, 2023).

This is evident in Norway and Germany, our two case countries, where couriers have sought better conditions through collective bargaining and works councils. Previous research, however, has highlighted the challenges that German and Norwegian couriers face when trying to engage with institutionalised forms of worker representation. In Norway, research has shown how companies strategically adapt their employment model, shifting from employment contracts to the 'typical' platform model relying on self-employed workers (Jesnes, 2024). Other studies have pointed to the challenges for labour market integration and unionisation among delivery workers with migrant backgrounds, who constitute a high share of the workforce (Newlands, 2022). Against this background, Jesnes (2024) has also emphasised the importance of combining associational, structural and institutional power resources to build labour power in Norwegian food delivery. Similarly, studies highlight food delivery companies' strategies to undermine worker organisation, including spatial isolation, engaging mostly migrant workers, extending probation periods and exploiting legal loopholes to block works council formation (Altenried, 2021; Heiland, 2021). Studies on food courier organising in Berlin also show how grassroots collectives, led by migrant workers, harness coalitional and discursive power through alliances with social actors to overcome barriers to collective organisation (Alyanak & Karlıdağ, 2022; Orth, 2022).

Against this background, we argue that PRA-oriented analyses of delivery workers' struggles need to pay greater attention to the interrelations between the institutional context in which platform workers are embedded and workers' collective action strategies. While institutional contexts can provide potential power resources, we hold that the extent to which platform workers can seize these resources is shaped by multiple factors, including industrial relations frameworks, the composition of the workforce and the extent to which workers are able to mobilise other power resources to overcome barriers to putting institutional rights into practice.

METHODS

Case selection

In the following, we undertake a comparative analysis of food and grocery delivery workers' protests in Germany and Norway. We selected these countries based on their shared traits as coordinated market economies with institutionalised cooperation between the social partners and governments (Doellgast et al., 2023) and their history of food delivery organising. This sampling enables comparison to identify similarities and differences between the two cases (Patton, 2014). It also provides an interesting starting point for understanding how power resources are used by 'new' groups of workers within a field that lacks institutionalisation in an otherwise highly institutionalised context.

However, Norway and Germany differ significantly in unionisation rates and collective bargaining coverage, long seen as key indicators of associational power at the societal level. In Norway, collective agreements cover 100% of workers in the public sector, 55% in the private sector and 53% in the private service sector (Nergaard, 2024, p. 24). About half of the total labour force is unionised, with 34% in the private service sector (Nergaard, 2024, pp. 11, 13). In Germany, the unionisation rate is only 13%, lower still in the private service sector (Zandt, 2022), and 41% of employees are covered by collective agreements (Destatis, 2021). Low union presence in the private service sector suggests challenges in organising workers, driven by high turnover rates, a large migrant workforce and a high proportion of young workers.

The two countries also differ when it comes to institutional frameworks for collective representation at the workplace level. Norway's multi-tiered collective bargaining is described as 'centralised decentralisation' (Alsos et al., 2019, p. 353). While sector-level negotiations determine wages for most workers, this is supplemented by company-level collective agreements. The company-level agreements are followed by regular meetings between management and trade unions at the workplace level to address issues like layoffs, working time, the implementation of the Working Environment Act and collective bargaining outcomes (Dølvik et al., 2018). Norway has no national minimum wage, but wage terms are extended in sectors with weaker unions, such as cleaning and hospitality. The pattern wage bargaining system, led by Fellesforbundet, ensures wage growth is aligned with export-competing industries, maintaining low inequality. This approach particularly benefits the lowest paid, as they benefit from wage increases negotiated by stronger unions with greater bargaining power (Svarstad, 2023). In Germany, trade unions most often negotiate collective agreements with employers' associations at the sector level, while works councils (statutory, non-union bodies) represent employees at the workplace (Müller & Schulten, 2019). Works councils have co-determination rights in various company processes, including changes in the wage and bonus structure or the implementation of new technologies (Doellgast et al., 2023). They also play an important role in monitoring the implementation of labour laws and collective agreements where they exist. However, collective bargaining of wages is not within their jurisdiction. Germany introduced a national minimum wage in 2015 (Müller & Schulten, 2019).

As opposed to many other European countries, delivery workers in both countries have traditionally had employment contracts (albeit often in the form of part-time contracts), giving workers access to collective bargaining frameworks, and in Germany, importantly, the right to form a works council. From a PRA perspective, it is interesting to explore the extent to which these different institutional frameworks for collective representation enable different forms of

collective action in food and grocery delivery, while acknowledging that workers also need (to develop) the capabilities to effectively use these frameworks.

Data collection and analysis

The data collected for this paper are derived from fieldwork conducted in Germany in 2021 and 2022 and in Norway from 2018 until 2022. Fieldwork in Germany was conducted as part of the Fairwork project, which assesses working conditions on digital labour platforms against five Fairwork principles – fair pay, fair conditions, fair contracts, fair management and fair representation (Fairwork, 2022) – and of which three of the authors are or were members. Thirty-five semi-structured, in-depth interviews were conducted with couriers and organisers from five food and grocery delivery apps in Berlin: Lieferando, Gorillas, Flink, Getir and Wolt. Interviews were structured around the five Fairwork principles, with some questions left open-ended to capture further demographic data and workers' daily experiences. Semi-structured interviews were also conducted with management staff from three platforms, addressing business models and labour management practices to ensure different perspectives (Tracy, 2010). Additionally, we draw on participant observations from various events in Berlin organised by (or involving) delivery workers.[1]

Fieldwork in Norway was conducted as part of one of the author's (Kristin Jesnes) individual PhD research project. Twenty-four couriers were interviewed through both focus groups and individual interviews from 2018 to 2022 and this was complemented by observation of the Foodora workers' 2019 strike.[2] Initially centred around Foodora couriers on part-time employment contracts, the study expanded to include Wolt couriers on freelance and independent contracts, in response to this platform's substantial growth during the pandemic. However, the collective organising among Foodora workers remains the primary focus of this case study, with Wolt's entry influencing these efforts. Interviews were semi-structured and covered similar topics to those addressed in Germany, including payment structure, working conditions, health and safety, and collective representation, in addition to workers' individual backgrounds. While individual interviews allowed for tackling more sensitive issues such as workers' migration histories, group discussions allowed deeper exploration of management structures, working conditions and issues around organising efforts (Patton, 2014). Some couriers who took on positions as trade union representatives during fieldwork were interviewed several times. Furthermore, interviews with representatives of platforms' management, trade union officials and employer associations were conducted to ensure different perspectives (Tracy, 2010).

