

53rd Health & Safety Committee

Brussels, 30 October 2025

The **Chair, Geert De Prez** (BE) welcomes the participants (*enclosure 3*) and especially Rose Sargent, as a new member from UK to the H&S Working Group. She works together with Jamie Cater on H&S. The Chair starts with the first item on the agenda (*enclosure 1*).

You will find the slides presented at the meeting (*enclosure 4*) as well as the action points of the meeting (*enclosure 5*).

1. Approval of the minutes of the 52nd H&S Committee meeting

For the record, the final minutes of the 52nd Working Group meeting were approved.

2. Action points of the 52nd H&S Committee

The actions of the previous meeting are discussed by the Secretariat. A full list of actions and outcomes is attached as per *enclosure 2*.

3. Chemical at the Workplace

a. Carcinogens, Mutagens or Reprotoxic substances at Work Directive

The **Secretariat** gives an update of the work at European level.

On 18 July 2025, the **Commission** has published a proposal for a Directive amending Directive 2004/37/EC as regards the addition of substances and setting limit values in its Annexes I, III and IIIa. This has been Circulated to the Members on 11 August (Circular 185/25).

This proposal is the sixth revision of the CMRD. It proposes limit values and relevant notations for cobalt and its inorganic compounds in line with the request through CMRD 4, polycyclic aromatic hydrocarbons (PAHs) and 1,4-dioxane. It also adds welding fumes to the “List of substances, mixtures and processes” in Annex I to the CMRD. This initiative also includes an amendment to correct the existing entry on mercury and divalent inorganic mercury compounds in Annex III to fully align the term used for this substance with the scope of the CMRD.

The Commission has decided not to set an OEL for isoprene, following the opinion of the Risk Assessment Committee (RAC) of ECHA, suggesting that the current prevention of occupational exposure to isoprene is sufficient.

Overall, the Commission estimates that the preferred options should prevent 1676 cases of lung cancer and 18912 non-cancerous cases over 40 years.

In the **European Parliament** (EP), on 13 October 2025 Liesbet Sommen (EPP, Belgian) was appointed Rapporteur in the EP EMPL Committee. So far, there are two shadow rapporteurs: Nora Mebarek (French, S&D) and Maria Ohisalo (Finnish, Greens/EFA).

Ceemet will organise meetings with the rapporteur and shadows.

In **Council** work has progressed. **Jens Skovgaard Lauritsen** informed the Members that under the Danish presidency, an agreement is sought to stick to the Commission proposal as well as the opinions of ACHS regarding the Occupational Exposure Limits (OELs). However, isoprene, which is excluded in the Commission proposal, would be taken on board by the Council.

- **Cobalt and inorganic compounds:** The proposed limit is 0.01 mg/m³ for particles that can be breathed in through the nose and mouth, and 0.0025 mg/m³ for finer particles that can reach deeper into the lungs. The transitional limits (0.02 mg/m³ and 0.0042 mg/m³) give industries six years to adapt.

The Members discussed about the worrying situation of the short transitional period. If our companies will not get raw materials, they will be pushed out of the EU. We should push to keep the industry, and the jobs, in Europe. Self-sufficiency on mining in Europe is crucial.

In the Commission, better coordination of the various DGs would be welcome. Even though the limit values (LV) have been checked by the regulatory scrutiny board, the effects on SMEs, consumers and the economic consequences, the problem remains that the scrutiny board cannot suggest different transitional periods. There is no added value for LV with administrative costs but no gains for workers health.

A company visit is planned for some MEPs to Umicore, Belgium by the Cobalt Institute. MEP Liesbet Sommen (Belgian, EPP) as well as 2 Shadow MEPs Maria Ohisalo (Finnish, Greens) and Mariateresa Vivaldini (Italian, ECR) will join the visit. One of the important points for Umicore is that PPE must be taken into account when measuring at LV. With regard to PPE a fit test is important. There is no EU legislation to have measurements.

Members agreed to share how in their country fit testing is adopted. The suggestion was made to put fit testing of PPE on the agenda of the next H&S Committee meeting.

- **Polycyclic aromatic hydrocarbons (PAHs).** The proposed new limit value is 0.00007 mg/m³. To help the most affected sectors adapt, a temporary limit of 0.00014 mg/m³ will apply for six years after the directive comes into force.

