

To: Members of the SME Intergroup

Brussels, 10 November 2015

**Subject:** UEAPME Letter on the EU strategic framework on health and safety at work 2014-2020

Dear Member of the SME Intergroup

UEAPME, the European Association of Crafts and SMEs, is calling for your support, ahead of the upcoming plenary vote on the EU strategic framework on health and safety at work 2014-2020 in the last week of November. In view of some major concerns for SMEs on the report as tabled, please find below our main considerations.

While we support aspects on awareness raising and support for SMEs and micro-companies (Paragraph 10), risk prevention (Paragraph 12), and guidance and labour inspectors (Paragraph 17), we have strong concerns about the following issues, for which we need your support:

- **Musculoskeletal disorders (MSDs)**

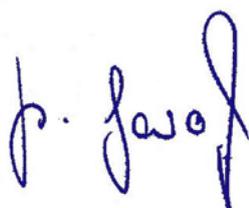
For UEAPME, a comprehensive legal instrument on musculoskeletal disorders (MSDs) (Paragraph 26) as currently called for in the report, is definitely not the right approach, as it would clearly impose new administrative and financial burdens for employers. As a previous Impact Assessment (issued by the EU Commission in 2012) has shown, a binding legislative initiative would be very costly, with 90% of those costs borne by SMEs. Work in the field of MSDs should be focused on awareness raising and prevention, and tackle the real causes of MSDs.

- **Harassment and violence at work**

UEAPME strongly disagrees with a proposal for a legal act (Paragraph 34) based on the EU social partners' Framework Agreement on harassment and violence at work. UEAPME wishes to point out that, together with ETUC, European employer organisations are taking new actions to achieve full implementation of their agreement based on their Work Programme 2015-2017. A new legal act from the Commission will not solve the problems on the ground.

We would be thankful if you, as member of the SME Intergroup, could take these concerns into consideration. My team is also ready to discuss and clarify this position with you in person if necessary.

Yours sincerely,



Peter Faross  
Secretary General