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Public consultation on EU Strategic Framework on Health and Safety at Work

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Introduction

The aim of this open public consultation is to take stock of the quality and implementation of the Strategic Framework on Health and Safety at Work 2014-2020 and to receive input for the future Strategic Framework 2021-2027.

For further information, we kindly refer you to the current Strategic Framework, which can be accessed in your own language **here.**

This open public consultation will be available for 12 weeks from 7 December to 1 March 2021.

About you

Hungarian

Irish

Italian

Latvian

*Language of my contribution	
Bulgarian	
Croatian	
Czech	
Danish	
Dutch	
English	
Estonian	
Finnish	
French	
German	
Greek	

Lithuanian
Maltese
Polish
Portuguese
Romanian
Slovak
Slovenian
Spanish
Swedish
*I am giving my contribution as
Academic/research institution
Business association
Company/business organisation
Consumer organisation
EU citizen
Environmental organisation
Non-EU citizen
Non-governmental organisation (NGO)
Public authority
Trade union
Other
*First name
Richard
*Surname
PRICE
*Email (this won't be published)
richard.price@europeancancer.org
*Organisation name
255 character(s) maximum

F O O O O	
European Cancer Organisation	
European Canoci Organisation	
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*Organisation size

- Micro (1 to 9 employees)
- Small (10 to 49 employees)
- Medium (50 to 249 employees)
- Large (250 or more)

Transparency register number

255 character(s) maximum

Check if your organisation is on the <u>transparency register</u>. It's a voluntary database for organisations seeking to influence EU decision-making.

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*Country of origin

Argentina

Please add your country of or	igin, or that of your organisa	tion.	
Afghanistan	Djibouti	Libya	Saint Martin
Åland Islands	Dominica	Liechtenstein	Saint Pierre
			and Miquelon
Albania	Dominican	Lithuania	Saint Vincent
	Republic		and the
			Grenadines
Algeria	Ecuador	Luxembourg	Samoa
American	Egypt	Macau	San Marino
Samoa			
Andorra	El Salvador	Madagascar	São Tomé and Príncipe
Angola	Equatorial	Malawi	Saudi Arabia
3	Guinea		
Anguilla	Eritrea	Malaysia	Senegal
Antarctica	Estonia	Maldives	Serbia
Antigua and	Eswatini	Mali	Seychelles
Barbuda			

Ethiopia

Malta

Sierra Leone

Armenia	Falkland Islands	MarshallIslands	Singapore
Aruba	Faroe Islands	Martinique	Sint Maarten
Australia	Fiji	Mauritania	Slovakia
Austria	Finland	Mauritius	Slovenia
Azerbaijan	France	Mayotte	Solomon
			Islands
Bahamas	French Guiana	Mexico	Somalia
Bahrain	French	Micronesia	South Africa
	Polynesia		
Bangladesh	French	Moldova	South Georgia
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Barbados	Gabon	Monaco	South Korea
Belarus	Georgia	Mongolia	South Sudan
Belgium	Germany	Montenegro	Spain
Belize	Ghana	Montserrat	Sri Lanka
Benin	Gibraltar	Morocco	Sudan
Bermuda	Greece	Mozambique	Suriname
Bhutan	Greenland	Myanmar	Svalbard and
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Botswana	Guatemala	Netherlands	Taiwan
Bouvet Island	Guernsey	New Caledonia	Tajikistan
Brazil	Guinea	New Zealand	Tanzania
British Indian	Guinea-Bissau	Nicaragua	Thailand
Ocean Territory	Gamba Bioda	. Hodi agaa	. Hanaria
British Virgin	Guyana	Niger	The Gambia
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	Cayman Islands		Iran		Pakisian		Caicos Islands
0	Central African	0	Iraa	0	Palau	0	Tuvalu
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0	Chad	0	Ireland	0	Palestine	0	Uganda
0	Chile	0	Isle of Man	0	Panama	0	Ukraine
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0	Clipperton	0	Jamaica		Peru		United States
0	Cocos (Keeling)	0	Japan		Philippines	0	United States
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							Islands
0	Colombia		Jersey		Pitcairn Islands		Uruguay
	Comoros		Jordan		Poland		US Virgin
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0	Congo		Kazakhstan		Portugal		Uzbekistan
	Cook Islands		Kenya		Puerto Rico		Vanuatu
0	Costa Rica	0	Kiribati		Qatar		Vatican City
0	Côte d'Ivoire	0	Kosovo		Réunion		Venezuela
0	Croatia		Kuwait		Romania		Vietnam

