



Ms Karima Delli
European Parliament
60, rue Wiertz
B-1047 Bruxelles

7 October 2011

Dear Ms Delli,

We have read with great interest your draft report currently being discussed in the EMPL Committee on the mid-term review of the European Health and Safety Strategy.

However we have serious concerns on the draft report, which paints a negative picture of employers' approach to health and safety at work, failing to acknowledge the commitment and efforts of employers in this field. The report should recognise that companies devise effective health and safety strategies, based on risk prevention. Amendment 50 rightly states that employers' interest in occupational health and safety (OSH) goes beyond their legal obligations. It is due to a real commitment to protecting workers' health and safety and the importance of OSH for productivity. We agree that SMEs need help to put in place risk-prevention policies and that initiatives such as the OiRA (online risk assessment tool) are useful in this respect.

The statement that the reduction in the number of accidents at work in the EU is due to lower employment levels and a continuing shift to the tertiary sector is not based on evidence. We therefore support amendments 101 and 102, which state that the reduction in accidents is also due to greater attention to occupational health and safety issues and that at least the reasons for this reduction should be investigated.

We are particularly concerned about the call for EU legislation in the areas of work-related stress and musculoskeletal disorders. Since such problems are caused by multiple factors, not always at the workplace, such action would not be effective. It is likely to create complexity and unnecessary additional costs for employers, which would be better avoided. We therefore support amendments 71 and 217 which delete the references to legislation in these areas.

We disagree with the criticism of flexible forms of work (including temporary work, part-time work, teleworking etc), which are important for companies as well as workers. We therefore support the observation in amendment 212, although would emphasise that such forms of work are welcome by many workers. As the health and safety framework directive already provides sufficient protection, there is no need for a specific approach to protect the health and safety of workers in certain forms of employment or with certain contracts.

We hope that you are able to work towards a final report which takes into account our comments, which we believe reflect better the reality of health and safety in European companies.

Yours sincerely,

Philippe de Buck