

Standardization Strategy Guidelines of the French Occupational Injuries Branch

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Glossary of acronyms used

- the **Occupational injuries Branch** of the French Social Security system, manages legal insurance against accidents at work, commuting accidents and occupational diseases for employees under the general Social Security system (industry, trade and services). It implements occupational risk prevention policy.
- **CARSAT**: Caisse d'assurance retraite et de la santé au travail / Retirement and Occupational Health Insurance Fund
- **CAT/MP**: Commission des accidents du travail et des maladies professionnelles / The Occupational Injury and Disease Commission
- **CGSS**: Caisses générales de sécurité sociale / Overseas Health Insurance Funds
- **CNAMTS-DRP**: Direction des risques professionnels de la Caisse nationale de l'assurance maladie des travailleurs salariés / Occupational Risks Direction of the National Health Insurance Fund for Employees
- **CRAMIF**: Caisse régionale d'assurance maladie d'Ile-de-France / Regional Health Insurance Fund of Ile-de-France
- **INRS**: Institut national de recherche et de sécurité pour la prévention des AT/MP / National Research and Safety Institute
- **OSH**: Occupational safety and health

The **OSH Network**, or Network, refers to the “OSH experts” from the CARSAT funds, INRS, CNAMTS-DRP and EUROGIP who contribute to the standardization work on behalf of the Occupational Injuries Branch.

These strategy guidelines were submitted to the decision-making bodies of the three national organizations of the Occupational Injuries Branch: Board meeting of EUROGIP (24 November 2015), Occupational Injury and Disease Commission (13 January 2016) and Board meeting of the National Research and Safety Institute, INRS (14 January 2016).

Standardization issues for the Occupational Injuries Branch

Since the New Approach (1985), standardization has become the main lever for integration of occupational safety and health (OSH) as of the product design stage (machinery, personal protective equipment, etc.) and contributes strongly to the harmonization of European regulations.

Apart from the fact of defining technical specifications to implement the requirements of the European directives, standards have always been a tool with a powerful multiplying effect for risk prevention in the medium and long term.

The establishment of reference documents for French and foreign manufacturers and designers who mostly use the OSH solutions recommended in the standards regularly raises the safety level of products used in the working world.

Conversely, in the event of insufficient or incomplete standards or no standards, the OSH Network of the Occupational Injuries Branch copes on a case by case basis with specific risk prevention measures in the field, the widespread adoption of which requires major resources, with no guarantee of success.

The reduction of exposure to occupational risks is implemented at the design stage, so the Occupational Injuries Branch's investment in the production and regular revision of standards forms part of an active policy of risk management in line with the policies of the other European occupational risk insurers.

Numerous documents such as the Revel report⁽¹⁾ and the recent Evrard report⁽²⁾ present standardization as an important aspect of business intelligence, a strategic lever for improving competitiveness and a tool having a positive impact on the safety of work equipment and personal protective equipment. Allowance for occupational health in the national standardization policy guidelines

contributes to sustainable economic development and should enhance organizations' performance.

French Decree 2009-6971⁽³⁾ of 16 June 2009 relating to the French standardization system ranks standardization among activities in the general interest producing reference documents. Moreover, the Ministry of Labour has clearly stated its position regarding the standardization activities of the Occupational Injuries Branch, considering that the experts of the CARSAT and CRAMIF funds, INRS, CNAMTS and EUROGIP promote public policy in standardization work.

The Occupational Injuries Branch confirmed its investment in the field of standardization by explicitly including this permanent risk prevention tool in the "Convention d'Objectifs et de Gestion"⁽⁴⁾ (COG - Objectives and management agreement) 2014-2017 that it signed with the government.

And yet, participation in standardization is a medium-term OSH activity which has a longer time frame than the "COG" agreements. The Occupational Injuries Branch must have a long-term perspective, beyond the immediate priorities, and standardization work forms part of the strategy guidelines of the insurance against accidents at work and occupational diseases.

Changes in the standardization environment also make it necessary to redefine work priorities and new work procedures in a period marked by increasingly scarce resources, so as to preserve the influence of the insurance against accidents at work and occupational diseases in European and international occupational safety and health standards.

