

1. Do you think that the *reference framework for the prevention of alcohol and drug use in the workplace* adopted by the Pompidou Group provides for the basis for the design of a national coherent policy and programme on the subject in your country?

In our opinion, the answer is clearly yes. Because the Reference Framework:

- It recognizes the magnitude of the problem
- It recognizes the existence of occupational factors in drug use behaviours
- It recommends a comprehensive policy on health and safety, compared to other approaches that only refers to safety.
- It states that the problem at the workplace can't be denied
- It stresses the need of improving working conditions
- It expresses the need for involvement of all stakeholders (Governments, Unions, Employers Organizations)

In Spain, some things have been carried out which are in the Framework.

On the one hand, I want to point out the existence since 1997 of the "National Commission on Prevention of drug use in the workplace", in which the Government (National Plan on Drugs), the major unions (CCOO and UGT) and Employers Organizations (CEOE) are represented. This Commission has undertaken significant actions. I want to highlight, apart from prevention campaigns in specific sectors, the regular conduct of a survey on prevalence of alcohol and drugs use in the workplace.

Moreover, in our union, we have experience in preventive intervention plans agreed between all stakeholders in:

Railway Sector: 30,000 workers.

Councils: 2,000 workers

Steel sector: 1,000 workers

Graphic Arts Sector: 300 workers.

Thus, we advocate preventive interventions maintained over time, such as marks the Framework.

2. What else would be necessary to use it as a reference for the design and implementation of a national strategy on the prevention of alcohol and drug use in the workplace?

In our opinion it wouldn't be necessary more from the theoretical point of view but the experience shows us that even having proper operating principles are not always put into practice.

Possible obstacles for this could be:

- National and regional legislation. I recall that some labor laws remain punitive responses to the alcohol and drugs problem at the workplace.

- The actual commitment with the Reference Framework by all the stakeholders. Sincerely we doubt about this general commitment.
- Our current experience shows that the practice of some employers is far from Framework: denial of the problem, punitive approach, based solely on the safety approach (emphasizing workplace accidents), analytical testing without applying the ethical standards recommended by the ILO, among others.
- Finally, in the case of Spain, the current working situation (unemployment, low salaries, job insecurity, etc.) makes that the prevention of alcohol and drugs at work is not a priority.

3. Do you think that the EU risk assessment guidance document and related tools such as OIRA and national risk assessment documents can be adapted to deal with the prevention of alcohol and drug use in the workplace by assessing hazards and risk related to these problems?

Well, we know that psychosocial factors (work pressure, excessive demand, unstimulating tasks, etc.), environmental factors (inadequate facilities, environmental pollution, adverse weather conditions, etc.) and professionals factors (professional sectors: construction, hospitality, etc.), along with other factors may favor the consumption of alcohol and drugs among workers.

Therefore, in assessing the risks of the work required by the law, all these factors must be analyzed. Sometimes, some employers want to make the risks assessment according to their wishes, personalized. Therefore, it is necessary to use verified procedures. The OIRA (Online Interactive Risk Assessment) may be an appropriate tool for making the risk assessment.