

Al x OSH AlAS 2025 Actions in the ENSHPO framework

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Contributions

- Jan 28, 2025: Participation in the IOSH Webinar "The future of OSH: Innovations, challenges and global trends".
- May 20, 2025: EU-OSHA Healthy Workplaces Campaign Good Practice Exchange Event. Paper & speech on "Al Regulations & OSH - The Challenge of Balance".
- May 21, 2025 Participation in the Targeted Consultation in Preparation of the Commission Guidelines to clarify the Scope of the Obligations of Providers of General-purpose ai Models in the Al act.
- **June 9**, 2025 ENSHPO Members Meeting. Presentation of the Brussels Paper.

Contributions

- July 16, 2025: Participation in the Targeted Targeted Stakeholder Consultation on Classification of Al Systems as High-Risk – Shaping the Future of OSH in the Age of Al.
- **July, 2025**: Proposal to clarify the scope of the AI systems definition in the draft Italian Law on AI (now L. 132/2025, in force as of today, **Oct. 10**).
- October, 2025: In preparation. CALL FOR EVIDENCE Digital Omnibus (Digital Package on Simplification). Proposals for a Directive and a Regulation.

Key points

- High-Risk Classification Challenges: Al systems designed to improve workplace safety are often classified as "high-risk" under the EU Al Act, which imposes significant compliance burdens that may paradoxically hinder the adoption of beneficial safety technologies.
- Worker Monitoring as a High-Risk Practice: A specific proposal is made to add "Al systems for continuous, real-time physiological or psychological monitoring of workers in non-safety-critical contexts" to the Al Act's list of high-risk applications (Annex III) due to the severe psychosocial harm they can cause. A specific set of rules could simplify the adoption of Al in safety-critical contexts.
- Critical Role of Human Oversight: Ensuring meaningful human oversight is crucial for safely deploying AI in the workplace; this involves providing proper training and authority to prevent over-reliance on automated systems and to manage risks effectively.
- Focus on Psychosocial Risks: The contributions strongly advocate for interpreting AI safety regulations broadly to include not just physical harm, but also significant psychosocial risks such as stress, burnout, and reduced autonomy stemming from algorithmic management and worker monitoring.
- Navigating Legal and Value Chain Complexity: OSH professionals must understand the nuanced legal definitions within the Al Act (e.g., "safety component") and address the complexities of the Al value chain to ensure responsibility and transparency from developers to deployers.