[1]One of the authors (Zeynep Karlıdağ) had been a member of the Gorillas Workers Collective (GWC), a grassroots worker collective that played a leading role in establishing a works council at Gorillas in Berlin, before becoming a research assistant in the Fairwork project, tasked with assisting in the recruitment and conducting of interviews. The author's personal connections with the GWC were crucial for trust-building and opened doors for the participation of the Fairwork Germany lead researcher (Oğuz Alyanak) in GWC meetings and protests. During these events the lead researcher's role can best be described as sympathetic 'participant as observer' (c.f. Scott & Medaugh, 2017), who maintained a friendly relationship with GWC members but without interfering in the collective's decision-making processes. By the time of data analysis and results publication, none of the authors had any organisational or personal ties to the GWC or the Gorillas platform.

[2]Further details on the methods and data for the Norwegian case can be found in Jesnes (2024).

In both countries, relevant documents – such as contracts, screenshots of app dashboards, media articles, collective agreements and court documents – were collected and analysed in relation to the interviews. This triangulation of data was conducted to ensure both the subjective perspective of participants and a more objective reading of working conditions and events (Tracy, 2010). Table 1 provides an overview of collected data in Norway and Germany.

Data analysis was conducted using a deductive content analysis of the cases (Patton, 2014). The different types of worker power resources (structural, associational, institutional, coalitional and discursive) served as deductive categories. These categories informed our first step of data structuring and coding, followed by a comparative evaluation of the structured data from Norway and Germany to identify the elements explaining similarities and differences. Additionally, we created timelines and reconstructed the case narratives to support our collective analysis of how workers have leveraged various power resources (Patton, 2014).

The study has three main limitations. First, the article and analysis were developed after the interviews, but the similarity of the data from two compelling cases encouraged us to continue. Second, there is potential for researcher bias due to involvement in the German case (see footnote 1). However, while some researchers on the German team were involved in the Gorillas mobilisations, others were not, which helps mitigate potential biases. Third, the findings from the two cases have limited generalisability. However, we believe the research offers transferability, achieved when readers feel the study resonates with their own experiences and can make use of its insights (Tracy, 2010). Platform workers in other contexts may find valuable insights and lessons in these case studies.

TABLE 1 Overview of collected data in Norway and Germany.

Type of data	Norway (Oslo)	Germany (Berlin)
Semi-structured interviews (and focus groups for Norway)	24 food and grocery delivery couriers from platforms Foodora and Wolt 5 union officials 4 platform management representatives 2 employer organisation representatives	35 food and grocery delivery couriers from platforms Lieferando, Gorillas, Flink, Getir and Wolt 3 platform management representatives
Participant observation	Foodora workers' 2019 strike	Meetings and socials organised by GWC Wildcat strikes and demonstrations Works council elections Court hearings concerning labour conflicts at Gorillas
Document analysis	Delivery workers' contracts Company websites Screenshots of app dashboards Media articles Collective agreements	Delivery workers' contracts Company websites Screenshots of app dashboards Media articles Court documents

BUILDING LABOUR POWER: DELIVERY WORKER STRUGGLES IN BERLIN AND OSLO

Evolution and characteristics of app-based food and grocery delivery in Germany and Norway

In Germany and Norway, app-based food delivery began with the platform Foodora in 2014 and 2015, respectively. In both countries, Foodora initially hired couriers on part-time contracts. In 2019, the Dutch company Delivery Hero bought Foodora and created the brand Lieferando, which has since operated in the German market, continuing the tradition of employment contracts. Lieferando is currently the largest app-based delivery service in Germany, operating in more than 60 cities (Just Eat Takeaway, 2024). In Norway, Foodora is the leading delivery platform, operating in 17 cities with 2900 couriers in 2021 (Foodora, 2021).

In both countries, app-based delivery has become more diverse and competitive in recent years. In 2018 and 2019, the Finnish delivery company Wolt (est. 2014, acquired by DoorDash in 2022) entered the Norwegian and German markets and now operates as the second-largest food and grocery delivery app in both countries. In Germany, several app-based grocery delivery companies entered the market during the pandemic. The largest have traditionally been Gorillas, Flink and Getir, which bought Gorillas in 2022 (Fairwork, 2022). However, in April 2024, Getir announced its exit from the German market with both brands (Ksienrzyk, 2024), and soon after, the company ceased its global operations, continuing business only in its home base, Turkey.

