

► Reporting and recording of work accidents and occupational diseases in the Republic of Moldova



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Summary

Moldova has developed a legal framework on the investigation of work accidents and occupational diseases, which is mostly aligned with the ILO Code of Practice on Recording and Notification of Occupational Accidents and Diseases. However, Moldova lacks the institutional capacity to fully enforce the effective compliance with the legislation on reporting.

Numerous evidence suggests under-reporting of work accidents, in particular non-fatal or non-severe accidents in Moldova. Compared with selected European countries, Moldova reports multiple times lower incidence rates of work accidents but multiple times higher incidence rates of fatal accidents. Furthermore, the data on social security benefits suggest that a large number of work-related injury cases were treated as non work-related. Especially, there is a serious deficiency in the reporting occupational diseases. Despite that fact that the established procedure for establishing the diagnosis of occupational diseases is in place, a very few number of cases are recorded in the national register of occupational diseases in Moldova.

A considerable degree of under-reporting and mis-reporting of work accidents can be linked to the limited scope and institutional capacity of the State Labour Inspection, limited capacity of employers and lack of competent OSH specialists, low awareness of employees on their rights and benefits, financial disincentive for employers due to a disparity in the social security benefits, and a large share of workers involved in the informal economy and self-employed who are outside the scope of regular labour inspection.

In Moldova, several institutions are responsible for the collection of data on work accidents and occupational diseases, but there is no mechanism for coordination or a centralized electronic database on reporting and recording of work accidents at the national level. The available statistical data on work accidents are partly compliant to Eurostat and NACE standards, providing selected key information on work accidents. To formulate an evidence-based occupational safety and health policy, it is desirable to analyse the work accident data by taking into account such factors as: occupation, employment status, age, size of the enterprise, type of injury, part of body injured, risk exposure and working environment. In addition, the Moldovan legislation does not require the notification of dangerous occurrences and incidents which do not result in work accidents (near misses).

Based on the assessment of the national reporting systems of work accidents and occupational diseases in Moldova, the following recommendations are made:

- As the single authority in charge of enforcement of occupational safety and health and investigation of work accidents, the State Labour Inspection should improve its institutional capacity to effectively conduct integrated inspections (covering occupational safety and health, labour relations, general working conditions and other aspects by one inspector) in accordance with international labour standards, in particular ILO Conventions No. 81 and No. 129. In this regard, there is a need to review the current legislation which is partly based on the tort system, where the investigator firstly checks any fault in the occurrence of the work accident. Similarly, the current legislation which only allows announced labour inspection visits should be revised.
- There is a need to improve employers' compliance with work accident reporting. Necessary training and guidance should be provided to employers to help them better comply with their legal obligations on the investigation of work accidents at the enterprise level, particularly for small-scale enterprises who lack designated OSH specialists. The recent ratification ILO Conventions No. 161 by Moldova could contribute in developing more options for OSH services.
- Employees should be made aware of their rights and benefits in case of work accidents and occupational diseases and they should exercise them without reluctance or feeling any fear of losing

the job. At the same time, employees and trade unions should enhance their capacity in safety and health at work and the investigation of work accidents. It is crucial to formalize a large number of workers in the informal economy, which is estimated at around 25.1% of the total employed population in 2018.

- The existing disparity in the social security law concerning employers' liabilities between work-related and non work-related benefits should be eliminated, as currently employers must pay the first 20 days of benefits in case of work accidents or occupational diseases, while they are liable for the first 15 days in case of general incapacity of work. For this reason, some employers discourage employees from reporting work accidents. The National Office of Social Insurance should review and facilitate the administrative procedure to apply work-related benefits.
- The State Labour Inspection and the National Bureau of Statistics should develop a coordination mechanism for collection and analysis of work accident statistics. The development of a national database work accidents and occupational diseases should be considered in order to ensure access and exchange of data by the relevant institutions. To serve as an evidence base for the OSH strategy, the work accident data should be analysed in more detail in line with the methodology of Eurostat's European Statistics on Accidents at Work (ESAW).
- There is an urgent need to reinvigorate the reporting and recording system of occupational diseases. As a first step for improvement, medical doctors should be trained and sensitised on the importance of detecting the underlying occupational risk factors at the stage of medical examinations, rather than focusing on the treatment of the patients' symptoms.

There is a considerable room for improvement in the reporting and recording of work accidents and occupational diseases in Moldova. The key findings and recommendations formulated in this report will contribute to building an effective national occupational safety and health system in Moldova. The ILO is ready to support this process within the framework of the ongoing development cooperation project "Protecting workers and ensuring decent and safe working conditions in times of COVID-19 crisis and recovery in Moldova."

