



Committee of the Regions

ECOS-IV-015

**72nd Plenary Session
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**OPINION
of the
Committee of the Regions
on the
COMMUNITY STRATEGY 2007-2012 ON HEALTH AND SAFETY AT
WORK**

THE COMMITTEE OF THE REGIONS

- believes that Member States need this strategy paper as a core document on which to draw as they develop their own strategic development plans to improve health and safety at work; such plans have major implications both for local and regional authorities and for larger businesses and SMEs alike;
- stresses that regional and local authorities are major employers in all EU Member States and are well-placed to spearhead health and safety initiatives. Therefore the European Commission should, when carrying out the strategy, pay special attention to local and regional authorities;
- shares the Commission's view that, under the Lisbon strategy, the Member States have acknowledged the major contribution that guaranteeing quality and productivity at work can play in promoting economic growth and employment. Indeed, the lack of effective protection to ensure health and safety at work can result in absenteeism, in the wake of workplace accidents and occupational illnesses, and can lead to permanent occupational disability. This is not only a human tragedy for the people concerned, but also has a major negative impact on the economy. The enormous economic costs of problems associated with health and safety at work inhibits economic growth and affects the competitiveness of businesses in the EU;
- considers that the Community and the Member States should, as a matter of urgency, have access to the latest reliable statistics and to a data collection and processing system that provides a true overview of the extent of occupational accidents and diseases.; And, in this sense, recommends to start working in order to harmonize statistics of labour accidents and professional illnesses in the European Union;

Rapporteur:

Uno Silberg (EE/UEN-EA), Chairman of Kose Municipality Council

Reference document

Communication from the Commission to the Council, the European Parliament, the European Economic and Social Committee and the Committee of the Regions – Improving quality and productivity at work: Community strategy 2007-2012 on health and safety at work
COM(2007) 62 final

I. POLITICAL RECOMMENDATIONS

THE COMMITTEE OF THE REGIONS

General comments

1. welcomes the European Commission's initiative to press ahead with efforts to improve quality and productivity at work and to devise a Community strategy on health and safety at work for the 2007-2012 period. This initiative seeks to secure a 25% reduction in accidents at work by 2012 in EU-27 by improving health and safety protection for workers. It would also make a major contribution to the success of the Growth and Jobs strategy;
2. believes that Member States need this strategy paper as a core document on which to draw as they develop their own strategic development plans to improve health and safety at work; such plans have major implications both for local and regional authorities and for larger businesses and SMEs alike;
3. stresses that regional and local authorities are major employers in all EU Member States and are well-placed to spearhead health and safety initiatives. Therefore the European Commission should, when carrying out the strategy, pay special attention to local and regional authorities;
4. shares the Commission's view that, under the Lisbon strategy, the Member States have acknowledged the major contribution that guaranteeing quality and productivity at work can play in promoting economic growth and employment. Indeed, the lack of effective protection to ensure health and safety at work can result in absenteeism, in the wake of workplace accidents and occupational illnesses, and can lead to permanent occupational disability. This is not only a human tragedy for the people concerned, but also has a major negative impact on the economy. The enormous economic costs of problems associated with health and safety at work inhibits economic growth and affects the competitiveness of businesses in the EU;
5. urges the Commission to pool the political synergies that exist between the individual EU institutions, the Member States and above all the local and regional authorities in a bid to improve health and safety at work;
6. considers that the Community and the Member States should, as a matter of urgency, have access to the latest reliable statistics and to a data collection and processing system that provides a true overview of the extent of occupational accidents and diseases. And, in this sense, recommends to start working in order to harmonize statistics of labour accidents and professional illnesses in the European Union;
7. feels that Member States must draw on a national strategy, based on the Commission strategy, to foster a safe working environment, covering issues of employment, employment relationships and conditions at the workplace;

8. considers that an effective insurance scheme must be available to Member States to cover workplace accidents and occupational illnesses. This would provide an incentive not only to increase safety at the workplace but also to keep a record of all workplace accidents and cases of occupational illness;
9. would stress the need to give sufficient attention to prevention measures in the context of risk management and to ensure that prevention is not seen as part of monitoring. Risk management comprises both prevention (proactive risk management) and a "fire brigade strategy" (reactive risk management), both of which must be given equal importance;
10. takes due note of Commission's assertion that this is a *strategy* for health and safety at work for the 2007 to 2012 period. The communication must therefore be deemed to be a *strategy document*;