That is the subject of this document which specifies the strategy guidelines for the standardization activities of the Occupational Injuries Branch in the coming years.

(1) Report by Claude Revel submitted to Nicole Bricq: "Développer une influence normative internationale stratégique pour la France" (Developing a strategic international normative influence for France) - Bercy, Thursday 31 January 2013

(2) Report by Lydie Evrard, interministerial representative for standards, submitted to the Minister of the Economy, Industry and the Digital Industry: "Politique nationale de normalisation et stratégie pour la compétitivité de notre économie" (National standardization policy and strategy for the competitiveness of our economy) - December 2014

(3) Decree 2009-697 - <https://www.legifrance.gouv.fr/affichTexte.do?cidTexte=JORFTEXT000020749979&dateTexte=20160205>

(4) Convention d'Objectifs et de Gestion (COG) 2014-2017 - <http://www.securite-sociale.fr/IMG/pdf/cogetatcnamts2014-2017-2.pdf>

1. A changing environment

1.1 Standardization fields

In 2014, more than 60% of the standardization activity of the Occupational Injuries Branch was on standards for the design of safe products. These were mostly harmonized European standards, giving a presumption of conformity with the essential health and safety requirements of the New Approach European directives:

- 49% for the field of work equipment (machinery; construction, lifting and handling machinery);
- 13% for the field of personal protective equipment.

The other (and increasing) main part of this standardization activity, at slightly less than 40%, concerned standards related to prevention at the workplace, with:

- 25% concerning the prevention of occupational diseases through work on standards ensuring the comparability of a certain level of occupational safety and health (characterization, test, measurement, analysis, sampling and statistical methods) and risk prevention (chemical risks, noise, vibrations, emissions, etc.);
- 13% covering work organization as a whole (concepts, definitions, signs, management).

Numerous technological and societal upheavals have occurred, with variable impacts on health: new production methods, new waste management, the use of biotechnologies and nanoparticles, object connectivity, human/machine collaboration, the silver economy, new technologies and their impact on work organization, on the degree of autonomy at work, on the boundary between private life and working life, etc.

Standardization has not been immune to these changes.

For some years now, standardization programmes have largely tended to turn toward standardization fields more related to prevention at the workplace than to product design.

The new standardization issues no longer concern technical aspects exclusively, and standardization is becoming resolutely oriented toward organisational fields having a major impact on OSH priorities (MSDs, handling, maintenance, falls on the same level, domestic help, teleworking, psychosocial risks) and emerging issues (nanomaterials, new energies, ecodesign approaches).

The Occupational Injuries Branch takes this trend into account in its strategy guidelines for the coming years.

1.2 Reference documents

Most of the work to allow for health and safety requi-

rements as of the product design stage (work equipment - personal protective equipment) within the framework of the New Approach and the New Legislative Framework (NLF) has been completed.

The European objective is now to improve the existing situation by taking into account user feedback and changes in state-of-the-art practice when revising standards. The CARSAT funds' collection of certain feedback from the field and enquiries performed following serious accidents at work make it possible to allow for users' experience during these revisions.

The Occupational Injuries Branch should help to improve the standards during their revision on the European or international level by making sure to cover as well as possible the prevention of occupational disease risks (MSDs, cancers, deafness) and aspects related to noise, vibrations, ergonomics, gases, fumes, dusts, etc. Moreover, aspects related to improvement of the conditions of use of the equipment covered by the standards are not sufficiently taken into account, so that a study of the complementarity between these standards and the Network's infra-regulatory tools is indispensable.

A feature of these last two years has been the numerous new forms of documents, and an acceleration of the consultation processes, with increasingly short public enquiry periods (transition from five to three months at ISO and CEN). These changes require closer watch, in particular because these new deliverable, which could be carried over into NF, CEN or ISO standards, may not be suitable for dealing with occupational safety and health.

The international application of European standards is a constant aspect of all standardization issues, and it takes place more or less easily depending on the subject. The context is one of globalization of the economy in which the trend is to give primacy to international standardization (ISO/IEC) as the tool for global market regulation, compared with so-called "regional" European standardization (CEN/CENELEC).