Introduction

The collection, recording and notification of data on work accidents and occupational diseases are essential for formulating evidence-based occupational safety and health policies and setting priorities and targets for preventive action. However, countries in Central and Eastern Europe including Moldova face major challenges of under-reporting of non-fatal work accidents and dysfunctional national register systems of occupational diseases.

Within the framework of the ILO project “Protecting workers and ensuring decent and safe working conditions in times of COVID-19 crisis and recovery in Moldova,” the ILO conducted the analysis of the current system of reporting, data collection and analysis of work accidents and occupational diseases in Moldova. The purpose of this report is to support the national effort to improve the reporting and recording systems of work accidents and occupational diseases.

This report is organized as follows. Chapters 1 and 2 analyse the current reporting system of work accidents and occupational diseases, respectively. Both chapters review the legislative and institutional framework and the reporting and notification systems, and examine their compliance to ILO code of practice on recording and notification of occupational accidents and diseases. Chapter 3 reviews the national statistical system of work accidents and occupational diseases. It also analyses the extent of under-reporting, its reasons and consequences. Chapter 4 concludes the findings of the report and provides recommendations for the improvement of the data reporting system in Moldova.

This report has been prepared by Victor Gilca, ILO Consultant, under the supervision of Kenichi Hirose, Senior Social Protection Specialist, ILO Office for Central and Eastern Europe, based on the consultations and interviews with representatives of the state institutions and social partners, and on the desk review of available reports on the issues related to occupational safety and health in Moldova. The report was reviewed by Arsenio Fernandez, Specialist in Labour Administration, Labour Inspection and OSH and Tzvetomira Radoslavova, Technical Legal and Labour Law Compliance Officer of the Labour Administration, Labour Inspection and Occupational Safety and Health Branch (LABADMIN/OSH), ILO Geneva.

We hope that key findings and recommendations formulated in this report will contribute to formulating the strategic actions to improve the reporting and recording of data which will lead to a better national occupational safety and health system in Moldova.

1. The current work accident reporting system in Moldova

► 1.1. Review of the legislative and institutional framework

The main legislation regulating the reporting of work accidents includes the Labour Code (Title 9), Law No. 186 of 2008 on Occupational Safety and Health, and the Government Decision No. 1361 of 2005 on the approval of the Regulation of the Methods of Investigation of Work Accidents.

Law No. 140 of 2001 on State Labour Inspection attributes the State Labour Inspection the national supervision and coordination of enforcing the labour and OSH legislation.¹ Through several amendments in recent years, the supervising authority of the State Labour Inspection has changed from the Ministry of Labour and Social Protection to the Ministry of Economy, then back to the Ministry of Labour and Social Protection which is currently named the Ministry of Health, Labour and Social Protection.

Numerous legislative changes resulted in a fragmentation of responsibilities regarding work accidents and occupational diseases. The earlier Government Decision No 61 of 1992 on the Establishment of the Labour Protection Department clearly stipulated that its main functions include “the analysis of causes of work accidents and elaboration of measures needed for its prevention, control, registering and record keeping of work accidents and occupational diseases.” The current State Labour Inspection Law No. 140 only refers to its responsibility to present the statistics on work accidents and occupational diseases in its annual reports. It should be noted that the competence of recording and analysis of occupational diseases was transferred to the National Agency for Public Health in 2001. This situation led to a series of contradictions in interpreting the legislation and clear division of responsibilities between these institutions. There is no established procedure of data exchange between the National Agency for Public Health and the State Labour Inspection.

In 2018, a major change was made to the OSH legislation which had a significant impact on the mandate of State Labour Inspection. As a result, the OSH control function of the State Labour Inspection was transferred to 10 public institutions.² This change was widely criticized because these institutions were not sufficiently prepared and lacked necessary human resources and institutional capacity. This compromised the process of investigation of work accidents and the effectiveness of safety controls, as

1 It should be noted that the control of OSH legislation in certain state services, such as the Ministry of Defence, the Ministry of Internal Affairs, the Security and Intelligence Service, the National Administration of Penitentiaries and Anticorruption Center, is organized independently by these institutions without the involvement of the State Labour Inspection.

2 Including: (i) National Agency for Food Safety, (ii) Agency for Consumer Protection and Market Surveillance, (iii) Agency for Technical Surveillance, (iv) National Agency for Public Health, (v) Environment Protection Inspectorate, (vi) National Agency of Auto Transportation, (vii) Civil Aeronautical Authority, (viii) Naval Agency, (ix) National Agency for Energy Regulation, and (x) National Agency for Regulation of Electronic Communications and Informational Technology.

well as data relating to the recording of work accidents. The provisions were abolished starting 2021 and the full competence regarding OSH was re-established to the State Labour Inspection.

