EUROGIP

The obligation to assess occupational risks

The Framework Directive and its transposition in the countries of the EU-15

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Understanding occupational risks in Europe

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Introduction

The obligation of prior assessment of occupational risks was created by the European Union in the Directive of 12 June 1989 (Directive 89/391/EEC concerning the application of measures to promote improvements in the safety and health of workers in the workplace, OJ L 183 of 29.6.1989, p. 1-8).

This directive - known as the Framework Directive - is the fundamental document setting out the general principles of health protection and safety at work in the European Union. It lays down, for all workers, common principles of prevention at source. And it covers a broad field of occupational health and safety, i.e. not only technical factors and aspects but also organisational aspects (work organisation) and social aspects (social relations).

It thus defines a series of obligations and procedures, such as the elimination of risk and accident factors, informing and consultation of workers, and procedures relating to situations of serious and imminent danger... But above all, it places prior assessment of occupational risks at the top of the hierarchy of general occupational health and safety principles, whenever risks have not been able to be avoided.

For the twelve member countries of the European Union, when the Framework Directive was enacted (1989), the deadline for transposition of this directive was set at 31 December 1992.

It should be specified that a European directive is designed merely to stipulate the results to be achieved within a given period of time, and that it is up to the Member States to take the appropriate measures for its transposition into national law. Accordingly, the date of origin and the content of the obligation, and its conditions of application, can vary from one State to another.

Year of transposition of the Framework Directive into national law in the countries of the EU-15(1)

1991	France, Portugal
1992	Belgium, United Kingdom
1993	Finland, Ireland
1994	Denmark, Italy, Luxembourg, Netherlands
1995	Austria, Spain
1996	Germany, Greece
2001	Sweden

However, in most countries of the EU-15, the provisions of the 89/391/EEC directive have been transposed into national law in two stages, with a second set of specific risk assessment regulations often clarifying or supplementing a first very general law on occupational risk prevention.
It is these regulations that this document proposes to examine and compare; the practical aspects of the procedure for prior assessment of occupational risks specific to each country are not covered by the present study.

(1) The twelve new States which became members of the European Union in 2004 and 2006 are excluded from the scope of the study due to the lack of hindsight and information available to us at present concerning application of the national laws transposing the Framework Directive

I - Types of risks to be assessed

What the Framework Directive says (Article 6, paragraph 3 point a):

"The employer shall [...] evaluate the risks to the safety and health of workers, inter alia in the choice of work equipment, the chemical substances or preparations used, and the fitting-out of work places."

All health and safety hazards for the employees must be evaluated. This general obligation has been correctly transposed into national law in all the countries except one.

Accordingly, Italy was sentenced in 2001 by the Court of Justice of the European Communities(2) because in its transposition decree(3) the obligation of assessment concerns only a given series of risks, those referred to in particular in the directive on work equipment, chemical substances or preparations used, and the fitting-out of work places. But this legislative decree should have mentioned that this list was merely indicative.

In parallel to this general obligation, the Member States were nevertheless able to adopt specific measures relating to the assessment of certain risks. These measures can be found, depending on the country, both in the text transposing the Framework Directive, and in other regulations which may sometimes be prior to the transposition document.

For instance, Italy requires a certain amount of specific information that the assessment document must contain where carcinogenic or mutagenic risks exist in the enterprise. For example, Article 63 of the legislative decree for transposition into national law requires in particular that the characteristics of jobs of work and their duration, and the quantity of carcinogenic agents produced or used, their concentration and their capability for penetrating the organism be evaluated and put in writing. Likewise, Article 78 of the same legislative decree mentions for biological risks a whole set of specific information to be provided.

In Sweden, numerous regulations already required an assessment of risks concerning certain specific fields, and this well before the transposition law of 2001: this is the case for risks of violence in the workplace (1993), noise and lead (1992), mine workers (1996), the construction industry (1999) and chemical risks (2000).

In Portugal also, the assessment of certain types of risk has been rendered compulsory in legislation other than the decree(4) for application of the directive; examples are biological risks (1997), carcinogenic agents (1993), asbestos (1989), noise (1992), vinyl chloride monomer (1989), lead (1989) and risks specific to miners (1993).