Devising a strategic development plan

11. is pleased that a strategic development plan (strategy document) is being drawn up in line with Community rules;
12. notes a discrepancy in point 5 between the section on health surveillance (using certain procedures) and that dealing with social and demographic change (generational aspects). Moreover, the section on the rehabilitation of workers uses very old data (from 1999) which are hardly likely to be of any relevance for a strategy covering the period up to 2012. The 2002-2006 strategy should – at least – be taken as a base;

Remit, vision and underlying values

13. is surprised that the strategy document gives no real indication of its remit and vision. In terms of targeted Community action, therefore, the document lacks any common approach or purpose. It also fails to state its precise objective or what kind of action is supposed to be taken for which target group. Nor is it wholly clear about what a resolution of the issue is meant to achieve;
14. considers it important to give expression to Member States' shared values, which form the basis of joint action and underpin moves to achieve the objectives at hand;

Points of departure for the strategic development plan

15. notes that, according to the document, the strategic development plan is designed to cover the period 2007-2012. Thus there is some indication of the timeframe involved in pursuing the objectives and measures set out in the development plan, but this is not tied the attainment of any specific targets;
16. feels that the document should indicate how often – and how thoroughly – the plans are to be revised (plans left unrevised for, say, three years risk becoming obsolete);

17. Welcomes with satisfaction the high participation of Member States in drawing up the strategic development plan. However, regrets that the participation of local and regional authorities in drawing up the strategy has not been facilitated, although proximity to citizens is needed in this process. In this sense, regional and local entities are not only employers but also they may be agents responsible for implementing these policies;;
18. urges that the strategic direction of the European Commission's 2002-2006 Community strategy on health and safety at work continue to be pursued;
19. recognises the earlier strategy's success in raising public awareness of the importance of health and safety at work, which was highlighted as an integral part of quality management and a critical factor in economic performance and competitiveness;
20. is surprised at the strategy paper's failure to bring quality management into the discussion of health and safety at work, or indeed to take up the issue at all;
21. notes that that many businesses in the EU Member States, including leading European enterprises, have introduced the EFQM system (European Foundation for Quality Management) as a basis for their activities. All Member States should be made aware of this system as a model for an effective strategy that may also be used in the field of health and safety at work;
22. urges Member States to take on board the fundamental concepts of the EFQM quality management system – results orientation, customer focus, leadership and constancy of purpose, management by processes and facts, people development and involvement, partnership development and corporate social responsibility – thus encouraging advances in the area of health and safety at work and fostering progress in harmonising the legal framework involved. The Member States should also seek to show understanding for the aspirations of the various interest groups within society and to respond appropriately;

Appraisal of the current situation

23. considers that it is essential for an appraisal of the current situation to have available statistical data in respect of the individual EU Member States or general data for the EU as a whole; such data should be time-related, in order to make it possible to recognise the trend;
24. stresses that the appraisal of the current situation should include an analysis of the available results and current problems, possibilities and risks, broken down by area;
25. points out that, by their very nature, the dangers and risks have become more complex and inter-dependent. It is therefore essential to carry out a risk analysis in order to make an appraisal of the possible dangers and to carry out risk management, taking account of the various types of risks. It is very important to carry out a critical appraisal of the current situation as this is the only way in which it will be possible to set realistic targets;