However, according to the Government Decision No.395 on Regulation of Controls, all inspection must be planned though a formal annual list of enterprises and inspection of one enterprise must not be more than once per year. Moreover, the nation-wide lockdowns in March-May 2020 and April 2021 due to the COVID-19 pandemic also imposed a temporary moratorium of control inspections, including those by the State Labour Inspection.

► 1.2. Reporting of work accidents

The scope of the Government Decision No. 1361 of 2005 on the Approval of the Regulation of the Methods of Investigation of Work Accidents covers employees in all economic sectors but does not include the self-employed workers.

In the above regulation, a work accident is defined as “an event that has caused injury to the employee's body (e.g. injury, psychological stress, electric shock, burns, frostbite, suffocation, acute intoxication, bodily injuries caused by insects and animals, natural disasters, etc.), as a result of the action of a risk factor (e.g. property, state, process, phenomenon, behaviour) proper to an element of the work system (e.g. executor, work tasks, means of production, work environment) and which led to the temporary or permanent loss of capacity work or the death of the employee.” Further, all work accidents are divided into fatal accidents, severe accidents, and accidents that resulted in temporary incapacity for work for at least one day.³

The regulation also defines an accident outside work – referring to as “an event which has caused injury to the employee's body, of which the direct cause, as determined by acts, is unrelated to the performance of work or duties, even if it occurred during the working hours, at work or on the territory of the unit (examples of accidents outside work include: play, brawl, intentional self-harm, suicide, cases of latent illness and natural death, use of means of production for personal purposes without the permission of the employer or manager, committing theft from the property of the unit, the individual employer and the like).” The investigation of accidents will also look into whether notified cases are work-related or not, as well as their severity and any violations of labour laws and safety regulations.

(1) Notification of work accidents

The Government Decision No.1361 stipulates that each injured person or witness is obliged to inform immediately on the occurrence of a work accident to the management. The employer should then ensure first aid and, as needed, the transportation to a medical institution, while requesting a medical certificate confirming the character of the accidents.

At the same time, the employer should notify immediately (by phone or other communication means) the occurrence of a work accident to the State Labour Inspection, the National Office of Social Insurance, the trade union, and the National Public Health Agency (in cases of occupational diseases and intoxications). In cases of severe or fatal accidents, the employer is obliged to inform the police.

While there is no specific form of notification, the regulations specify the following list of core information to be provided:

³ Article 4 of Convention No. 155 refers occupational accidents and diseases as accidents and injury to health arising out of, linked with or occurring in the course of work.

- The name and address of the establishment/individual employer;
- The name, family status, age and occupation of the injured person(s);
- The date and time of the accident;
- The scene and circumstances surrounding the accident;
- The nature of injury caused to the injured person;
- The name, job title and contact number of the person who submitted the notification.

(2) Investigation of work accidents

The Government Decision No.1361 stipulates the following approach in the investigation of the work accidents depending on the severity of the case.

Severe and fatal work accidents are investigated by the State Labour Inspection. The inspectors are entitled to access all original documents related to the OSH protection and preventive measures at the enterprise, as well as timely receiving of medical certificate regarding the character of the injury within 24 hours, and forensic expertise within five days in cases of fatal accidents. The investigation report normally needs to be submitted within 30 days.

Other work accidents that resulted in temporary incapacity for work are investigated by a committee set up by the employer within 24 hours from the occurrence of the accident. The committee should be composed of at least three members including the head of the OSH service, one representative of the employer and one representative of the trade union. The committee members must have the relevant technical training, knowledge of OSH and must not be one who organizes, controls, or conducts the work at the accident sight. The committee must submit a report within five days, which is then approved and signed by the employer within 24 hours, and an authenticated copy of the investigation report is submitted to the State Labour Inspection within three days.

Each work accident case is recorded based on the reporting form provided in Annexes of the Government Decision No.1361. There are two reporting forms – one for the accidents resulting in temporary incapacity for work to be complied by the employers, and the other for severe or fatal accidents to be complied by the labour inspector. These two forms are almost identical. Table 1.1 presents the structure of the reporting form for investigation of work accidents.