It is possible that there may be other examples in other countries, but given the large number and complexity of the regulatory documents relating to occupational risks in force in each country, it is hard to draw up an exhaustive list.

(2) Judgment of the CJEC of 15 November 2001 (case C-49/00) - Note that this conviction concerns several aspects of transposition of the directive.

(3) Legislative decree 626/94 of 19 September 1994 (Art. 4)

(4) Legislative decree 2000-109 of 30 June 2000

What the Framework Directive says (Article 7, paragraphs 1 and 3):

"The employer shall designate one or more workers to carry out activities related to the protection and prevention of occupational risks; if such protective and preventive measures cannot be organized for lack of competent personnel in the undertaking and/or establishment, the employer shall enlist competent external services or persons."

Most countries have transposed this aspect of the directive without adding clarifications or additional conditions. Three principles are to be noted.

1/ It is the employer who is required to implement a policy of occupational risk prevention in his enterprise; it is therefore he who bears the responsibility for risk assessment.

2/ Great importance is assigned to the fact that the employees or their representatives must take part in preparing, performing and following up the assessment.

3/ Finally, the employer is required to hire outside specialists who could assist him in the area of work safety and injury prevention if he is not capable of meeting, in-house, the obligation of assessing the risks in his enterprise. These are cases in which the competencies of the employer, those of workers appointed by him or, where applicable, those of the internal risk prevention department are inadequate.

The transposition of this latter principle posed a problem for some countries. In particular, the directive could have been interpreted as allowing the employer the choice of performing risk assessment internally or enlisting competent services outside the enterprise.

Now, it is only subsidiarily that the employer should entrust risk assessment to external players. Accordingly, the CJEC ruled(5) that Dutch law was not in conformance with the requirements of the European directive, because the law authorises the employer to choose freely whether to make use of internal or external health and safety services (see opposite).
And the use of such competent external services is compulsory when the internal competencies are inadequate.
Italy was therefore convicted(6), because the use of external services is not made explicitly compulsory when an enterprise does not have all the required capabilities in-house.
Although most of the countries transposed this aspect of the directive without adding clarifications or additional conditions, some seized this opportunity to stipulate more precise conditions regarding the competent entities for risk assessment, or else to define the risk prevention services, both internal and external (sometimes in a law other than the transposition law).

In Spain, for example, Article 10 of the Legislation on Occupational Risk Prevention Services(7) provides that the company manager must perform risk assessment in accordance with the following conditions:
- The employer must take responsibility himself for risk assessment, if the enterprise has less than six workers, and with the exception of certain particularly dangerous activities defined by law, if the company manager exercises his occupation routinely, and if he has the capabilities corresponding to the preventive functions that he will implement.
- He must appoint one or more employees to perform this, except if the required risk prevention activities are too extensive; in that case one or more in-house or outside occupational risk prevention services will have to be called on.
- He must establish an in-house occupational risk prevention service for enterprises with more than 500 employees; for enterprises of between 250 and 500 employees, this is possible but is subject to conditions.
- He must use an outside risk prevention service in all other cases, but the employees' representatives must be consulted beforehand concerning this initiative.

The Netherlands, for their part, have adopted an original position.
The employer (or a company specialist in hygiene, health and working conditions) can perform the assessment himself or else do so in cooperation with an arbodienst(8).

(5) CJEC judgment of 22 May 2003 (case c-441/01)

(6) See note 2 page 3

(7) Royal decree 39/1997 of 17 January 1997 (Reglamento de los Servicios de Prevencion)

And in any case, since 1998, the document resulting from the assessment must always be checked by a certified arbodienst or by an occupational health and safety expert, likewise certified. We should specify that since 1st January 2007, enterprises with less than 26 employees are exempted from this obligation of verification of the document by an arbodienst, on condition that tools produced specifically and recognised by the social partners are used for the assessment approach.

This organisation or expert verifies:
- that the document based on the risk assessment is complete and reliable;
- that it corresponds to the actual situation of the enterprise;
- that the document and the associated implementation plan are performed correctly;
- that it takes into account present-day conceptions of safety, health and well-being, and complies with the standards and directives in force.

