

# Public consultation on the new EU occupational safety and health policy framework

You reply as -single choice reply-( <b>compulsory</b> )	on behalf of an organisation
Please indicate your organisation's name -open reply-( <b>compulsory</b> )	DASHPO (Danish Association of Safety and Health Professional Organizations)
In which country are you and/or your organisation based? -open reply-( <b>compulsory</b> )	Denmark

## Necessity and nature of a new EU OSH policy framework

Do you agree with the assessment of the EU OSH Strategy? Did it lead to tangible results? -open reply-(**compulsory**)

We partly agree with the assessment of the EU OSH strategy, but we don't find, that the strategy lead to the necessary results for EU OSH performance.

In order to improve workplace safety and health, do you consider it necessary to continue coordinating policies at EU level or is action at national level sufficient? -open reply-(**compulsory**)

We consider it as a "must" both to intensify and continue coordination of OSH policies at EU level and ensure implementation, so the resulting work environment are safe and secure.

If you deem such a framework at EU level is necessary, explain why. Which aspects should be covered? -open reply-(**compulsory**)

In order to create equal conditions at the internal market, and to prevent that employees are exposed to harmful and unsafe work environment, it's necessary to commit all member states to aim for the highest possible level or standard for safety and health. The following aspects should be covered: a. Regulation of the OSH protection level and national governmental control by the Labor Inspectorate b. Regulation of the company level of prevention, including workers involvement and the role of OSH professionals c. Regulation of role and competences and education of OSH professionals, which includes both internal functions in companies as well as external preventive services, Occupational Health Service, OSH-coordinators especially with functions in building and construction-sites and Occupational Health Doctors.

## Level of commitment

With respect to your answer to the above questions, is there a need for a new EU OSH Strategy or should alternative measure be considered? Please explain. -open reply-(**compulsory**)

We find a huge need for a new EU OSH strategy and also a need to pay more attention on implementation and law enforcement in EU-27. The reason why we propose this focus are big differences in law enforcement in different parts of EU, which give unequal conditions on the market and thereby undermine conditions so secure good work environment.

If EU level action is necessary in order to improve workplace safety and health, do you consider it necessary to set broad goals and priorities and to coordinate national policies at EU level? -open reply-(**compulsory**)

General goals are not in themselves effective measures, but they do give a direction for specific national efforts. Coordination of national policies will be still more necessary as new countries with very different levels and traditions for OSH-prevention will be members of EU. Not at least to secure equal market and production conditions.

What would be the added-value of including specific targets into a possible new EU OSH policy framework to measure progress in improving workplace safety and health in the EU? -open reply-(**compulsory**)

Specific targets will be more operational for the national implementation than broad non-binding goals and will also make better possibilities for measuring the progress and enable the member states to benchmark their level against each other.

Should a new policy framework include a list of objectives, actions, calendars and actors involved in the implementation of

actions or should it be limited to setting a vision for the future, and a definition of goals and priorities? -open reply-  
(compulsory)

It is crucial that a new framework or strategy includes specific actions and actors and not only visions and broad goals and priorities.

## Content of a new EU OSH policy framework

What are the key challenges in the OSH area?

How would you prioritise them? -open reply-(compulsory)

Harmonization of: a. The national OSH protection level b. The companies access to OSH professional support and the role and involvement of OSH professional companies - internal as well as external preventive services, OHS etc. c. The workers involvement in OSH at company level d. The competences and minimum education of OSH professionals including construction site OSH-coordinators

What practical solutions do you suggest to address all or some of these challenges? -open reply-(compulsory)

National binding EU regulation – developed after consultations with the OSH professionals European organizations such as ENSHPO, ISHCCO etc. Knowledge sharing and transfer of training and education standards for training of OSH professionals

Do you consider that such a framework should develop initiatives to provide further protection for vulnerable groups of workers and/or for workers in specific high risk sectors? -open reply-(compulsory)

Yes – especially young and elderly workers, pregnant workers, disabled employees, temporary and migrant workers – and high risk sectors such as fishing, mining, construction etc. Everybody is a part of a vulnerable group sooner or later in their life. So we are sure that every worker should have access to occupational health service as a member of one of vulnerable groups.

Do you consider that measures for the simplification of the existing body of EU OSH legislation should be included in such a political instrument? If so, which ones would you suggest? -open reply-(compulsory)

We don't find it necessary to include a simplification of the body of EU OSH legislation in a political instrument. The crucial point is how to stimulate activities at workplaces, that prevents risks and creates good work environment for all? Incentives to those firms, who works seriously and continuing with these fields, trough economic compensation, a strong brand or other form for recognition can push the development in the right direction. International regulators must always try to make simple and clear rules, but the complexity of the EU OSH-regulation is not a key problem for the companies as the OSH-rules from EU has to be implemented through national regulation.

Do you think that such a framework should specifically identify and address the challenges posed by the ageing of the working population? If so, which measures would you suggest? -open reply-(compulsory)

Yes indeed – when the work population grows elder (and includes still more females) the OSH protection level must be re-evaluated and adjusted

What measures would you suggest to reduce the regulatory burden on SMEs and micro-enterprises, including reducing compliance costs and administrative burden, while ensuring a high level of compliance with OSH legislation by SMEs and micro-enterprises?\* -open reply-(compulsory)

Micro-enterprises (and some SMEs) have generally a lower level of OSH-protection and bigger problems to maintain their company-internal OSH-prevention. They therefor need more compulsory OSH-professional support. Less OSH-regulation of these smaller enterprises will undermine the EU harmonization and deteriorate safety and health inside SME's dramatically.

Do you have any views on the role of social dialogue at EU and national level to the identification, preparation and implementation of any new initiatives to improve health and safety at work? -open reply-(compulsory)

EU should encourage good tri-partied OSH-dialogue at national level, support the establishment of relevant and sufficient framework for this dialogue – and perform consultations with the social partners and the OSH-professionals national organizations.

Add any further aspects that in your view were not sufficiently taken into account by the above questions? -open reply-  
(compulsory)

We have strong wishes that we in the end of the day can celebrate a new EU OSH strategy for occupational safety and health!