► **Table 1.1. Reporting form for the investigation of work accidents**

	Main field	Description of field
1	Name of the establishment (enterprise or individual employer) where the accident occurred	1.1. Address of the establishment 1.2. The Superior Forum (committee with representatives of the holding company) 1.3. Economic activity 1.4. Property form 1.5.* The establishment's fiscal and registration codes 1.5/1.6. Number of people employed, including women, 1.6./1.7. The section, the sector and the scene of the accident
2	Name of the entity which employed the injured person	2.1. Address (including the name and surname of the individual employer)

	Main field	Description of field
3	Identity details of the injured person	3.1. Name 3.2. Home address 3.3. Sex 3.4. Age 3.5. Position held, title of job 3.6. Years worked in the function/profession/occupation, which was performed during the accident 3.7. OSH training 3.7.1. Additional OSH training 3.7.2. On-the-job training or periodical training 3.8. Medical examination 3.8.1. Medical examination upon start of employment 3.8.2. Periodical medical examination
4	Date and time of the accident	
5	Classification of the accident	Individual or collective
6	Detailed description of the scene and circumstances in which the accident occurred	6.1. Description of the circumstances surrounding the accident (through falling, hitting, being crushed, explosion, fire, criminal attack, electric shock, etc.)
7	Cause of the accident	7.1. Related to the person performing the work (violation of work rules and instructions, not using protective equipment) 7.2. Related to production (equipment out of order, technical condition of the building and/or the road), 7.3. Related to the work task (gaps in organisation at the workplace and work process, lack of training etc.) 7.4. Related to the work environment (gas and dust concentration, temperature and humidity, level of brightness, etc.) 7.5. Diagnosis of the injury (transcribed from the certificate issued by the medical institution)
8	Persons who violated labour laws and regulations	Name and type of violations
9	Measures aimed at the liquidation of the cause of the accident and prevention of similar events in the future	Type of measure, term of implementation, responsible person, notes

Note:* Applicable only for severe and fatal cases.

Source: Government Decision No.1361 (Annexes 1 and 2).

The reporting forms ask most information as required by the ILO Code of Practice on Recording and Notification of Occupational Accidents and Diseases (sections 6.3.2 and 6.3.3). The following observations are made:

- The Moldovan forms do not include separate fields relating to the nature and the location of the injury (e.g. fracture of a left leg) as recommended by the ILO Code of Practice. However, they require a diagnosis of the injury which is transcribed from the medical certificate.
- The ILO Code of Practice recommends that commuting accidents should also be notified. It should be noted, however, that the Moldovan legislation on work accidents only covers the cases commuting between home and workplace with the transport provided by the employer or during business travel. Accidents that occurred in other situations of commutation are not covered by the national legislation.
- The Moldovan forms ask more detailed questions, including whether the injured worker received an OSH training, on the job training, medical examination (upon start of employment and periodical ones). In addition, they investigate any violations of labour laws and regulations.

- The ILO Code of Practice also recommends the notification of dangerous occurrences and incidents which do not result in a work accident (near misses). However, such cases are not foreseen by the Moldovan OSH regulation.

(3) Registration and recording of work accidents

Records of work accidents are registered in the register of work accidents kept by the establishment and the local public administration authority. The establishments and local public administration authority report the data of the work accidents registered annually to the National Bureau of Statistics.

(4) Annual Reports of the State Labour Inspection

The State Labour Inspection compiles annual reports on work accidents from its own recordings of the investigation of severe and fatal work accidents (including the planned control visits to establishments, which results in detection of unreported work accidents), and the investigation reports received from establishments in cases of work accidents that caused temporary incapacity for work.

Table 1.2 summarizes the data on work accidents in the Annual Reports of the State Labour Inspection, which are publicly available at the State Labour Inspection's webpage.

► **Table 1.2. Work accident data in the Annual Reports of the State Labour Inspection**

	Main field	Description of field
1	Number of notifications regarding work accidents received	
2	Number of work accidents investigated by labour inspectors	Including disaggregation by fatal and severe work accidents, women, work accidents and accidents outside of work
3	Number of persons injured in work accidents	Including disaggregation by economic activity, fatal, women, children under 18 years of age, number of days of incapacity of work, number of establishments, expenses, index of average number of days of temporary incapacity for work per person,
4	Number of accidents with temporary incapacity for work investigated by the employer's commissions	
5	Distribution of persons injured by work accidents by circumstances and causes	<ul style="list-style-type: none"> - Circumstances of the work accident (including falling, hitting, crushing, contact with hazardous substances, electric shock, contact with heat, explosions, etc.) - Causes of the work accidents (dependant of the employee, equipment, work task and work environment)
6	Distribution of fatal and severe work accidents by circumstances and causes	<ul style="list-style-type: none"> - Circumstances of the work accident (including falling, hitting, crushing, contact with hazardous substances, electric shock, contact with heat, explosions, etc.) - Causes of the work accidents (dependant of the employee, equipment, work task and work environment)

Source: State Labour Inspection.