In terms of employment relations, some differences exist between the countries. In Germany, all delivery companies have provided employment contracts to their workers since 2020, following a German Federal Employment Court ruling that clarified platform workers, including app-based couriers, are employees (Defossez, 2022; Fairwork, 2022). As employees, workers on German delivery platforms have the right to form works councils, unionise and engage in collective bargaining. While attempts by workers to do so have met resistance from platform companies (Alyanak & Karlıdağ, 2022), workers were able to form works councils through two waves of organising. The first wave was characterised by collective action from predominantly German and second-generation migrant couriers working for Deliveroo, first in Cologne and then in other cities. They initiated the 'Liefern am Limit' ('Delivering at the Limit') campaign in 2018, soon receiving support from the hospitality workers' union NGG (Herr, 2021). Since 2019, the campaign – now officially led by NGG – has focused mainly on Lieferando, as Deliveroo exited the country the same year, supporting the formation of works councils. NGG pushed for a collective agreement with Lieferando, but without success (Jesnes et al., 2021). The second wave started in early spring 2021 in Berlin, where a group of primarily migrant workers founded the GWC and organised a series of public protests. Unlike the 'Liefern am Limit' campaign, migrant worker-led grassroots initiatives in Berlin have mostly acted independently of established trade unions, instead focusing on protesting labour rights violations and establishing works councils to monitor the implementation of labour laws (Orth, 2022).

In Norway, by contrast, there has been a shift towards the independent contractor model as a prevalent mode of employment relations. Since 2019, Wolt and Foodora have operated with freelancers (paid per delivery without being permanent employees or fully self-employed) and

independent contractors (solo self-employed).[3] Foodora offers a freelancer model, where couriers can be employed by a third party that handles administrative tasks in exchange for a percentage of their earnings through Foodora (Jesnes & Oppegaard, 2023). Foodora couriers in larger Norwegian cities can choose between employment, freelancer and independent contractor models. By 2022, fewer than half of Foodora workers in Norway had employment contracts (Interview with company representative, 2022), and couriers report that this number has declined further. Since Foodora initially started with employment contracts, worker organising has remained within the collective bargaining framework. In 2017, Foodora workers in Oslo, who were formally employed, began to organise under the Transport Workers Union, which later merged with Fellesforbundet, Norway's largest private sector union. Under Fellesforbundet's leadership, Foodora workers engaged in a 5-week strike in 2019, which resulted in a collective agreement between Fellesforbundet and Foodora, renegotiated several times since. In January 2024, the Norwegian Working Environment Act (2005) updated employee status criteria to include continuous personal labour and subordination through management. A presumption rule was also introduced, classifying workers as employees unless proven otherwise. In late 2024, three couriers, with support from Fellesforbundet, sued Wolt over employment status (NRK, 2024).

Barriers to building worker power in Berlin and in Oslo

In both cities, there are common barriers to building worker power, which result from the specific model of work organisation in app-based delivery and the composition of the workforce. Workers' associational and structural power, particularly marketplace bargaining power, is constrained by algorithmic management, which allows platforms to rely heavily on migrant workers. An interviewed worker activist estimated that in Berlin, migrant workers make up the vast majority of the labour force in app-based delivery, which restricts their marketplace bargaining power due to limited job market alternatives and high transaction costs for changing jobs (Interview with GWC activist, 2022; Orth, 2023). This is also the case in Norway, where according to a union representative working as a courier since 2019, 'there has always been a large proportion of workers with migrant backgrounds' (Interview with courier union representative, 2022; see also Newlands, 2022).

Workers' structural power is limited because platforms maintain large, flexible 'on-demand' labour pools, reducing workers' ability to disrupt operations. In Oslo, platform companies rely on large pools of freelancers, while in Berlin, companies often seek couriers through temporary staffing firms in addition to hiring workers directly. Hence, in both cities, mobilising a large share of the workforce is required for work stoppages or strikes to effectively disrupt operations. In grocery delivery, the hurdles for exercising workplace bargaining power through work stoppages are somewhat lower, as the warehouses represent geographical 'chokepoints'. By blocking the entrance to warehouses, a small group of workers can halt all deliveries in a specific area (at least for a limited time), as explained by a Gorillas worker:

[3]In everyday conversation, the terms "freelancers" and "self-employed" are used interchangeably, despite important distinctions. Under the National Insurance Act, freelancers are treated more similarly to self-employed individuals, resulting in them receiving fewer social benefits compared to employees. However, in terms of tax law, freelancers are treated more like employees since employers deduct taxes for both employees and freelancers (Alsos et al., 2022).

'There are 14 Gorillas distribution centres in Berlin, with more being opened. These are essential locations for the business model of the "instant" delivery service. [...] When blocking these distribution centres, which are located throughout the city, the system does not work, which is an advantage for the strikers'. (Interview with GWC activist, 2022).

When the distribution centres were blocked, the company first asked workers to relocate and continue deliveries from other warehouses. Those who agreed relocated to continue operations from other hubs. In cases where the majority of workers refused or where workers in other warehouses also went on strike, part of the wildcat strike strategy was for organisers to cycle from one warehouse to the next, shutting down operations. The company would then cease operations in the city for the remainder of the day.

Exercising structural power requires the mobilisation of associational power through collective action. However, diverse worker backgrounds, divergent political views and differing attitudes towards collective organising pose significant barriers to building associational power in the Berlin and Oslo delivery sectors. In Oslo, organisation efforts were led by a small group of Norwegian and Western European workers who initially faced serious challenges in organising due to heterogeneous political stances and country backgrounds within the workforce – as expressed by this worker and union activist:

'Of the migrants who were part of the union, there were Western Europeans, and many of them were more fight-demonstration advocates who did not believe in the union. What we discussed a lot at the time was how on earth are we going to bring in the Syrians, the Africans, the Portuguese? It was not possible to penetrate those milieus. Therefore, we were typically Western Europeans, and mostly Norwegians who took the initiative'. (Interview with Oslo Foodora courier and union activist, 2019)

The social fragmentation among workers is further aggravated by divergences in employment status within the same company. In Oslo, Foodora operates a dual model with employees and freelancers/self-employed paid per delivery. While the employment model offers greater security, the freelance model allows for higher earnings (e.g., through working more than a standard 8-h shift per day), especially on weekends when there are more deliveries, and through specific bonus structures.

