



# SIMPLIFICATION KEY TO MAINTAINING EXISTING HEALTH & SAFETY (H&S) STANDARDS: CEEMET POSITION PAPER ON THE EU STRATEGIC FRAMEWORK AND THE ONGOING REFIT EVALUATION OF ALL EU WORKPLACE H&S DIRECTIVES

CEEMET outlines in this position paper our priority policy recommendations regarding the new EU Strategic Framework on Health and Safety at Work 2014-2020 and the Commission's ongoing evaluation of all existing EU occupational safety and health (OSH) legislation.

## Simplifying Health and Safety Directives - key to increasing compliance and reducing burdens

While MET employers questioned the timing of a new EU Strategic Framework on Health and Safety at Work 2014 - 2020 last year, we welcome its focus on simplification and better implementation of existing worker protection legislation. We believe the framework would have benefited from being delayed until after the Commission completed its evaluation and review of all existing Health & Safety (H&S) legislation in 2015, and integrating the findings from the

ongoing Regulatory Fitness and Performance Programme (REFIT).

As part of the REFIT evaluation, CEEMET are making the case that H&S standards can be maintained through the consolidation and simplification of the existing regulatory regime. 24 H&S Directives are currently being evaluated with the process due to be completed by the end of 2015. Simplifying the duplicated requirements in existing legislation e.g. risk assessments, will have the benefit of reducing the administrative burden on SMEs, while increasing compliance. Directives will also need to emphasise the principle of individual capability and clearly need to be evidence based.

CEEMET's key points on the ongoing OSH evaluation are outlined in the following 5 points:

### 1: Implementation of H&S Directives across Member States

CEEMET believes that the biggest challenge facing EU OSH policymakers is the enforcement of existing EU H&S Directives. **Existing legislation must be implemented consistently and effectively across all 28 Member States before considering areas for new initiatives.** This challenge has competitiveness implications for European industry in terms of administrative burdens and compliance costs, whereby companies have to navigate different H&S regulatory systems in Member States. Implementation is key to create a level playing field for companies to operate in.

### 2: Maintain H&S standards through consolidation and simplification

As part of the REFIT evaluation, health and safety standards can be maintained through the consolidation and simplification of the existing regulatory regime. Simplifying the duplicated



requirements in existing legislation e.g. Risk Assessments, Medical Surveillance, Information, Instruction, Supervision and Training will have the benefit of reducing the administrative burden on SMEs, while increasing compliance.

### 3: Simplify the existing EU regulatory system for chemical substances

CEEMET calls on EU institutions to simplify the existing EU regulatory system for chemical substances (including nano materials) so that this results in greater understanding, more consistency and predictability for employers and SMEs who operate in this very complex regulatory environment. Overall, CEEMET believes that regulatory simplification and a universal approach to hazardous chemical substances is urgently needed at EU level.

There is an imperative to establish a single EU regulatory framework which covers both occupational health and safety and environmental exposure to chemical substances and materials. The existing EU framework is confusing, is overlapping and is not coordinated. It is too complex for most employers, especially SME's, to understand and implement.

Simplifying and consolidating the existing regulatory framework will have the added value of reducing administrative burdens and compliance costs, thus improving EU competitiveness globally.

### 4: Directives need to emphasise the principle of individual capability and clearly need to be evidence based

Employers support the vision of a sustainable working life centring on facilitating people being in work and remaining in employment longer. However, ensuring a sustainable working life is not just determined by OSH policies, but is also linked to the public health policy which is not controlled by employers.

EU policy makers should not propose new initiatives for particular categories of workers, e.g. young persons, pregnant women and older workers. Instead, attention should focus within

the Framework Directive on Individual Capability and Fitness for Work for all persons through the normal risk assessment process.

### 5: Focus needed on developing practical guidelines, exchanges of best practice and practical tools

A greater focus is also needed on developing practical guidelines, exchanges of best practice, and provision of information and practical tools to help companies understand and comply with legislation. It is important to identify measures and tools to help SME's and companies understand and comply with OSH legislation. If we improve implementation we will reduce the regulatory burden on SMEs.

#### **About CEEMET:**

**CEEMET (Council of European Employers of the Metal, Engineering and Technology-Based Industries)** is the European employers' organisation representing the interests of the metal, engineering and technology-based industries. Through its national member organisations it represents 200 000 companies across Europe. The vast majority of them are SMEs, providing over 35 million direct and indirect jobs.

