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Position Paper from German Social Insurance issued 19 February 2026

Efficient regulation: Without compromising occupational
safety and health standards

Key messages from the German Social Insurance

- _ A strong economy requires reliable occupational safety and health: Good working conditions are not a cost factor, but rather an investment in productivity, securing skilled workers, and strengthening Europe's position.
- _ Simplification yes – dismantling of protection standards no: Reducing bureaucracy must not lead to deregulation. The aim must be to create a practical, comprehensible, and reliably enforceable set of rules without compromising protection standards.
- _ Targeted modernisation of occupational safety and health: Existing EU regulations must be further developed where new forms of work, psychosocial stress, climatic risks, and technological changes require it.
- _ Participation ensures quality: Transparency and the early involvement of social partners, expert committees, and social security institutions are crucial for effective and enforceable regulations.
- _ Prevention works and pays off: Integrated prevention approaches reduce accidents, lower costs, stabilise contributions, and strengthen long-term employability and competitiveness. Every euro invested in prevention generates an average economic benefit of €2.20.
- _ Consistent use of digitalisation: Digital technologies and AI offer great opportunities for more efficient and prevention-oriented occupational safety and health.
- _ Demonstrable impact: The goals of the EU occupational safety and health strategy – including Vision Zero – must be supported by measurable progress.
- _ Implementation is key: Occupational safety and health can only be effective if it is consistently applied, monitored, and supported by targeted European measures.

I. Effective and modern occupational safety and health strengthen Europe's competitiveness

The European Union has a clear political agenda: it wants to strengthen its competitiveness, reduce bureaucratic obstacles, and make regulation more effective.

Initiatives such as the Competitiveness Compass, Better Regulation, the Quality Jobs Roadmap – including the announced revision of two occupational safety and health Directives – and various omnibus procedures are examples of this. At the national level, too, reducing bureaucracy is high on the political agenda. Occupational safety and health is also increasingly becoming a focus of attention.

The German Social Insurance (DSV) expressly welcomes these initiatives and at the same time emphasises: A strong economy requires safe work. Good working conditions are not merely a cost factor, but an investment. They contribute to productivity, help retain skilled workers, foster innovation and strengthen business locations. Modern regulation should shape European regulations in a way that makes them practical and reliable to implement, without lowering protection standards.

II. Shaping the future of occupational safety and health in Europe

Europe has a solid foundation in the field of occupational safety and health. For decades, European Directives have set binding minimum standards, defined clear responsibilities, and at the same time allowed sufficient flexibility to respond to new risks and changes in the world of work. At national level and within companies, they also provide adequate scope for implementation.

However, the world of work is changing. New forms of work, increasing work intensity, growing psychosocial stress, climate-related health risks and the need to take greater account of gender-specific aspects require the further development of the thematic Directives. Against this background, it is appropriate that the European Commission is reviewing the implementation of occupational safety and health legislation in the Member States while also analysing its potential for modernisation.

From the DSV's perspective, the decisive factor is how simplification and more flexibility in occupational safety and health are concretely designed and implemented. The needs and capacities of small and micro-enterprises must specifically be taken into account. Simplification must not be equated with deregulation or the dismantling of protection standards. Regulations should not be fundamentally called into question. Instead, it should be assessed whether provisions are effective and support companies in practice. Where this is not the case, targeted modernisation is required. The DSV believes that new EU-wide regulations are necessary when existing regulations no longer adequately cover new risks and changing working conditions.

III. Ensuring transparency and involvement

Simplification in occupational safety and health can make an important contribution if it reduces unnecessary complexity and facilitates implementation at company level. Meaningful starting points lie in particular in reporting and documentation requirements, the avoidance of duplicate structures and the use of digital and interoperable procedures. The revision of the Directives on workplaces and display screen equipment provides an opportunity in this regard. New and mobile forms of work, digital work processes and technological developments can thus be better reflected, psychosocial risks more effectively addressed and overlaps between the two Directives reduced. Simplification and modernisation must be considered together and must equally take into account the interests of employers and employees.

From the DSV's perspective, simplification must not come at the expense of established participation and consultation procedures. Transparency and the early involvement of technical expertise ensure high-quality and implementable occupational safety and health legislation. The further development of key elements, such as in the context of the Directive on carcinogens, mutagens or reprotoxic substances at work, through delegated acts, must be viewed critically if this restricts established bodies such as the Advisory Committee on Safety and Health at Work (ACSH) and thereby weakens the quality and practical applicability of legislation. The involvement of social insurance institutions, in particular statutory accident insurance, is equally important.