To perform this verification, the arbodienst or the expert holds discussions with the employer and may visit the enterprise. It then informs the employer of its conclusions. The latter must provide the workers with a copy of the conclusions of the arbodienst.

An *arbodienst* may be internal or external to the enterprise. But the terms of the Dutch law being vague, the use of an arbodienst has often been interpreted as “external arbodienst”.
And since the law does not carry over the subsidiary nature of the use of outside competencies, it authorises de facto the employer to choose freely between internal and external health and safety services, which has been condemned by the CJEC(9).
In practice, enterprises, including SMEs, prefer to use an external arbodienst.

(8) The arbodiensten are independent private organisations specialised in the area of working conditions. They consist of at least one industrial doctor, a safety specialist, an expert in occupational health and a specialist in work organisation.

(9) See note 2 page 3

III - Formalisation of risk assessment

What the Framework Directive says (Article 9 paragraph 1 point a and Article 10 paragraph 3 point a):

"The employer shall be in possession of an assessment of the risks to safety and health at work" and "the employer shall take appropriate measures so that workers [...] have access [...] to risk assessment."

The principle of formalisation
In all the EU countries, formalisation or documentation of the results of risk assessment is compulsory. However, some countries have stipulated exceptions to this obligation of formalisation for small enterprises.

In the United Kingdom, enterprises with less than five employees are not obliged to draw up a written report. But, in the event of an audit, they must be capable of proving that they have indeed undertaken the procedure.

In Germany, the employer must have documents concerning the identification and assessment of risks and hazards in the workplace, and concerning the adoption of measures against these hazards and risks. Germany has, however, limited this obligation to enterprises of more than ten employees, unless the enterprise's business is of a particularly dangerous nature. Germany has been convicted by the CJEC(10) because of this formalisation exception. But the country defends itself by arguing that the obligation of documentation for small enterprises exists elsewhere in compulsory particular regulations adopted by the Berufsgenossenschaften (sector-based organisations for occupational risk insurance and prevention).

In Italy, every employer is required to establish, following the assessment, a document containing, inter alia, a report on assessment of the risks for safety and health specifying the criteria adopted for this assessment. This country allows for an exception, however: the employer of a so-called "family-run" enterprise or an enterprise which employs up to ten employees is not subject to this obligation, except where particular risk factors exist. However, this employer is required to certify in writing that the risk assessment and the obligations resulting therefrom have indeed been performed.
The trade unions regularly object to this self-certification which allows the employer to declare that he has performed the assessment without providing the slightest written documentation concerning its content.

(10) CJEC judgment of 7 February 2002 (case C-5/00)

Formalisation media
As regards the documentation medium chosen by the employer, it is accepted that the results of the risk assessment can be materialised in the form of a written document or an electronic document.
Some countries specify in greater detail than others what such a document must contain in particular, even though, in fact, there are no real differences from one country to another.

In the Netherlands, the written document (called risico's inventarisatie en evaluatie, ri&e - literally "inventory and assessment of risks") must contain both a description of the risks and the measures designed to limit them, and the risks affecting particular categories of workers. An "inventory" part concerns identification of the risks; the "assessment" part covers an estimate of their severity and a comparison with a regulatory or legal standard.

This document must:
- be complete (it must not neglect activities, departments, positions or groups of people);
- be reliable (it must represent the actual situation);
- be up-to-date (it must represent the current situation);
- be written (a copy must be sent to the Works Council and each worker must be able to consult it);
- take into account the major themes relating to safety, health and well-being (the environment, on the other hand, is not especially part of the approach);
- take into account the risks concerning particular categories of workers: young workers, elderly workers, disabled workers, pregnant workers, home workers, people performing holiday jobs, part-time workers, workers concerned by flexible work.

In **Belgium**, a good risk assessment report or file indicates:
- which risks are evaluated;
- which groups of workers incur specific risks;
- what decisions are taken during risk assessment, and on what information these decisions are based (General Work Safety Regulations, Code, directives and standards, etc.);
- what agreements have been reached for re-examination of the risk assessment.

In **Luxembourg**, one must document in writing:
- The result of the risk assessment;
- The measures adopted regarding protection at work;
- The result of inspection of the measures.