Cuba	Kyrgyzstan	Russia	Wallis and
			Futuna
Curação	Laos	Rwanda	Western
			Sahara
Cyprus	Latvia	Saint	Yemen
		Barthélemy	
Czechia	Lebanon	Saint Helena	Zambia
		Ascension and	
		Tristan da	
		Cunha	
Democratic	Lesotho	Saint Kitts and	Zimbabwe
Republic of the		Nevis	
Congo			
Denmark	Liberia	Saint Lucia	

The Commission will publish all contributions to this public consultation. You can choose whether you would prefer to have your details published or to remain anonymous when your contribution is published. Fo r the purpose of transparency, the type of respondent (for example, 'business association, 'consumer association', 'EU citizen') country of origin, organisation name and size, and its transparency register number, are always published. Your e-mail address will never be published. Opt in to select the privacy option that best suits you. Privacy options default based on the type of respondent selected

*Contribution publication privacy settings

The Commission will publish the responses to this public consultation. You can choose whether you would like your details to be made public or to remain anonymous.

Anonymous

Only organisation details are published: The type of respondent that you responded to this consultation as, the name of the organisation on whose behalf you reply as well as its transparency number, its size, its country of origin and your contribution will be published as received. Your name will not be published. Please do not include any personal data in the contribution itself if you want to remain anonymous.

Public

Organisation details and respondent details are published: The type of respondent that you responded to this consultation as, the name of the organisation on whose behalf you reply as well as its transparency number, its size, its country of origin and your contribution will be published. Your name will also be published.

I agree with the personal data protection provisions

GENERAL VIEWS ON OCCUPATIONAL SAFETY AND HEALTH

The EU Strategic Framework on Health and Safety at Work 2014-2020 supports the promotion of high standards for occupational safety and health both within the EU and internationally. It aims to address the major health and safety at work challenges facing the EU through the implementation of a range of different actions at national and EU level. For more information, please see the Framework itself, which can be accessed in your own language **here**.

In this section, we are interested to understand your level of engagement with the existing EU Strategic Framework on Health and Safety at Work 2014-2020 and hear your views on how the situation within your country and/or the EU has changed since 2014.

Are you involved in or do you contribute to the design and/or implementation of occupational safety and health (OSH) policy, legislation and/or other measures? Please select what best applies to you.

- Yes, at EU level
- Yes at national or sub-national (regional, municipal) level
- Yes, I/my organisation are involved in OSH policy and/or legislation implementation in the workplace
- Yes, in another capacity
- No, not at any level

If chosen "Yes, in another capacity" please specify:

The European Cancer Organisation is not-for-profit umbrella federation of 34 member organisations working in cancer at a European level. we convene oncology professionals and patients to agree policy, advocate for positive change and be the united voice of the European cancer community, including in respect to occupational health and safety matters with relevance to cancer. This includes issues such as cytotoxic exposure and outdoor worker exposure to UV radiation, the impacts of over-working on health professionals, and the return to work needs of cancer survivors.

Please answer the survey from your own perspective – for example based on the situation in your company, your country or, if you deal with occupational safety and health (OSH) issues at EU level, based on the situation in the EU as a whole.

Thinking about the situation in your country / the EU, has workplace safety and health in your opinion become better since 2014?