A comparison at European level clearly demonstrates the economic added value of integrated prevention and implementation approaches. In Germany, statutory accident insurance combines prevention, advice, supervision, rehabilitation and reintegration under a single responsibility. This approach prevents cost shifting to other systems, reduces workplace accidents and absences and has a positive long-term effect on contribution rates. At the same time, it sustainably strengthens employability and company productivity. The combination of prevention and implementation also creates a robust data basis and practical experience that support the continuous development of prevention strategies and regulations.

The European Commission must systematically involve social insurance institutions, in particular statutory accident insurance, in the further development of European occupational safety and health policy. Alongside the European social partners, who link rule-setting and company practice, they provide technical expertise, reliable data and concrete practical experience.

IV. Occupational safety and health in Europe: modern, practical, digital

Digitalisation offers significant opportunities to make occupational safety and health in Europe more practical and effective while at the same time strengthening productivity and the competitiveness of European companies. From the DSV's perspective, digitalisation in occupational safety and health should therefore be advanced as a European investment and modernisation project. European Union programmes such as Digital Europe provide suitable instruments to specifically support digital solutions for prevention, supervision, advice, rehabilitation and administration.

Digital technologies and artificial intelligence (AI) offer additional potential, particularly in light of demographic change and the increasing shortage of skilled workers. At the same time, they are fundamentally transforming work processes and organisational structures. This makes it all the more important not to use them solely to increase efficiency, but to embed them in a modern prevention culture.

Practical examples from statutory accident insurance demonstrate how this can succeed. AI-supported analyses enable the early identification of companies with an increased accident risk and thus targeted, risk-based prevention advice. Digital procedures also simplify administrative processes and relieve qualified personnel of routine tasks. In rehabilitation management, data-based applications support optimised case management. When used correctly, digitalisation thus helps to target prevention more precisely, streamline procedures and deploy resources more effectively, thereby strengthening occupational safety and health, securing skilled labour and enhancing competitiveness alike.

V. Occupational safety and health is a location advantage and strengthens competitiveness

The number of workplace accidents in the European Union is declining. In 2023, around five per cent fewer non-fatal workplace accidents were recorded than in the previous year, and the rate of fatal workplace accidents has fallen by approximately 17 per cent over the past decade. This shows that prevention measures are effective. At the same time, workplace accidents and occupational diseases continue to cause significant economic costs amounting to around three per cent of gross domestic product, more than the Union-wide defence expenditure of two per cent.

The international Return on Prevention study conducted by the International Social Security Association (ISSA) demonstrates the economic benefits of prevention. It shows that every euro invested in prevention generates, on average, an economic return of 2.20 euros through fewer workplace accidents, lower follow-up costs and a faster, sustainable return to employment. Systems without integrated prevention, rehabilitation and compensation structures generally do not achieve this level of efficiency.

Prevention has an impact on several levels simultaneously: it strengthens competitiveness, preserves employability and contributes to social stability. The DSV advocates anchoring prevention as a central pillar of the European competitiveness strategy and supporting the objectives of the EU Occupational Safety and Health Strategy, including Vision Zero, through measurable progress. A reduction of fatal workplace accidents by at least 30 per cent by 2035 compared to 2023 is ambitious but achievable if prevention is consistently strengthened through strategic investment.

At the same time, the implementation of existing regulations for protection must be enforced more rigorously. Occupational safety and health can only be effective if rules are reliably applied and monitored across Europe. In addition, systematic support through needs-based, EU-funded programmes and investments in prevention measures is required. Such support should be open to all Member States and go beyond time- and topic-limited campaigns of the European Agency for Safety and Health at Work (EU-OSHA).

From the DSV's perspective, European occupational safety and health requires clear rules, reliable implementation and targeted investment in prevention. Only this interaction will sustainably strengthen safety and health at work for the benefit of workers, companies and Europe's competitiveness.

About us

The German Federal Pension Insurance (DRV Bund), the German Social Accident Insurance (DGUV), the National Association of Statutory Health Insurance Funds (GKV-Spitzenverband), the national associations for statutory health and long-term care insurance funds at the federal level and the Social Insurance for Agriculture, Forestry and Horticulture (SVLFG) have joined forces to form the "German Social Insurance - Working Group Europe" (Deutsche Sozialversicherung Arbeitsgemeinschaft Europa e. V.) with a view to their common European policy interests. The association represents the interests of its members vis-à-vis the bodies of the European Union (EU) as well as other European institutions and advises the relevant stakeholders in the context of current legislative projects and initiatives. As part of the statutory insurance system in Germany, health and long-term care insurance with 75 million insured persons, pension insurance with 57 million insured persons and accident insurance with more than 70 million insured persons in 5.2 million member companies offer effective protection against the consequences of major risks of life.