In Berlin, directly employed couriers work alongside couriers employed through temporary staffing agencies, who often work for a specific platform for only a short period, and they were paid slightly higher. Different employment models fragment the workforce by creating diverging interests, making it more difficult for workers to agree on common actions. Moreover, most workers, including freelancers and temporary workers, especially in the early stages of organising, did not have access to institutional frameworks such as collective agreements or works councils. Those who took the first step in organising warehouse closures through wildcat strikes were often members of what would later officially become the Gorillas Works Council. These workers were protected from dismissal for actions like work disruptions due to their status as electoral council members responsible for organising works council elections.

Finally, barriers to building associational power in the Oslo and Berlin delivery sectors also result from platforms' efforts to undermine collective worker organisation, such as limiting interactions between workers. As expressed by this Berlin-based worker activist,

'Before, when I was working in Lieferando, in the app, all the couriers could talk in one chat room together. The dispatchers and managers could see this chat. But after, they removed this option because of unionising and all that'. (Interview with Berlin-based Lieferando courier, 2021)

When workers engage in collective organising, platforms implement penalising measures, such as firing activists or allocating fewer shifts to 'problematic' workers. In Berlin, workers' vulnerability to being fired is exacerbated by delivery companies' employment practices, which (except for Lieferando) offer only 1-year fixed-term contracts with a probation period of 6 months, during which platforms can dismiss workers without notice or justification.

Given these barriers to building structural and associational power, what opportunities and challenges exist for workers to leverage institutional power resources? In Oslo, the main institutional power resource available to workers is to organise under the auspices of a trade union, which allows workers to strike and push for a collective agreement. Until 2022, the right to strike was limited to employees. However, in 2022, after this study was completed, the European Commission adopted guidelines allowing solo self-employed individuals to engage in collective agreements, expanding their capacity for collective action. In Berlin, couriers with employment contracts can either organise within a trade union and push for a collective agreement or organise in works councils. Workers from both Oslo and Berlin report that one main challenge in leveraging the institutional power resources linked to collective bargaining and works council formation was involving migrant workers, who are often unfamiliar with the Norwegian or German industrial relations frameworks and the roles of unions and works councils. These challenges were especially pronounced in Berlin, where migrant workers at Gorillas took the lead in (self-)organising and forming works councils. To form a works council, workers must follow a formal election process requiring extensive documentation. Usually, workers are guided in this process by an established trade union. However, in the case of Gorillas, significant language barriers existed since no detailed information or training about works council formation in English was offered by traditional trade unions, according to interviewed worker activists. Moreover, to receive support from the established service sector union ver. di, responsible for Gorillas as a grocery delivery company, the GWC first needed to organise a significant number of workers. This long-term organising approach was incompatible with Gorillas workers' need to achieve short-term solutions to the pressing problems they faced, which is why workers chose to organise outside of ver. di (Interview with GWC activist, 2022; Fairwork, 2021).

In the next section, we will illustrate the different strategies that delivery workers in Oslo and Berlin adopted to overcome barriers to leveraging institutional power resources and to building associational and exercising structural power.

Delivery workers' strategies for overcoming barriers to building labour power

Berlin: Grassroots organising, network building and works council formation at gorillas

Initially, a small group of migrant workers at Gorillas began organising meetings in public places and squats to discuss workplace issues, such as faulty equipment, payment delays, opaque wage cuts and unsanitary warehouse conditions. These meetings helped workers from diverse backgrounds discover and formulate shared interests – a first step towards building associational power. An open letter to Gorillas management was written and signed by the workers, as described in the following quote by one worker:

'Who wants to sign it? The letter was asking the company to listen to workers and try to find a way to fix the problems. I signed, hoping to find people that I could talk to about this. Then the blizzard came. People from two warehouses refused to work. Basically, they organised a spontaneous strike'. (Interview with GWC activist, 2022)

After receiving no response from the management, and facing a harsh winter in Berlin, a group of Gorillas couriers stopped work in protest, leading the company to temporarily cease operations in February 2021. This bolstered workers' confidence in collective organising and marked a turning point in their efforts.

Motivated by this success, a group of seven workers founded the GWC and raised various concerns with management. When management again failed to respond, the workers felt their representation was not being taken seriously (Rosa Luxemburg-Stiftung, 2021). At this stage, the GWC was a group of workers seeking changes to company policies that affected them. However, they lacked formal legal representation. To address this limitation, the GWC aimed to leverage institutional power resources by establishing a works council. The Works Constitution Act (Betriebsverfassungsgesetz, BetrVG) provided the GWC with an institutional power resource that protected their key organisers from arbitrary termination, as members of the electoral council – responsible for organising works council elections – and the works council itself are protected from dismissal. In this way, the GWC successfully challenged the dismissal of a member and official initiator of the works council process, who had been terminated after posting about labour rights in Germany on social media (Fairwork, 2021).

However, the formation of a works council requires navigating a complex bureaucratic process, which must be conducted in German – a challenge for the GWC members, most of whom had limited proficiency in the language. To overcome this, building coalitional power resources through networks with local labour and community activists was crucial. These networks included labour activists from the anarchist grassroots union Freie Arbeiter*-innenunion (FAU) and the Berlin Tech Workers Coalition, a grassroots worker collective in the tech start-up sector. Through these networks – which continued to play a significant role in organising workers from other delivery platforms such as Flink and Getir – workers accessed knowledge about German labour laws and the works council formation process.

In parallel with forming a works council, the GWC sought to expand their associational power by gaining members and mobilising workers for collective action. Throughout 2021, the GWC organised various protests to address the pressing issues workers faced. To further expand their associational power, GWC members leveraged coalitional power resources, drawing support from local labour and community activists who helped mobilise different migrant and left-wing communities (as well as other delivery workers) for wildcat strikes and demonstrations. Allied activists also contributed to leveraging discursive power resources by writing and sharing social media posts and news reports to raise awareness and public support for Gorillas workers' issues.