In Denmark, since 2000 all enterprises are obliged to prepare a written assessment; prior to that, those with a number of employees equal to or less than five were exempted.
The assessment must include the following aspects:
- Identification of working conditions within the enterprise;
- Description and evaluation of working environment problems;
- Definition of priorities and development of an action plan designed to solve these problems;
- Guidelines for monitoring of the action plan.

Although the obligation of prior assessment of occupational risks has existed in France since 1991, it was only in 2001 that a decree stipulated that the employer must record the results of this procedure in a "single document". This document must contain an inventory of the risks identified in each work unit of the company or plant. A circular(11) released the following year specifies than the inventory concept leads to a two-stage definition of risk assessment: a hazard identification stage followed by a risk analysis stage.

Other countries, such as **Finland**, have merely adopted the vague wording of the directive, namely: “The employer must be in possession of the risk analysis and assessment”.

In all the countries, with the exception of the cases mentioned earlier in which formalisation is not made compulsory by law, the documentation resulting from the risk assessment approach must be available in the enterprise and be accessible to management, the employees and their representatives and the Labour Inspectorate in the event of a possible audit.

(11) DRT Circular No. 6 of 18 April 2002

IV - The link between risk assessment and preventive action plan

What the Framework Directive says (Article 6, paragraph 3 point a):

"Subsequent to this evaluation, the preventive measures must assure an improvement in the level of protection afforded to workers with regard to safety and health".

(12) See page 6 (formalisation)

(13) See note 8 page 5

Very often, the national laws which establish the obligation of risk assessment also require the working out of a preventive action plan, with a more or less direct and formal link between the two documents depending on the country.

The countries mentioned below are those in which the legislation establishing the obligation to assess risks refers explicitly to the preventive action plan as a consequence of this approach.

In the Netherlands, the ri&e document(12) must, in addition to an inventory of identified risks, their assessment and certification of the approach by an arbodienst(13), contain the following items:
- a plan for implementation of preventive measures, which includes a schedule of concrete measures to prevent the identified risks;
- the opinion of the arbodienst concerning the implementation plan;
- the list (nature and date) of serious injuries that have occurred in the enterprise, i.e. those that have led to sick leave or death of the victim.

And each year, the employer must:
- consult his employees concerning the implementation plan, its performance, and its suitability for the current situation of the enterprise;
- draw up a written report concerning performance of the implementation plan which also indicates the deadlines by which these measures must be taken.

Each worker must be able to obtain knowledge of it; in practice, a few copies are left for free consultation or distributed to each worker.

While there are no particular legal obligations concerning the structure of the implementation plan, it must nevertheless indicate:
- the measures taken relating to the observed risks (distinguishing between the various establishments of the enterprise, departments, work stations and job positions);
- the way in which these measures will be introduced;
- the resources available for this introduction;
- the people in charge of performance of the plan;
- at what time and in what way this performance will be covered by a report and will be assessed;
- the deadline by which these measures must have been taken.

To choose the measures to be taken, priorities should be established (urgency, optimum efficiency), especially based on the advice of the arbodienst and in consultation with the workers and/or their representatives.

In Belgium, two written documents are compulsory for risk analysis and preventive measures: the Overall Risk Prevention Plan and the Annual Action Plan.

The Overall Risk Prevention Plan is a five-year plan in which the risk prevention activities to be implemented are scheduled. Risk assessment forms an integral part of this, because in this plan measures and priorities are defined on the basis of the risk assessment.

In practice, in addition to the risk assessment, it contains:
- the preventive measures to be defined;
- the priority objectives to be attained;
- the activities and assignments designed to attain the objectives;
- organisational, material and financial resources;
- the assignments, obligations and resources of all those involved;
- the way in which the overall risk prevention plan is adapted to new circumstances.

The second compulsory written document is the Annual Action Plan, which establishes the risk prevention policy of the enterprise on an annual basis and adapts the overall risk prevention plan to circumstances that have changed over time.

In **Ireland**, each enterprise must present the risk assessment results in a written document (known as the "Safety Declaration"), which must include a plan for implementation of the preventive measures.

