



Geneva and Brussels, 25 September 2025

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Calling for urgent intervention to prevent the adoption of draft law 10147 “On Workers’ Safety and Health at Work” in Ukraine

Dear Director General,

We are writing this letter to you on behalf of [IndustriALL Global Union](#) and [industriAll European Trade Union](#), both representing workers in mining, energy, and manufacturing industries throughout the world, to urgently request the ILO’s immediate intervention regarding draft law No. 10147 “On Workers’ Safety and Health at Work” In Ukraine.

Like the International Labour Organization (ILO), we place paramount importance on occupational safety and health. In June 2022, occupational safety and health were added as the fifth Fundamental Principle and Right at Work. This new status ensures that protecting workers from work-related injuries and illnesses is no longer optional but a required basic human right.

On August 21, 2024, the Verkhovna Rada of Ukraine adopted, in the first reading, draft law No. 10147 “On Workers’ Safety and Health at Work”. Following this, the Committee on Social Policy and Protection of Veterans’ Rights established a working group to prepare the draft for the second reading.

A total of 1,011 amendments were submitted by Members of Parliament, including 109 amendments proposed by MPs Mykhailo Volynets (chairperson of the KVPU) and Yulia Tymoshenko (Batkivshchyna bloc). The working group held 82 sessions between October 8, 2024, and May 2, 2025. Despite this extensive work, the amendments reflecting the views of trade unions were largely disregarded.

Grave concerns regarding draft law No. 10147:

1. Repeal of Existing Occupational Safety Law

The draft law repeals the current Law of Ukraine “On Occupational Safety,” developed with ILO and EU input. Its repeal would void the regulations built on it, leaving occupational safety largely unregulated and creating legal uncertainty across sectors.

2. Abolition of Mandatory Benefits and Employer Liability

The draft abolishes statutory benefits and compensations for hazardous work—reduced hours, extra leave, preferential pensions, higher pay, free preventive nutrition and sanitary breaks—and removes the principle of full employer responsibility for safe workplaces. Nearly one-third of Ukraine’s workforce faces harmful conditions, yet the draft offers no binding safeguards.

3. Weakening of Labour Code Protections

Key protections in Chapter XI “Occupational Safety” would disappear, including:

- **Pregnant workers and mothers of young children** – loss of guaranteed lighter work with full pay.
- **Minors** – removal of prohibitions on hazardous, night and overtime work. These deletions contradict the draft’s own statement that safety and health form part of labour legislation.

4. Violation of Constitutional and International Obligations

By narrowing existing rights and shifting regulation to individual contracts while sidelining collective bargaining, the draft violates:

- **Constitution of Ukraine, Article 22** (no regression of rights),
- **EU-Ukraine Association Agreement, Article 296**, and
- **ILO Conventions Nos. 87, 98, 135 and Recommendation 143**.

5. Restrictions on Trade Union Rights

The draft omits liability for obstructing trade union monitoring and introduces a 25 per cent representativeness threshold, excluding most unions from workplace oversight. This breaches the Constitution (Article 36), the Law “On Trade Unions,” and the ILO conventions cited above.

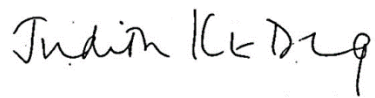
6. Disregard of Trade Union’s Position

The unified position of the Joint Representative Body of Trade Unions was disregarded in preparation for the second reading.

Protecting workers’ lives and health is not merely a trade union demand: it is a constitutional duty and a European standard. We stand ready to provide any additional information the ILO may require and to support all efforts aimed at ensuring that Ukraine’s labour legislation fully complies with international norms.

We look forward to your prompt action and reply.

Sincerely yours,

A handwritten signature in black ink, appearing to read 'Judith Kirton-Darling'.

Judith Kirton-Darling
General Secretary
IndustriALL European Trade Union

A handwritten signature in black ink, appearing to read 'Atle Høie'.

Atle Høie
General Secretary
IndustriALL Global Trade Union