- Strongly Agree
- Agree
- Neither Agree nor Disagree

- Strongly Disagree
- Don't know

Please specify why:

500 character(s) maximum

Updates of the Carcinogens and Mutagens Directive are important steps to prevent occupational cancers. However much remains to be done to protect the cancer workforce from chemical and psychological health risks. This includes exhaustion with attendant patient safety risk. Successful reintegration of cancer patients and survivors into the workplace should also be promoted. Further attention is needed to the protection of outdoor workers from harmful effects of their exposure to UV radiation.

Do you agree or disagree that sufficient action has been taken since 2014 to ensure high level of protection of workers' health and safety by...

	Strongly Agree	Agree	Neither Agree nor Disagree	Disagree	Strongly Disagree	Don' t know
the European Parliament and the Council	0	•	0	0	0	0
the European Commission	0	0	0	•	0	0
national or regional authorities (ministries of employment, national institute for occupational safety and health (OSH), labour inspectorate, etc.)	•	0	•	•	0	0
employers	0	0	•	0	0	0
employers' organisations at EU level	0	0	•	0	0	0
employers' organisations at national level	©	0	•	0	0	0
workers	0	0	•	0	0	0
workers' organisations (trade unions, etc.) at EU level	©	0	•	0	0	0
workers' organisations (trade unions, etc.) at national level	0	0	•	0	0	0

- *How familiar are you with the EU Strategic Framework on Health and Safety at work 2014-2020?
 - Very familiar (I know it in detail)
 - Somewhat familiar (I know certain aspects)

Not familiar (or only to a very limited degree)

In your opinion, how important are the following priorities of the EU OSH Strategic Framework 2014-2020 in relation to the key occupational safety and health (OSH) issues faced in your country / the EU since 2014:

	Very Important	Important	Slightly Important	Not Important	Don' t know
Better enforcement of OSH legislation by EU Member States	•	0	0	0	0
Improve statistical data collection and develop the information base on work related diseases and health issues	0	•	0	0	0
Address health and safety issues, such as the ageing of the workforce, emerging new risks, prevention of work-related and occupational diseases	0	•	0	0	0
Better coordinate EU and international efforts to address OSH and engage with international organisations	0	•	0	0	0
Simplify existing OSH legislation	0	•	0	0	0
Facilitate compliance with OSH legislation, particularly by micro and small enterprises	•	0	0	0	0
Further consolidate national OSH strategies, aligning them with the EU OSH Strategic Framework	0	•	0	0	0

VIEWS ON THE EU STRATEGIC FRAMEWORK 2014-2020

In this section, we are interested to understand your views on progress against the specific challenges and objectives identified in the EU Strategic Framework on Health and Safety at Work 2014-2020. The Strategic Framework defined 7 strategic objectives and a set of actions to be taken by different actors at EU and national level to help achieve each of these objectives.

The strategic objectives are:

- 1. Further consolidate national strategies
- 2. Facilitate compliance with OSH legislation, particularly by micro and small enterprises
- 3. Better enforcement of OSH legislation by Member States
- 4. Simplify existing legislation
- 5. Address the ageing of the workforce, emerging new risks, prevention of work-related and occupational diseases
- 6. Improve statistical data collection and develop the information base

7. Better coordinate EU and international efforts to address OSH and engage with international organisations

For more information on the challenges and objectives, please see the Framework itself, which can be accessed in your own language <u>here</u>.

Do you agree or disagree that the EU Strategic Framework on Health and Safety at Work 2014-2020 ...

