

Meeting of the Working Group for the Development of the Strategy for the Improvement of Occupational Health and Safety

June 17, 2022

Dina Janković, representative of the Safety at Work Association of Montenegro in the Working Group for the Development of the Draft Strategy for the Improvement of Occupational Health and Safety in Montenegro 2022-2027, attended the meeting of the Working Group held on June 17, 2022, in the Old Government Building hall. During the meeting, she once again presented comments and suggestions on the Draft strategy, which the Association had previously submitted in written form:

COMMENTS, PROPOSALS, AND SUGGESTIONS Draft Strategy for the Improvement of Occupational Health and Safety in Montenegro 2022-2027 with the Implementation Action Plan 2022-2023

Comment/proposal/suggestion 1:

The national document does not reflect the real situation, where the stakeholders in this field are diverse, as well as the activities they carry out.

Explanation of comment/proposal/suggestion 1: In the SWOT analysis of the Draft Strategy for the Improvement of Occupational Health and Safety in Montenegro 2022-2027, "involvement of the civil sector and tripartite action through the adoption and implementation of regulations" is mentioned as a "strength." However, this "strength" has not been utilized in the planned implementation of activities. Civil society organizations (CSOs) were involved in the planning process of this document, and in line with the principles of good governance, we expect to be involved in the implementation process and later in monitoring, in order to contribute according to our capacities.

Comment/proposal/suggestion 2: Nowhere is it stated that CSOs will be involved in the implementation of the planned activities for which they themselves provided numerous suggestions during the drafting of this strategic document.

Explanation of comment/proposal/suggestion 2: Civil society organizations are already implementing and will continue to implement a range of programs that contribute to achieving the goals of the Strategy. These programs should be integrated into the document to provide a comprehensive overview and facilitate the monitoring of the effects of the efforts made by various stakeholders in collaboration with the Ministry of Labor and Social Welfare.

Comment/proposal/suggestion 3: The participation of CSOs/Association for Occupational Safety and Health in Montenegro is not mentioned in the implementation of planned training and manual development.

Explanation of comment/proposal/suggestion 3: As the only professional organization in Montenegro solely dedicated to the improvement of occupational health and safety, the Association for Occupational Safety and Health in Montenegro has been responsible for conducting training and developing manuals during its 24 years of existence. We believe it is appropriate for this role to continue. This would leverage our experience and capacity, and in collaboration with the Ministry of Labor and Social Welfare, update the established approach and materials.

Comment/proposal/suggestion 4: Only the Ministry of Labor and Social Welfare and, in a few instances, the Inspectorate for Inspection Affairs are listed as activity holders.

Explanation of comment/proposal/suggestion 4: If the strategic document is limited to activities carried out solely by the Ministry of Labor and Social Welfare, a limited amount of funds will be allocated during budgeting. Through collaboration with CSOs, significantly larger amounts from EU funds can be utilized to achieve the goals of improving occupational health and safety in Montenegro.

Comment/proposal/suggestion 5: There is no mention of education in secondary schools and universities, while the awarding of photography by elementary school students is mentioned.

Explanation of comment/proposal/suggestion 5: The activity involving elementary schools is not relevant because the topic is not sufficiently important or relatable to children of that age. Expecting elementary school students to take photographs on this topic is unrealistic and does not achieve any goal of improving occupational health and safety. It also inefficiently uses budgetary funds. Instead, we suggest working with high school students in vocational schools who enter the labor market earlier, as well as with technical and technological faculty students and young people in general. Our organization is already implementing a youth project that can be replicated in the coming years. The planned activities will be carried out in October and November 2022, including numerous lectures and training sessions in vocational schools in Podgorica, Bijelo Polje, and Nikšić, as well as in all technical and technological faculties.

Comment/proposal/suggestion 6: Our initiative, which we have presented many times over the past two years, regarding the establishment of a National Council for Occupational Health and Safety, is not included.

Explanation of comment/proposal/suggestion 6: Since the Social Council already has a significant number of activities, as mentioned in the strategic document itself, there is not enough time for it to focus on occupational health and safety. This has been the case in all other countries in the region and has proven to be ineffective. Therefore, it is necessary to establish a National Council that would enable the implementation of measures and compliance with standards, as well as the implementation of policies, strategies, and legislative solutions. This would reduce the number of injuries, accidents, and occupational diseases, while strengthening a preventive culture, partnership, and inclusive dialogue, significantly improving the rights related to employment and the well-being of employees. This council would initiate the adoption of new regulations in the field of occupational health and safety and the development of national programs for the effective implementation of activities and practices in this area. The organizational and institutional

capacities assessment report of the National Councils for Occupational Health and Safety in IPA countries, which was prepared in 2020 as part of the project "Improving Working Conditions and Occupational Health and Safety as Support to Western Balkans Countries in the Process of EU Accession," supported by the European Commission, contains all the information about the work of the Council for Occupational Health and Safety and the benefits of establishing such a body. This report has been submitted for review to the Ministry of Labor and Social Welfare.

Comment/proposal/suggestion 7: The organizers of the World Day for Occupational Health and Safety are not mentioned.

Explanation of comment/proposal/suggestion 7: The Association for Occupational Safety and Health in Montenegro has been traditionally and successfully commemorating the World Day for Occupational Health and Safety for many years. Sometimes this was done independently, and sometimes in cooperation with the relevant ministry, the Ministry of Labor and Social Welfare, the Chamber of Economy, and social partners. We believe that this day is an opportunity for all relevant stakeholders to get involved and contribute, and it is necessary to mention this in the document. Only through the participation and contributions of all interested parties can we achieve the goal we all strive for. In the past two years, the Association has awarded prizes for good practices on this day to legal and natural persons who have made the greatest contributions to the development of occupational health and safety in Montenegro in the previous year. We believe that this tradition should not be interrupted but jointly improved.