



Open letter to Vice President Tajani and to Commissioner Andor

Brussels, 26 March 2012 - On 28 March 2012 the Impact Assessment Board will discuss, in the area of occupational health and safety, the impact assessment on a draft new legislative proposal on ergonomics, including work-related musculoskeletal disorders.

The objective of this letter is to express our profound concerns on this legislative initiative, which is neither necessary nor desirable. We are alarmed that the European Commission is pursuing a new binding horizontal ergonomics directive, including extending the scope of the EU level regulatory framework, notably by removing existing exemptions. This would clearly impose new administrative and financial burdens for all employers and in no case constitute a simplification.

Moreover, the issue of a disproportionate impact on SMEs and micro businesses remains unresolved, as proven by the Matrix external impact assessment. It acknowledges that a binding legislative initiative (option 4) would be the most expensive - 3.7 billion EUR, with 90% of those costs borne by SMEs.

We also wish to recall that there is not always a direct causal link between the occurrence of work-related musculoskeletal disorders and the workplace, as these are often caused by factors external to the working environment.

We therefore urge the Commission to carefully scrutinise the costs and benefits of the draft legislative initiative on enterprises, in particular SMEs and to undertake a robust SME test before proceeding any further with this work.

We also insist that the European Commission respects its commitment to cutting red tape and consequently avoids a new binding legislative initiative in this field. This would have a detrimental impact on growth and jobs at a time when all efforts should be geared towards improving the production capacities and competitiveness of European enterprises.

Instead we advocate pursuing stronger actions on awareness raising, information and training. We very much hope that the Commission will be able to share our opinion.

(List of signatories follows on page 2)



Signatories (organisations in alphabetical order):

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