





ATTN. Mr. Massimo Garribba DG Energy Directorate D Nuclear Safety and Fuel Cycle

Cc. Günther Oettinger **Commissioner for Energy** 

Brussels, 13 November 2013

Subject: Safety and security in the European nuclear industry and consultation of social partners

Dear Mr. Garribba,

As European Social Partners in the Electricity Sector – EPSU and industriAll European Trade Union representing the employees and Eurelectric representing the employers – we would like to especially draw the attention to the health and safety of the workers in the nuclear industry, permanent staff and subcontracted workers, who are closest exposed to the risks and accidents that might occur.

Jointly, we have taken a position on Security and Safety in the Nuclear Industry in 2011 emphasising that ensuring the highest levels of safety needs to dominate the operation of the industry and we have participated in the impact assessment preceding the legislative proposal for amending the current nuclear safety directive where we stressed, amongst other things, that we recommend the relations with subcontractors are evaluated to ensure the highest levels of health and safety and appropriate training to prevent that subcontractors pose a risk to the industry.

Indeed, we are glad to see that this specific concern has been taken up in the proposed directive.

We also welcome the goal-setting approach of the proposal as it shall ensure that the existing high standards in some countries are not undermined by minimum standards while promoting further progress to the highest levels of safety provisions.

For us it is of utmost importance that our voice is being heard when it comes to the safety and security of all nuclear workers and provisions regulating these. We appreciate the fact that our







comments have been taken into account in the proposed directive and we would like to emphasize that we are looking forward to being further involved in the consultation mechanisms of the European Commission and cooperate with DG Energy so as to ensure that the nuclear workers in Europe are operating under the highest safety and security standards.

Yours sincerely,

Bernd Frieg (industriAll

**European Trade Union)** 

the Electricity Sector

President of the European

Social Dialogue Committee for

Jan Ruden (EPSU)

Vice-President of the European Social Dialogue Committee for the Electricity Sector

**Emanuela Preiti** (EURELECTRIC)

Vice-President of the European Social Dialogue Committee for the Electricity Sector