Although the European standards system is now a model providing inspiration for countries such as China which are remote from Europe's economic sphere, the European directives are not the reference framework for international standardization work and economic issues may cause occupational safety and health concerns to be overlooked.

This economic advantage for European firms in the arena of global competition could also be weakened by the signature of mutual recognition agreements as planned notably in the draft transatlantic agreement with the United States, in which the standard is recognized as an

appropriate tool for international regulation.

The strategic challenge for the Occupational Injuries Branch in this context of globalization is to become organized and join forces with European counterparts to effectively defend Europe's established practice. The Occupational Injuries Branch should help to ensure that the international replication of standards is performed while preserving the established OSH practices of the European standards.

1.3 National standardization policy

The French standardization system is completing its restructuring initiated by Decree 2009-697 (see note 3 on page 3). The next national standardization policy will aim to use the standard as a strategic tool to enhance the efficiency and sustainable development of the French economy.

The prevention of occupational risks is a means of sustainable development for companies, and the Branch should make sure that the viewpoint of the insurance against accidents at work and occupational diseases, a cross-cutting network, is heard and included in the national standardization strategy.

1.4 Within the Occupational Injuries Branch

Standardization deploys limited resources. In terms of efficiency, the cost/efficiency ratio of the standardization tool applied to OSH is beneficial for the risk management of accidents at work and occupational diseases.

And yet, against a backdrop of restrictions affecting financial and human resources (departing personnel not replaced), in the past few years there has tended to be a growing shortage of experts available to cover the needs for expertise while these competencies exist in the Network.

Work deserves being started to train new OSH insurance personnel and inform them of the importance of standardization as a long-term risk prevention tool.

The commitment of these personnel over medium- to long-term periods is of fundamental importance to improve document quality, to prevent a deterioration of the content of the normative references during their revision, to promote established European practice and its high safety level at the ISO level, or to produce at the international level new standards which will play a co-regulatory role in Europe.

The Occupational Injuries Branch intends to permanently support the experts in these standardization tasks.

All these changes in the environment have led to a redefinition of institutional standardization policy and prioritization of the Occupational Injuries Branch's areas of operation.

2. Strategy Guidelines for the Occupational Injuries Branch

2.1 Prioritize areas of operation

The Occupational Injuries Branch confirms its investment in the field of standardization. However, the growing number of new subjects, the requirements of regular standard revisions and the current context of changing resources are forcing the Occupational Injuries Branch to redefine priorities, even if this means limiting its work to subjects related directly to its role as insurer.

The aim is to prioritize areas of operation by:

- identifying, based on the priority goals of the Occupational Injuries Branch, the European and international standardization work in which it should take part in priority, so as to provide those in charge of managing the standardization work with a framework compatible with the potential number of experts; and

- defining, for each of them, the guidelines of the mandate that the Occupational Injuries Branch will entrust to the experts assigned responsibility for representing it.

In a situation of restrictions on resources, greater synergy should be sought between activities as part of priorities contractualized with the supervisory authorities and standardization work. This work should also be oriented on the basis of possible medium-term impact on the cost of the main occupational risks.

More pragmatically, the Occupational Injuries Branch should be involved in priority with:

Issues in which the “improvement in working conditions” aspect is a stated goal of the standardization groups’ work programme;

Fields in which there is a high risk of changes in occupational safety and health requirements during regular revisions;

Emerging subjects with a significant occupational safety and health aspect which could limit the occupational risk insurer’s means of action.

The standardization steering committee of the Occupational Injuries Branch must be capable of guiding and validating the participation of the experts in accordance with an analysis grid to be established on standardization subjects, e.g. those related to the priority goals of the Occupational Injuries Branch (current “COG” agreement, OSH guidelines of the National Technical Committees). With the proliferation of proposals for new standardization work, strong reactivity is also required, and an internal consultation procedure should be provided for, while making it possible to define swiftly and reliably the position of the Occupational Injuries Branch on participation or not.

The social partners will be regularly informed on

important subjects in the CAT/MP (the Occupational Injury and Disease Commission).

