

# LAW 9/2025, OF 3 DECEMBER, ON SUSTAINABLE MOBILITY

## Relevant Developments in the Labour Field



### I. Introduction.

Law 9/2025 introduces a new regulatory framework that makes mobility at work a structural element of labour organisation. The law broadens the scope of labour *compliance*, incorporates new planning, negotiation and monitoring obligations, and establishes a specific penalty system.

Its impact will be cross-cutting: it affects HR, Operations, Occupational Risk Prevention, Sustainability and Labour Relations.

### II. The 10 most relevant developments.

#### 1. General obligation to draw up Sustainable Mobility Plans for Work (PMST).

Companies and public entities with more than 200 employees or 100 per shift must have an SMWP in place within a maximum period of 24 months from the date of entry into force. The plan must be based on a diagnosis of travel patterns and contain corrective and improvement measures.

#### 2. Mandatory negotiation with employee representatives.

SMTPs must be negotiated with the RLT or, failing that, in a committee with the most representative trade unions, both at a general and sectoral level. Mobility becomes a labour issue and not just a logistical one.

#### 3. Amendment of the Workers' Statute (DF3).

Article 85.1 ET is extended to include the obligation to negotiate sustainable mobility measures in collective agreements: collective transport, active mobility, low emissions, teleworking, working hours and collaborative solutions.

#### 4. Monitoring and periodic evaluation.

Plans must include a biannual monitoring report, with indicators and evaluation of results, which will be repeated every two years of the plan's validity.

#### 5. Reinforced minimum content of PMSTs.

Plans must include measures such as:

- Promotion of active mobility (walking, cycling),
- Public transport,
- Low-emission mobility, both shared and collaborative,
- Teleworking where possible,
- Recharging infrastructure for zero-emission vehicles,
- Road safety and accident prevention measures,
- Residual carbon footprint offsetting.

#### 6. Additional obligations for high-occupancy centres.

Centres with more than 1,000 employees located in municipalities or metropolitan areas



with more than 500,000 inhabitants must adopt enhanced measures to reduce travel during rush hour or during the working day and prioritise low- or zero-emission modes of transport.

### **7. Inclusion of all groups accessing the centre.**

The diagnosis and measures must consider not only the workforce, but also visitors, suppliers and external personnel, while also integrating municipal or regional mobility plans.

### **8. Creation of the Integrated Mobility Data Space (EDIM).**

Article 13 establishes new obligations regarding information, traceability and data management, which will require the professionalisation of the collection, processing and reporting of data on access, travel and infrastructure use.

### **9. Obligation to guarantee accessibility, equality and safety in travel.**

Articles 29 to 31 require a review of how staff access workplaces, ensuring safe, accessible and equitable conditions for all.

### **10. New penalty system (Articles 103 to 110).**

Infringements for non-compliance with planning, data, accessibility or monitoring obligations are classified. Mobility is no longer a voluntary area and becomes enforceable by the labour authority.

## **III. Conclusion.**

Law 9/2025 represents a structural change in the management of labour mobility. Companies must integrate this issue into their internal culture, coordinate departments and anticipate

change through diagnosis, negotiation and planning. The existence of specific subsidy lines makes anticipation a competitive advantage.

The challenge is not only to comply, but also to organise and prioritise actions to minimise internal friction and maximise organisational return: less congestion, a better employee experience and safer, more sustainable mobility.



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