	Strongly Agree	Agree	Neither Agree nor Disagree	Disagree	Strongly Disagree	Don' t know
focussed on the key challenges and issues in the area of OSH?	0	0	0	•	0	0
strategic objectives responded to key challenges and issues in the area of OSH?	0	0	0	•	0	0
was clear in the way it was structured and formulated?	0	0	•	0	0	0
ensured involvement and ownership from stakeholders?	0	0	•	0	0	0

Under its first strategic objective the EU Strategic Framework on Health and Safety at Work 2014-2020 called on Member States to review their national occupational safety and health (OSH) strategies in light of the new EU framework. The Commission and EU-OSHA were tasked with establishing a database covering all national OSH strategies, and facilitating the exchange of good practices. In your opinion and based on your experience, do you agree or disagree that actions taken by Member States ...

	Strongly Agree	Agree	Neither Agree nor Disagree	Disagree	Strongly Disagree	Don' t know
made good progress?	0	0	•	0	0	0
led to tangible results?	0	0	•	0	0	0
were relevant to the actual priorities in the area of OSH?	0	0	•	0	0	0
involved the appropriate stakeholders?	0	0	•	0	0	0

Has your country developed a new occupational safety and health strategy or updated its existing one since 2014?

- Yes
- O No
- Don't know

Do you agree or disagree that the occupational safety and health strategy of your country is aligned with the EU Strategic Framework on Health and Safety at Work 2014-2020 as regards its priorities / key objectives?

- Strongly Agree
- Agree
- Neither Agree nor Disagree
- Disagree
- Strongly Disagree
- Don't know

Under its **second strategic objective** the **EU Strategic Framework on Health and Safety at Work 2014-2020** called on Member States to provide support on implementing IT-based tools to facilitate compliance with occupational safety and health legislation. The Commission, in collaboration with EU-OSHA and/or other actors, was tasked with developing guidance, promoting the exchange of good practices, and carrying out awareness raising activities.

Based on your experience, do you agree or disagree that these actions...

	Strongly Agree	Agree	Neither Agree nor Disagree	Disagree	Strongly Disagree	Don' t know
made good progress?	0	0	0	0	0	0
led to tangible results?	0	0	0	0	0	0
were relevant to the actual priorities in the area of OSH?	0	0	0	0	0	0
involved the appropriate stakeholders?	0	0	0	0	0	0

The <u>Framework's</u> third strategic objective called for better enforcement of occupational safety and health (OSH) legislation by Member States. Key actions included: mapping labour inspectorates' resources and evaluating their capacities

to enforce OSH legislation, evaluating the programme of exchange/training of labour inspectors, and assessing the effectiveness of monitoring compliance.

Based on your experience, do you agree or disagree that these actions...

	Strongly Agree	Agree	Neither Agree nor Disagree	Disagree	Strongly Disagree	Don' t know
made good progress?	0	0	•	0	0	0
led to tangible results?	0	0	•	0	0	0
were relevant to the actual priorities in the area of OSH?	0	0	•	0	0	0
involved the appropriate stakeholders?	0	0	•	0	0	0

Under its **fourth strategic objective** the **EU Strategic Framework on Health and Safety at Work 2014-2020** refers to the simplification of legislation at both EU and national level, in order to reduce unnecessary burden, and to encourage the promotion of good practice.

Based on your experience, do you agree or disagree that these actions...

	Strongly Agree	Agree	Neither Agree nor Disagree	Disagree	Strongly Disagree	Don' t know
made good progress?	0	0	•	0	0	0
led to tangible results?	0	0	•	0	0	0
were relevant to the actual priorities in the area of OSH?	0	0	•	0	0	0
involved the appropriate stakeholders?	0	0	•	0	0	0

Under its **fifth strategic objective**, to address the ageing of the workforce, emerging new risks, and work-related and occupational diseases, the **EU Strategic Framework on Health and Safety at Work 2014-2020** called for support in the dissemination of findings from the European Risk Observatory, and good practices to support older and other specific groups of workers, as well as mental health issues at work, were to be identified and promoted.

Based on your experience, do you agree or disagree that these actions...