(5) The National Bureau of Statistics

The National Bureau of Statistics collects data on work accidents from enterprises and local administration. Table 1.3 presents the key items of the reporting form. The data are publicly accessible though the institutions website, which provides data by years (since 1995), economic activity, expenditures, circumstances, causes, number of days of incapacity for work, and territorial unit. However, the data

of non-fatal accidents are not classified by severe ones and the ones resulting temporary incapacity for work.

► **Table 1.3. Reporting form of work accidents by the National Bureau of Statistics**

	Main field	Description of field
1	Number of persons injured in a work accident	<ul style="list-style-type: none"> - Number of injured with a temporary incapacity of work of 3 or more days (disaggregation by women and children of 18 years or below) - Number of fatal accidents (disaggregation by women and children of 18 years old or below) - Number of days of incapacity for work lost for 3 or more days (including of deceased) - Expenditures related to the work accidents (including medical leaves, payment towards recovery, unique payments/ benefits, value of damaged equipment and tools, damaged buildings and constructions and other expenses)
2	Distribution of persons injured by work accidents by circumstances and causes	<ul style="list-style-type: none"> - Circumstances of the work accident (including falling, hitting, crushing, contact with hazardous substances, electric shock, contact with heat, explosions, etc.) - Causes of the work accidents (dependant of the employee, equipment, work task and work environment)

Source: National Bureau of Statistics.⁴

(6) The National Office of Social Insurance

The National Office of Social Insurance maintains the database of beneficiaries of work accidents and occupational diseases related benefits, although its statute does not require collecting data on work accidents and occupational diseases. Its Annual Reports provide the number of beneficiaries and average amount of benefits of the benefits for temporary incapacity for work, disability benefits, and death grants as result of a work accident or an occupational disease.

⁴ Form AM-2016 on Work accidents.

2. The current occupational diseases reporting system in Moldova

► 2.1. Review of the legislative and institutional framework

The main legislation regulating the reporting of occupational diseases includes the Law No. 10 of 2009 on State Supervision of Public Health and the Government Decision No.1282 of 2016 on Approval of the Sanitary Regulation Regarding the Research and Establishment of the Diagnosis of Occupational Disease (intoxication).⁵

Moreover, the responsibility for investigation, recording and analysis of occupational diseases is scattered to several institutions, including the National Agency for Public Health with its territorial Public Health Centres, the State Public Health Surveillance Service and the Republican Center for Occupational Diseases.

As shown in Table 2.1, the current list of occupational diseases (replacing the former list inherited from the Soviet times used until 2016) comprises seven general categories, partly aligned with the International Classification of Diseases including the ICD codes.

► Table 2.1. List of occupational diseases in Moldova

	Main heading	Main groups
1	Diseases caused by chemical agents	<ul style="list-style-type: none"> - Metals, their alloys, amalgams, inorganic and organic compounds - Halogens and inorganic compounds - Inorganic compounds of nitrogen, carbon, sulphur and phosphorus - Aliphatic aromatic hydrocarbons
2	Diseases caused by physical agents	
3	Diseases caused by biological agents	Bacteria / Viruses / Parasites / Fungous
4	Respiratory diseases	<ul style="list-style-type: none"> - Agents with immuno-allergic mechanism of action, the predominant cause of asthma - Agents with an immuno-allergic mechanism, the predominant cause of extrinsic allergic alveolitis

⁵ In the Moldovan legislation, occupational disease includes intoxication.

	Main heading	Main groups
5	Skin diseases	
6	Diseases caused by overload	<ul style="list-style-type: none"> - Diseases caused by overuse of the vocal cords - Diseases caused by visual overload
7	Occupational tumours	

Source: Government Decision No.1282 (Annex 1).

The national list mostly conforms the ILO List of Occupational Diseases except that it does not include mental and behavioural disorders.

► 2.2. Reporting of occupational diseases

According to the Government Decision No.1282 of 2016 on Approval of the Sanitary Regulation Regarding the Research and Establishment of the Diagnosis of Occupational Disease, the reporting flow in case of occurrence of an occupational disease is described as follows:

(1) Notification of occupational diseases

The report form for occupational disease is completed by the medical institutions that detected the case of occupational disease.

The report form, provided as Annex of the Government Decision No.1282, which requires the following information:

- Name of the employer;
- Name of territorial Public Health Center;
- Name, sex, date of birth, ID number, personal code of patient;
- Address, contact means: phone, cell, email;
- Place of work/unit of the establishment, address and phone;
- Occupational field;
- Name of section, sector;
- Profession, function;
- Presumptive or modified diagnosis of occupational disease , including the name of the (group of) disease;
- Possible causal factors.