In **Spain**, the company manager must draw up a written document containing:
- an assessment of the risks for health and safety in the workplace and the scheduling of risk prevention action;
- the concrete protection and prevention measures to be implemented and, in some cases, the protective equipment which must be used;
- the results of regular inspections of working conditions and the workers' activity;
- the list of occupational diseases and occupational injuries which have resulted for the worker in a work disability of more than one day.

In **Italy**, the regulations establish a direct link between risk assessment and the preventive action implementation plan. Accordingly, employers (except for those exempted from recording the risk assessment results) are required to establish a document containing:
- a risk assessment report, specifying the criteria adopted for this assessment;
- a definition of the preventive and protective measures and personal protective equipment, following the risk assessment;
- the schedule of measures that could ensure a gradual improvement in safety levels.

V - Frequency of the risk assessment approach

The Framework Directive makes no statement on this aspect.

Most countries set no frequency rule, but refer to the occurrence of changes in working conditions in the enterprise to require that the approach be applied again.

In some countries, such as Belgium and Germany, the guides to aid with risk assessment emphasise that this is not a single procedure, but a dynamic process that must be started again whenever a change liable to alter the risks occurs in the workplace.
There are specific times at which an assessment must be performed in all cases:
- when new processes are introduced;
- when new equipment or materials are used (work equipment and products);
- when there is a change in work organisation (work procedures and methods);
- when new work situations are introduced: new workplace, another building, etc.);
- when new workers are hired;
- whenever an incident or accident occurs or is narrowly avoided.

In the **Netherlands**, the document resulting from risk assessment must be updated whenever this is justified by the knowledge resulting from its implementation, by a change in work methods or working conditions, by the state of the art or by the opinion of occupational health and safety specialists. The law transposing the directive emphasises that the document must be "up-to-date". For example, a new production line could be set up, the services proposed by the enterprise could be broadened, renovation or extension work could be performed, or there could be a major change in the workers' jobs.

In **Finland**, revision is required whenever there is an essential change in working conditions.

Some countries advise the enterprises to define a frequency rule themselves.

In the **United Kingdom**, the guides of the Health and Safety Executive(14) recommend scheduling a review of the assessment at regular intervals. The time between each review depends on the nature of the risk and the possible extent of changes in operations.

In **Spain**, work stations must be assessed again when harm to workers' health has been detected, and otherwise on a regular basis.

In **Sweden**, the assessment must be reviewed regularly, and in the event of a change in the enterprise's operations.

Only three countries stipulate in their regulations a frequency with regard to the review of risk assessment.

In **France**, the assessment must be updated when a major development decision alters health and safety conditions or working conditions in the enterprise, and when additional information is received concerning the assessment of a risk in a work unit. The document must in any case be updated at least once a year.

In **Denmark**, the workplace assessment must be reviewed when changes take place in the work and in work methods and processes and when these changes have an influence on health and safety conditions during work, and every three years at the latest.

In **Italy**, the assessment must be reviewed upon each change in the production process that will have a significant effect on the safety and health of the workers. The legislative decree for transposition lays down special provisions for the assessment of carcinogenic risks, however, including in particular a review every three years at most.

(14) UK organisation for occupational risk prevention

VI - Sanctions for risk assessment failings

Until now, few countries seem to have provided for sanctions in the event of a risk assessment failing.

In **Spain**, the Law on Occupational Risk Prevention(15) stipulates that an assessment or formal presentation failing is a serious offence liable to a fine of 1500 to 3000 euros.

Italian(16) legislation provides for a penalty of three to six months' imprisonment or a fine of 1500 to 4000 euros in the event of a breach of the obligation to draw up the risk assessment document, or if the approach were to be carried out without the competent persons (doctor if necessary, or risk prevention manager) or without having consulted the safety representative of the enterprise, or else in the event of a breach of the obligation of self-certification for SMEs.
In Belgium, a risk assessment failing may be punished by eight days' imprisonment and/or a fine of 50 to 1000 euros.