	Strongly Agree	Agree	Neither Agree nor Disagree	Disagree	Strongly Disagree	Don' t know
made good progress?	0	0	•	0	0	0
led to tangible results?	0	0	•	0	0	0
were relevant to the actual priorities in the area of OSH?	0	0	•	0	0	0
involved the appropriate stakeholders?	©	0	•	0	0	0

Under its **sixth strategic objective** the **EU Strategic Framework on Health and Safety at Work 2014-2020** outlined the need to improve available data and information, inter alia by assessing and improving the availability and comparability of data on accidents at work, and on occupational diseases at EU level.

Based on your experience, do you agree or disagree that these actions...

	Strongly Agree	Agree	Neither Agree nor Disagree	Disagree	Strongly Disagree	Don' t know
made good progress?	0	0	•	0	0	0
led to tangible results?	0	0	•	0	0	0
were relevant to the actual priorities in the area of OSH?	0	0	•	0	0	0
involved the appropriate stakeholders?	0	0	•	0	0	0

Under its **seventh strategic objective**, the <u>EU Strategic Framework on Health</u> and Safety at Work 2014-2020 identified several actions to better coordinate EU and international efforts to promote occupational safety and health (OSH) in the world and to strengthen support to candidate countries and international cooperation.

Based on your experience, do you agree or disagree that these actions...

	Strongly Agree	Agree	Neither Agree nor Disagree	Disagree	Strongly Disagree	Don' t know
made good progress?	0	0	•	0	0	0
led to tangible results?	0	0	•	0	0	©

were relevant to the actual priorities in the area of OSH?	0	0	•	0	0	0
involved the appropriate stakeholders?	0	0	•	0	0	0

Do you agree or disagree that the EU Strategic Framework on Health and Safety at Work 2014-2020 contributed to better work place health and safety for specific groups of workers who may be identified as potentially facing specific risk factors, such as women, older workers, workers with disabilities, seasonal workers, migrant workers, etc. as well as the self-employed?

- Strongly Agree
- Agree
- Neither Agree nor Disagree
- Disagree
- Strongly Disagree
- Don't know

Please provide further details regarding the specific group potentially at risk and/or risks faced.

500 character(s) maximum

The oncology workforce is exposed to many occupational health risks, including cytotoxic exposure. In addition, stress and impossible workloads may lead to psychological distress, exhaustion and burnout. Exhaustion raises the risk of medical error. The 'second victim' psychological impacts of such incidents must also be recognised.

Cancer survivors may face work impairments during and after their treatment, such as fatigue, pain and depression, alongside discrimination by employers.

In your opinion, were the following stakeholders involved in **the design** of the EU Strategic Framework on Health and Safety at Work 2014-2020 and its actions?

	Too much	About the right amount	Too little	Not at all	Don' t know
National or regional public authorities (ministries of employment, national institute for OSH, labour inspectorates, etc.)	0	0	0	0	•
Employers' organisations (employers' associations, trade associations, etc.)	0	0	0	0	•
Workers' organisations (trade unions, etc.)	0	0	0	0	•
Employers (incl. self-employed)	0	0	0	0	•

Academic / research institutions	0	0	0	0	•
OSH professionals (private experts / consultants, external prevention service providers, OSH network members, etc.)	0	•	0	0	•
Public insurance organisations	0	0	0	0	•
Other civil society organisations/NGOs	0	0	•	0	0
Other	0	0	0	0	•

If chosen "Other" please specify which stakeholder.

250 character(s) maximum	7		

In your opinion, did the following stakeholders contribute to **the implementation** of the EU OSH Strategic Framework 2014-2020 and its actions?

