



UNION EUROPEENNE DE L'ARTISANAT ET DES PETITES ET MOYENNES ENTREPRISES  
EUROPÄISCHE UNION DES HANDWERKS UND DER KLEIN- UND MITTELBETRIEBE  
EUROPEAN ASSOCIATION OF CRAFT, SMALL AND MEDIUM-SIZED ENTERPRISES  
UNIONE EUROPEA DELL' ARTIGIANATO E DELLE PICCOLE E MEDIE IMPRESE

## **UEAPME position paper on the article 138 consultation on blood-borne infections**

### **Introduction**

The European Commission consulted the European Social Partners with an Article 138 consultation on protecting European healthcare workers from blood-borne infections due to needlestick injuries.

UEAPME hereby responds to the following questions posed by the European Commission.

### **Questions**

*Do you consider it useful to take an initiative to strengthen the protection of European healthcare workers from blood-borne infections due to needlestick injuries?*

UEAPME generally considers the health and safety protection of all workers as important and useful. This of course also includes workers from the health care sector. For these workers, the prevention from biological agents is particularly necessary. Consequently, this very specific issue would be better tackled at sector level rather than at inter-sectoral level. The sectoral social partners are better placed to design the appropriate solutions for such a technical problem.

Concerning the idea of revising directive 2000/54 in order to specifically address the risk arising from work with needles and other medical sharps, UEAPME believes that this is not appropriate, as the scope of this directive is about biological agents in general and not on the use of specific tools. . Principally UEAPME is of the opinion that the currently existing legislative instruments are sufficient to protect the workers in the health care sector. More useful would be the elaboration of particular guidelines which lay out the specific risk prevention conditions for this area.

*Do you think that a joint initiative by the European social partners under Article 139 of the Treaty establishing the European Community would be appropriate?*

On the basis of the above-mentioned comments, UEAPME does not see interprofessional social partner negotiations under article 139 adapted to tackle this question.

Brussels, 09/02/07