

## CEEP RESPONSE TO EU STRATEGIC FRAMEWORK ON HEALTH AND SAFETY AT WORK 2014-2020

### Executive summary

- CEEP agrees with the commission's proposal regarding three major health and safety at work challenges to be emphasized during the period 2014 to 2020: to **improve implementation of existing health and safety rules**, to **improve the prevention of work-related diseases**, to take account of **the ageing of the EU's workforce**
- CEEP's view is that at this time no new legislation or Europe-wide targets would contribute to the improvement of health and safety. In the event that the Commission considers initiating legislation, CEEP would prefer "framework" legislation, with implementation details to be determined by the Member States.
- CEEP notes that continued attention needs to be paid to the prevention of occupational MSDs, cancers and mental distress. Regarding MSDs, improved dissemination and implementation of existing standards and regulations are seen **as being of greater value than the formulation of more extensive or detailed regulations**.
- Regarding an ageing workforce, **Member States are encouraged to promote sustainable work conditions linked with the age of workers in a life cycle approach**. Social dialogue partners have an essential role to play in efforts to identify, create and maintain sustainable working conditions.
- The seven key strategic objectives of the new framework seem to be both relevant and well-formulated; **their value will be determined by what is accomplished during the coming years**. The Commission has the opportunity to provide support to the objectives, but several objectives would seem to be primarily within the sphere of influence of Member States and other organizations.
- CEEP supports efforts to maintain high levels of health and safety while reducing administrative burdens. CEEP supports the objectives of REFIT. **A continuous joint effort by the Commission, other EU institutions and Member States is required to simplify EU legislation and eliminate unnecessary administrative burden**.
- CEEP would like to point out that neither CEEP nor representatives from its member state organizations are included in any ordinary capacity in EU-OSHA, ACHS or SLIC. CEEP and its members are in effect excluded from the social dialogue process as it is conducted in these bodies. This applies also to the objective of reinforcing coordination with international organisations.

CEEP is pleased to have a new strategy document at the EU level and CEEP supports the commission's efforts in the field of occupational safety and health.

CEEP agrees with the commission's proposal regarding three major health and safety at work challenges to be emphasized during the period 2014 to 2020:

- to **improve implementation of existing health and safety rules**, in particular by enhancing the capacity of micro and small enterprises to put in place effective and efficient risk prevention strategies
- to **improve the prevention of work-related diseases** by tackling new and emerging risks without neglecting existing risks
- to take account of **the ageing of the EU's workforce**.

Given that approximately 80% of workers in the EU are employed by SME's, CEEP supports the attention devoted to this area. CEEP proposes that, based on national statistics, greater attention be focused upon assisting SME's in managing the core risks associated with their branch or area of activity. For SME's, local risk assessment to mitigate other risks could complement efforts to remove and reduce risks identified through analysis of national statistics.

CEEP notes that continued attention needs to be paid to the prevention of occupational MSDs, cancers and mental distress. Regarding MSDs, improved dissemination and implementation of existing standards and regulations are seen as being of greater value than the formulation of more extensive or detailed regulations. In addition, increased vigilance and effort needs to be devoted to evaluating the health effects of the 100 000 chemical substances used in the EU. Expanded collaboration with European Chemical Agency and State members are viewed as crucial to eliminating or minimizing the negative effects of chemical exposures. Absence and illness related to mental distress demand continued attention. Collaborations between occupational, health and public health experts and bodies might be required in order to better address this complex issue.

Those involved in innovation, for example, so-called green technologies, should, in CEEP's view, be encouraged to integrate OSH issues in the design processes.

Regarding an ageing workforce, Member States are encouraged to promote sustainable work conditions linked with the age of workers in a life cycle approach. Social dialogue partners have an essential role to play in efforts to identify, create and maintain sustainable working conditions.

The Strategic Framework proposes to address these challenges with a range of actions under seven key strategic objectives:

- **Further consolidating national health and safety strategies** through, for example, policy coordination and mutual learning.
- **Providing practical support to small and micro enterprises** to help them to better comply with health and safety rules. Businesses would benefit from technical assistance and practical tools, such as the Online Interactive Risk Assessment (OiRA), a web platform providing sectoral risk assessment tools.
- **Improving enforcement by Member States** for example by evaluating the performance of national labour inspectorates.
- **Simplifying existing legislation** where appropriate to eliminate unnecessary administrative burdens, while preserving a high level of protection for workers' health and safety.

- **Addressing the ageing of the European workforce** and improving prevention of work-related diseases to tackle existing and new risks such as nanomaterials, green technology and biotechnologies.
- **Improving statistical data collection** to have better evidence and developing monitoring tools.
- **Reinforcing coordination with international organisations** (such as the International Labour Organisation (ILO), the World Health Organisation (WHO) and the Organisation for Economic Co-operation and Development (OECD) and partners to contribute to reducing work accidents and occupational diseases and to improving working conditions worldwide.

While the seven key objectives seem to be both relevant and well-formulated, their value will be determined by what is accomplished during the coming years. The Commission has the opportunity to provide support to the objectives, but several objectives would seem to be primarily within the sphere of influence of Member States and other organizations.

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The objective of improving enforcement by Member States might reasonably be re-formulated to emphasize improved compliance. The term “enforcement” implies the use of negative sanctions to compel employers and workers to follow laws and rules. Labor inspectorates using this model tend to search solely for errors and violations and ignore all else. CEEP proposes complementing this approach with one that encourages and acknowledges effort and compliance among employers and workers.

CEEP supports efforts to maintain high levels of health and safety while reducing administrative burdens. CEEP supports the objectives of REFIT. A continuous joint effort by the Commission, other EU institutions and Member States is required to simplify EU legislation and eliminate unnecessary administrative burden. In the coming years, key concerns will be assessing whether existing OSH legislation is suitable and effective, examining how to improve its implementation, and ensuring better and equivalent compliance across Member States and enterprises. CEEP’s view is that at this time no new legislation or Europe-wide targets would contribute to the improvement of health and safety. In the event that the Commission considers initiating legislation, CEEP would prefer “framework” legislation, with implementation details to be determined by the Member States.

CEEP supports the proposals to integrate awareness raising of OSH as well as OSH education into school programs. OSH topics should be included in educational and training programs for those aspiring to become managers and leaders.

It is essential to promote development of work organizations and working cultures which support health and safety at the workplace. In doing so we also promote a positive social climate which enhances productivity.

Below follows a quote from the Finnish strategy document “Policies for the work environment and well-being at work until 2020” which further stresses our point of view:

*“Health, safety and well-being are important common values, which are put into practice in every workplace and for every employee. The activities of a workplace are guided by a common idea of *good work and a good workplace*. *Good work means a fair treatment of employees, adoption of common values as well as mutual trust, genuine cooperation and equality in the workplace. A good workplace is productive and profitable. From the perspective of the work environment, a good workplace is a healthy, safe and pleasant place.*”*