	Too much	About the right amount	Too little	Not at all	Don' t know
National or regional public authorities (ministries of employment, national institute for OSH, labour inspectorates, etc.)	0	0	0	0	•
Employers' organisations (employers' associations, trade associations, etc.)	0	0	0	0	•
Workers' organisations (trade unions, etc.)	0	0	0	0	•
Employers (incl. self-employed)	0	0	0	0	•
Academic / research institutions	0	0	0	0	•
OSH professionals (private experts / consultants, external prevention service providers, OSH network members, etc.)	0	0	0	0	•
Public insurance organisations	0	0	0	0	•
Other civil society organisations/NGOs	0	0	•	0	0
Other	0	0	0	0	0

In your opinion, what were the most significant barriers to fulfilling the EU Strategic Framework on Health and Safety at Work 2014-2020 objectives? Please select up to three answers. If you don't perceive any barrier, you can skip the question.

at most 4 choice(s)

Lack of commitment or engagement of the EU institutions

	External factors, such as the COVID-19 pandemic
	Lack of technical capacity among stakeholders to engage with OSH priorities
	EU strategic objectives and actions not being relevant enough / not aligning
	to OSH priorities
V	Lack of monitoring, benchmarks and targets
	Lack of commitment or engagement of social partners
	Lack of interest/uptake by workers
	National OSH strategies not aligned to EU strategic objectives and actions
	Lack of coordination between different European Commission services and
	/or other EU institutions
	Economic context
1	Other
1	Lack of commitment, engagement or coordination of / among EU Member
	States
	Limited human and financial resources
	Lack of awareness/understanding of OSH among key stakeholders
	EU strategic objectives and actions not leading to concrete results / having
	limited impact
V	Lack of interest/uptake by employers

If chosen "Other" please specify what other barrier(s) you perceive?

500 character(s) maximum

The Strategic Framework should be accompanied by components to measure progress towards goals. Silos in approach towards the goals should be broken where possible, and complementarity with other EU initiatives found. We recommend, in the context of Europe's Beating Cancer Plan, and associated initiatives such as the Inequalities Registry, goals for improving occupational exposure to carcinogens be included. Our Workforce Network would be pleased to provide further advice on achieving this.

OVERALL OPINIONS AND VIEWS ON THE FUTURE OSH STRATEGIC FRAMEWORK

In this section, we are keen to understand your views on what should be included in a new EU Strategic Framework on Health and Safety at Work. This includes questions around key challenges and objectives that should be addressed, the type of actions which should be included and what the main priorities of such a policy initiative should be.

In your view, did the EU Strategic Framework on Health and Safety at Work 2014-2020 contribute to improved health and safety at work at...

	To a great extent	Somewhat	Very little	Not at all	Don't know

EU level?	0	•	0		0
national level?	©	•	0	0	0
regional level?	0	•	0	0	0
the workplace (for example in your organisation)?	0	•	0	0	0

Please briefly explain why you believe the EU Strategic Framework on Health and Safety at Work 2014-2020 contributed – or not – to improved health and safety at work.

500 character(s) maximum

It would have been preferable that the Strategic Framework 2014-2020 included more elements addressing occupational health and safety concerns of the cancer community. The CMD updates proposed by the Communication on "Safer and Healthier Work for All" will help prevent occupational cancers. However, more attention is needed to protect cancer workers from the specific occupational health risks they are faced to, and to assist the reintegration of cancer patients and survivors into the workplace.

Thinking ahead to the next 7 years (2021-2027), how important do you think the following will be in terms of OSH policy and action at EU level to be included in a Strategic Framework?

	Important	Slightly Important	Not Important	Don' t know
Effective application of OSH legislation	•	0	0	0
International cooperation and coordination of OSH policy	•	0	0	0
Development and dissemination of OSH guidance, good practices and other awareness raising activities	•	0	0	0
Promoting cooperation and coordination of OSH policies across policy areas, such as health, education, environment, chemicals etc.	•	0	0	0
Promoting social dialogue	•	0	0	0
Updating and adapting OSH related legislation	•	0	0	0
Supporting enforcement activities	•	0	0	0

In your view, has the Covid-19 pandemic increased or decreased the importance of any of the following OSH-related issues...

