

Germany's SchwarzArbMoDiG Gives Customs AI-Supported Risk Scoring - With a Legal Ban on Automated 'Dangerousness' Verdicts

AI in the Public Sector · Good practice · Germany

Quality score: 47/100

Evidence strength: Moderate

Summary

Germany's SchwarzArbMoDiG law, in force since January 2026, gives customs' undeclared-work unit a legal basis for AI-supported risk scoring and cross-agency data analysis - while explicitly banning AI from autonomously judging an individual's 'dangerousness'.

Key dimensions

Dimension	Score
Evidence of impact / measured public value	0/3
Transparency, fairness & accountability	2/3
Transferability / demonstrated replication	1/3
Scalability beyond pilot	2/3
Governance, capability & sustainability	2/3

Evaluated by C-NAPSE

Data sources

[C-NAPSE web research](#) — accessed 2026-08-19

[Generalzolldirektion - Finanzkontrolle Schwarzarbeit \(FKS\), German Customs](#) — accessed 2026-08-19

[Zoll: FKS Jahresbilanz 2025 \(official\)](#) — accessed 2026-08-19

[CMS Law: Gesetz zur Modernisierung der Schwarzarbeitsbekämpfung beschlossen](#) — accessed 2026-08-19

[netzpolitik.org: Kampf gegen Schwarzarbeit - Zoll soll Telefonate abhören dürfen](#) — accessed 2026-08-19

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