Harmonized Standards for product design

Standardization work in the field of product design concerns the safety and ergonomics of:

Work equipment:

- generic standards (types A and B);
- standards specific to a machinery category (type C);
- standards relating to ergonomics or physical atmospheres (noise, vibrations, etc.): improvement to comply with the essential requirements of the Machinery Directive.

Personal protective equipment

The Occupational Injuries Branch should persist with its activity in these traditional fields according to the competencies in the OSH Network and, for work equipment, according to the incidence rate and severity level of accidents.

New fields of operation

The numerous proposals of new subjects for French, European or international standardization require special attention before taking any decision regarding participation. They are, for example:

- New technologies: ecodesign approaches, new energies;
- New fields: services have a preponderant position in the modern employment market and are the subject of numerous developments in standardization. New fields such as domestic help, teleworking, the silver economy, distribution and logistics, the hygiene standards of hospital establishments and psychosocial risks are likely to be standardized.

These topics must be watched, and active participation should be considered when they have an impact on the Branch’s priorities (MSDs, PSRs, handling, falls, etc.).

The number of proposals for organisational standards related to health and safety in the workplace has increased sharply on subjects such as: operator training, maintenance, the use of machinery, but also health and safety management, risk management, human resource management and quality of life in the enterprise.

Based on the principle that what comes within the social field falls within the competence of national prerogatives (the labour code, collective bargaining and other agreements negotiated between management and organised labour), while what comes under design falls within the

competence of standardization, the Occupational Injuries Branch has made its expertise available to the standardization bodies chiefly on subjects allowing integration of OSH as of the product design stage or to standardize test methods and measurement protocols that are meaningful. The public authorities supported by the social partners have always opposed standards aiming to organize work outside of the social dialogue specific to each nation.

Participation in OSH standardization work is evaluated in light of the framework of action defined by the equi-representational organizations of the Occupational Injuries Branch⁽⁵⁾. Participation on these subjects sometimes proves necessary to ensure, for example, that they are consistent with public policies, especially if the work is initiated by ISO member countries which, for want of a framework for equi-representational negotiations, use standardization.

Faced with strong international demand for the adoption of standards on work organization, Health and Safety Management Systems (SMS) and services, the participation of the Occupational Injuries Branch is indispensable to anticipate change, obtain access to the documents and assert its viewpoint. Moreover, the movement now seems to be under way with the 2013 decision of the Occupational Injuries Branch to sit in the discussion bodies so as not to leave a free range to the promoters of the future international standard on SMS.

The Occupational Injuries Branch must be capable of working on standardization subjects related to workplace safety based on documents produced by the Branch (e.g. recommendations) or allowing formalization of its OSH Network's specific expertise.

2.2 Capitalize on the work of the Occupational Injuries Branch

Standardization is a long-term solution with a major impact in national, European or international spheres. A standard is the result of a consensus, allowing the interested parties to share and appropriate the technical solutions or concepts written in a document whose application is voluntary but which is often considered as de facto binding on the whole sector.

The occupational risk prevention work and new technical solutions developed by the Occupational Injuries Branch have already been capitalized on in the standards, greatly increasing their scope and dissemination. For

example, the NF X35-702 :2015 standard produced on the basis of the INRS ED 6098 proposes to the operators and designers of household waste sorting booths ergonomic recommendations to reduce, as of the design stage, the risk of musculoskeletal disorders (MSDs) for sorting personnel whose job involves repetitive tasks.

The pro-activeness of the Occupational Injuries Branch should be increased by the proposal of new standardization subjects on the French or European level, based on INRS documents and the recommendations or expertise of the Network.

This may involve making the knowledge of the Occupational Injuries Branch available in metrology standards, measuring methods and test methods to ensure, for example, that measurements of physical and chemical agents are performed in accordance with state-of-the-art practice and with a risk prevention objective.

Some national recommendations, such as those concerning the maintenance of ready mix concrete trucks and household refuse collection, could also justify the need to produce new standards to remedy the insufficient scope of user recommendations.

Synergy between national recommendations and standardization work should therefore be increased by establishing an information circuit for the CTNs (comités techniques nationaux – national technical committees) on standardization activity in the field in question.