Their growing base of associational power gradually enabled Gorillas workers to exercise structural power through wildcat strikes that disrupted operations in Berlin. One of the largest wildcat strikes occurred in July 2021, following the company's failure to respond to a list of 19 demands from Gorillas workers. For an entire day, more than 100 Gorillas couriers and warehouse workers halted operations and toured Berlin on their bikes, visiting various warehouses to mobilise more workers. A member of the German Bundestag for the Social Democrats joined the protests in solidarity. By the end of the strike, workers had gained not only greater visibility but also promises from the company to address the most urgent issues. To organise this strike and other demonstrations, coalitional power resources – such as access to

resources from allied local migrant activist organisations – were crucial for Gorillas workers. As one former GWC activist explained': Specifically Migrantifa, they did a lot. They got the car, they got the sound system, they helped with the technical organising of a lot of our rallies' (Interview with former GWC organiser, 2022).

The GWC and their allies also used coalitional and discursive power resources to overcome barriers in the works council formation process, particularly a lawsuit initiated by Gorillas, which sought to challenge the legal basis of the electoral council (Fairwork, 2022). The GWC launched a broad social media campaign, framing the lawsuit as an attempt at union-busting, and received widespread public and media support from their network of allies. As one GWC organiser explained:

'There were a bunch of panels, etc., that we were invited to speak at by all these different organisations. [...] It's kind of this mutual support thing where you do this, and then they help you out with something else. So that's often the case of the support. If an issue is promoted by bigger organisations, then their supporters tend to generate a better outreach'. (Interview with former GWC organiser, 2022)

After the Berlin labour court formally rejected Gorillas' claim against the electoral council in December 2021, the first works council at Gorillas was established. Many GWC leaders became its members, and the works council gained support from a large portion of the workforce. With the establishment of the works council, Gorillas workers were able to institutionalise the shift in power between workers and management that had been achieved through a combination of power resources, wildcat strikes and protests. Works council members could now address issues directly with management without fear of dismissal. However, the works council has only been able to achieve limited improvements for workers, due to management delaying responses to inquiries, cancelling or postponing meetings, or simply rejecting the council's demands (Rosa Luxemburg-Stiftung, 2021). Furthermore, without the support and training resources of an established trade union, works council members have struggled to navigate the complex bureaucratic processes required to run a works council (Interview with former GWC organiser, 2022).

Oslo: Trade union organising and collective bargaining at Foodora

In September 2019, employed Foodora workers, represented by the United Federation of Trade Unions Fellesforbundet in Norway, agreed on a collective agreement with Foodora: the first collective agreement in app-based delivery and, therefore, a historic win for workers. In the following, we examine the strategies through which delivery workers in Oslo – the local arena for workers' strikes and protests – overcame barriers to building labour power, as illustrated in Section 4.2, and finally managed to sign this agreement with Foodora.

The first step towards building power resources among Foodora workers was to develop the ability to organise collectively and to build associational power. In the face of the spatial fragmentation of the workforce, workers initially relied on a Facebook group called 'Riders Club Norway' and later a Slack group to mobilise workers. The Facebook group described itself as 'an inclusive cycling community in Norway created by working cyclists in Oslo'. This online community soon became a space for discussing precarious working conditions and low pay. From this community, about 20 – primarily Norwegian and Western European workers – decided to organise under the Transport Workers Union. These workers' decision to join a trade union was influenced by Norway's high unionisation rate and strong collective bargaining

tradition, leading couriers to believe that union membership was the best way to improve their conditions (Jesnes et al., 2021). This demonstrates how societal-level associational power interacts with, and shapes, workplace-level power (Refslund & Arnholtz, 2022).

After this initial phase of establishing a core group of worker union activists and representatives, the challenge remained to reach a level of organisation that would enable workers to disrupt Foodora's operations and thereby exercise structural power. Although the collective agreement negotiations had begun, the lengthy process made workers sceptical about joining the union. However, two strategies helped them to recruit new union members and expand their collective power base. First, they used the general growing dissatisfaction about deteriorating conditions at Foodora – couriers had lost various benefits, such as access to an office – to recruit workers for the union. New members were recruited through face-to-face meetings outside restaurants and via the Slack channel. Second, worker activists leveraged Norwegian labour law as an institutional power resource, provided by the Norwegian Working Environment Act (WEA), to mobilise workers in claiming their right to actual working hours defined in their contracts (Jesnes, 2024). This demonstration of institutional power, which offered significant benefits to workers, was crucial in many workers' decisions to join the union. The following quote from a Foodora worker and union representative describes the somewhat lengthy process of organising couriers, and how the efforts to increase hours in contracts triggered mobilisation:

'From the end of 2017 we grew to 30–40 members. It also went up a little or remained stable. The challenge was that it took a long time with the collective agreement. Will it ever come to a result? Did we ever achieve anything? Is there any point in signing up? It was a debate back and forth, some were sceptical, some who joined but that were still sceptical. More people joined when we got some victories. For example, when we demanded a position corresponding to actual working hours'.

In the spring of 2019, Foodora workers managed to expand their associational power base to one-sixth of the workforce, organising in the Transport Workers Union, which subsequently merged with Fellesforbundet. Both unions are members of the leading trade union confederation LO, which counted one million members in 2023 (LO, 2023). The affiliation with Fellesforbundet allowed Foodora workers to mobilise additional power resources in two ways: First, it gave workers access to structural power resources in the form of a well-equipped strike fund, which enhanced workplace bargaining power. Second, through Fellesforbundet, workers now had access to communication officials and other human resources, enabling them to leverage discursive power in the form of media campaigns.