	Significantly Increased	Slightly Increased	Neither Increased not Decreased	Slightly Decreased	Significantly Decreased	Don' t know
infectious disease prevention measures in the workplace, including where risk of infection is higher or in essential services	•	0	0	0	0	0
increase of teleworking / remote working / working from home and prevention of related risks	•	0	0	0	0	0
work-related psycho-social risks / ergonomic risks prevention	•	0	0	0	0	0
access to OSH related information	•	0	0	0	0	0
coordination among Member States in tackling the COVID-19 pandemic at the workplace	•	0	0	0	0	0
effective OSH measures for vulnerable groups of workers, such as seasonal, migrant, temporary or self-employed workers	0	•	0	0	0	0
enforcement issues	•	0	0	0	0	0

Thinking about the future (the next seven years), do you think a new EU Strategic Framework on Health and Safety at Work and its priorities should...

- other
- be discarded there is no need for an EU-level OSH Framework
- be updated/adapted
- remain broadly the same
- be fundamentally changed/adapted

Thinking ahead to the next 7 years (2021-2027): What are the key challenges that are common across the EU and require further OSH policy action? Please select up to four answers.

at most 4 choice(s)

- Risks from dangerous substances (e.g. chemicals / carcinogens)
- OSH risks to specific socio-demographic groups (women, migrants, etc.)
- OSH risks emerging from ICT/digitalisation (increased digitalisation, AI, workers' surveillance, right to disconnect)
- OSH risks emerging from nanotechnology/nanomaterials
- OSH risks emerging from the rise of platform economy (gig-work, increased precarious and atypical work)
- Preparedness for future threats to workers' health and safety (e.g. infectious diseases)
- Increased working from home / teleworking
- OSH risks emerging from robotics/automation/new technologies
- Ergonomic risks and musculoskeletal disorders (MSDs)
- Other
- Promotion of international OSH policy collaboration dimension
- OSH risks emerging from climate and environmental change (such as infectious diseases)
- Psychosocial risks (increased work intensity, blurring of work-private life, etc.)

If chosen "Other" please specify:

500 character(s) maximum

Cancer entails many work challenges and impairments, during treatment and in the long term. This includes job retention, limitation of career opportunities, and reduced ability to (re)enter in the job market for cancer patients and survivors, who are at a 40% higher risk of unemployment than cancer-free people. Assisting the successful (re)integration of cancer patients and survivors into the workplace must thus be part of EU strategies against cancer and for occupational health and safety.

What practical solutions do you suggest to address all or some of these key challenges?

2500 character(s) maximum

Healthcare workers involved in the delivery of cancer care face many potential occupational health and safety risks. As an example, cancer nurses, oncology pharmacists as well as technicians and cleaners may, because of their exposure to cytotoxic products, suffer from acute effects, such as dermatitis and menstrual problems, and chronic effects, such as effects on reproduction and the developing foetus in pregnant women, hearing impairment and cancer.

Stress and impossible workloads, increased by COVID-19, lead to psychological distress, exhaustion and burnout. Exhaustion raises the risk of medical error and patient safety being compromised. Reactions of healthcare workers involved in such adverse events, known as second victims, include: anxiety, obnubilation, confusion, difficulty concentrating on tasks, depersonalisation, frustration, guilt, sadness, mood changes, insomnia, the constant replaying of the incident, lack of professional confidence, and fear of legal action and loss of reputation.

Exposure of healthcare workers to cytotoxic products should now be covered under the Carcinogens and Mutagens Directive. EU legislation should specifically protect them from the reprotoxic effects of these agents, preventing any harm to men and women of childbearing age as well as to their offspring. The EU-OSHA could also take a leading role in promoting uptake of relevant best practices that minimise the exposure of cancer workers to harmful products, and reduce the risk of adverse events, such as through digitalization.