Links between design standards and rules for use

Aspects relating to improving conditions of use of the equipment covered by the standards are insufficiently taken into account, so that a study of the complementarity between these standards and the Network's infra-regulatory tools is essential.

Historically, European standardization developed to allow the free circulation of goods in the intra-Community space, without being hindered by local rules.

De facto, the social partners found themselves excluded from standardization work and the OSH Network sometimes seems to be the only equi-representational entity capable of acting on behalf of employees. This position is not without consequences for machinery, for example, since it is recalled in the 2006/42/EC directive that machinery must be also designed so as to prevent "any reasonably foreseeable misuse".

Before the publication of the Machinery Directive, the personnel of the Funds (CARSAT funds formerly called CRAM funds - Retirement and Occupational Health

(5) On the French level: la Commission des accidents du travail/maladies professionnelles (CAT/MP - The Occupational Injury and Disease Commission), or le Conseil d'orientation sur les conditions de travail (COCT - the Steering Committee on Working Conditions)
On the European level: le groupe de travail "Normalisation" du Comité consultatif pour la sécurité et la santé sur le lieu de travail (Comité du Luxembourg) (The "Standardization" Working Group of the Advisory Committee on Safety and Health at Work (Luxembourg Committee)
On the international level: The International Labour Organization (ILO)

Insurance Funds, the former Regional Health Insurance Funds) could take measures in the field of work equipment design in order to make changes in this equipment for safer use. The Community system has made it complex for personnel to ask for changes to be made to machinery, without bringing into question the existing certificates of conformity. The OSH Network of the Occupational Injuries Branch has a system for handling OSH problems on dangerous machinery that enables it to deal with the most critical cases. It has indeed become less easy for the Branch's OSH experts to influence the designers. The definition of the instructions and conditions of use in standards should undergo careful examination so that machinery manufacturers may not hold the users liable for shortcomings regarding allowance for occupational risk prevention as of the design stage. For example, in connection with the links between the design and use of machinery, the Network's experts could adopt recommendations in particular as a basis for standardization work.

Reinforcing standardization activities in synergy with the manufacturers and users could, on certain subjects, improve the efficiency of standardization work. The Occupational Injuries Branch will examine ways to encourage (e.g. via financial aid) these stakeholders to take part in the standardization effort.

2.3 Improve the quality of standards

The Occupational Injuries Branch should ensure the improvement of OSH standards during their revision on the European or international levels, focusing on the following objectives:

- Improving the quality of the Harmonized Standards when they are incomplete (certain risks not dealt with);
- Adapting the content of the standards to the current state of technical progress;
- Improved allowance for emissions and ergonomics aspects making it possible to reduce risks of occupational diseases (MSDs, cancers, deafness, etc.); for example, the solutions proposed in the ergonomics standards should be carried over more extensively into machinery-specific standards (Type C);
- Allowance for feedback from the field;
- Preservation of established Community practice during the transition from European standards to international standards.

This work on maintenance of the standards is essential and less time-consuming than producing standards on new subjects; it must necessarily be carried out from a long-term perspective.

MSD prevention has been a national priority for more than 10 years (see the medium-term guidelines of the early 2000s, the Plan national d'actions coordonnées in 2009 - PNAC - National plan of coordinated actions, the national 'TMS Pros' programme in 2014, and the "COG" agreements). However, it must be recognized that many machinery standards do not deal with ergonomics. This is a subject generally little discussed in machine-specific standards (Type C), and the generic standards (types A and B) are not very well known by machinery manufacturers and are hard to apply.

One of the priorities of the Occupational Injuries Branch when taking part in revision of the machinery design standards will be allowing for ergonomics in certain Type C standards.

Organize experience feedback and contribute to market surveillance

The Occupational Injuries Branch must be capable of inputting data to the revision files managed by the CEN and the Technical Committees, notably by transmitting user feedback and by processing the data coming from EPICEA⁽⁶⁾. This aspect, still relatively undeveloped, is strategic for the work of negotiation during standardization consensus building.

