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EurECCA Position Paper

THE AIRCRAFT IS A WORKPLACE

Closing the Occupational Health and Safety gap for Cabin Crew

For Cabin Crew, an aircraft is not only a means of transport. It is the place where their working lives unfold — and European occupational health and safety policy should fully reflect that reality.

EurECCA'S PRINCIPLE

A mobile workplace may require adapted rules, but it should not mean weaker protection.

A workplace that happens to fly

For passengers, an aircraft is a place they enter for a few hours. For cabin crew, it is their workplace. It is where they spend a large part of their professional lives, often over several decades. It is where they perform safety-critical duties, assist passengers, respond to emergencies, work through turbulence, manage disruptive behaviour, handle equipment, work in confined spaces and cope with irregular schedules, night duties and repeated changes of time zone.

The aircraft is therefore not only a means of transport. It is also a working environment, with its own physical, organisational and psychosocial risks. European law already provides general protection through Directive 89/391/EEC, whose basic logic is prevention: risks should be avoided where possible, assessed where they cannot be avoided and reduced through better organisation of work and effective protection of workers.

Those principles apply to cabin crew just as they apply to every other worker. Yet the European framework contains an important gap. Directive 89/654/EEC, the EU Workplace Directive, lays down minimum safety and health requirements for workplaces, but expressly excludes "workplaces inside means of transport".

EU law recognises that workplaces can exist inside means of transport. The question is whether those workers receive an equivalent level of workplace-specific protection.

An unfinished part of Europe's safety architecture

For cabin crew, the exclusion is not a technical detail. The place where they perform the essential part of their professional activity falls outside the main EU instrument designed specifically to regulate workplace conditions.

The European Commission recognised this issue more than thirty years ago. In the early 1990s, it proposed specific European legislation on minimum safety and health requirements for transport activities and workplaces on means of transport. The logic was straightforward: the general Framework Directive would continue to apply, while transport workers would benefit from rules adapted to the particular characteristics of their workplaces.

That legislation was never finally adopted. This leaves a simple but important question: what now provides the comprehensive workplace-specific protection that the Commission once considered necessary for workers inside means of transport?

Directive 2000/79: essential, but not the whole picture

Part of the answer came in 2000 with Directive 2000/79/EC on the organisation of working time of mobile workers in civil aviation. That Directive remains important. It introduced sector-specific protections relating to working time, block flying hours and days free from duty, and it reflects the obvious connection between working time, fatigue, recovery and aircrews' health.

But Directive 2000/79 was created to regulate the organisation of working time. It was not designed to regulate every aspect of the aircraft as a workplace. Working time is one part of occupational health and safety, but it is not the whole picture.

For cabin crew, occupational health also involves ergonomics, manual handling, cabin air quality, noise, environmental exposure, radiation, psychosocial pressure, mental health, disruptive passengers, violence at work, circadian disruption and cumulative fatigue. It also requires an understanding of how these different risks interact with one another over an entire career.

These issues cannot all be reduced to working-time limits. Nor should every occupational health concern have to be solved by reopening a social-partner agreement concluded more than twenty-five years ago. The broader question is whether Europe has ever fully completed the occupational health and safety framework for those who work inside an aircraft.

Aviation safety and occupational health are complementary

Aviation is already highly regulated. Aircraft certification, airworthiness, flight operations, cabin safety, emergency procedures and fatigue management are governed by detailed European rules. That is necessary.

But aviation safety and occupational health and safety are not the same thing. Aviation safety asks whether an aircraft can be operated safely. Occupational health asks what repeated exposure to that working environment means for the people who spend their professional lives inside it.

An aircraft may comply fully with technical and operational safety requirements while still raising questions about ergonomics, cumulative exposure, psychosocial risks or long-term worker health. The two systems should therefore complement each other, not replace one another.

THE QUALITY JOBS ACT CONNECTION

A quality job must also be a healthy and sustainable job. Europe's debate on the future of quality employment must include workers whose workplace is mobile, technically complex and exposed to risks that cannot be understood through working-time rules alone.

Why this matters for the Quality Jobs Act?

The European Union is now looking again at what makes work genuinely sustainable and genuinely good. That debate cannot be limited to salary, contractual status or access to training. A quality job must also be a healthy job: work that can be carried out safely and sustainably over an entire professional career, with proper protection against both immediate and long-term physical and psychosocial risks.

For EurECCA, the link with the Quality Jobs Act is therefore direct. If Europe wants to modernise its social framework and respond to the realities of today's labour market, aircrew must be part of that reflection. A mobile workplace is still a workplace, and the people inside it should not receive weaker protection simply because their working environment crosses borders every day.

The issue is not that cabin crew have no legal protection. They do. The problem is fragmentation. General occupational health and safety law, aviation safety regulation, working-time rules, national legislation, collective agreements and company procedures all play a role. But between these different legal worlds, gaps can appear.

The questions Europe should now answer:

1

Who looks at the aircraft cabin as a workplace in its entirety?

2

Who assesses the combined effects of irregular schedules, ergonomics, environmental exposure and psychosocial pressure?

3

Who ensures that a risk does not fall between aviation regulation and workplace health protection?

4

What instrument now performs the workplace-protection role once envisaged for transport workers?

What EurECCA is asking for?

EurECCA calls on the European Commission to carry out a comprehensive assessment of the occupational health and safety framework applicable to aircrew. That assessment should examine what Directive 89/391 already provides, what Directive 89/654 excludes, what Directive 2000/79 covers, what aviation law already regulates and where genuine gaps remain.

- Recognise the aircraft as a workplace within EU occupational health and safety policy.
- Revisit the logic behind the Commission's earlier proposals on transport workplaces.
- Bring together DG EMPL, DG MOVE, EASA, OSHA, national authorities, occupational-health experts and cabin crew organisations.
- Assess modern evidence on physical, environmental, organisational and psychosocial risks affecting cabin crew.
- Where gaps are identified, consider appropriate minimum requirements under Article 153 TFEU, while using social dialogue where appropriate.

Different rules should not mean less protection

An aircraft cannot be regulated in exactly the same way as an office or factory. Its technical and operational characteristics are unique. But adaptation should not become an excuse for lower protection.

The principle should be straightforward: a mobile workplace may require adapted rules, but workers inside it should benefit from an equivalent level of occupational health and safety protection.

The legal tools already exist. Article 153 TFEU allows the European Union to support and complement Member State action aimed at improving the working environment to protect workers' health and safety. The starting point, however, should not be a predetermined legislative solution. It should be a clear recognition of the problem, followed by evidence-based assessment.

Cabin crew do not stop being workers when the aircraft doors close.

The aircraft does not stop being a workplace when it leaves the ground.

If Europe truly wants every job to be a quality job, then every workplace — including one at 35,000 feet — must offer effective protection for the health and safety of the people who work there.

THE AIRCRAFT IS OUR WORKPLACE.

European occupational health and safety policy should fully reflect that reality.

EurECCA represents, protects and develops the rights

and needs of all cabin crew all over Europe.

FLYING TOGETHER – PROTECTING EACH OTHER

About EurECCA: established in Brussels since 2014, the European Cabin Crew Association, EurECCA, represents, protects and develops the rights and needs of cabin crew across Europe. EurECCA is composed of cabin crew unions from EU Member States and neighbouring countries and works on working conditions, social protection and health and safety at work.

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