

Joint Position of the European Social Dialogue for the Wood sector on the New Community Strategy on Occupational Safety and Health

The Social Partner organisations of the European Wood sector - EFBWW and CEI-Bois - pay much attention to working conditions and prevention activities for better health and safety at work. A specific working party was installed in the framework of the European Social Dialogue which is regularly running joint activities on different aspects of Occupational Safety and Health (OSH).

We agreed on writing a joint position paper on the future Community Strategy on OSH, aiming to convey our concerns and perspectives to the European Commission but also to other actors involved in the preparation of the Strategy, such as the Advisory Committee in Luxemburg and the European Parliament.

As Social Partner organisations of the European Wood sector we believe that our work reached important achievements in the area of Health and Safety. We had the opportunity to complete European projects through which aimed at the support and amelioration of the situation in the field. Among others we worked out a project on better prevention in respect to the exposure to Formaldehyde and another one on Wood Dust.

Before presenting our views regarding actions required for our sector, we briefly comment on general developments regarding working conditions and on the Community Strategy 2007 to 2012.

1.

In the recent years many efforts have been accomplished in the health and safety front. Unfortunately, there still are opposing **trends** that negatively influence these achievements and mitigate their positive impact. Increasing psycho-mental hazards, stronger competition caused by a more globalised economy, health hazards caused by new and dangerous materials/chemicals should be taken in greater consideration and correctly dealt with.

2.

In particular, there is need for specific support for the **New Member States** and the candidate countries when implementing the European legislative framework on OSH. The transposing of legislation needs to be matched with the strengthening of workplace inspections Funds for the improvement of working conditions, the application of the legal framework and for specific action regarding core working hazards are requested.

3.

An ambitious and sensitive **social policy** promotes social cohesion, social harmony and political stability hence positively influences productivity and economic growth. As correctly identified by the current strategy, the initiatives in the legislative area should focus on the strengthening of the European legislation and the monitoring of its application.

3a

The Social Partner organisations of the European Wood sector wish to emphasise the need for a **comprehensive Community Strategy on health and safety**: an inclusive and balanced set of legislative and non legislative measures, depending on which is the most effective in terms of practical implementation. Hence, the traditional OSH tools should be complemented by tools and strategies designed to anticipate, identify, evaluate, and control emerging risks arising from changes in the world of work, as well as from innovative technologies. Above all, policies should be designed to effectively and successfully be implemented by companies.

3b.

The Social Dialogue Partners organizations of the Wood Sector wish to underline that in view of guaranteeing the lives and health of workers and ensure a level playing field for the companies operating on the European market, further effort has yet to be accomplished in assuring the correct application and the effective **enforcement** of the Community *acquis*.

Monitoring the application of legislation remains of a primary importance. The strategy and its mid-term review correctly identify the need for a uniform application of the community *acquis* in order to guarantee comparable levels of production in all member States.

At the European level the SLIC will have to maintain its role in monitoring and facilitate the cooperation between national labour inspectorates. On the national level it is necessary to keep supporting initiatives aiming to improve the effectiveness of the inspections. In this regard labour inspections authorities should be assisted in terms of instruments in order to achieve their objectives. In particular a national effort should be indicated in enhancing (or correctly put in place – for those member States that still lack success in the area) the regular evaluation of OSH inspection annual work plans, the systematic training programmes for OSH inspectors and the capacity of labour inspectors to appraise occupational risks.

3c.

Reduction of administrative burden will not mean reducing the levels of protection already in place, but will lead to the reduction of unnecessary administrative burden, providing companies with better guidance for compliance and good practice exchange between Member States.

4.

The current strategy is also correct in its description of shortcomings in the application of the existing EU legislation of OSH. **Enforcement** should be one of the most important priorities of the future strategy. This is a prerequisite for obtaining roughly comparable levels of protection in all Member States. Enforcement should not only be done for the sake of the employees, but also for the sake of ensuring free and fair competition. Focus should continue on making control more efficient.

5.

As OSH cannot be considered an isolated policy, links to other EU-policies have already been enhanced. OSH-aims should be taken in consideration when defining **Community policies** for example in education, employment policies or research and development. Such perspective is

already correctly described in the current Strategy but unfortunately not yet achieved. In doing so the Social Partner Organizations should be consulted and involved.

6.

Ensuring improvements in the area of **OSH requires the coordinated and continuous action** of many players. In the strive for improvements in the area of Health & Safety, Member States and social partners each have their specific role to play. A preventive culture has to fully exist in the workplace: the social partners have a responsibility in prevention, education and training.

7.

In the future strategy much more focus should be paid to the problem of **work related diseases**. The quantitative dimension of the problem is much higher than the one caused by accidents at work. In this connection, the current strategy missed to be ambitious. We suggest a conversion of the EU recommendation concerning occupational diseases (2003/670/EU) into a minimum directive. We do not wish total harmonisation in this field and we are aware of the fact that the national recognition procedures are differing widely, but minimum requirements regarding the different kind of occupational diseases which are recognised is not touching these problems.

8.