The OSH problem handling system established in the Occupational Injuries Branch in 2006 by CNAMTS (French National Health Insurance Fund for Employees) and EUROGIP allows CARSAT personnel to adopt data processing of technical enquiries, e.g. following fatal injuries implicating machinery, as a basis for notifying the OSH Network of OSH problems observed in the field. Apart from reports which could lead to the application of a safeguard clause, shortcomings can thus be identified in existing standards and guide the choice of priorities for the standardization action of the Occupational Injuries Branch.

Market surveillance is an additional aspect of the Harmonized Standards to ensure the free circulation of safe goods in Europe⁽⁷⁾. In the field of work equipment, this market surveillance is especially important in that the system of Type A, B and C machinery standards leads to the production of standards specific to certain

(6) EPICEA is an anonymous national database containing more than 19,000 cases of accidents at work which have occurred since 1990 to employees under the general scheme of the Social Security. These accidents are fatal, serious or significant with regard to prevention. <http://www.inrs.fr/publications/bdd/epicea/recherche.html>

(7) See EUROSHNET's Cracow Memorandum "Standardization for Safe Products", adopted in September 2008 <http://www.euroshnet.eu/pdf/Cracow-Conference-2008/Memorandum-en.pdf>

machines (Type C) which do not systematically carry over the safety concepts defined in the generic standards common to all machines.

Therefore, the standardization activity of the Occupational Injuries Branch should:

- encourage processing of reports on OSH problems for the aspects regarding standardization, and communicate concerning the resulting follow-up action on the standards. This system for centralizing feedback from the field could be extended to subjects other than work equipment;

- contribute to market surveillance by using information from the field (processing of the technical enquiries following fatal injuries on machinery, for example) to improve the existing European standards and ensure that they are fully applied;

- ensure, via EUROGIP, that the interpretations expressed by the notified bodies contained in the RfUs (Recommendations for Use) are known to the Network's experts and are input into the revision files of machinery design and personal protective equipment standards.

2.4 Reinforce and optimize the presence of the Occupational Injuries Branch

The Occupational Injuries Branch should maintain an operational presence in the French, European and international standardization strategy and management bodies in which the main guidelines of OSH standardization programmes are decided on.

On the French level

The French standardization system is completing its restructuring initiated by Decree 2009-697 (see page 3). According to the Evrard report, future national standardization policy will now aim to use the standard as a strategic tool to enhance the efficiency and sustainable development of the French economy.

The prevention of occupational risks is a means of sustainable development for companies, and the Occupational Injuries Branch should make sure that the viewpoint of the insurance against accidents at work and occupational diseases, a cross-cutting network, is heard and included in the national standardization strategy.

A strategic challenge for future years will be to make the role of the Occupational Injuries Branch visible by maintaining and strengthening its participation in all the decision-making and strategy bodies in which the main guidelines of OSH standardization programmes are deci-

ded on.

At present, EUROGIP represents the Occupational Injuries Branch in the AFNOR Strategic Policy Committee on Safety and Health. Through its roles and the technical expertise at its disposal, the Occupational Injuries Branch is the only credible French institution on all issues relating to OSH. It should also be able to sit on the Comité français de coordination et de pilotage de la normalisation (CCPN - French Committee for the Coordination and Management of Standardization) set up in 2010 as part of the new governance for the French standardization system alongside numerous stakeholders (trade union organizations, consumer representatives, NGOs, etc.) and, when it is set up, the standardization group of the Conseil d'orientation des conditions de travail (COCT - Steering Committee on Working Conditions).

On the European and international levels

Product standardization has major strategic implications in any ambitious industrial policy.

The Occupational Injuries Branch is visible and credible on the European level, in particular via EUROGIP's participation in the CEN strategic bodies, the CEN SABOHS (CEN Strategic Advisory Body for Occupational Health and Safety) and the CEN Advisory Nucleus (CEN Strategic Advisory Body for Machinery Standardization).

The standardization activity of the Occupational Injuries Branch should, insofar as possible, invest more in the management of European and international standardization by serving, for example, as chairman on Technical Committees, by acting as consultant⁽⁸⁾, and by developing links with public authorities (Directorates General of the European Commission, for example) and with the standardization group of the Luxembourg Committee.