In the discussion on PAHs, it is unclear if LV are possible and how to measure almost nano figures. A LV only has meaning if firstly, you have a clear protocol and know how to manage it, and secondly if there is a clear method of measuring. A LV is only one of the tools of preventing chemical risks. If the legislation is created for the chemical and petrochemical industry, there is a different reality in the metalworking industry.

An example from a French company showed that the cost of measurement by a third-party lab outweighed the cost of prevention. On the other hand, in Denmark there is no obligation for measuring if you apply the LV.

If the burden is too high, it is important to bring this up at the national level.

- **1,4-dioxane:** The proposed general limit is 7.3 mg/m³ with a short-term exposure limit of 73 mg/m³. A biological limit is also suggested.
- In addition to setting these exposure limits, the Commission proposes "**notations**," which warn employers and workers of possible exposure through the skin or other means and indicate when additional protective measures are necessary.

- **Welding fumes:** Welding fumes can contain harmful substances such as chromium, nickel, and cadmium compounds, which are classified as carcinogens. The proposal plans to include welding fumes in the CMRD.

The Members discussed welding fumes, where they agreed that for the separate agents there are different OLV depending on the material you are welding. The Commission did not answer questions to clarify the entry, scope and range.

As you cannot replace welding, companies would be forced to look for other processes and materials. If they don't exist, the consequences are huge.

There are guides from SLIC from 2017. If an entry is new, it requires clarifications. It is very important to take into account the footnotes. The order of the wording must be looked at. It would be worthwhile to suggest or ask the Commission to help draft the questions & clarifications.

4. Workplace Mental Health

a. Update on the latest EU developments

The Secretariat informed the members that following the mandate on mental health and PSR adopted 3 February 2025 ACSH within ACHS, the ACSH Working Party on mental health (MH) and psychosocial risks (PSR) at work has set out how to work.

The first objective is to defining MH & PSR at the workplace. Also, a list of potential risk factors underpinning PSR at the workplace will be made.

Clemens Rosenmayr informed the members about the discussions regarding the definition where each interest group highlights different points of attention (cfr. slides).

b. Discussion

A debate evolved about the elements that should be in the definition of PSR.

Often personal or social aspects play a role in mental health. The Members agreed that only aspects that fall under the responsibility of the employer and that are directly related to work tasks, should be taken into account. The notion within employers' control and a reduction of subjective elements, are essential. **Rose Sargent** suggested an alternative definition and forwarded it to the Secretariat. [Note: Circulated to the members later that day in Circular 263/25]

Regarding the potential risk factors underpinning, the members discussed the that the working environment is already covered in the Directive.

Franck Gambelli stressed that the objective is to avoid a Directive. There are guides from OECD and tools, however these cannot be used universally.

5. Second stage social partner consultation on telework and the right to disconnect: feedback of final Ceemet position

The **Secretariat** gives an update. Ceemet provided written input to the Commission on 6 October 2025, based on input and comments from experts of EU Committee meeting and H&S Committee.

The Commission clearly found inspiration for the Staff Working Document relating to telework and the right to disconnect, in the draft documents (of 30 June 2025) on the EU OSH review. There were references to the Opinion in the ACHS.

Next steps: the Commission will analyse the responses from the social partners. The Secretariat will closely monitor the next steps.

In the discussion that follows, members agree that the main issue is the definition of telework. BusinessEurope is open for negotiations, whereas ETUC is not willing to discuss this topic again with the employers.

6. European Commission Revision of EU OSH Directives

- a. Display Screen Equipment (90/270)
- b. Workplace (89/654)

The **Secretariat** informs that the Commission has not yet officially launched the revision of both directives. However, Members have received draft documents of the impact assessment that is being worked on. As mentioned before (previous item) the Commission clearly found inspiration in the draft relating to the OSH Directives.

The Secretariat will closely follow and monitor any new steps in this process.

Franck Gambelli gives an update of the Steering Committee that held a meeting the day before and informed the Members of the meeting he had with the desk officers at the Commission explaining our position in detail.

However, the Impact Assessment gives no insight at all regarding the impact on health and merely tries to refer to (potential) costs for the employer. Questions can be raised whether the consultant understands the issues at stake; it seems a very political file.