26. takes the view that, if we are to make a realistic appraisal of conceivable damage arising from potential risks, it is very important not merely to bring about an awareness of sources of danger and their overall impact; it is also essential to define the criteria for assessing the damage. When making the assessment of damage, distinctions should be drawn between the technological, psychological, sociological, cultural and economic aspects of the risks involved;
27. emphasises that the Member States should determine precisely how information is to be gathered and compiled, which parties are to be responsible for these measures and what procedures are to be followed. These elements are frequently not determined by declaratory legal provisions; in the absence of a theoretical and practical basis which is readily understandable to all parties, no positive outcome can, however, be expected;
28. considers that there is an urgent need for the Member States to have at their disposal a sound methodological basis for risk management, which should, moreover, be drawn up in accordance with scientific principles;
29. points out that it is necessary to continually monitor conditions and risk factors so as to keep up to date and define any new risk factors that should emerge;
30. takes the view that the issue of occupational illnesses should be addressed in greater detail in the strategy document. An approach based on adequate degree of flexibility and clarity should be pursued when determining the criteria for analysing occupational illnesses so as to enable such illnesses to be classified by taking account of their original causes;
31. regards it as vitally important that the diagnosis of occupational illnesses in the Member States should not be rendered more difficult and that the payment of compensation should take place in the most unbureaucratic way possible;
32. also regards it as vitally important that there should be an effective legal and administrative system which ensures that occupational accident and illness is recorded but should not in particular over-burden SMEs;
33. calls for occupational accidents and illnesses to be accurately recorded in all Member States and for a strategic action plan to be introduced to improve safety at the workplace, such measures should not over-burden SMEs;
34. regards as essential that the fulfilment of requirements and rules in respect of the working environment should be monitored in order to reveal any shortcomings and to prevent risks;
35. recognises that shortcomings in organising the way the working environment is managed are one of the key causes of occupational accidents and illnesses. Every human life which is lost and every working day lost through sickness represents a considerable loss for every Member

State, regional or local authority, business and small- and medium-sized enterprises (SMEs); the overall costs to society are, however, very much higher;

36. regrets the absence of any explicit reference to the fact that healthy behaviour patterns can basically only emerge where underlying conditions at the workplace and in society are themselves healthy and salubrious;
37. wishes to see standard, generally recognised methods of analysis, such as SWOT, PEST, GAP, FFA or CAF, used when a common strategic approach is formulated in the organisations of the various Member States and in order to ensure objective, adequate and comparable results;

Strategic objectives

38. welcomes the Commission's proposal under which the main goal of EU strategy is to continue to be the ongoing, steady reduction in the number of industrial accidents in the period 2007-2012; it shares the Commission's view that, during the period in question, the overall objective of the 27 EU Member States should be to bring about a 25% reduction in the number of industrial accidents and the incidence of occupational illnesses, even though such a goal may appear to be too much of a "eye-catching" objective;
39. notes that there must be a clear message behind these strategic objectives. The ultimate objective, i.e. what has to be achieved by which date, has to be clearly spelled out;
40. points out that the strategic objective must be in line with the following (SMART) requirements: it must be *specific, measurable, agreed, realistic and timed*. These qualities ensure that the task in hand is clearly formulated and numerically measurable, which presupposes that the scales of measurement will be contractual obligations;
41. draws attention to the fact that the strategic objective must be in line with what is required, i.e. the goals will have to be linked to a specific timetable, so as to ensure that their achievement can be monitored and measured. Hence the concept of setting short- and long-term objectives which would clearly mean that the main objective would have to be subdivided into smaller intermediate objectives so that their realisation could be measured, monitored and managed more precisely;
42. considers that there is an urgent need to establish a system of indicators for the Member States which would provide the basis for the appraisal of the initial situation and the target situation and the efficiency of the measures taken. The main defining features of such indicators should be relevance, substantiveness, quantifiability, robust nature and the efficiency of the expenditure involved;

Measures for achieving the objectives

43. welcomes the fact that the Commission is supporting SMEs by making use of existing legal provisions; would like to see the legislative framework brought into line with the development of the labour market and simplified, above all, bearing in mind the situation of SMEs;
44. stresses that instruments should be defined in support of the measures set out in the strategic development plan. Such instruments would cover programmes, larger projects, strategic investments and other broader fields of action, such as routine tasks, designed to help achieve the objectives which have been set;
45. notes that, in contrast to the way in which the other issues are treated, the question of the establishment of a legislative framework (chapter 4 of the strategy document) is addressed in too great detail. The various aspects of business life should be systematically scrutinised on the basis of, for example, the PESTLE principle (*political, economic, social, technical, legal, environmental*). The examination should be carried out not just in the overall framework of the EU but also in the context of the individual Member States; it should cover the fields of politics, the economy, social questions, technological aspects, legal aspects and protection of employees;
46. advocates support for the establishment of corporate health promotion schemes;

Financial framework and timetable

47. draws attention to the fact that it is absolutely essential for the strategy document to include a financial framework and a timetable, setting out the estimated overall cost of the development plan and the allocation of costs in respect of particular years or other periods of time;
48. would like to see the section dealing with the planning and implementation of measures to reduce safety hazards and to provide protection at the workplace, make provision for the use of a standard form with regard to the financial framework and the timetable, in order to ensure that data provided by Member States is comparable and can be analysed generally throughout the EU;

