



UNION EUROPEENNE DE L'ARTISANAT ET DES PETITES ET MOYENNES ENTREPRISES  
EUROPÄISCHE UNION DES HANDWERKS UND DER KLEIN- UND MITTELBETRIEBE  
EUROPEAN ASSOCIATION OF CRAFT, SMALL AND MEDIUM-SIZED ENTERPRISES  
UNIONE EUROPEA DELL' ARTIGIANATO E DELLE PICCOLE E MEDIE IMPRESE

## **UEAPME position paper on the priorities for the upcoming Community Health and Safety Strategy 2007-2012**

### **Introduction**

UEAPME representing the interests of craft and SMEs in Europe, appreciates the possibility to present its priorities for the next community health and safety strategy. UEAPME would like to stress the importance of analysing the impact of the last EU Health and Safety strategy 2002-2006 before defining a new strategy and to build on the evaluation for the new EU priorities. Therefore we welcome the Commissions effort to base the new Community Strategy 2007-2012 on the evaluation of the last one.

### **Section 1: Looking back on the Health and Safety Strategy 2002-2006**

#### **General Comments**

Ensuring a working environment that is safe and healthy within the firm is simply a matter of survival for Europe's small enterprises, which employ an average of 3 to 4 workers and for whom each worker is essential. Small enterprises have an ethic which is based, above all, on human values, which means that a worker is regarded less as a mere productivity factor but rather as a human being with his/her own personal and family background and his/her potential know-how, competence and creativity. This is why crafts and SMEs must prevent accidents and avert work-related risks.

Furthermore, SMEs are firmly convinced that a safe and healthy working environment is a factor that has a bearing on the firm's economic performance. However, it must not be used as a pretext for excessive regulation. The real challenge confronting us today lies more in correct and effective application of all the existing legislation across the 25 Member States and in the prevention of risks rather than in drawing up new legislation.

#### **UEAPME activities**

UEAPME took this topic very seriously into consideration. It informed its member organisations about developments in this area at EU level and helped to disseminate information specifically relevant for Crafts and SMEs. UEAPME took part in seminars and conferences concerning various health and safety related topics at EU level.

Furthermore, the European association for crafts, small and medium sized enterprises actively participated in the European Programme for the prevention of accidents in SMEs run by the Bilbao Agency. Under this programme, UEAPME together with its national member organisations carried out the project *Preventisme* (

<http://www.preventisme.org>). This project focused on the collection and exchange of good practises of simple but very efficient practical solutions for the prevention of accidents, conceived by small businesses for small and medium-sized enterprises. The results were widely disseminated and provide a source of inspiration to transfer to other enterprises and sectors or otherwise encourage other enterprises to reflect and develop their own solutions. The usefulness of such practical tools is reflected in the recent interest of the Bilbao Agency to translate this work additionally in the languages of the new Member States to further disseminate the results across the EU.

### **Activities of European Social Partners**

More than with most other topics, health and safety at work can only be achieved through a partnership approach. That is why UEAPME, together with the other social partners concluded various bipartite agreements at European level, on topics which are integrating the health and safety dimension.

In 2002 the four European Social Partners, UEAPME, CEEP, UNICE and ETUC concluded a voluntary agreement on *Telework* which included a specific chapter on health and safety aspects. In accordance with paragraph 9 of the telework agreement, European Social Partners adopted the joint implementation report on 28 June 2006. It describes how the national members of the signatory parties have implemented the voluntary agreement, and in particular how health and safety aspects have been considered at national, local and company level. This report will be sent to the European Commission once it has been finalised.

In 2004, as part of their autonomous work programme 2003-2005, the European Social Partners carried out negotiations on *Stress at work*. The objective of the voluntary agreement on stress was to increase the awareness and understanding of employers and workers of work-related stress, and to provide them with a framework to identify and prevent or manage problems of work-related stress. In this agreement, once again, the signatory parties recalled the obligations of employers and the duties of workers for health and safety aspects.

Furthermore, the European Social partners are currently negotiating a voluntary agreement on harassment and violence at work as foreseen by their work programme 2003-2005. In due time, the Commission will be informed by the European Social Partners of the results achieved.

Both of these agreements and the current negotiations clearly fall under the *Quality of work* aspect of the community strategy 2002-2006.

### **Activities of UEAPME's national members**

During the last years UEAPME's national members carried out various initiatives in the field of health and safety linked to the last Community strategy and participated in implementing the community strategy. These initiatives include:

1. Mobilisation of professional Craft and SME organisations for helping employers

Professional Craft and SME organisations took a number of new initiatives supporting their member companies in risk evaluation through tailored made solution (Example: Single documents for risk assessments in SMEs set up by CGPME in France)

In Austria the Austrian Federal economic chamber (WKÖ) together with the other Austrian social partners and the Austrian Social Insurance for occupational risks created a website on health and safety which offers assistance to the employer in evaluating health and safety risks at work. Furthermore, a specific website has been established by the WKÖ in order to provide Austrian employers with access to competent advisory services.

In the UK, the Federation of Private Business (FPB) together with the trade unions (TUC) provided the same information through a practical guide. Some national members of UEAPME offer specific health and safety courses to the owners of SMEs in order to transmit the newest legislation in this field. (Example : The Zentralverband des Deutschen Handwerks (ZDH) in Germany and the Confédération Générale des Petites et Moyennes Entreprises (CGPME) in France).

