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Report

on behalf of the Committee on the Environment, Public Health and Consumer Protection

on the draft resolution of the Council of the European Communities (Doc. 480/77) on a Community action programme on safety and health at work

Rapporteur: Mrs V. SQUARCIALUPI

1.2.1

By letter of 5 January 1978 the President of the Council of the European Communities requested the European Parliament, pursuant to Article 100 of the EEC Treaty, to deliver an opinion on the draft resolution submitted by the Commission of the European Communities to the Council on a Community action programme on safety and health at work.

The President of the European Parliament referred this draft resolution to the Committee on the Environment, Public Health and Consumer Protection as the committee responsible and to the Committee on Budgets and the Committee on Social Affairs, Employment and Education for their opinions.

On 25 January 1978 the committee appointed Mrs Squarcialupi rapporteur.

It considered this draft resolution at its meetings of 22/23 February and 20/21 March 1978 and adopted it unanimously at its meeting of 26/27 April.

Present: Mrs Krouwel-Vlam, chairman; Mrs Squarcialupi, rapporteur; Mr Adams, Mr Andersen, Mr Bourdellès, Mr Brégégère, Mr De Clerq (deputizing for Mr Emile Muller), Mr Edwards, Mr Ellis, Mr Flämig (deputizing for Mr Willi Müller), Mr Guerlin, Mr Lamberts, Mr Noè, Lord St. Oswald, Mr Schyns, Mr Veronesi and Mr Wawrzik.

The opinions of the Committee on Budgets and the Committee on Social Affairs, Employment and Education are attached.

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The Committee on the Environment, Public Health and Consumer Protection hereby submits to the European Parliament the following motion for a resolution together with explanatory statement:

MOTION FOR A RESOLUTION

embodying the opinion of the European Parliament on the draft resolution of the Council of the European Communities on an action programme on safety and health at work

The European Parliament,

- having regard to its resolution of 24 September 1975¹,
 - having regard to the draft resolution on an action programme²,
 - having been consulted by the Council (Doc. 480/77),
 - having regard to the report of the Committee on the Environment, Public Health and Consumer Protection and the opinions of the Committee on Budgets and the Committee on Social Affairs, Employment and Education (Doc.97/78),
1. Expresses its satisfaction at the proposed action programme which is a genuine attempt to tackle one of the most difficult aspects of economic activity, namely the prevention of occupational accidents and diseases;
 2. Welcomes the fact that a programme to prevent damage to health is attempting to identify and keep under observation not only actual physical illnesses but also psychological factors;
 3. Considers, therefore, that measures at Community level are urgently needed to establish reliable statistical research methods to indicate the actual number of industrial accidents and diseases incurred as a result of working activity and the number of working days lost;
 4. Urges the Commission to concentrate its efforts to protect the workers' health principally on eliminating occupational hazards as far as possible;
 5. Welcomes the attempt to assign individuals to jobs for which they are most suited and to offer extra protection to migrant workers, particularly on first taking up work, young workers and women, not only in case of pregnancy, but during all their child-bearing years;

¹ OJ No. C 239, 20.10.1975, p.36

² OJ No. C 9, 11.1.1978, p.2

6. Welcomes the statement health protection should be considered an integral factor at the design stage for apparatus, equipment and machinery;
7. Emphasizes the importance of more stringent and extensive execution of regular supervision and servicing of materials and equipment at the workplace;
8. Urges that where dangerous substances and preparations are being handled, the risk level be clearly indicated;
9. Urges further that as much attention should be devoted to the protection of workers' safety and health in secondary undertakings (subcontractors) and in small undertakings as in large undertakings;
10. Considers it vital that an independent expert committee be set up and assigned to test the toxicological nature of each new chemical substance before it is employed in production and to review the characteristics of those already in common use;
11. Looks for the early submission of a directive on the handling and utilization of dangerous and toxic substances which will strike the optimal balance between safeguarding the health of the workers and that of persons dealing in such substances and protecting the environment;
12. Underlines the need for a central information system on safety procedures regarding toxic substances used in industry to which at least industrial medical officers, managerial staff and workers' representatives could have access;
13. Stresses the complete independence of industrial medical officers;
14. Considers it a sine qua non of this action programme that the workers should themselves be actively and positively involved in the various actions;
15. Hopes that in the implementation of this comprehensive programme, the Commission will obtain the full cooperation of all the social partners and make full use of the experience and expert knowledge available in industry;
16. Urges the Commission to take positive action as soon as possible and propose further measures within the framework of this programme and considers it a matter of urgency that the necessary funds and personnel should be made available at the earliest opportunity;
17. Considers that, in the interests of programme efficiency, it is essential that Parliament should receive regular, perhaps annual progress reports, perhaps annually;
18. Approves the action programme, subject to the abovementioned remarks - particularly those expressed in paragraphs 14 and 15.