The report form should be also signed by the patient to express his/her consent of the transmission of personal health data to other medical institutions for further consultation and treatment.

The report file is sent to the responsible Public Health Center of the National Agency for Public Health and to the employer within 24 hours of establishing the suspicion of occupational disease.

(2) Investigation of occupational diseases

The investigation should be initiated within 24 hours for acute occupational diseases, and within 72 hours for chronic occupational diseases.

The investigation of acute occupational diseases is carried out by the territorial Public Health Center of the National Agency for Public Health which covers the location of the enterprise with the participation of the employer's representative. In the absence of a complete and reliable assessment of the occupational risk factors at the workplace, the specialist of the territorial Public Health Center of the National Agency for Public Health performs the necessary laboratory investigations and instrumental measurements.

Table 2.2 presents the structure of the reporting form for the investigation of the occupational diseases. The report is compiled by the specialist of the State Surveillance Service of Public Health within three days for acute occupational diseases and 15 days for chronic occupational diseases after receipt of the notification and signed by the members of the commission. The form provides all information of notification of occupational diseases as required by the ILO Code of Practice on Recording and Notification of Occupational Accidents and Diseases (sections 6.4.1) with the absence of fields regarding the number of workers in the enterprise (6.4.1.a)v) and employment status (6.4.1.b)iv).

► **Table 2.2. Reporting form for the investigation of occupational diseases**

	Main field	Description of field
1	Name, surname, year of birth of affected person	
2	Administrative unit	
3	Name of the establishment	Full name, address, phone, legal address 3.1. Type of activity 3.2. Name of section, sector
4	Profession/occupation of the employee/person	4.1. Total length of service 4.2. Length of service in given profession/occupation 4.3. Length of service in the conditions of the action of harmful and unfavourable factors, which could have caused the occupational disease 4.4. Professional route (career advancement)
5	Presumptive diagnosis of occupational disease	
6	Date and institution which established the diagnosis	
6*	Date (time) of illness	Completed only in cases of acute occupational diseases (intoxications)
7	Date and time of receipt by the Public Health Center of the report fiche on the suspicion of occupational disease	
8	Description of working conditions that could have caused occupational disease	<ul style="list-style-type: none"> - Area, volume, location of equipment and their characteristics - Condition of ventilation, heating and air conditioning systems, etc. - Lighting system status - Non-compliance with the technological regulation of the production process - Infringement of the operating regime of technological equipment, appliances and working tools, presence of emergency situations - Open field work activity

	Main field	Description of field
	8.1. Detailed description of the technological operations performed, the production activity	Listing all the harmful factors of the production environment and the technological process, their sources, duration of action in% (based on technical and technological documentation, timing, technological regime, materials of attestation of places the work)
	8.2. Characteristic of the work and rest regime	Cart method, shifts, presence, duration and observance of regulated breaks (table of evidence of time worked), over time work
	8.3. Personal Protective Equipment (PPE)	Model, level of assurance in accordance with the present harmful factor, periodicity of use, violation of the rules of storage and application (STAS, ISO, instructions on safety and health at work)
9	The results of laboratory and instrumental investigations performed at the researched jobs (in strict accordance with the presumptive diagnosis) in dynamics for the last 5 years.	The duration of the action of the occupational risk factor (s) during the work shift or weekly / monthly is indicated. Information about the testing laboratories that performed the investigations (their accreditation), the year of their performance. If data from the literature are used, the source, year are indicated
10	Health characteristics of the occupational environment factors at the workplace of the affected person according to the degree of harmfulness	For each separate factor in strict accordance with the presumptive diagnosis. According to the Methodical Indications "Hygienic evaluation of the factors of the occupational environment and the work process. Hygienic criteria for classification of working conditions" 10.1. Existence of contact with pathogens of infectious and parasitic diseases
11	The general estimation of the working conditions with the record of the combined and associated actions of all the risk factors from the occupational environment and the work process	Is carried out according to the Methodical Indications "Hygienic evaluation of the occupational environment factors the work"
12	Availability, condition and use of social and sanitary rooms	
13	Provision with food, including special, curative-prophylactic	
14	Medical care	Results of medical examinations on employment/ periodic
15	The existence at the worker of the general disease previously established with identical diagnosis, he was directed to the Republican Center of Occupational Diseases	
16	Existence in the past of occupational diseases (intoxications) among the employees of the department/ sector	If yes, the diagnosis is indicated
17	Function, name, surname, and signatures of the members of the commission, who participated in the investigation of the case of suspicion of occupational disease	

Source: Government Decision No.1282 (Annex 3).

