



## Working Conditions Advisory Committee

WCAC General Secretariat, 15 January 2021

### **The opinion of the PSG of the WCAC on the guidelines for the European Union's strategy in the matter of health and safety at work**

The Permanent Steering Group of the Working Conditions Advisory Committee (PSG of the WCAC) brings together the representative social partners at a national level. The Working Conditions Advisory Committee is accountable to the Employment Minister and is involved in drawing up strategic guidelines for national policies. In particular, as per Articles L. 4641-2 and R. 4641-7 of the Labour Code, its mission is to contribute towards defining the French position on strategic issues in terms of health and safety at work at European or international level. Having examined the European Commission's roadmap on the European Union's strategic framework on health and safety at work for the years 2021 to 2027, the PSG of the WCAC deemed it necessary to submit an opinion on the future strategic framework's guidelines to France's representatives on the Tripartite Advisory Committee for Health and Safety at Work and the French Permanent Delegation to the European Commission for Information. If necessary, it will amend it in the light of the European Commission's assessment of the latest strategic framework for health and safety at work covering the years 2014-2020.

The opinion was unanimously adopted and reads as follows:

The social partners meeting as the Permanent Working Conditions Steering Group (PSG of the WCAC) are deeply committed to safeguarding the health and safety of all workers, regardless of their status and personal circumstances (age, gender, origin, disability, etc.). They support the European Commission's initiative for a European-wide strategy on health and safety at work. They support the principle that guides the European Commission's strategy to build the most comprehensive approach possible to prevention, to better anticipate the rapid and numerous changes that are characteristic of evolution in the workplace, and to provide particular assistance to vulnerable workers. They also support initiatives to promote occupational health in small businesses.

They are deeply convinced that health and safety at work means that working conditions be examined, that specific action is taken in respect of those workers most exposed to risks, and that a culture of prevention is established in all businesses. This culture of prevention must be able to develop through constant dialogue between management and staff.

In this respect, all the parties involved express profound reservations about the standardisation procedures relating to health at work, and in particular, the ISO 45001 standards relating to health and safety at work management schemes.

The social partners would like the new European strategy in health and safety matters at work to establish the principle whereby primary operational prevention in the field of health at work and that of dialogue between the social partners should take precedence, as a constituent element in establishing prevention in businesses.

The PSG members also consider that the protection of employees must be an integral consideration when examining working conditions. It must not be based solely on a mechanical application of regulatory standards. In this respect, they would like particular attention to be paid to working conditions or arrangements in which an employee, because of his or her sex, is more exposed to risk than employees of the other sex, for example, because personal protective equipment is not adapted to his or her morphology.

The social partners consider that the new strategy should place particular emphasis on older employees vulnerable to job fatigue and workers in the digital environment.

The social partners stress that the prevention of accidents at work and occupational illnesses is based, independently of the employer's responsibility, on industrial relations and a collective effort, implying a free exchange of views on working conditions within a company.

This is also based on both the progress and quality of research and the independence of scientific evaluation. For this reason, increased vigilance is required to keep scientific evaluation free from any conflict of interest, whether objective (hierarchical or financial relationships) or subjective (personal or associative relationships, etc.).

There can be no preventive occupational health care without readily accessible, qualified health professionals and occupational health and safety officers. Moreover, the resources available to those concerned with health and safety at work must be sufficient to carry out the measures necessary to maintain workers' health, particularly in small and medium-sized businesses.

The collection of occupational health data can be used highlight the best practices of the Member States and influence the Commission's strategy. However, the evaluation of best practice only makes sense if the criteria used allow for objective comparison.

Therefore, the social partners call on the Commission to pursue the objective of defining the criteria that would enable relevant comparisons to be made between the health and safety at work policies of the Member States.

In conclusion, the social partners would like to see the following points incorporated into the European Union's health and safety strategy:

- the assertion of the precedence of primary operational prevention and social dialogue in any policy on health and safety at work;
- the need for readily accessible and qualified health and prevention practitioners in the area of occupational health to implement a health and safety policy in relation to working conditions;
- the determination of agreed, standard criteria for assessing the effectiveness of health and safety policies implemented by the Member States;
- the need to provide useful support to small and medium-sized businesses to help them implement the rules on health and safety at work, particularly concerning so-called complex risks (including chemical risks);
- the importance of examining working conditions to take into account the inherent risks for all workers, and in particular the risks to which the most vulnerable groups are exposed;
- the contribution of research work and innovation in the field of occupational health and safety to continually improve working conditions;
- the independence of evaluation in the field of occupational health.

***This document was discussed and agreed by the social partners in the WCAC Permanent Steering Group framework.***

***The latter is made up of trade unions (CFDT, CGT, CGT-FO, CFTC, CFE-CGC) and management organisations (MEDEF, CPME, U2P, UNAPL, FNSEA) national-level representatives, the State (Ministry of Employment - DGT- and Ministry of Agriculture - SAFSL-) and the CNAM (Occupational Hazards Branch).***