EXPLANATORY STATEMENTI. INTRODUCTION

1. The Community action programme on safety and health at work is the concrete form of what was stated in principle in the Council Resolutions of 22 November 1973 and 17 May 1977 on the Community's environment programmes.
2. The guidelines on which this programme was to be based were the subject of a report drawn up by Mr MEINTZ on behalf of the Committee on the Environment, Public Health and Consumer Protection which was debated and adopted during the plenary sitting of 24 September 1975¹.
3. The social action programme of 21 January 1974 also mentioned amongst its priorities the establishment of an initial action programme, relating in particular to health and safety at work and adaptation of tasks, etc. An appropriation of 850,000 u.a. has already been entered in the Community budget at the insistence of the European Parliament following a proposal from its Committee on the Environment, Public Health and Consumer Protection. According to the financial statement accompanying the **present action programme drawn up in cooperation with the Advisory Committee on Safety, Hygiene and Health Protection at Work**, 1,100,000 EUA and 1,300,000 EUA will be needed in 1979 and 1980 respectively.

II. SUMMARY OF CONTENTS

4. The essential aim of the programme is to increase the level of protection against occupational risks of all kinds by making the prevention, checking and control of these risks more effective.
5. In order to bring about an improvement in material working conditions, accident aetiology and human behaviour at the workplace, the Commission envisages the following six concrete initiatives:
 - (1) Incorporation of safety aspects into the various stages of design, production and operation;
 - (2) Determination of exposure limits for workers with regard to pollutants and harmful substances present or likely to be present at the workplace;
 - (3) More extensive monitoring of workers' safety and health;

¹ OJ No. 239, 20.10.1975, p.36

- (4) Accident and disease aetiology and assessment of the risks connected with work;
- (5) Coordination and promotion of research on occupational safety and health;
- (6) Development of safety and health consciousness by education and training.

III. OBSERVATIONS AND SPECIAL REMARKS

6. The Commission very much welcomes this action programme which gets to grips with one of the most troublesome aspects of economic and social activity, namely occupational accidents and diseases.

7. Technically, the programme has been drawn up with great precision and it contains new and relevant elements although in some cases they have only been mentioned in passing. If they were better formulated, the initiatives envisaged might be more effective.

8. Considerable value is attached to the fact that, to prevent damage to health, an attempt is made to identify and keep under observation not only the actual physical illnesses but also the psycho-social factors which are one of the main causes of malaise among workers.

9. Greater attention ought to be paid in this context to the way in which work as such is organized and to the division of work which, when inflexibly applied, can be counterproductive : if there is a rigid division between those who direct and those who perform the work , professional skills are not used to full advantage, in other words the individual is unable to give content to his work .There is no doubt that the humanization of work and efforts to achieve job enrichment raise the level of protection against occupational risks at the workplace.

10. As an objective observer, your rapporteur considers it absolutely necessary that measures be taken to establish reliable statistical research methods at Community level in order to gain an idea of the real number of industrial accidents and diseases directly and indirectly attributable to work.

11. Here the committee would like to draw the Commission's attention to a certain statistical lacuna. While not denying the practical statistical value of the data contained in Table III/6(Industrial accident rates for selected economic activities - fatal accidents) of the social indicators published by Eurostat¹, the impact on the layman of the shocking absolute figures for fatal industrial accidents is inevitably greatly reduced by the use of unhelpful conversion factors and hence these relative figures ought not to be published unaccompanied by the absolute figures.