From our point of view, options 2a and 2b of the Annex 8 are very positive (*Cfr. Circular 263/25 of 30 October 2025*). Nevertheless, problems remain regarding mobile construction sites, rules of coordination and the hierarchy of responsibilities. In the future there could be a form of co-responsibility. Whereas the employer has an obligation to manage and organise (Art. 6) there can be legal problems if this is extended to an external party who is not an employer (e.g. private house owner). Therefore, there should be an exemption. In addition, there are already exemptions for non-occasional workplaces (car, train, café). Legal security is necessary for employers. The Commission is likely to push for a scenario, which exempts means of transport.

The main issue remains that the responsibility of the employer goes too far. The principle of the WPD is to have a “culture of compliance”. We should be aware that a more formal approach of essential requirements takes a different angle (we protect ourselves via lawyers).

Franck Gambelli concluded that the evolution is good, but we need the aforementioned specification and exclusion regarding Art. 6. The Trade Unions will opt for the strictest scenario; the employers for a minimalist legislative approach of scenario 2A to limit responsibility. The Commission might opt for the middle scenario.

7. Climate change & OSH

The **Secretariat** briefly informs the Members that the ACSH will give an opinion on possible gaps in the current legislation relating to heat stress.

The Chair gives the floor to **Clement Rosenmayr**, who, as a member of the Working Party, has followed this closely.

Clemens Rosenmayr explains that an opinion is expected by the end of the year. With regard to heat stress, we will be committed to take some actions. He outlined various issues: extreme compound weather elements, hazardous chemical substances, (indoor) air quality, biological agents, and how these interrelate with OSH and climate change. There were 5 drafting group meetings, the result will be an opinion on heat and an opinion on the other topics.

Heat: tough negotiations. The red line is not to have a binding legislative initiative on heat. Other non-binding options are suggested. The opinion will outline which topics were discussed, on which topics there was consensus, and that finally no recommendation is brought forward. Since heat is also discussed in relation to the WPD, this topic will be picked up in a couple of years.

As regards the other topics: air quality is contentious. There is a focus on air quality directives, even without an OSH dimension, where employers should take measures. Thus, we focus on not having additional measures, general recommendations for employers, Member States, Social Partners.

There is a strong push for legislation on biological agents, hopefully only in the form of an Annex, instead of a Directive.

Regarding chemicals: ECHA and EU OSH should liaise regarding a general inclusion in data sheets; no new legislation.

An important aspect is awareness raising and to follow instructions of (local) authorities. There seems to be an increase in the level of extremeness and frequency.

The **Chair** opens the floor to the Members for discussion. Regarding extreme heat and flooding, have an insurance could be a first step. During extreme heat, stop working completely is not so easy for a company. There are legal consequences, e.g. regarding contracts, that should not be pushed onto a company. Lessons can be learned from Covid: it was looked upon as a social problem, with everybody working together. It was regarded as a public health problem rather than an employer problem. Likewise, filtering the air that comes inside a workplace should not be the obligation of an employer.

Lastly, the role of Bureau was clarified. The Bureau meets delegates of the three Interest groups the day before plenary. Sometimes minor changes can be made in this way, that are then put to the plenary. If changes are not possible, then there will only be a presentation in plenary on what has been agreed.

8. How to handle AI in H&S issues

The **Secretariat** shares information of the European Parliament, more specifically the own initiative legislative draft report of MEP Bula (EPP, Polish), insight in the EPP positioning and the intention of the Commission to work on AI@work. The draft report runs counter the position of Ceemet (*cfr. slides*).

Jens Skovgaard Lauritsen remarks that the definition alone shows how difficult this is. Technology can be machine learning, but not necessarily generative AI. It is premature to have a new Directive. **Kresimir Iveskic** informs about research on algorithmic management of two professors which showed nothing new. The industry also has been monitoring processes for 20 years.

The **Chair** opens the floor to discussion.

