



## Resolution on the content of a Directive on the prevention of occupational heat risks

Adopted at the Executive Committee meeting of 4-5 March 2025

Climate change is increasingly exposing workers to occupational heat stress, and this entails significant implications for their safety and health.

The number of people dying due to extreme heat in the workplace is increasing faster in the European Union than in any other part of the world, with a 42% increase in heat-related workplace deaths since 2000. As with any other OSH-related risk, these risks can be prevented, provided that the employers – in consultation with trade unions – conduct a risk assessment and implement adequate preventive measures. Migrant workers and seasonal workers, who often work under precarious conditions with limited access to proper safety measures and training, are particularly vulnerable to the effects of extreme heat. Their temporary or insecure employment status frequently hinders the effective implementation of preventive measures, further exacerbating their risk.

Already in 2019, ETUC called on the European institutions to enact legislation to protect workers from high temperatures as part of climate change and adaptation strategies to it. Thanks to trade union action, the European Commission published guidance for the workplace on heat. However, we have to deal with longer lasting periods of heat more and more often. The continuous death toll summer after summer is proof that recommendations to employers are not enough, and obligatory proceedings should be put in place through binding legislation as soon as possible.

This resolution lays down the main demands of the European trade union movement to be included in a much-needed Directive on the prevention of occupational heat. It calls for the comprehensive protection of all workers from heat stress, a risk that often affects those in sectors with typically precarious working conditions. It is worth mentioning the ILO report “Heat at Work: Implications for Safety and Health” which stresses the lack of standardised policies, as well as the work on OSH implications of climate change carried out by the EU Advisory Committee on Safety and Health. ETUC commits to engaging in further discussions with its member organisations on the OSH implications of other extreme weather phenomena associated with climate change, beyond just heat. Many of the protective measures listed below should also apply as obligations for employers in cases where workers are exposed to very low temperatures.

The European Union and its Member States have a complex array of occupational safety and health regulations to safeguard workers. However, employers too often fail to observe these obligations effectively, particularly concerning outdoor workplaces. For this reason, ETUC urges the European Commission to enact a Directive on the prevention of occupational heat exposure, encompassing the following key demands:

- Binding maximum working temperatures through a European Directive should be established, taking into consideration sector-specific working conditions like nature and intensity of work, indoor and outdoor activities.



- Employers must implement mandatory heat risk assessments, integrating advanced indicators that consider e.g. temperature, humidity, and shade/exposure to sunlight, and airflow.
- Heat stress should be defined in the body of the European Directive, for which the definition included in the opinion of the Advisory Committee on Safety and Health, should be used: Heat stress occurs when a worker's body accumulates excess heat which, if not released to the environment, will raise core body temperature, leading to potential health risks and reduced productivity.
- Risk assessment methods should align with international standards such as the Wet Bulb Globe Temperature (WBGT) index to ensure accurate measurements of heat stress conditions with varying safety thresholds based on work intensity.
- These risk assessments should be inclusive, ensuring that workplace evaluations and prevention strategies are designed to address the specific effects of heat exposure at work from a gender perspective and also taking into account the specific needs and vulnerabilities of groups *such as* outdoor workers, pregnant employees or in menopause, older workers, individuals with pre-existing health conditions and migrant and/or seasonal workers, undocumented workers, and those working in precarious conditions.
- A Directive on the protection of workers against occupational heat should promote further preventive actions in the framework of collective agreements, ensuring that trade unions have a role in designing workplace policies.
- Guaranteeing the meaningful collaboration with trade unions, employers must develop and implement heat-management plans, including tailored measures for heatwaves and extreme weather conditions, with the obligation to systematically monitor alerts by the national meteorological institutes.
- These plans should include education and training for employers, workers, and supervisors on recognising symptoms of heat stress and implementing first-aid measures. Workers should have the right to targeted and regular medical check-ups and health monitoring, which can also be a tool to prevent underreporting of work-related heat stress, UV radiation, and other diseases and accidents. Health monitoring plans should be ensured by the employer, in cooperation with trade unions and independent occupational physicians, particularly with regard to vulnerable groups of workers.
- There is a need to establish a concrete scheme of preventive measures based on the STOP approach:
  - Risk **substitution / elimination** by ceasing work when all implemented measures have failed to avoid the risk.
  - Employers should provide sufficient **technical** measures such as shaded areas, climatisation systems, access to drinking water, and sanitation facilities for workers.
  - Employers should implement **organisational** measures including but not limited to acclimatisation programmes, adapting working time and the capacity to self-pace the work, and cooling breaks. Risk assessments and organisational measures should also cover commuting to work and telework.

Finally, without neglecting their obligation to implement technical or organisational preventive measures (the hierarchy of obligations on prevention), employers should also provide **personal protective equipment**. This equipment should be suitable for preventing exposure to high temperatures and should be designed in such a way that it does not pose any additional risks to health and safety. Personal protective equipment that can protect against sun exposure (such as high-protection sunscreens) should also be provided by the employer. The use of personal protective equipment and its interplay with occupational heat should be considered in the risk assessment.



- The legislation should recall that workers have the right to withdraw their labour with no detrimental consequences to the workers if they are exposed to an immediate risk to their health and safety, such as workplace heat exceeding established temperature limits and/or if the employer fails to implement appropriate adaptation measures. Accurate and reliable EU-wide statistical data on heat-related occupational illnesses and fatalities should be collected to inform evidence-based policymaking and enforcement.
- The relationship between heat and occupational cancer requires further investigation. There is a need for ongoing scientific research on how heat exposure contributes to workplace accidents, with particular attention to its impact on elderly workers.
- Enforcement procedures and measures to guarantee compliance, including means for a better functioning of the labour inspectorate such as resources and training. The scope of application of this directive should be broader than the Framework Directive and the Workplace Directive, and domestic workers must not be excluded from its application. A Directive on protecting workers from occupational heat must clearly outline the full involvement of the Workers' Safety Representative (WSR) in identifying and implementing measures to manage heat risks, including technical, organisational, and training measures.
- Wage compensation schemes in the event of economic activity stoppage due to extreme heat should be considered, with respect to the existing national model for redundancy funds. Such a wage compensation system, while certainly a right for the worker, may not be part of an OSH-related Directive.