¹ Social indicators for the European Community 1960-1975
1977 edition - p.136-137 - see Annex I

12. The final comparative results themselves provide little information if no mention is made of the factors needed to convert them back into absolute terms. This very much reduces the utility of the statistics of the 'social indicators' series and the social statistics yearbook. (Annex I).
13. A basic number of definitions and data, possibly divided according to economic sectors, and set out according to the seriousness of accidents, incapacity for work, length of hospitalization, industrial diseases, medical costs compared with income, and social security expenditure, (as given for example in table form in Annex II) would show that the present situation is **alarming and calls for efficient preventive safety measures** to be taken at the workplace.
14. Furthermore, it must be emphasized that the programme is equally concerned with action against industrial accidents (which naturally make a much bigger impression on public opinion) **as with combatting diseases contracted at the workplace.**
15. The draft programme does not always make a clear distinction between the limitation and elimination of occupational risks. The choice of solution is therefore left to the discretion and interpretation of the governments and institutions concerned with the health and safety of workers. The choice between prevention and cure is an extremely difficult one.
16. It must be stressed that a ban on the use of carcinogenic substances, as suggested in this programme, is preferable to a system of fixed maximum levels. **This presupposes, inter alia, a series of checks (human biological indicators) carried out by an extensive and costly monitoring system, which might lead to speculative actions being taken to the detriment of workers' health.** An improvement in the working environment, on the other hand, is less costly and of greater benefit to employees' health; it would also be a more effective method than assessing the damage after the event, as was done in the past.
17. A new and **valuable factor** in the programme is the attempt to take account of individual aptitudes when introducing people to the work process and to offer extra protection to young employees and women.
18. More attention should be given to the particular biological characteristics of women, not only in pregnancy itself but during all their child-bearing years. particularly if they come into contact with teratogenic and mutagenic substances and certain toxic substances such as lead.

19. It is therefore necessary to take account of their biological make-up in relation to particular activities. For example, there are machines which have to be worked with a pedal which can cause damage to the ovaries and jobs which have to be performed in an unnatural position which can cause premature delivery. It is important to stress the importance of any improvements in this area since the damage to morale of miscarriages resulting from work is impossible to assess. Attention must also be given to the fact that women take many medicines because, owing to their double role as employee and housewife, their pace of life tends to be exhausting.
20. The design of apparatus, equipment and machinery should also take account of the opinion of industrial medical and safety officers, since there is more than just a technological aspect to industrial equipment. Safety and health protection requirements should be given equal consideration. It is also essential to take account of both acute effects (noise, vibration) and chronic effects (dust) on health.
21. Since the majority of accidents are caused by the poor maintenance of equipment, it has to be emphasized that servicing needs to be more accurate and more frequent.
22. In considering the problem of handling dangerous substances and preparations, the concept of the level of risk should be introduced, as is already the case in certain countries (Germany). A general indication, such as that given in a normal safety code, tends to encourage certain habits, whereas an indication of the real degree of danger presented by a substance, which might be corrosive, flammable or explosive, is more effective than a simple 'danger' sign. Workers' attention must be drawn to this 'scale' of risks.
23. Small companies and subcontractors should be urged to pay as much attention to the health and safety of workers as large undertakings, where the trade unions are more effectively represented. The same is true of agriculture, where workers are insufficiently protected partly because complicated machinery and dangerous substances have not been in use for very long. Particular attention should anyway be given in all sectors to protecting the health of immigrant workers who are already exposed to other dangers and possible harm on account of the cultural and geographical environment which is very different from that of their countries of origin.
24. New chemical substances ought to be allowed in the production process only when they have been guaranteed unarmful. It is therefore desirable that a scientific committee be set up which could act in complete autonomy, quite independently of private interests. This committee must be created by co-operation between public authorities. Its duty must be to investigate each new chemical substance put on the market so as to prevent substances which are subsequently found to be extremely harmful to workers' and consumers' health being put into production and having subsequently to be banned.

25. As the programme suggests, it is necessary for a Community directive to be put into effect as soon as possible concerning the handling and use of dangerous and toxic substances that seeks as far as possible to strike a balance between protection of employees' health and protection of the environment. Not only those people using insecticides and herbicides, i.e. producers and farmers, need to be protected, but also those who eat or use products which have been in contact with these substances. This would mean combining an environment protection programme with a consumer protection programme, which would call for new studies and greater coordination.

26. The idea of setting up a system to keep a watch on toxicity in industry, so as to establish a central information system is to be welcomed. However, the proviso contained in certain texts that information would be transmitted to interested persons or institutions 'when required' is ambiguous. The data should be made available as soon as such studies are finished, since the health and safety of human beings is at stake and it is therefore difficult to decide at what moment it becomes necessary to pass on such information.