Through Fellesforbundet, workers demanded a collective agreement with Foodora. After obligatory mediations failed, in August 2019, Foodora couriers and the union decided to start a strike led by over 100 couriers, which lasted 5 weeks. In this strike, workers sought to leverage a combination of structural power through work stoppages compensated by union funds, coalitional power by mobilising support from politicians, and discursive power through broad press coverage and a social media campaign (#rosastreiken, or 'pinkstrike'). Due to the upcoming local elections, the strike received broad media attention, further fuelled by visits from high-level national politicians and union representatives during the local elections that autumn. The visibility of the strike, combined with the use of social media, helped to overcome barriers in mobilising migrant workers, allowing the union to double its members among couriers. As one courier put it:

'I didn't know anything about the union at that point. I started to hear about the issues from some colleagues. We had a forum on Slack for couriers. I was added to the forum, and then suddenly there was a strike and a meeting for everyone to join, which I did. I read about what

the Foodora management said about the strike. [...] It looked like Foodora wasn't doing the right thing. They didn't take me out to strike straight away [when I joined the union], but after 2 weeks I joined the strike'. (Interview with Oslo-based courier, 2022)

One significant success factor for the strike was the resources provided by Fellesforbundet and LO, which greatly enhanced workers' associational power, as explained by this unionist:

'The execution of the strike had a lot to say about the fact that we were in a larger union – we had our own media people. They followed up closely on all points. We were here [at the office] a quarter of an hour after the negotiations broke down [at the National Mediator Office] and then the media group from Fellesforbundet waited for us and wondered what a flyer should look like, and it was printed at 10 o'clock the next day. Strategic words were given by the couriers who had been in the negotiations all along. The networks were bigger. We were part of a large apparatus. [...] We have received a lot of help'. (Interview with union official from Fellesforbundet, 2019, cited in Jesnes, 2024, p. 518)

By 29 September 2019, Foodora finally agreed to sign a collective agreement with Fellesforbundet, which also established monthly meetings between worker representatives and management to discuss any issues workers face. The collective agreement is renegotiated every 2 years between the Federation of Norwegian Enterprise (Virke), which Foodora joined, and Fellesforbundet, while wages are renegotiated locally each year. The collective agreement institutionalised the shift in the capital–labour power balance that Foodora couriers had achieved by combining different power resources. However, the potential of the collective agreement to bring about improvements for workers was circumvented by Foodora's shift towards the independent contractor model. When Foodora introduced this option in 2019, parallel to the negotiations for a collective agreement and the expansion of Wolt in the capital, many workers opted to become freelancers to work more hours, especially on weekends when demand was highest. Foodora employees are subject to WEA limits on working hours, unlike independent contractors. Now, the company-level collective agreement at Foodora Norway covers only those workers classified by the company as employees and does not affect platform workers at other companies. Table 2 summarises the barriers and strategies for building delivery workers' power in Oslo and Berlin.

DISCUSSION AND CONCLUSIONS

What can we learn from this comparative analysis of delivery workers' collective action strategies in Germany and Norway regarding opportunities and barriers for building labour power in food and grocery delivery? Three arguments will be made here concerning (a) delivery workers' need to strategically combine different power resources to overcome barriers to building labour power, (b) the role of industrial relations frameworks in shaping workers' strategies and (c) the dynamic and relational nature of workers' power resources.

First, our analysis has highlighted various barriers to delivery workers' exercise of associational, structural and institutional power. These barriers stem primarily from the high share of migrant workers, who often lack knowledge of the local language and labour laws, and platforms' mode of work organisation, which reinforces competition and segmentation among couriers, aligning with the findings of Altenried (2021) and Heiland (2021). Refslund and Arnholtz (2022) have suggested studying cases where workers combine various power resources. Our research demonstrates that workers can overcome barriers by strategically combining different power resources. This is important to show that worker activism can succeed when supported by multiple stakeholders who enhance worker power.

TABLE 2 Summary of barriers and strategies for building labour power in Berlin and Oslo (own elaboration).

Power resource	Berlin	Oslo
Structural power	× Algorithmic management enables easy replacement of workers × High share of migrant workers depending on wages from job ✓ Wildcat strikes (usually not exceeding 1 day) with support from allied community and labour activist groups	× Algorithmic management enables easy replacement of workers ✓ 5-week-long strike with support from Fellesforbundet including strike fund
Associational power	× Spatial fragmentation of workers × Diverging interests of heterogenous workforce × Union-busting measures by company ✓ Works council formation	× Spatial fragmentation of workers × Diverging interests of heterogenous workforce ✓ Organising within established trade union provides access to organisational resources
Institutional power	× Migrant Workers lack language skills and knowledge to manage bureaucratic procedure for works council formation × Limited support from established unions × Attempts of company to stop works council formation ✓ Mobilising support from labour activist allies to navigate works council formation process	× Collective agreement only covers employed workers ✓ Using the Norwegian Working Environment Act to improve working conditions. ✓ Using Norwegian institutional collective bargaining framework to (re-) negotiate collective agreement and wages
Coalitional power	✓ Mobilising support from allied grassroots labour activists and local migrant communities	✓ Mobilising support from local politicians
Discursive power	✓ Media and public campaigns to raise public awareness and support	✓ Media and public campaigns to raise public awareness and support

In the Norwegian case, Foodora workers' ability to build associational power through organising within a large established trade union and the institutional framework granting employed workers the right to strike was crucial to workers' capability to exercise structural power via a 5-week strike. Through the union's strike fund, Foodora workers had access to an alternative income source on strike days, enabling them to stop work for a prolonged period. The strike's effectiveness as leverage against Foodora was further strengthened by mobilising discursive and coalitional power resources, in the form of support from the Norwegian Confederation of Trade Unions (LO) and local politicians. Figure 1 illustrates the interplay of power resources combined by Oslo-based Foodora couriers.

