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European Organisation of Agricultural, Rural and Forestry Contractors

Confédération Européenne des Entrepreneurs de Travaux Techniques Agricoles, Ruraux et Forestiers

Europäischer Zentralverband der land- und forstwirtschaftlichen Lohnunternehmer und ländlichen Dienstleistungsunternehmer

Brussels, September 2026

Quality Jobs Act: Retain the Agriculture and Forestry Exemption in the Workplace Directive

In its second-phase social partner consultation on the Quality Jobs Act, the European Commission considers revising the Workplace Directive (89/654/EEC) and removing the exemption in Article 1(2)(e) for “fields, woods and other land forming part of an agricultural or forestry undertaking but situated away from the undertaking’s buildings”. The Commission argues that the exemption creates different levels of protection for agricultural workers depending on where the land is situated.

CEETAR opposes the removal of this exemption. Agricultural, rural and forestry contractors support high standards of occupational safety and health. Extending building-based rules to fields and forests would not deliver them.

The Directive defines a workplace as a place housing workstations on the premises, or within the area, of the undertaking. Its requirements are designed for buildings: stability, emergency routes, ventilation, lighting, room temperature, sanitary facilities and rest rooms. Its outdoor provisions concern workstations within the undertaking’s area.

The exemption is not an anomaly. The Directive also excludes means of transport used outside the undertaking, temporary or mobile work sites, extractive industries and fishing boats: work that, like fields and forests, does not take place on fixed premises.

Contractors carry out harvesting, forwarding, planting, spraying, slurry application and other field operations on land owned by others. Sites are outdoor, remote and temporary. A forestry team may move site within days; an agricultural contractor may serve several farms in one day. Duration, access, terrain and weather vary constantly. Permanent facilities at each site are neither feasible nor meaningful.

There is no protection gap. The Framework Directive (89/391/EEC) applies to all sectors of activity, including agriculture and forestry. Employers must assess risks, apply preventive measures adapted to the work, and inform and train workers. The Work Equipment Directive (2009/104/EC) covers the use of machinery, with specific requirements for mobile work equipment, such as roll-over protection.



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CEETTAR does not dispute the risks the Commission highlights. It notes that in 2023 agriculture and forestry had the third highest incidence of fatal accidents at work in the EU, and that workers in these sectors report the highest exposure to extreme heat. These risks stem from the work itself: machine operation, tree felling, terrain and weather. Requirements for buildings do not address them; the risk-based framework does. The Commission itself considers addressing heat- and weather-related risks through the risk assessment obligation of the Framework Directive.

Where specific risks require more attention, the answer is better implementation and guidance under the existing framework, not rules written for buildings.

Removal would be disproportionate. Obligations such as providing toilets and staff facilities at every separate worksite would impose significant costs on a sector made up largely of micro and small businesses, without a corresponding safety benefit. Article 153(2)(b) TFEU, the legal basis the Commission envisages, requires directives to avoid administrative, financial and legal constraints that would hold back the creation and development of SMEs.

Applying only parts of the Directive would not solve this. Its requirements apply where the features of the workplace, the activity, the circumstances or a hazard require. At constantly changing sites, this would create legal uncertainty over which obligations apply where, leaving interpretation to national enforcement and litigation.



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Recommendations

CEETTAR calls on the European Commission to:

- **Retain the exemption:** keep Article 1(2)(e) in any revised or merged Workplace Directive.
- **Use the existing framework:** address outdoor risks under the Framework Directive, supported where needed by non-binding sectoral guidance.
- **Assess the impact:** cover agricultural and forestry SMEs explicitly in the impact assessment, including the cost of facilities at dispersed and temporary worksites, given the duration of work, distance to permanent facilities, type of work and weather.
- **Involve the sector:** consult agricultural and forestry contractors on any measure affecting outdoor, mobile work.

Conclusion

Good rules fit the workplace they regulate. Fields and forests are not buildings, and EU law has recognised this since 1989. CEETTAR urges the Commission to retain the exemption and stands ready to contribute practical expertise on safety in outdoor work.

About CEETTAR:

The European Confederation of Agricultural, Rural and Forestry Contractors, established in 1961, represents about 150,000 companies and nearly 600,000 workers. It aims to represent the interests of land-based contractors in Europe. In 2014, the European Network of Forestry Entrepreneurs decided to merge with CEETTAR, resulting in a stronger and more representative single organisation representing land-based contractors at EU level.

CEETTAR aims to be a proactive force to benefit the contractors and the rural economy at European level. Its objective is to:

- *Represent the national federations and defend their professional interests in relation to the institutions of the EU. This way, CEETTAR is recognised as representative organisation for contractors towards the European Institutions,*
- *Represent the national federations and defend their professional interests towards other private organisations, which are active at European level and beyond. CEETTAR maintains constructive relations with COPA-COGECA (farmers), CEMA (agricultural machinery industry), EFFAT (workers)...*
- *Help organisations in the new Member States to fulfil their national objectives as rapidly as possible and under the best conditions through the expertise transfer developed by the CAP 50 years ago.*