

OECD on-line public consultation on Draft Recommendation
on Regulatory Policy and Governance

I read the draft and I am quite worried because there is no explicit recognition of the role of the workforce and of trade unions. In Finland all substantial social benefits and legislation that affect the lives of employees are agreed in a three-sided process involving both sides of industry and the Finnish government. So the role of the trade unions are very important also on regulatory policy and it should be so also in the future.

On the draft page 14 it says: Administrative simplification programs should be evaluated for their "value-for-money". Evaluation should not only focus on the quantification of administrative burdens reduced but also on other outcomes and effects for society.

I would add to this that the reductions of legislative and administrative burdens should not be done at the expense of the employees. When improving and simplifying legislation, it is necessary to take extensive measures to make sure that there is no attempt to improve competitiveness at the expense of e.g. the occupational health and safety or equality of the employees. Cutting down labour law should not be used to reduce regulation, as this would, in the long run, be a very unsustainable way to boost competitiveness. We should keep in mind that innovations are only created in companies where the employees are physically and mentally fit and have the energy to maintain their know-how through training and orientation.