

POSITION

National Confederation of Employers' and Entrepreneurs' Unions of the Czech Republic

on

the Draft Report containing recommendations to the Commission on psychosocial risks, stress and mental health in the workplace (2026/2023(INL)),

Prague, 24 August 2026

The National Confederation of Employers' and Entrepreneurs' Unions of the Czech Republic (KZPS ČR), as the largest umbrella organization of employers in the Czech Republic, **expresses its fundamental disagreement with the recommendations to the Commission on psychosocial risks, stress and mental health in the workplace (2026/2023(INL))**.

KZPS ČR in no way disputes that employees are exposed to many stressors in the workplace that may affect their health and performance. At the same time, however, it **considers it impossible to measure the level of stress empirically and therefore to define legislative requirements for its reduction**. Stress-related strain must be addressed individually, within the specific conditions of individual companies, as part of standard personnel management or collective bargaining.

European and national legislation already requires employers to identify, assess and minimize risks associated with work. Framework Directive 89/391/EEC on the introduction of measures to encourage improvements in the safety and health of workers at work establishes a general obligation for employers to assess risks to the safety and health of employees and to take appropriate preventive measures. **Psychosocial risks can be addressed precisely within this existing risk-management system.**

Czech law also already regulates the assessment of risk factors in working conditions. Act No. 258/2000 Coll., on the protection of public health, together with implementing regulations, also considers psychological strain as one of the factors of working conditions. Unlike other risks (e.g. noise, vibration and thermal stress), these factors are defined in general terms, which we consider logical and fully sufficient. The level of stress cannot be physically measured. Also, the perception of its intensity is highly subjective – what stresses one employee may not stress another.

Specific comments:

The draft, in point D, states: "Every third employee works at high intensity, to tight deadlines, or in their free time." Leaving aside the fact that the term "high-intensity work" is subjective, we do not consider this statement to be negative. **Working to tight deadlines or at higher intensity are and must be a natural part of the functioning of a market economy that is intended to remain competitive.** They therefore cannot be categorically labelled as a negative phenomenon.

The draft, in point M, states that: "remote work and flexible working arrangements ... are associated with increased work intensity." We fundamentally disagree with this. Experience shows that **working from home is, in most cases, less productive than working as part of a team**, and employers are withdrawing from offering it precisely because it is inefficient.

In point S, paragraph 4, the document calls on employers to "ensure mandatory, systematic, participatory and duly documented assessment of psychosocial risks at all workplaces." This would mean an enormous administrative and economic burden and is unacceptable to employers.

For the same reasons, the requirement in Article 6(1) is also unacceptable: "Based on the assessment of psychosocial risks, employers shall adopt an annual action plan setting out specific measures to prevent, eliminate or reduce psychosocial risks related to work. Employers shall implement the annual action plan, monitor it and evaluate its implementation." It is paradoxical that representatives of the European Commission repeatedly declare that reducing the administrative burden is essential, while at the same time **generating more and more obligations**.

In conclusion, allow us to emphasize that **the primary role of employers is to create value through the production of goods or the provision of services and to achieve long-term profits** – including in a highly competitive international environment. Only in this way can they fulfil their obligations towards governments and pay sufficient taxes necessary for economies to function and for governments to finance social programs. Companies are not, and must not become, welfare institutions or state-regulated agencies caring for employees.

In our view, the existing European and national occupational safety and health framework already provides sufficient tools to identify and address psychosocial risks. The priority should therefore be its proper implementation and practical use, rather than the creation of additional regulatory layers – which we fundamentally reject.

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