Looking back one can assert that the last Community strategy was worked out without sufficient **consultation** of the social partner organisations on European level. We expect that, besides having debates within the Advisory Committee in Luxemburg, also the European Social Partner Organisations from the represented recognised Social Dialogues will be consulted.

9.

When developing integrated approaches on OSH prevention and given the need to integrate health and safety into other European policies, the Community needs to improve the financial resources earmarked for the corresponding activities in future. Specific **European budget** for the proceeding of specific action and programmes, based on the strategy, have to be provided. Regarding the structuring of these programmes we expect a serious involvement of the European Social Partner organisations.

10.

Today, health hazards are, in general, more complex. The traditional hazards, such as the different aspects of ergonomic conditions or noise, are nowadays associated to **new risks**, such as an increased use of numerous different hazardous substances or growing psycho-mental stress, caused by multifactorial reasons.

The social partners nevertheless recognise the efforts that have been carried out over the last 10 years with the REACH regulation and the Biocidal products Regulation. Both pieces of legislation aim at identifying and assessing chemical substances prior to their placing on the market ensuring that basic health and safety concerns are addressed.

11.

In our view, the current Strategy is correctly describing changes in **labour relations**, resulting in a growing number of precarious jobs or the emergence of new hazards. Our daily experience and the scientific evidence obtained demand that we consider and duly deal with these new tendencies.

12.

The new community strategy will have to reflect the **global transformations** that our time is witnessing. Our society, hence our playing field, is more and more characterized by demographical changes, technological innovation and transformation of work patterns that should correctly dealt with. Spreading forms of illegal employment are a plague in our culture that needs to be tackled and properly fought.

Aspects of importance for the Wood sector:

We have been very engaged in the implementation and application of EU legislation and OSH programmes on numerous EU and candidate countries and also on company level, given us in-depth insight in the state of play regarding the today's hazard in our sector. Against that background we see special need for action in the following areas.

I. Ergonomics

The cross-European enterprise survey, ESENER (European Survey of Enterprises on New and Emerging Risks) points at musculoskeletal disorders as one of the principal concerns for European enterprises. Similarly, Eurostat summaries show that consequences of musculoskeletal disorders are increasing in line with the aging workforce. Our experiences in the wood sector confirm these statements. Following aspects are of high importance in our sector:

- Physical pressure and heavy loads;
- Ergonomics of machines and at workplaces in office;
- Internal transport and traffic.

II. Chemicals & substances

Over the last years we witnessed an ever increasing number of chemicals placed on the market and meant to be used in our work-processes. Those products are often causing specific health risks. To name a few problematic aspects:

- We share the concern about an ongoing use of solvents, resulting in workers exposure to organic solvents.
- We are still confronted with sometimes high exposure to wood dust. Reducing these exposures is no longer a question of missing technology or devices but more a question of disseminating the good examples and experiences. Some best practices can be found in the jointly prepared brochure 'Less Dust', ran under the umbrella of the European Social Dialogue Committee Wood.
- The measurement of exposure to different chemicals is difficult and often lacking. In this respect and against the background of the possible disastrous health effects we need more advice and support, especially for the micro and small enterprises.
- Nanotechnology is a relatively new technology, and there is still great uncertainty about the distribution and use of Nano-materials. In our sectors, nano-applications are, for example, in coatings. In this perspective, it is necessary to stress the need for deeper sector focused research on Nanotechnology especially considering its possible consequences for employees.

III. Machinery

For the Wood sector machinery safety is of the highest importance. In some cases it is clearly recognizable that old machinery is placed beside other brand-new machinery. Operators need to be qualified in processing in a safe way. We need to fight a culture of not using safety mechanisms and Personal Protective Equipment.

Moreover, hazardous aspects still concern:

- High level of noise;
- False or insufficient ergonomic;
- Wood dust emissions.

What we expect in this relation are specific programmes under the Framework programme for research and development dealing with those and other work related health problems, like the ergonomics of materials and tools.

IV. Risk assessment

The evaluation and assessment of risks, as it is demanded by the Framework Directive (89/391), is often not carried out or not in the necessary quality. More help is requested. Much more tailor-made support in terms of guidance, tools for the evaluation but also personal support is requested. Labour inspectorates and prevention institutions should be able to accomplish preventive and informative tasks; they should hence be supported with necessary instruments. We consider the active involvement of workers and their representatives in all phases of the risk assessment as vital for any improvement.

V. Information and training of workers

The information and training of workers in all aspects of occupational safety and health at organisational and company level is crucial. Since all work situations are sector-specific, information and training of workers need to meet those specificities. It should be an urgent task of European institutions to support any kind of material in this respect. Information and training must always try to enhance the motivation of workers. Also a remarkable insufficient use of PPE is a cultural item that should be tackled by training and information activities.

VI. Participation

All experiences in our sector confirm that an efficient and transparent health and safety organisation in companies is very much depending on involvement and acceptance. The direct participation of workers, in risk assessments as well as in the implementation of prevention measures is crucial in this respect. We intend to support initiatives in the direction to direct participation and a stronger prevention culture in our sector. However, we also expect that EU institutions to be more proactive and we also expect a clear framework ensuring participation in all aspects of occupational safety and health.

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