(3) Establishment of the diagnosis of occupational diseases

The medical institution which detected a suspicious case of occupational disease is obliged to refer the patient to the Republican Center of Occupational Diseases for establishing the diagnosis of occupational disease within 14 days in acute cases or 45 days in chronic cases. The diagnosis of the occupational disease is made solely based on the conclusion regarding the connection of working conditions with occupational disease in the investigation report.

After establishing the diagnosis of occupational disease, the Republican Center for Occupational Diseases prepares the declaration form as per Government Decision 1282 (Annex 4), comprising of the same fields as the investigation form (See Table 2.2). The declaration form is sent, within three days, to the responsible Public Health Center of the National Agency for Public Health and to the employer, territorial unit of the State Labour Inspection work (in case of acute occupational intoxications), the insurer (in case of insured illness) and the responsible Public Health Center of the National Agency for Public Health.

(4) Registration and reporting of occupational diseases

The National Agency for Public Health is responsible for collecting data on confirmed occupational diseases and recording them in the register of occupational diseases. The data are presented in the Annual Report on the State Surveillance of Public Health, which are publicly available on the website of the National Agency for Public Health. All materials on investigation of occupational diseases must be kept at the National Agency for Public Health, within the public health centre and the medical institutions. For establishments, cases of occupational diseases are registered in the same register which records work accidents. However, as we see later, there is a significant deficiency in collecting and recording data on occupational diseases.

3. Work accident and occupational disease statistics

► 3.1. Analysis of the reported data

In Moldova, several institutions are responsible for collection of data on work accidents and occupational diseases. There is no mechanism for coordination or a unified database at the national level.

(1) Occupational diseases

As shown in Table 3.1, there has been extremely low number of reported cases of occupational disease, which strongly indicates that the national register system of occupational diseases has a serious implementation deficiency in Moldova.

► Table 3.1. Number of registered occupational disease cases, 2012-2020

Year	Occupational disease	Sector	No. of affected people	Total per year
2012	Welder's pneumoconiosis	Food industry	1	12
	Pulmonary tuberculosis	Health	3	
	Chronic hypertrophic laryngitis, dysphonia	Education	1	
	Osteochondrosis	Agriculture	3	
	Multiple Myeloma (Cancer)	Health	1	
	Deafness	Food industry	1	
	Chronic pesticide poisoning	Agriculture	1	
	Chronic viral hepatitis	Health	1	
2013	Osteochondrosis. Chronic hepatitis.	Agriculture	5	6
	Osteochondrosis.	Agriculture	1	
2014	–			0
2015	Osteochondrosis. Toxic encephalopathy	Agriculture	2	2
2016	–			0

Year	Occupational disease	Sector	No. of affected people	Total per year
2017	Laryngeal cancer	Anti-fire service	1	4
	Vibration disease	Agriculture	1	
	Chronic obstructive pulmonary disease	Extractive industry	1	
	Toxic encephalopathy	Agriculture	1	
2018	Acute intoxication	Light industry	2	3
	Chronic obstructive pulmonary disease	Industry	1	
2019	Tuberculosis	Health	1	1
2020	Vibration disease	Agriculture	1	2
	Tuberculosis	Health	1	

Source: National Agency for Public Health and Republican Center for Occupational Diseases.

(2) Summary of work accident investigations by the State Labour Inspection

Table 3.2 summarises the data from Annual Reports of the State Labour Inspection. The following observations are made:

- The total number of notifications of work accidents varies between 400 and 500 per year. Of these, between 100 and 135 cases were investigated by the State Labour Inspection or other institutions. The remaining 300 to 370 cases were reported by enterprises.
- The State Labour Inspection conducts around 100 investigations per year. However, it carried out only 43 investigations in 2019 when the responsibility of labour inspection was transferred to 10 public institutions.
- Of all investigated fatal cases by the State Labour Inspection, about 40 percent of them were classified as accidents outside of work. Of all investigated severe cases by the State Labour Inspection, up to 20 percent of them were classified as temporary incapacity for work.
- The number of fatal accidents of workers without employment contract has been increasing, which raises concern on the safety conditions of workers in the informal economy.

It should be noted that the Annual Reports of the State Labour Inspection simply describe the selected data without any tabulation of the detailed information collected in the investigation.