27. Industrial medical officers and those who bear responsibility for the protection of health and safety at places of work can perform their duty to the full only when they have access to all information concerning production and the substances used and, furthermore, to information regarded as a company secret. Only then can they duly assess the seriousness and extent of any risk. This arrangement is already included, for example, in the labour agreement negotiated by the Italian metal workers. That agreement also lays down that the services of the Labour Inspectorate, which comes under the Ministry of Labour, shall forward a copy of the inspection report to employees' representatives. Secrecy is maintained only in respect of measures of a penal or administrative nature and hence the employees' representatives are informed only of actual infringements.

28. Finally, it is absolutely necessary to emphasize the complete independence of industrial medical officers and to define their professional duties, partly to help bring about the free establishment of industrial medical officers within the Community in accordance with EEC directives. At all events there needs to be a definition of his professional duties and an indication of the type of education he must have had.

29. The good will and cooperation of all social partners is indispensable if this very comprehensive programme is to be carried out, since they will need to maintain a constant exchange of experience and information. If in particular it is desired that the directives generated by this programme should be truly effective, fullest use will have to be made of the experience and job-related knowledge of the workers themselves. If their help is not enlisted, there will be no chance of making a positive contribution to the combating of occupational accidents and diseases.

30. It will be possible to put into effect the instructions and actions to be prepared by the experts only through the experience and technical knowledge of the workers. If they were to observe the regulations to the letter (by working to rule), it would be enough to disrupt the production system and bring everything to a halt. Thus there is a danger of even this programme remaining a dead letter if no account is taken of the experience and knowledge about the working environment possessed by the International Labour Office.

31. As an example of a new way of protecting workers' health, your rapporteur feels it appropriate to mention the experience acquired by Italy since 1970, when the regions were established. Since that time more than 200 local health inspectorates have been set up and are run by the local authorities, which regard industrial hygiene and the dangers to the environment and to the local people as a single problem. It would be as well to study the work of these local bodies more closely, despite their occasional excesses and distortions. Nevertheless, all in all, it may well prove possible to benefit from their experience at European level.

Industrial accident rates for selected economic activities (fatal accidents)

		FR Germany (11/a) (6)	France (1/a)	Italy (11/a)	Nether- lands (1/a)	Belgium (11 'a)	Luxembourg (11/c)	United Kingdom (1/a)	Ireland (1/b)	Denmark	
Mining and quarrying	1960	0.99	0.72	0.72	:	0.89	0.48	0.67	0.53	:	1960
	1965	0.82	0.74	0.44	0.27	0.79(4)	0.22	0.63	1.30	:	1965
	1970	0.68	0.78	0.43	0.37	0.81	1.18(2)	0.45	0.67	:	1970
	1974	0.46(5)	0.69(1)	0.24(1)	0.10	0.46(1)	:	0.30	0.43	:	1974
Coal mining	1960	:	0.67	:	0.30	:	:	0.37	:	:	1960
	1965	:	0.78	:	:	:	:	0.62	0.76(3)	:	1965
	1970	:	0.76	:	:	:	:	0.43	1.00(3)	:	1970
	1974	:	0.64(1)	:	:	:	:	0.30	:	:	1974
Manufacturing	1960	0.19	0.10	0.18	0.12	0.14	0.04	0.04	0.10	:	1960
	1965	0.18	0.10(4)	0.15	0.19	0.16(4)	0.19	0.04	0.06	:	1965
	1970	0.18	0.12(2)	0.11	0.03	0.13(2)	0.14	0.04	0.06	:	1970
	1974	0.16(5)	:	0.08(1)	0.04	0.13	0.15(2)	0.04	0.08	:	1974
Construction	1960	0.58	:	0.86	:	0.41	:	0.24	:	:	1960
	1965	0.51	:	0.82	0.33	0.63(4)	:	0.14	0.09	:	1965
	1970	0.40	0.49	0.65	0.07	0.60	:	0.19	0.16	:	1970
	1974	0.35(5)	:	0.51(1)	0.08	0.44(1)	:	0.15	0.15	:	1974
Railways	1960	0.30	0.26	0.26	0.39	0.06	:	0.34	0.14	:	1960
	1965	0.30	0.25	0.26	0.14	0.14	:	0.31	0.38	:	1965
	1970	0.31	0.13(2)	0.20	0.44	0.24	:	0.28	0.40	:	1970
	1974	0.26(5)	:	0.14(1)	0.07	0.13	:	0.21	0.19(1)	:	1974

