

# Europe's Beating Cancer Plan

Institution of Occupational Safety and Health (IOSH)  
response to the European Commission's consultation



Submission

07.05.20



## Introduction

**The IOSH European Transparency Register number is 913858710558-02**

IOSH, the Chartered body for OSH professionals has around 47,000 members in 130 countries and welcomes the opportunity to submit our comments to *Europe's Beating Cancer Plan* to be carried forward by the European Commission, under the stewardship of the Commissioner for Health and Food Safety.

IOSH has members in most European Member States, with over 1,800 in the Republic of Ireland. We are also active members of the European Network of Occupational Safety and Health Professional Organisations (ENSHPO), as well as supporting health and safety improvements in the accession countries and Balkan network.

In addition, IOSH has long-standing and positive working relations with European institutions, working as partners with EU-OSHA on Europe-wide campaigns and engaging with European research and training networks and organisations such as the European Bank for Reconstruction and Development.

In the responses that follow, we focus on the need to reduce exposures to work-related carcinogens and prevent occupational cancers. We promote IOSH's *No Time to Lose* campaign at [www.notimetolose.org.uk](http://www.notimetolose.org.uk), which highlights the need for action to reduce the estimated 742,000 global annual deaths due to work-related cancers. Our campaign focuses on raising awareness of practical steps to reduce exposures to four major occupational carcinogens: diesel engine exhaust emissions, solar radiation, silica dust and asbestos.<sup>1</sup> IOSH was pleased to register *No Time to Lose* as part of the European Roadmap on Carcinogens and to provide case studies on prevention, see here <https://roadmaponcancer.eu/solutions/good-practices/>.<sup>2</sup> We close our submission with references and further information about IOSH.

## IOSH answers to questions from the online questionnaire

### *What do you think citizens can do to help beat cancer?*

IOSH advocates that by informing and educating workers and employers, and offering practical solutions, exposure to carcinogens at work can be reduced or eliminated. We believe that citizens can increase their awareness of occupational cancer, its causes, and how to prevent it, by accessing relevant information and that they can also encourage their employers to support IOSH's *No Time to Lose* campaign at [www.notimetolose.org.uk](http://www.notimetolose.org.uk).

### *What do you think health professionals can do to help beat cancer?*

IOSH believes that health professionals can access, use and promote information on occupational cancer prevention, such as at IOSH's *No Time to Lose* campaign at [www.notimetolose.org.uk](http://www.notimetolose.org.uk). We also

encourage multidisciplinary working on prevention and worker engagement from professionals in occupational health, occupational safety and health, human resources and operational management.

### ***What do you think public authorities / national governments can do to help beat cancer?***

IOSH believes that public authorities / national governments can raise awareness in their citizens and employers by promoting information on occupational cancer prevention, such as IOSH's *No Time to Lose* campaign at [www.notimetolose.org.uk](http://www.notimetolose.org.uk), which focuses on diesel engine exhaust emissions, solar radiation, silica dust and asbestos.

We advocate that administrations should also consider tailored strategies and policies for work-related cancer affecting blue-collar workers in low-profile occupational sectors (such as cleaning, industrial maintenance, waste recycling and treatment, etc.) to help reduce the 'invisibility' of the issue and raise public perception.<sup>3</sup>

We also recommend the development of comprehensive national databases on exposure to occupational carcinogens.<sup>4</sup>

### ***Do you support the idea that the EU should do more to address cancer?***

Yes, IOSH firmly supports the idea that the EU should do more to address cancer and should prioritise efforts on prevention of work-related cancers. We advocate that the future new EU Occupational Safety and Health (OSH) Strategy addresses the major causes of work-related cancer and builds on the revision of the Carcinogens and Mutagens Directive (CMD).<sup>5</sup> Also, that methods for establishing occupational exposure limits should be harmonised to ensure the highest levels of health protection for all workers in the EU.<sup>6</sup>

In line with the International Social Security Association's 'Vision Zero'<sup>7</sup> harm at work campaign and the recommendations of international organisations, such as the [International Commission on Occupational Health](#) (ICOH) the International Labour Organization (ILO) and the World Health Organization (WHO), IOSH suggests that the EU encourages all countries to draw up national programmes for prevention of occupational cancer, including for elimination of asbestos-related diseases and silicosis.<sup>8</sup>

IOSH through its Research fund commissions a wide range of research related to work-related cancer. This includes studies that have revealed how many outdoor workers in the UK are diagnosed with malignant melanoma skin cancer,<sup>9</sup> and those into other pressing concerns, such as the relationship between shift work and cancer,<sup>10</sup> and sun safety awareness strategies and barriers<sup>11</sup> to adopting sun-safe behaviours in the UK construction sector. In addition, IOSH is about to publish research on better understanding the risk of harm to professional drivers from exposure to diesel exhaust emissions.<sup>12</sup>

We therefore advocate that enhanced efforts are needed in the form of occupational cancer research funding to better understand the causes and prevention of occupation-related cancers.

