

**CoESS comments on Second phase consultation of the social partners on the simplification of the provisions of the “health and safety at work” directives concerning the reports on their practical implementation.**

CoESS (Confederation of European Security Services) refers to the comments made on May 2005 on the First phase consultation of the social partners on this process.

CoESS supports the basic approach taken by the European Commission regarding this initiative, in particular, a) foreseeing a harmonised interval of 5 years and b) envisaging a standard implementation report.

As the Commission has stated in the Second phase consultation, “the exercise should be simplified and stepped up, in particular through the involvement of the social partners in the preparation of the national reports”. The Commission also states that some suggestions should be made in order to “improve the content of the structure and specific arrangements to encourage the active and effective participation of the Social partners at national level during the drafting of the national reports and in line with existing national partners”.

We have already stated in the First Phase consultation that opting for a single report can facilitate involvement of the relevant parties at national level. We insist on the importance that the specific arrangements to encourage the active and effective participation of the Social partners at national level, mentioned by the European Commission, should take an adequate sectoral approach in order to allow particular national sectoral associations to be involved in this important process. In particular, we consider that those national associations not particularly affected by a specific piece of legislation, as a result of the wide range of activities developed by the employees (for instance, private security companies), should have the opportunity to participate. We consider that the approach taken by the Commission as far as the content of the standard report is concerned (general part and specific chapters categorised by different criteria covering aspects specific to the directives in question) can also contribute to this objective.