

## Cefic views on EU Strategic Framework on Health and Safety at Work [2021-2027]

Ensuring a safe and healthy work environment for over 1 million direct employees and for over 3 million contracted co-workers is a strategic goal for the European chemical industry. Our industry works continuously to improve our safety, health and environmental performance while taking measures to prevent accidents. We believe that excellence in operations, preventing accidents and occupational diseases supports competitiveness and creates sustainable values<sup>1</sup>. By achieving this goal, we are convinced industry can make chemicals facilities better places to thrive.

Cefic supports the revision of the EU Strategic Framework on Health and Safety at Work for 2021-2027 to promote the higher Occupational Safety and Health (OSH) standards in Europe and elsewhere, to focus on better implementation of OSH *acquis*, and to ensure a science, data and risk-based policy involving Social Partners.

Safety and health protection at work is a fundamental objective for the European chemical industry, for which we are adopting best-in-class operational excellence programmes. Cefic and European Chemical Employers Group (ECEG) have long contributed to improving worker safety and health through a combination of highest standards and voluntary initiatives and continuous social dialogue.

In this regard, we highlight the long-lasting commitment to **Responsible Care**<sup>®</sup>, the global chemical industry's initiative towards improving health, environmental performance, to enhance security, and to communicate and to share practices with our stakeholders. Secondly, we point to the fact that the number of non-fatal accidents at work in the EU27+UK chemical sector dropped on average by 5.1% per annum and the number of fatal accidents at work dropped on average by 5.2% per annum between 2010 and 2017<sup>2</sup>.

We are proud to be **active partners of EU OSHA's Healthy Workplaces** for the past and ongoing campaign 'Lighten the Load' for 2020-2022 and join forces in helping to improve the workers' well-being. We believe **sharing best practices** can help our industry and its partners safely handle dangerous substances, to improve safety performances at the workplaces and improve coherence between Member States (MSs).

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<sup>1</sup> According to recent estimates, investments in this area can produce high ratios of return, averaging 2.2 [source: *International Social Security Association (ISSA), The return on prevention: Calculating the costs and benefits of investments in occupational safety and health in companies*] and in a range between 1.29 and 2.89 (source: *BenOSH, Socio-economic costs of accidents at work and work-related ill health*, <http://ec.europa.eu/social>).

<sup>2</sup> Eurostat data for [non-fatal](#) and [fatal](#) accidents and Cefic analysis 2020.

Although safety and health performances of the industry have improved over the years, we are still working to achieve our goal for further and continuous improvement at the workplace. Hence, Cefic would like to share its views on building the new strategic framework to make the workplaces better and ensure the workers protection.

### What are we seeking for in new Strategy?

- Over the next 7 years, the strategy should focus on **risk mitigation brought about by an aging population and increased migration flows**. This includes longer working life, along with continuous re-skilling and up-skilling of workers at chemicals and partners sites.
- The strategic framework should **anticipate the emergence of new type of risks and exposure due to changing working conditions**. For instance, the outbreak of COVID-19 in Europe has increased mobile working and digitalisation of the workplaces. This has created new challenges, such as the increasing importance of minimum staff management at the workplace and new ways of communication. We believe that the **new strategic orientation for OSH should play a key role** in providing more guidance on how to ensure the workers' health and safety in the new mobile working conditions.
- We believe in **better implementation of OSH *acquis***. The new Strategic Framework should **enhance the importance of social dialogue** with anticipation to allow an exchange between social partners based on data and scientific evidence. The strategy should reinforce the key role of the **Advisory Committee on Safety and Health (ACSH) and the Working Parties (e.g. on Chemicals)** to ensure effective enforceability of measures.
- The Strategy should enhance the role of **EU OSH Agency** to become stronger, more **science-based** and efficient to be able to develop guidelines/ tools and share good practices across industries, which should also address the needs of **micro and small enterprises**.
- The Strategy should **address the OSH priorities** developed in Green Deal, the Chemical Strategy for Sustainability and Europe's Beating Cancer Plan **in a coherent way to avoid the overlapping of legislations and objectives**. Evaluations and impact assessments are crucial to match the level of ambition and the state of play of technologies. An example is the setting of occupational exposure limit values, where Cefic sees a need for more coordination between ACSH, EU and MSs to establish a priority list of substances for which an Occupational Exposure Limits (OELs) is relevant.
- The Strategy should **frame EU-wide minimum requirements and objectives for OSH**. Cefic believes the role of national authorities should remain to implement these requirements and objectives within their national health and safety strategies according to the subsidiarity principle. Additionally, improved coordination between EU Agencies, Commission, ACSH and MSs is expected to particularly improve the setup of OELs.
- The Strategy should **promote the emergence of a global level playing field for OSH** by setting the same minimum level of protection within the EU and globally. The chemical industry would support the European Commission promote the EU OSH standards on the international stage towards improving workers protection at workplaces.
- The Strategy should clarify the **synergies between REACH and the OSH legislation**, while eliminating conflicts and inconsistencies. Cefic sees OSH and REACH legislations as complementary in the context of worker protection that must be risk-based and supported by a strong engagement with Social Partners in enhanced Social Dialogue. The existence of an effective EU framework would

allow DG Employment and Social Affairs to better cooperate with particularly DG Environment and DG Internal Market, Industry, Entrepreneurship and SMEs to achieve this. We consider that the EU 2021-2027 OSH strategy is a good opportunity to improve coherence and create a level playing field between MSs through national OSH strategy. For example, we would foresee that when there are concerns related to workers safety, the Regulatory Management Option Analysis (RMOA) under REACH should always take into account OSH legislation and its instruments to address it.

- We believe the Strategy should be **bolder in addressing the digitalisation opportunities**. Digitalisation could unlock up to €550 billion of value over the next few decades while enabling lower injury rates; higher health and safety standards and predictability; greater value chain transparency and improved public trust<sup>3</sup>. Increased digitalisation has also an important role to play in improving implementation and enforcement across Member States.

Cefic is looking forward to sharing its ideas and exploring potential policy solutions with the European Commission and Stakeholders in due course.

#### **Cefic statement of COVID-19 crisis**

*While contributing to this consultation we remain very aware we are all still experiencing unprecedented times, with industry, governments and institutions around the world taking major actions to address the Covid-19 crisis, and introducing large-scale policies which will have significant impacts for years to come. We will continue to support Europe's Member State governments and institutions in their efforts to overcome the socio-economic impacts of the crisis.*

*When investing for the future, industry, governments and institutions will have to ensure investments align with the policy targets of a climate neutral Europe by 2050. All this also means that the attractiveness of Europe as a re-investment destination, and re-shoring industry back to Europe, will depend more than ever on a favourable policy framework that manages ever-growing differences between the world's regions. We look to the European Commission to undertake the appropriate assessments and to include these wider considerations in the future framework that will be developed.*

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About Cefic  
Cefic, the European Chemical Industry Council, founded in 1972, is the voice of large, medium and small chemical companies across Europe, which provide 1.2 million jobs and account for 17% of world chemicals production.

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<sup>3</sup> [Molecule Managers - A journey into the Future of Europe with the European Chemical Industry](#)