In contrast, Berlin-based Gorillas workers' ability to exercise structural power through work stoppages was far more limited: Due to their decision not to organise with an established trade union, they could only execute wildcat strikes, which typically lasted up to 1 day on each occasion, and hence had a limited effect on Gorillas' operations. Similarly, workers faced

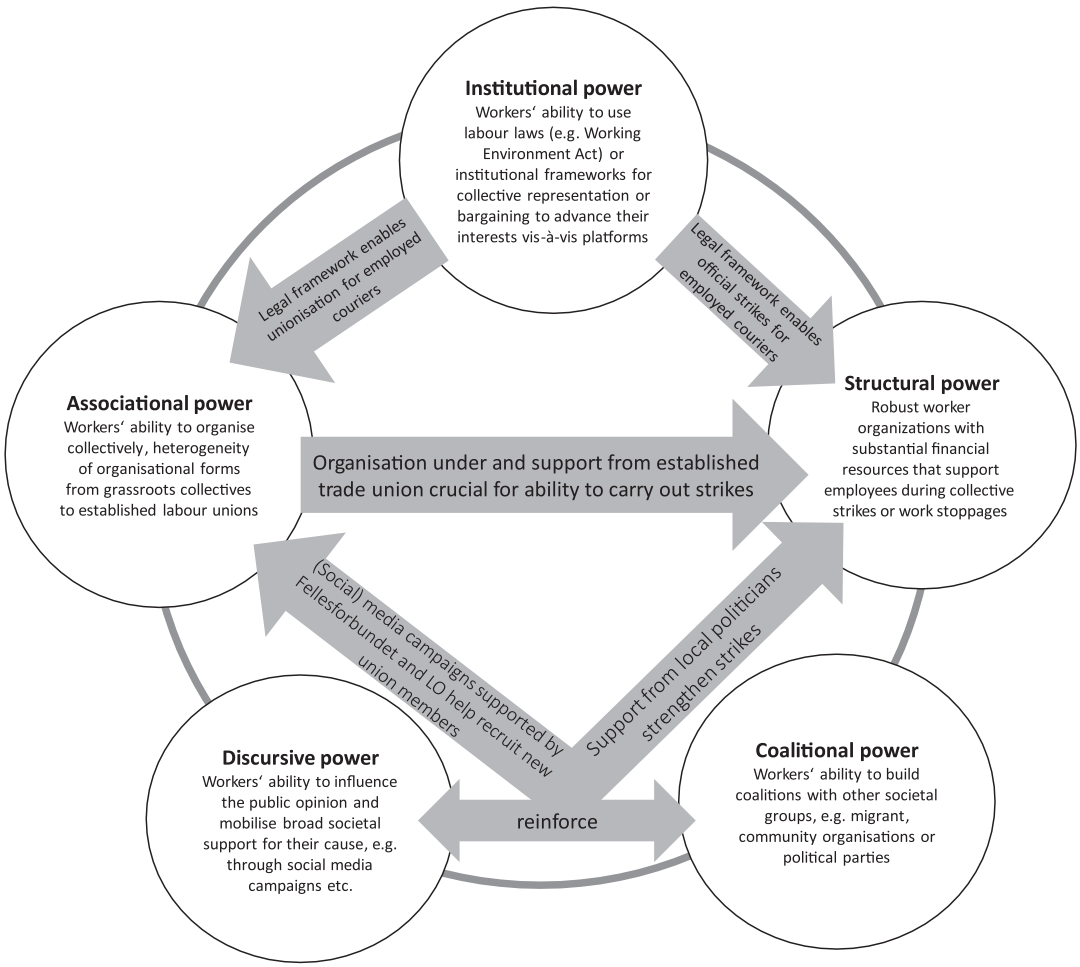

FIGURE 1 Interplay of power resources in the Oslo case (own elaboration).

greater barriers to leveraging institutional power resources through forming works councils due to language barriers, complex bureaucratic procedures, and resistance from the company. Against this background, workers' ability to mobilise additional coalitional and discursive power resources through a broad (social) media campaign covering workers' protests and criticising Gorillas' union-busting practices was crucial for creating leverage through their wildcat strikes and gaining public support for the works council formation.

Pressure on Gorillas therefore resulted not mainly from the workers' ability to disrupt the company's business but rather from their ability to frame their strikes and the works council formation project 'in line with prevailing views of morality' and thereby influence public opinion (Schmalz et al., 2018, p. 123). Figure 2 illustrates the interplay of different power resources leveraged by Gorillas workers in Berlin.

Our analysis has highlighted that institutional frameworks for collective representation can provide potential institutional power resources for platform workers. However, it has also shown that workers' ability to leverage institutional power depends on their capacity to