(15) Act of 8 November 1995 (article 47)

(16) Legislative Decree 626/94 of 19 September 1994 (Article 89)

(17) See page 6 (formalisation)

(18) Decree No. 2001-1016 of 5 November 2001

In the **Netherlands**, the Labour Inspectorate may apply the following penalties:

Size of enterprise	*Amount of fine*
Less than 5 employees	Euro 180
Between 5 and 9 employees	Euro 360
Between 10 and 39 employees	Euro 540
Between 40 and 99 employees	Euro 720
Between 100 and 249 employees	Euro 1080
Between 250 and 499 employees	Euro 1440
500 employees and more	Euro 1800

If the ri&e(17) is absent, the punishment is an immediate fine. If it is not complete, the labour inspector gives a warning to the enterprise, which has a period of three months to complete it. At the end of these three months, the Labour Inspectorate performs a counter-inspection and assigns a fine if the obligations are still not complied with.

In **France**, since 2002, penal sanctions may be inflicted on employers who are not in compliance with the decree on risk assessment(18). For example, the employer can be sentenced to a maximum fine of 1500 euros in the event of a breach of the obligation to transcribe the results of the risk assessment and in the event of failure to comply with the conditions of document updating.
The judge may double the sentence in the event of recurrence of the offence.

In these various countries, although a system of sanctions exists, it is hard to know whether it is actually applied.

Conclusion

Comparative study of the various laws for transposition of the Framework Directive shows that the obligations relating to the prior assessment of occupational risks have been carried over in the various European countries in a relatively uniform manner.

But apart from the purely regulatory aspect, it is interesting to learn the viewpoint of the enterprises and find out their perception of the obligation.

Significant research on the subject includes the results of a Danish survey(19) of 2003 which shows that three-quarters of the enterprises in this country have fulfilled their obligation to record the results of risk assessment in a written document (in Denmark, this obligation dates from 1994); four-fifths of these enterprises say they had no difficulty in drawing up the written document. Moreover, half of the enterprises called on outside help: a great majority (65%) contacted occupational health services, 12% contacted private consultants, but only 2% contacted trade union organisations and 5% employers' organisations, and 5% the national occupational health and safety organisation. Finally, two-thirds of employers think that this obligation to assess risks and draw up a document has had a positive impact on working environment issues.

According to a regional survey(20) carried out in France in 2005, two-thirds of enterprises have carried out the assessment procedure and drawn up the document. Four enterprises out of five that have carried out the procedure and recorded the results in writing did so with the internal resources of the enterprise. Of enterprises with less than 10 employees, 21% called on outside help (usually the public accountant). Nearly all enterprises with more than 50 employees have planned risk prevention actions following the risk assessment, compared with only half for those with less than 10 employees. And according to another regional survey(21) of 2006, few enterprises (one-third) perform updating of the document. The staff representatives, even when they are consulted, are in practice little involved in the procedure.
In general, the enterprises have a positive view of the obligation to assess risks. Only 20%(19) consider that the assessment approach has contributed nothing to their enterprise.

The content of the obligation and the enterprises' perception of it are, however, not the only risk assessment approaches that arouse interest. Indeed, feedback shows that, although the obligation is generally well understood, enterprises come up against practical difficulties that are found throughout Europe(22): risk assessment remains a complex approach for a majority of small enterprises; the identification of external stakeholders is not very easy due to their diversity; and the enterprises are keen to obtain more appropriate support tools than those available to them at present.

(19) 2003 survey on occupational risk assessment in Danish enterprises ("Danish Companies' use of Workplace Risk Assessment") carried out by the Danish Trade Union Confederation on a sample of 700 enterprises.

(20) Survey by the Regional Agency for the Improvement of Working Conditions (ARACT) commissioned by the Regional Directorate for Labour, Employment and Vocational Training (DRTEFP) of the Limoges region of France, carried out on 2035 establishments (348 exploitable answers).

(21) ARACT survey commissioned by the DRTEFP of the Languedoc Roussillon region of France, carried out on 2850 Committees for Health, Safety and Working Conditions in the region (248 exploitable answers).

(22) A cross-border approach (French-German analysis carried out in 2005 on occupational risk assessment as part of the activities of the Kehl Euro-Institute - Germany) showed that despite differences of culture and specific social traditions, management practices regarding occupational risk assessment are not so different.

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