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- (1) Reported accidents
 (11) Compensated accidents
 a) Rate per 1000 man-years. 300 days
 b) Rate per 1000 wage earners
 c) Rates per 1000 000 hours worked

- 1 1973
 2 1969
 3 1966
 4 1964
 5 1975
 6 Including commuting accidents

Industrial accidents and occupational diseases (general scheme) 1970 to 1974

Sources (Ministry of Labour
(and National Wage and Salary Earners' Sickness Insurance Fund

Units (Accidents and diseases: in thousands
(Revenue and expenditure: FF million

	1970	1971	1972	1973	1974		1970	1971	1972	1973	1974
Industrial accidents reported	2,300	2,274	2,528	2,607	2,332	Expenditure					
of which: accidents on the way to or from work ...	274	272	265	275	262	Temporary incapacity for work	1,748	1,957	2,183	2,481	2,925
Occupational diseases reported	9.3	9.4	9.6	10.0	10.0	Permanent disability pensions	2,661	3,015	3,450	3,875	4,500
Deaths	4.7	5.0	4.9	4.7	4.3	Joint industrial accident fund ³	579	588	647	680	733
Daily allowances	36,087	36,609	36,662	38,214	39,697	Health and social measures (appropriations made available)	192	213	233	269	312
Days in hospital	2,854	2,902	2,851	2,796	2,886	Medical check-ups (appropriations made available)	120	135	147	170	197
Breakdown of expenditure arising from temporary incapacity for work						Sickness and accident prevention fund (appropriations made available)	90	101	110	102	118
Surgical expenses ¹	97.1	103.2	110.4	122.1	135.5	Administration	427	476	625	722	839
Medical expenses	225.4	247.0	286.4	329.0	363.0	Miscellaneous	511	570	647	732	943
Pharmaceutical expenses ..	108.9	116.8	120.9	128.1	144.9	Total	6,328	7,055	8,042	9,031	10,567
Hospital expenses	314.4	367.6	415.7	459.3	549.1	Revenue					
Daily allowances	921.7	1,034.4	1,148.0	1,338.8	1,598.0	Contributions (after deduction of refunds) ⁴ ..	6,046	6,739	7,395	8,534	9,910
Miscellaneous ²	80.2	27.7	101.1	103.6	134.8	Claims against third parties	305	335	363	400	434
Total	1,747.7	1,956.7	2,182.5	2,480.9	2,925.3	Miscellaneous	-	-	-	-	91
						Total ⁵	6,351	7,074	7,758	8,934	10,435

¹ Surgery and electroradiology expenses - ² Artificial limbs, dental treatment and prosthesis, rehabilitation, vocational retraining, thermal cures, funeral expenses, etc. - ³ Fund providing supplementary payments to recipients of pensions from insurance companies for accidents which occurred before 1 January 1947 - ⁴ Including taxes paid directly to the National Sickness Insurance Fund - ⁵ Excluding the yield from fines for delayed payments

OPINION OF THE COMMITTEE ON BUDGETS

Letter from the committee chairman to Mrs KROUWEL-VLAM, chairman of the Committee on the Environment, Public Health and Consumer Protection

Subject: Draft resolution of the Council of the European Communities
on a Community action programme on safety and health at work
(Doc. 480/77)

Brussels, 27 April 1978

Dear Madam Chairman,

The Committee on Budgets considered the draft resolution at its meeting of 26/27 April 1978.

The aim of this initiative is to make available to the Commission all the data and information necessary to allow it subsequently to develop a 'common preventive policy with regard to all occupational risks'.

The programme has three general objectives:

1. Improvement of the working situation in order to produce a higher degree of safety in carrying out work.
2. Improvement of knowledge in order to evaluate occupational risks and perfect suitable prevention and monitoring methods.
3. Development of greater safety consciousness at the workplace.

Particular attention is given to:

- the incorporation of safety aspects into the various stages of design, production and operation;
- the determination of maximum limits of pollution to which workers may be exposed at the workplace;
- more extensive monitoring of workers' safety and health;
- research into the causes of diseases and accidents;
- education and training ;

The estimated cost of these proposals is 3,225,000 EUA of which 825,000 is available in the budget for the current year under item 3520 'Community action programme on safety and health at work'.