- In Austria general information is provided via the labour chamber.
- In Germany: co-determination topic, not to H&S. There is use of detecting sensors. Using VR sets for training is still under construction. BAUA does not yet have company examples. Authorities are analysing which companies to analyse to perform more efficient data mining.
- In Denmark: AI use in companies on cobots revealed nothing. So far, only based on data. There are examples of AI being used only as a planning tool in warehouses. Employees are fine with this, as it is objective e.g. who gets heavy loads. In the public sector it is used to assist medical evaluation. In prevention not seen so far. Danish authorities could use AI to see who to visit.
- In Belgium: similar experience. Safety managers are looking into what it can bring; how to instruct, how to evaluate a situation.
- In UK: AI is used preventative to train apprentices with VR headsets and virtual assistant. Simulating situations, trouble shooting. E-Learning tool. Project with companies working with local colleague specialised in VR.

The **Chair** concludes that we will keep AI on our agenda.

9. National roundtable

The Chair invites Members to share additional information and news relating to H&S from their country:

Austria: **Clemens Rosenmayr** (WKÖ)

- Stable government across left & right
- OSH focus on relieving administrative burdens to enhance competitiveness. There is a step-by-step release of this legislation.
- Young people (under 18) cannot be in a workshop with machinery anymore. Impact: no young people choose a career in industry. Ageing workforce will not be replaced if no young people choose these careers.
- Further caps and burdens administrative.
- Asbestos coalition: employer can go to prison if nothing is done in 6 months.
- Understanding for lesser OSH legislation.

Denmark: **Jens Skovgaard Lauritsen** (DI)

- Unemployment rate 2,9%
- Government of conservatives, socialists and liberals
- Heat protection regulations: heat warning as of 30° Celsius, than activate protection plan starts, e.g. cooling in cranes.
- Budgetary deficit of 18 billion: 6,2 billion 1st yr saved, no OSH related measures targeted.
- ISO 45000: not followed closely by DI

Germany: **Robert Thurm** (Gesamtmetall)

- €117 billion budgetary gap
- Drafts in 3rd strategy, MSD, chemicals. Improving risk assessments, also for SMEs.
- G7 summit miscellaneous 4/12.

Italy: **Lorenzo Dell'Acqua** (Assolombarda)

- Contractors working in Italy must have insurance as well as medical certification.
- Credit licence for external workers

Sweden: **Kresimir Iveskic** (Teknikföretagen)

- Elections in 2026. Campaigns have started.
- OSH proposal national coordinator function in Ministry of Employment to coordinate other Ministries. Employees responsibilities as well. Balanced approach.
- ISO 45010: guidelines on women's health is followed by a Swedish colleague
- ISO 45008: remote work, developing voluntary guidelines

UK: **Rose Sargent** (Make UK)

- MH initiatives. Prevention topics. Focus on product regulation and safety (to deviate from EU directives). OPSS can make deviations. Industry not in favour; biggest market is EU so they need it. Only if industry signposts that something should be changed. Machinery consultation.
- Nigel Farage: 2029 next elections. Bi-elections in Wales labour was in power. Anybody who is not for Welsh Labour party, voted for the Welsh nationalist party. Yet, Farage only has initiatives on migration.

Belgium: **Geert De Prez** (Agoria)

- New government. Decrease long term absentees (500.000 workers) by reintegrating long term sickness (+1yr). €20 billion budgetary gap in next years:
- Minister for SMEs asked the Ministers of Work to look into OSH in order for less legislation, more easy. Advice is asked of the social partners. Discussion not yet started. The position of the trade unions is that we cannot lower the level of protection.
- A general political strike has been announced for 24, 25 and 26 November

10. Miscellaneous

a. NEPSI website and webinar

A kind reminder of the information shared on 18/9/2025 regarding a new NEPSI webinar that can be followed online.

b. Questions for Dr. Wieske, who could be speaker at the next meeting

In order to prepare his intervention on the overlap of REACH and OSH, a Circular will be sent for Members to suggest questions for Mr. Wieske.

c. Date and place of next meeting

The Chair, **Geert De Prez**, announces that the next meeting will be his last as he will go into pension.

Date: **23 April 2026**

Place: **tbc**

As there are no other points raised under AOB, the **Chair** thanks the Members for their input and closes the meeting.