Management structure

49. points out that the management structure for ensuring safety and health protection at the workplace should include a description of the necessary coordination processes with regard to the drawing up, completion, implementation and appraisal of the development plan and the writing of the final report on the plan. It is essential to indicate in this context how cooperation, work-distribution and feedback processes involving the stakeholders are organised;

50. draws attention to the fact that it is essential to define the management structure for ensuring safety and health protection at the workplace if agreement is to be reached on the coordination, administration and other relevant aspects of the development plan for the respective areas and if other interested parties are to be kept informed;
51. draws attention to the International Labour Organisation's global Guidelines on occupational safety and health management systems (ILO-OSH) which, given the refusal to accept the setting of international standards in this area, were drawn up at the request of the International Organisation for Standardisation (ISO) to be implemented – as has to some extent already happened – by the relevant countries at national level; these guidelines reflect ILO values and tools relating to occupational health and safety management and lay down the basic requirements of an occupational safety and health management system designed to secure long-term improvements on this front;
52. points out that the abovementioned methodological basic principles are set out in the following documents:
 - *Guidelines on occupational safety and health management systems, ILO-OSH 2001;*
53. stresses that any long-term effective system of health and safety management designed to secure ongoing improvements in health and safety at the workplace must contain the following key elements:
 - occupational safety and health policy;
 - organising;
 - planning and implementation;
 - evaluation;
 - action for improvement

Implementation: report on the implementation, completion and conclusion of the strategic development plan

54. points out that the section dealing with the structure of the strategic development plan should tie in with the goals to be achieved and the measures to be implemented in the course of the duration of the action plan and the explanations. The action plan and the development plan must be comparable and have a matching structure;
55. recommends that the action plan be drawn up in tabular form, indicating, in respect of each subgroup, (a) the respective objectives, indicators and the measures which need to be taken to achieve the targets and (b) the activities to be carried out together with the implementing parties, the financial backers and the funding sources and instruments;

56. points out that supplementary measures should be introduced should it become apparent, in the course of the implementation of the strategic development plan, that changes need to be made or rules need to be laid down in respect of the existing objectives and measures. When decisions are taken regarding additional measures or the termination of existing measures, account should be taken, above all, of the following: the usefulness of the goals which have been set, the effectiveness of the measures adopted and changes which have been carried out or which are at the planning stage in respect of financing and fields of action;

Appraisal of the implementation of the strategic development plan

57. notes that when the objectives have been achieved, when the strategic development plan reaches the end of its duration or when it has been successfully implemented, a final report is to be drawn up on the development plan;
58. points out that it is essential to stress the following aspects in the section on the Member States dealing with the reporting period:
- the parameters on which the indicators in respect of the strategic objectives are based, i.e. the extent to which progress has been made in achieving the objectives;
 - the direct results of the measures;
 - a summary of the instruments used in connection with the implementation of the development plan, together with explanations;
 - changes - either already carried out or in the planning stage - in the respective field of activity.

The layout and structure of the report on the implementation of the strategic development plan should match that of the development plan and the associated action plan.

Brussels, 28 November 2007

The President
of the
Committee of the Regions

Michel Delebarre

The Secretary-General
of the
Committee of the Regions

Gerhard Stahl

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II. Procedure

Title	Commission Communication - Community strategy 2007-2012 on health and safety at work
Reference(s)	COM(2007) 62 final
Legal basis	Article 265(5) TEC
Procedural basis	Optional referral
Date of Commission referral	21.2.2007
Date of President decision	20.3.2007
Commission responsible	Commission for Economic and Social Policy (ECOS)
Rapporteur	Dr Uno Silberg, Chairman of Kose Municipality Council (EE/UEN-AE)
Analysis	5.6.2007
Discussed in commission	28.9.2007
Date adopted by commission	28.9.2007
Result of the vote in commission	Adopted by a majority
Date adopted in plenary	28 November 2007
Previous Committee opinions	Opinion on the Commission Communication on Adapting to Change in Work and Society: a new Community Strategy on Health and Safety at Work 2002-2006 CdR 168/2002 fin ¹ - COM(2002) 118 final

¹ OJ C 287, 22.11.2002, p. 11.