## 2. Information and Training

The WKÖ together with the other Austrian social partners and the Austrian social insurance for occupational risks produced information videos which were used for teaching apprentices and informing workers in order to create awareness of possible hazards at the workplace and a culture of prevention. The ZDH stresses the importance of health and safety at the workplace as part of their initial and continuous vocational training programmes. The CGPME set up a specific institute for the training of SME employees on health and safety topics.

## 3. Cooperation with national Ministries

In some Member States, such as Austria or France, social partners are being consulted on every new piece of legislation in the area of health and safety at the workplace, and the final decision is coordinated between them.

In France, CGPME were consulted on the national health and safety strategy 2005-2009. This cooperation depends heavily on the national industrial relation system and role of national social partners, and varies greatly across the Member States.

In the UK, the FPB is a member of the Health and Safety Executive Small Business Trade Association Forum. Current consultations include improving worker involvement – improving health and safety and managing workplace transport risk. It is also represented on a Department of Work and Pensions Ministerial Group established to present a framework for Health, Work and Wellbeing.

## 4. Awareness raising:

In order to raise awareness about health and safety at work, the WKÖ together with the Austrian social insurance for occupational risks awards an annual price (“Securitas”) for SMEs with less than 50 workers. It has made special achievements in the field of health and safety at the workplace.

A web portal on work and health which was established in cooperation between WKÖ, the Austrian Trade Union Federation, the Austrian Chamber of Labour and the Federation of Austrian industry, provides employers, employees as well as the public on information regarding health promotion at the work place as well as on health and safety.

### **Activities of UEAPME's sectoral members**

The Confédération Européenne des Professionnelles de l'Esthétique Cosmétique (CEPEC) carried out various activities to improve the health and safety situation in its sector. Amongst others, one of its members, the *Centre de Soins Esthétiques*, in order to prevent back and neck pain, replaced the chairs and tables with new models which could be adjusted in height by means of an electrical system.

Moreover, all the beauticians attended a training course concerning the Beautician's Code at 'Anbos' (a Dutch organisation that represents the interests of the profession). This Code represents the standard in this sector as regards quality of employment, hygiene, working conditions and the environment, as well as practice, training, and management.

Furthermore, all the employees of this Institute have also been vaccinated against the contraction of Hepatitis B.

## **Section 2: UEAPME's view on the priorities for the next Community strategy on health and safety at work 2007-2011**

UEAPME believes that the following priorities should be part of the future community strategy on health and safety, in order to set up a strategy which will better meet the needs and capacities of SMEs.

### **1. Using practical and effective instruments**

- The existing legislative framework at European level is sufficient. **Focus should be put on the implementation of this legislation** at national, regional, local and company level. In particular in the new Member States the use of financial support from the structural funds could contribute to a quicker and better implementation as well as the application of the “acquis communautaire” at the work places
- In the field of health and safety, the Commission's approach of “Think small first” should guide all its future activities, taking into account that 99% of all companies in Europe are SMEs, and 92% of these are micro enterprises. Therefore, before revising existing legislation or taking any new initiatives **an in-depth impact assessment has to be carried out**, especially concerning very small companies.
- As some of the “new” risks, such as musculoskeletal disorders originate also outside of the work place, a legislative approach is not necessarily appropriate to solve the problem. In this case, more initiatives should be developed in the field of awareness raising and prevention. In addition enterprises should not be held responsible for everything, which very often gives a negative image of entrepreneurs and entrepreneurship.
- **More efforts should be put on guidance.** The European level should continue its efforts in elaborating guidelines and other types of guides, which are aimed at the practical support of companies, in particular SMEs (e.g. Optical radiation guidelines to be elaborated in 2007 are essential for the correct implementation of the new directive).

### **2. Strengthening the culture of prevention**

- The development of a culture of prevention, as initiated already in the last Community strategy on health and safety at work, should continue to be focused on. Furthermore, this prevention culture must be based on a partnership between

all the players involved and must be accompanied by **substantial efforts in the areas of information and training and in enhancing awareness.**

- A programme for the prevention of Health and Safety risks at the workplace addressing specifically SMEs should be established in the framework of the Bilbao Agency, as it was done in the past.
- The Bilbao Agency should also continue its important work in the exchange of good practises between Member States and social partners.

### **3. Better cooperation and partnership**

- There is no need for new institutions, but rather for better networking and cooperation between already existing well-identified actors, and between sectors at all levels.
- Adequate involvement of social partners at all levels concerning health and safety policies for the workplace should be achieved.
- Awareness raising efforts should be further increased. The European week of health and safety at work being a good example of this.

### **Conclusion:**

Health and safety at the work place is a central issue for all employers. SMEs are well aware about the importance of the topic for the workforce they employ.

Nevertheless, too many legislative obligations combined with ill conceived texts for small businesses do not facilitate their full and correct implementation at the workplace.

Therefore, UEAPME is urgently calling for less and better legislation, and for a strong support through a variety of tools that facilitate the understanding of legislation by small employers and therefore its better application at the work place.

Brussels, 30 June 2006