The new Strategic Framework for Occupational Health and Safety must also build on Europe's Beating Cancer Plan's provisions on the (re)integration of cancer patients and survivors into the workplace. This can be achieved through an elevated mandate of the EU-OSHA to monitor and share national best practices. These efforts should notably aim at strengthening the role of primary care in this field and its coordination with secondary care, as well as at ensuring that employer organisations set up systems to fully support cancer patients, survivors and carers to continue their work.

Finally, the new Strategic Framework must strengthen its approach to the prevention of occupational cancers by enhancing UV protection measures, paying special attention to risks faced by outdoor workers. Risk groups include farmers, gardeners, outdoor events staff and construction workers.

How important do you think it is that a new EU Strategic Framework on Health and Safety at Work covering the next seven years contributes to...

	Very Important	Important	Slightly Important	Not Important	Don' t know
anticipating and managing change for better and longer working lives	•	0	0	0	0
preventing work-related diseases and accidents	•	0	0	0	0
improving OSH strategies at national level?	•	0	0	0	0

improving the application of EU rules	•		0	0	0
ensuring evidence-based policy	•	0	0	0	0
promoting higher occupational safety and health standards in the world	•	0	0	0	0

Should a new EU Strategic Framework on Health and Safety at Work define in detail a list of objectives, actions, timelines and actors involved in the implementation of such actions, or should it set a vision for the future, and a definition of goals and priorities?

- Define in detail a list of objectives, actions, timelines and actors involved in the implementation of such actions
- Set a vision for the future, and a definition of goals and priorities
- Don't know

In your view, what main issues should be included in the successor to the current EU OSH Strategic Framework, covering the next seven years?

2500 character(s) maximum

Healthcare workers face many health consequences as a result of their role in cancer care delivery. Cancer nurses, oncology pharmacists alongside technicians and cleaners may, because of their exposure to cytotoxic products, suffer from acute effects, such as dermatitis and menstrual problems, and chronic effects, such as effects on reproduction and the developing foetus in pregnant women, hearing impairment and cancer.

Finally, stress and impossible workloads, increased by COVID-19, lead to psychological distress, exhaustion and burnout. Exhaustion raises the risk of medical error. The 'second victim' psychological impacts of such incidents must also be recognised.

Despite recent recognition of some of these issues, such as within a 2015 report of the European Parliament, there still is no harmonised EU approach to occupational health risks of healthcare workers.

The new EU Strategic Framework must address specific occupational health risks faced by healthcare workers, with focus on cancer workers. In particular, exposure of healthcare workers to cytotoxic products needs to be covered under the CMD. EU legislation should specifically protect them from the reprotoxic effects of these agents, preventing any harm to men and women of childbearing age as well as to their offspring. The EU-OSHA could also take a leading role in promoting uptake of relevant best practices developed by expert stakeholder groups, to minimise the exposure of cancer workers to harmful products, reduce their unnecessary bureaucratic workload and provide them with psychological support.

The new Strategic Framework must also build on Europe's Beating Cancer Plan's provisions on the (re) integration of cancer patients and survivors into the workplace. This can be achieved through an elevated mandate of the EU-OSHA to monitor and share national best practices, as well as through prominent inclusion within the new Action Plan of the EU Pillar of Social Rights. These efforts should notably aim at strengthening the role of primary care in this field and its coordination with secondary care, as well as at ensuring that employer organisations set up systems to fully support cancer patients, survivors and carers to continue their work.

Finally, the new Strategic Framework must strengthen its approach to the prevention of occupational cancers by enhancing UV protection measures, paying special attention to risks faced by outdoor workers.

You may share any additional remarks or statement(s) regarding the topic of this public consultation here.

NB: Remember to remove any personal information from these documents in case you have opted for publication of your contributions in an anonymised way.

500 character(s) maximum

Urgent attention is needed to advance occupational health and safety for healthcare professionals, cancer patients and cancer survivors. The European Cancer Organisation, and in particular its Workforce and Survivorship & Quality of Life Networks, stand ready to help and look very much forward to contributing to the EU's efforts in this respect.

Contact

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