Via EUROGIP and INRS, the Occupational Injuries Branch is a founding member of the European network of OSH experts involved in standardization, testing and certification (EUROSHNET, www.euroshnet.eu) designed to pool the experience and requirements of the social insurer for occupational risks. This European cooperation, which is indispensable, has been weakened by the decline in investment in occupational safety and health standardization observed in recent years in France. The Occupational Injuries Branch should make sure to step up its activities with this Network.

Initiatives targeting the European authorities could also be undertaken to put forward the viewpoint of the OSH experts on the quality of health and safety aspects and the allowance made for them in European standards

(8) The CEN consultants are the guarantors of the Harmonized Standards on product design

within the framework of the French-German joint declaration on occupational safety and health standardization policy (Bonn, 25 March 2014).

For example, the new normative document formats (CEN Workshop Agreements) produced on the French, European and international levels according to a fast-track procedure do not ensure the representativeness of all interested parties, and in particular the circles concerned by OSH. The Occupational Injuries Branch's monitoring and support for lobbying of the CEN-CENELEC helped to ensure that the guide for production of the CEN/CENELEC workshop agreements⁽⁹⁾ clearly indicates that such agreements are not sufficient to meet the essential requirements of the New Approach European directives and cannot deal with subjects related to health or safety. This monitoring and these initiatives must be maintained.

The participation of the Occupational Injuries Branch in ISO's work considered important for occupational safety and health is strategic to counter the risk of a loss of influence during the transition from the CEN standards to ISO standards, in order to internationally promote established European practice and its safety level. Standards produced on the international level which will be adopted as European standards will continue to play a co-regulatory role in the European Union.

For the Occupational Injuries Branch, this implies that it optimize its resources (human and financial) to take part at the international level in the production of occupational safety and health standards alongside the industry and trade ministries, like the other international partners heavily invested for their part, in particular German and Anglo-Saxon partners.

2.5 Communicate and train

Communication and promotion in the field

Although it is not formally up to the Network to promote standards with companies, standardization work leads to the production of documents which remain very insufficiently exploited in the field by the personnel of the Funds, and are seldom used in conjunction with the Occupational Injuries Branch's own production.

Promotion and communication initiatives should be organized for the coming years.

Communication and promotion within the Occupational Injuries Branch

The Occupational Injuries Branch must be able to prepare for the arrival of new standards. Regular information on work progress will be provided in the CAT/MP and Board meetings of EUROGIP and INRS based on the monitoring performed by EUROGIP.

This should make it easier to determine the positioning of the national social partners in this future new international framework, and even guide the work of the CTNs regarding recommendations viewed as a tool complementing the standards.

Promotion and communication initiatives should be organized for the coming years, such as, for example:

Provision of regular information for the CAT/MP, coordinated by EUROGIP, in order to make its action more visible and to alert on standards requiring decision making;

Regularly informing regional consulting engineers (CARSAT-CGSS) and heads of departments (CNAMTS-DRP, INRS) on standardization work progress and the results achieved;

Conducting information sessions on standardization for the personnel of the OSH Network;

Raising awareness of the strategic importance of standardization among regional consulting engineers and Fund managers;

Organizing further training on standardization for experienced OSH personnel.

Moreover, standardization work will be evaluated and recognized as forming an integral part of the OSH activity of the Occupational Injuries Branch, and if possible included in the funds' multi-year management contracts.

New cost accounting rules should make it possible to distinguish clearly between this OSH activity and the more general field of the organizations' international activities, with which it is currently confused.

These simultaneous measures addressing the organizations are essential for effective implementation of the present institutional standardization policy and to prioritize the Occupational Injuries Branch's areas of operation in the coming years.

(9) CEN-CENELEC Guide 29 – CEN-CENELEC Workshop Agreements - Edition 1 - November 2014
http://www.eurogip.fr/images/pdf_page_normalisation/CENCLCGuide29_Worksho%20Agreements.pdf

Founded in 1991, EUROGIP is a French organization, whose activities are organized around five areas: enquiries, EU projects, information-communication, standardization and coordination of notified bodies. All have in common European aspects of the insurance or the prevention of accidents at work and occupational diseases.

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