Of the remaining 2,400,000 EUA, 1,100,000 EUA is to be entered in the 1979 budget and 1,300,000 EUA in that for 1980.

Of the 825,000 EUA to be spent in 1978, the largest part (400,000 EUA) is intended for study contracts for the drawing up of directives,

recommendations etc. The next biggest item is meetings of experts (125,000 EUA), the organization of colloquia, technical and scientific meetings (100,000 EUA), training courses and seminars, information visits etc.

The Committee on Budgets takes a favourable view of these proposals.

However, the Commission has, at the same time, requested additional posts for the implementation of the action programme, stating that in 1979 an extra

4 A officials

4 B officials

and 4 C officials will be required.

Here the Committee on Budgets reserves its judgment. It will only examine such requests for posts during the budgetary procedure in the autumn when it will be possible to gain an overall view of the Commission's staffing policy.

The committee regrets that the committee responsible has already taken a decision on this matter without awaiting its opinion. This violates the agreements made by the chairmen of the committees at a meeting chaired by the President of Parliament.

If in future however the committee responsible would indicate a deadline for the opinions, the Committee on Budgets would respect it. This would make satisfactory cooperation possible within the European Parliament.

.....

(sgd.) Erwin Lange

Present : Mr Lange, chairman; Mr Cointat, vice-chairman;
Lord Bruce of Donington, Mrs Dahlerup, Mr Dankert, Mr Fröh, Mr Ripamonti,
Mr Scott-Hopkins and Mr Shaw

OPINION OF THE COMMITTEE ON SOCIAL AFFAIRS, EMPLOYMENT AND EDUCATION

Draftsman : Mr J.M. Caro

The Committee on Social Affairs, Employment and Education appointed Mr Caro draftsman on 30 March 1978.

The draft opinion was considered by the Committee at its meeting of 18 April 1978 and adopted unanimously, with one abstention; on 24 April 1978.

Present: Mr van der Gun, chairman; Mrs Dunwoody and Mr Pistillo, vice-chairmen; Mr Caro, draftsman; Mr Bertrand, Mr De Keersmaeker (deputizing for Mr Santer), Mr Dinesen, Mrs Kellett-Bowman, Mr Lezzi, Mr Power and Mr Prescott (deputizing for Lady Fisher of Rednal).

I. Introduction

1. The present 'action programme on safety and health at work'¹, follows on from and lends practical substance to the 'guidelines for a Community programme for safety, hygiene and health protection at work'², published in 1975. These were based in turn on the resolution of the Council of the European Communities of 21 January 1974 concerning a 'social action programme', which also provided for the setting-up of an 'action programme for safety and health protection at work'. In its opinion on these guidelines of 24.9.1975³, the Committee on Social Affairs, Employment and Education made various critical comments concerning the form and content of the document and raised a number of points which should be taken into account and used as criteria when the present action programme comes to be considered.

II. Objectives

2. As a general basis for its objectives, the Commission document mentions the following:

- improvement of protection against all forms of occupational risk through more effective prevention, monitoring and control of these risks;
- achievement of full and unconditional participation of the social partners in accident prevention and health protection;
- better organization and better coordination between international organizations and appropriate institutions in the Member States;

The Commission defined the following general objectives:

- improvement of the working situation with a view to increased safety and with due regard to health requirements in the organization of the work;
- development of a more effective accident and disease prevention strategy at work;
- improvement of knowledge in order to identify and assess risks and perfect prevention and control methods and to conduct research into aetiology;
- improvement of human attitudes in order to promote and develop safety and health consciousness.

Starting from these general objectives the following six concrete initiatives are planned and specific time limits set for their attainment⁴:

- incorporation of safety aspects into the various stages of design, production and operation;

¹ Doc. 480/77 = COM(77) 657 final

² COM(75) 138 final

³ Doc. 211/75/Annex

⁴ Doc. 480/77, p. 5

- determination of exposure limits for workers with regard to pollutants and harmful substances present or likely to be present at the workplace;
- more extensive monitoring of workers' safety and health;
- accident and disease aetiology and assessment of the risks connected with work;
- coordination and promotion of research on occupational safety and health;
- development of safety and health consciousness by education and training.