***Do you know or have experience of any particularly good practice in supporting cancer survivors, or so you have any suggestions as to how this could be done?***

IOSH has funded research into [return to work after cancer](#). The research identified what employers can do to facilitate return to work and what is good practice in dealing with health and safety issues.<sup>13</sup> IOSH has also developed [guidance](#) in the form of webinars, tips, risk assessments, case studies and checklists to help employers manage health and safety issues for those returning to work after cancer.<sup>14</sup>

IOSH recommends that the new EU OSH Strategy could also cover the needs of workers returning to work after long-term illness, such as cancer from all causes.

***How can your organisation contribute to the EU plan on cancer?***

IOSH provides free occupational cancer prevention resources through its *No Time to Lose* campaign at [www.notimetolose.org.uk](http://www.notimetolose.org.uk). The initiative aims to get carcinogenic exposure issues more widely understood and help businesses take action. The campaign is working to:

- engage with policy-makers globally to promote [policies](#) to raise awareness and encourage cutting exposure to carcinogens at work
- commission or supporting [research](#) into occupational cancer, to find out more about causes, incidence rates and prevention strategies
- encourage businesses to design-in exposure prevention measures, through responsible procurement, design, manufacture and supply
- raise awareness of this significant health issue facing workers worldwide
- support a multidisciplinary drive across sectors to raise awareness, share knowledge and engage employees in solutions
- offer free practical, original [materials](#) and online tools to businesses to help them deliver effective prevention programmes.

***Is there anything else that you would like to add that has not been covered in this consultation?***

IOSH's *No Time to Lose* campaign seeks to tackle the global burden of occupational cancer in a solutions-driven way. It offers various resources that are practical to apply in workplaces, including an international action plan, free materials to raise awareness about occupational cancer, and the option for workers and employers to consult an expert. We would suggest that a more comprehensive educational and awareness resource similar to this one, could help raise awareness of other work-related carcinogens and contribute to making a positive impact for workers and employers.

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## About IOSH

Founded in 1945, the Institution of Occupational Safety and Health (IOSH) is the largest body for health and safety professionals in the world, with around 47,000 members in over 130 countries, including over 13,000 Chartered Safety and Health Practitioners. Incorporated by Royal Charter, IOSH is a registered charity, and an ILO international NGO. The IOSH vision is

**“A safe and healthy world of work”**

The Institution steers the profession, providing impartial, authoritative, free guidance. Regularly consulted by Government and other bodies, IOSH is the founding member to UK, European and International professional body networks. IOSH has an active research and development fund and programme, helping develop the evidence-base for health and safety policy and practice. Summary and full reports are freely accessible from our website. IOSH publishes an international peer-reviewed journal of academic papers twice a year titled *Policy and practice in health and safety*. We have also developed a unique UK resource providing free access to a health and safety research database, as well other free on-line tools and guides, including resources for business start-ups; an occupational health toolkit; and a risk management tool for small firms.

IOSH has 41 Branches worldwide, including the Caribbean, Hong Kong, Isle of Man, Oman, Qatar, the Republic of Ireland, Singapore and UAE, 18 special interest groups covering aviation and aerospace; broadcasting and telecommunications; construction; consultancy; education; environment and waste management; financial services; fire risk management; food and drink industries; hazardous industries; health and social care; logistics and retail; offshore; public services; railway; rural industries; sports grounds and events; and theatre.

IOSH members work at both strategic and operational levels across all employment sectors. IOSH accredited trainers deliver health and safety awareness training to all levels of the workforce from shop floor to managers and directors, through a professional training network of over 2,000 organisations. We issue around 180,000 certificates per year.

For more about IOSH, our members and our work please visit our website at [www.iosh.com](http://www.iosh.com). Our five-year strategy WORK 2022 can be viewed at [www.ioshwork2022.com](http://www.ioshwork2022.com) and our resources specifically tailored for business can be found here [www.iosh.co.uk/ioshmeansbusiness](http://www.iosh.co.uk/ioshmeansbusiness).

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