Enclosures:

1. *Agenda of 53rd H&S Committee*
2. *Action points from 52nd H&S Committee*
3. *List of participants*
4. *Slides of 53rd H&S Committee meeting (**attached separately**)*
5. *Action points from 53rd H&S Committee.*

53rd Health & Safety Committee Brussels, 30 October 2025

Agenda

- Item 1** **Approval of the minutes of the 52nd Working Group meeting**
- Item 2** **Action points of the 52nd Working Group meeting**
- Item 3** **Chemicals at the workplace**
 - a. Carcinogens, Mutagens or Reprotoxic substances at Work Directive
- Item 4** **Workplace Mental Health**
- Item 5** **Second stage social partner consultation on telework and the right to disconnect: feedback of final Ceemet position**
- Item 6** **European Commission Revision of EU OSH Directives**
 - a. Display Screen Equipment (90/270) & remote work
 - b. Workplace (89/654)
- Item 7** **Climate change & OSH**
- Item 8** **How to handle AI in H&S issues**
- Item 9** **National roundtable: maximum 4 minutes**
- Item 10** **Miscellaneous**
 - a. NEPSI website and webinars
 - b. Date and place of next meeting
 - c. AOB

Action points from 52 nd Ceemet H&S Committee	
Action 1	Secretariat to monitor developments around the topic of Mental Health at work and advocating against any binding initiative at EU level. → Ongoing
Action 2	Ceemet shall inform the members when proposals or initiatives on the Quality Jobs Roadman relating to H&S are published. → Expected in Q4 2025 (3 December 2025)
Action 3	Members agreed to inform the Ceemet Secretariat about mandates they have in national and European committees regarding H&S, such as (Working Parties of) ACHS. → Ceemet will circulate a table for Members to complete
Action 4	Ceemet shall inform the members when the proposal for a revision of the CMRD 6th is published and check with them which position / advocacy strategy shall be adopted. → Cfr. Circulars 185/25 and 249/25
Action 5	Franck Gambelli will send confidential (draft) documents to the Secretariat for circulation to a restricted need-to-know impacted group of the H&S Committee. <i>[In line with Ceemet policy, only one person of Ceemet member that is directly impacted will receive confidential draft documents. These documents are only to be circulated within your own organisation.]</i>
Action 6	Members to liaise urgently with their national confederation to prevent inclusion of telework in the definition of workplace. → No reporting back to Secretariat
Action 7	Clemens Rosenmayr will rend the other topics, apart from heat, to be discussed in the WP Climate change & OSH to be sent for input to H&S group. Input to be used by Clemens. Deadline for input 2 May. → Cfr. Circular 104/25
Action 8	Clemens Rosenmayr will send regular updates to Secretariat so members can be timely informed. → Ongoing

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List of participants

Name	Organisation	
Clemens Rosenmayr	WKO	Austria
Geert De Prez	AGORIA (Chair)	Belgium
Jens Skovgaard Lauritsen (online)	DI	Denmark
Franck Gambelli (online)	UIMM	France
Robert Thurm	Gesamtmetall	Germany
Lorenzo Dell'Acqua	Assolombarda	Italy
Kresimir Iveskic	Teknikföretagen	Sweden
Rose Sargent	Make UK	UK
Hilde Thys	Ceemet	Secretariat
Viktorya Muradyan	Ceemet	Secretariat

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Action points from 53rd Ceemet H&S Committee

1. The Secretariat shall make a table circulate it to the Members. Members are invited to complete this table with their mandates on H&S topics at European level (e.g. member of Working Party on climate change, in ACSH) or at national level (e.g. mandate to represent your organisation's members in a tripartite body within the Ministry).
2. In the next H&S Committee meeting, the Secretariat will give a short presentation to explain the legislative process at EU level, lead time, and the various phases where stakeholders can play a role.
3. The Secretariat will initiate a survey to the Members to map the situation in their country regarding fit testing of PPE. FIT test of PPE to be on the agenda of the next H&S Committee meeting.
4. Franck Gambelli to provide information of the position of BusinessEurope regarding adaptation of chemical industry (measuring).
5. Make UK to send the definition on psychosocial risk (PSR) at the workplace to the Secretariat, to share with the Members. [Done: circular 263/25 of 30 October 2025].
6. Liaise with Isaline Ossieur of BusinessEurope regarding OSH / H&S.
7. Recirculate the Ceemet position on measurement (1/12/2022).
8. Circulate the study on heat stress forwarded by Lorenzo Dell'Acqua.
9. Set questions for Dr. Wietske in preparation for his presentation in the next H&S meeting on the overlap between OSH and REACH.