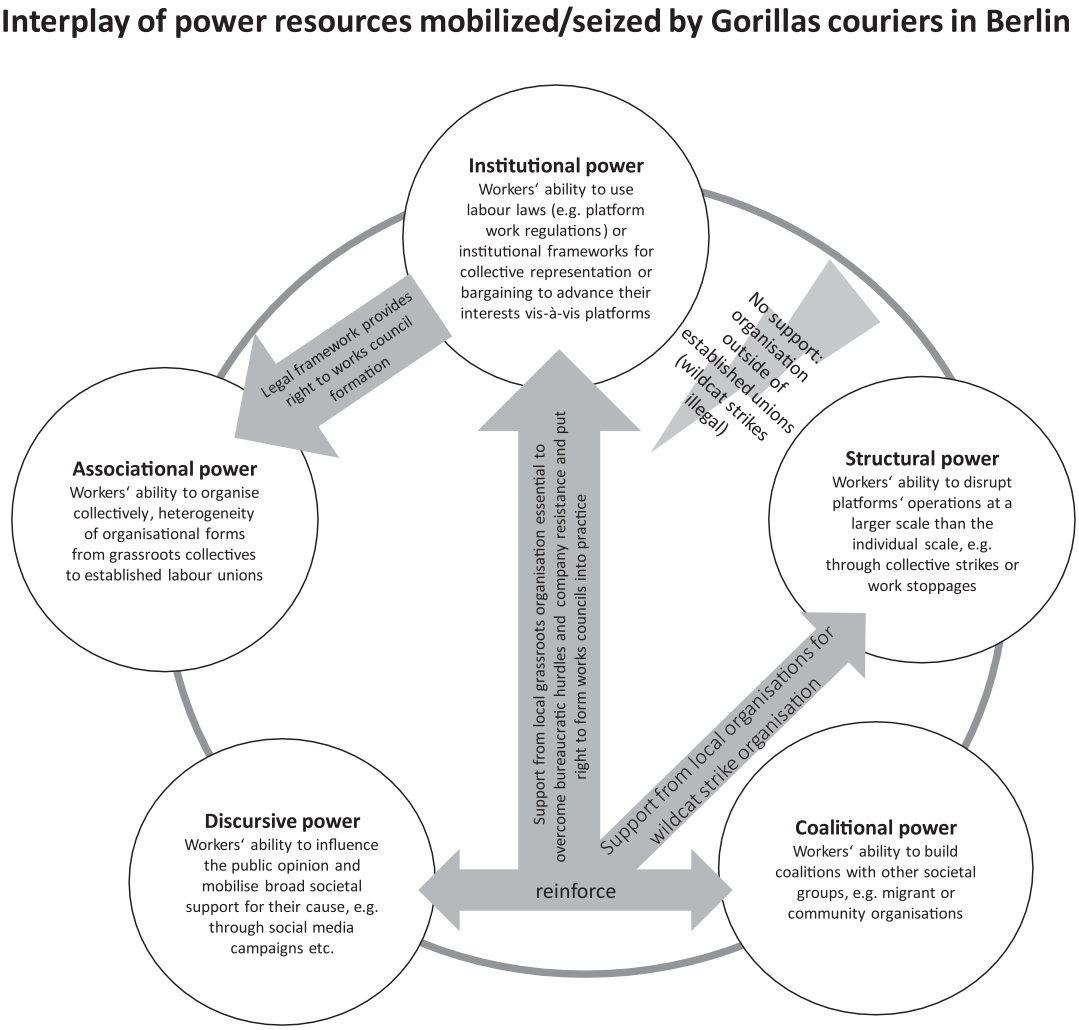

FIGURE 2 Interplay of power resources in the Berlin case (own elaboration).

mobilise other power resources, particularly associational power, illustrating the importance of leveraging the interplay between different power resources (Refslund & Arnholtz, 2022).

Second, our analysis shows that the institutional employment relations context does matter for worker strategies (see also Jesnes, 2024). We hedge Cini et al.'s (2022) argument that 'the different ways of organising adopted by riders in the early phase of their mobilisations depends neither on features of the labour process nor on the institutional characteristics of the employment relations context' (p. 346). Employed Foodora workers in Oslo chose to organise with an established union and seek a collective agreement, recognising the enduring power of unions in Norway, even in precarious sectors like transport and logistics. This also highlights the importance of mobilising power resources across the micro-, meso- and macro levels, as noted by Refslund and Arnholtz (2022).

In contrast, Berlin Gorillas workers' decision against joining an established trade union and instead pursuing works council formation independently must be interpreted against the background of Germany's 'dualised labour market' (Emmenegger et al., 2012). In Germany,

collective bargaining and institutionalised industrial relations are particularly prevalent in sectors with typical employment relations, while unionisation is low to non-existent in new, precarious and flexible service sectors with a high share of migrant workers – such as the app-based delivery sector. In these segments, established trade unions face various challenges in organising, including high worker turnover, and workers' often short-term motivation to use these jobs as a temporary solution. Consequently, the dualisation of the labour market is further aggravated, with 'insiders' in typical employment being covered by collective bargaining agreements and enjoying greater job security, rights and social protections compared to 'outsiders' in new, non-unionised and precarised sectors, such as the platform economy (Ibid.). These tendencies are also observed in Norway, albeit to a slightly lesser extent.

Lastly, our analysis has shown that once workers have institutionalised gained power resources (e.g., through collective agreements or works council formations), these power resources are still frequently contested and circumvented by platforms' counter-practices. This is especially the case when market competition is high and, in Norway, where there is no collective agreement covering several platforms that regulate the terms of competition in the industry. In Oslo, Foodora introduced the freelance model shortly after signing the company collective agreement and made it attractive for workers by prioritising freelancers when allocating lucrative weekend shifts. With many workers opting for the freelance model, the coverage of the company collective agreement and Foodora workers' associational power base faced a severe backlash. Without obtaining collective agreements in other delivery companies, it will remain difficult for the workers to maintain the successes achieved with the collective agreement and challenging to improve working conditions and pay among app-based food and grocery delivery couriers.

In Berlin, Gorillas (before its takeover by Getir, which has left Germany as of the writing of this article) changed its business model to a franchise model in reaction to workers' initiative for establishing a works council. Hence, once workers had finally managed to establish a works council, the council's representation mandate was limited to a specific warehouse (and no longer to the whole company), representing only a small part of the workforce. Our empirical findings therefore highlight not only the need for workers to develop or attain power resources but also the need for workers to maintain these power resources (see also Refslund & Arnholtz, 2022). This challenge intensifies when companies retain the option to exit the market, a strategy they often use in delivery services, and in this case. It also requires the continuous review and adaptation of organising strategies to respond to platforms' counter-practices and a differentiated strategy targeting not only individual companies but multiple companies in the same sector. An analysis of how this can best be achieved represents an important field for further studies focusing on collective worker agency in the platform economy.

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CONFLICT OF INTEREST STATEMENT

The authors declare no conflicts of interest.

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