III. Critical comments

3. The Commission's action programme represents a considerable contribution compared with the previous 1975 guidelines, as it offers a more detailed and more concrete description of the initiatives planned for health protection and safety at work in the European Community and thus increases the chances of a more harmonious improvement in living and working conditions for workers.

4. It should be noted that the Commission ought to have submitted, at an earlier stage, a greater number of practical projects with legislative content, and indicating the presence of firm political will. The document submitted offers nothing more at present than the features of a vast outline programme, from which a certain number of practical measures are supposed to evolve. Whilst registering its dissatisfaction that nothing has been done to accommodate its demands, the Committee on Social Affairs agrees to take note of the Commission's resolve to submit as soon as possible draft directives designed specifically to initiate the desired action.

5. As stated above, the Committee on Social Affairs, Employment and Education stressed various points in its opinion on the 1975 guidelines. These have been dealt with in the programme as follows:

(a) The 1978 budget showed a welcome increase in the funds allocated in the 1975 budget and condemned by the committee as wholly inadequate (162,000 u.a. for the programme and 36,000 u.a. for the 'Advisory Committee for Safety, Hygiene and Health Protection at Work'). The new figures are 825,000 u.a. for 1978, 1,100,000 u.a. for 1979 and 1,300,000 u.a. for 1980¹.

(b) The criticism that the Commission departments responsible for implementing the initiatives were understaffed now seems to be out of date, as can be seen from the budgetary appropriations for 1978²;

¹ Financial Statement, p. 2; for breakdown of the funds see point 5,1.1 (Doc. 480/77)

² Financial Statement, p.2, point 7: planned additional staff: 1 A and 1 B in the Statistical Office; 8 A - 4 B and 5 C in Directorate-General V (Doc. 480/77)

a final judgment on whether staffing is adequate cannot, however, be passed until these initiatives, which are mainly medium- and long-term, come to be implemented.

(c) Although the Committee on Social Affairs, Employment and Education can express only satisfaction at the way its suggestions on points (a) and (b) have been taken into account, it regrets that no progress has been made with regard to other points of criticism made in 1975, namely the legal form of the programme and the presentation of a new programme within a certain time limit. As had been done in other cases, the committee urged the Commission to give its proposals legally binding form and to present a more detailed programme within a year at the latest. Both requests have been ignored. The same applies to the request for more intensive safety training and information schemes for migrant workers whose accident rate is considerably higher than in the case of nationals.

IV. CONCLUSIONS

The Committee on Social Affairs, Employment and Education expresses its astonishment at having been assigned the role of committee asked for an opinion, when the problem concerned has enormous implications for employment and is one for which it should have been the committee responsible; and requests the Committee on the Environment, Public Health and Consumer Protection to include the following critical comments and practical proposals in the motion for a resolution:

1. Notes the presentation of the Community action programme on safety and health at work and considers that this document represents an important contribution to the development of a Community policy consonant with the 1975 guidelines for a programme for safety, hygiene and health protection at work;
2. Feels that a document of this kind constitutes an outline programme which ought to have been forthcoming long ago;
3. Regrets, therefore, that the Commission's dynamism has not been sufficiently evident in this area, and expresses its disappointment that genuine, practical draft proposals of a legislative character, embodying guarantees for their application have not been submitted to Parliament, which would have made it possible better to assess the extent of the Commission's political will;

4. Deplores the fact that the Commission has taken no action on the recommendations it made in 1975 on certain essential points, in particular for its proposals to be given a legally binding form and for a detailed programme to be presented within a twelve-month time-limit;
5. Considers that the use thus made by the Commission of the powers at its disposal ought to have enabled it to submit a larger number of practical measures at an earlier stage; however, the urgent need for a determined policy, clearly oriented in its application towards improving the living and working conditions of the employed population, does necessitate an increase in the provision of funds and staff;
6. Calls for a special effort to be made, through approaches to the authorities concerned and in particular, through concerted action with the social partners, to secure the consensus vital to the achievement of the objectives pursued;
7. Expresses astonishment that the 1978 programme does not take sufficient account of migrant workers, for whom the risk of exposure to disease and accidents at work remains high, even though the Committee on Social Affairs stressed, in 1975, the need to provide migrant workers with more extensive training and information on safety at work;
8. Reaffirms the fundamental importance of health protection and safety at work for the Community as a whole and therefore insists that, on the basis of the proposed programme, the practical measures of Community policy which the Commission intends implementing in this field be defined as a matter of urgency.