► **Table 3.2. Summary of work accident investigation, 2016-2020**

	2016	2017	2018	2019	2020
Number of accidents notifications	441	415	426	504	436
Number of persons injured	–	–	490	527	451
Accidents investigated by enterprises' committees	337	312	331	373	306
Number of investigated cases	112	105	97	135	132
- investigated by SLI	112	105	94	43	132
- investigated by other institutions	–	–	3	92	–

	2016	2017	2018	2019	2020
Fatal cases	69	57	70	73	63
- investigated by SLI	-	-	68	23	63
- investigated by other institutions	-	-	2	50	-
of which classified as work accidents	36	33	38	50	26
- Number of deceased men	26	33	38	49	26
- Number of deceased women	10	-	-	1	-
of which classified as accidents outside of work	29	23	26	10	30
of which do not fit to framework of the investigation Regulation	4	1	4	3	7
Severe cases	59	41	37	52	65
- investigated by SLI	59	41	36	20	65
- investigated by other institutions	-	-	1	32	-
of which classified as work accidents	39	39	31	11	56
- Number of injured men	42	36	32	50	53
- Number of injured women	12	3	4	1	8
of which classified as accidents with temporary incapacity for work	15	-	4	10	-
of which classified as accidents outside of work	4	1	-	1	5
of which do not fit to framework of the investigation Regulation	5	2	1	1	4
Work accidents with no work contract	1	1	6	5	8
of which fatal	1	1	3	3	6
of which severe	-	-	3	2	2
Work accidents occurred in previous years	8	2	2	5	2
of which fatal	4	1	1	2	
of which severe	2	1	1	2	1
of which outside of work	2			1	
of which do not fit to framework of the investigation Regulation	-	-	-	-	1

Source: ILO staff compilation from Annual Reports of the State Labour Inspection.

(3) Work accidents statistics of the National Bureau of Statistics

Table 3.3 presents the data on work accidents reported by the National Bureau of Statistics. The data on the number of work accidents are not exactly the same as the ones reported by the State Labour Inspection but the differences are relatively small. In addition to the total number by sex, the National Bureau of Statistics presents the fatal accidents by sex, as well as the number of days lost.

► Table 3.3. Work accident statistics, 2016-2020

	2016	2017	2018	2019	2020
Total	371	448	503	493	419
Men/Women	231/140	308/140	343/160	349/144	294/125
Fatal	29	41	38	36	31
Men/Women	25/4	41/0	37/1	34/2	31/0
Total days lost due to incapacity for work	12,997	15,199	16,123	15,877	11,673
Average days lost due to incapacity for work	35	34	32	32	28

Source: National Bureau of Statistics.

The National Bureau of Statistics provides the data related to work accidents by industrial sector, as shown in Tables 3.4 to 3.6.

The data of 2020 show that the sectors with high number of work accidents include: manufacturing, public administration and defence institutions, wholesale, construction, and transportation. The same sectors also show the highest incidence of fatal accidents. It should also be noted that while the agricultural sector accounts for only 15 work accidents in 2020, 4 of them were fatal. This also emphasises several labour market issues, particularly undeclared work and low coverage of social protection of farmers.

Manufacturing, public administration and defence institutions, construction, and wholesale are the leading sectors regarding number of days lost due to incapacity of work. Mining and quarrying sector had only 3 work accidents but showed the highest value of the average days lost, which suggests high severity of work accidents.

► Table 3.4. Number of work accidents by sector and sex, 2017-2020

	2017			2018			2019			2020		
	Total	Men	Women	Total	Men	Women	Total	Men	Women	Total	Men	Women
Total	448	308	140	503	343	160	493	349	144	419	294	125
Agriculture, forestry and fishing	34	33	1	18	16	2	30	29	1	15	13	2
Mining and quarrying	5	5	–	1	1	–	2	2	–	3	3	–
Manufacturing	77	50	27	100	71	29	76	56	20	87	56	31
Electricity, gas, steam and air conditioning supply	8	6	2	14	13	1	18	16	2	5	2	3
Water supply; sewerage, waste management and remediation	10	10	–	13	13	–	15	14	1	16	16	–
Construction	33	33	–	24	24	–	43	43	–	37	37	–
Wholesale and retail trade; repair of motor vehicles and motorcycles	49	24	25	62	35	27	69	31	38	49	30	19
Transportation and storage	34	22	12	39	25	14	40	22	18	33	23	10
Accommodation and food service	5	2	3	–	–	–	4	2	2	4	–	4
Information and communication	7	6	1	8	3	5	9	4	5	9	5	4

	2017			2018			2019			2020		
	Total	Men	Women	Total	Men	Women	Total	Men	Women	Total	Men	Women
Financial and insurance	5	2	3	6	4	2	2	1	1	1	1	-
Real estate	7	4	3	4	3	1	5	5	-	2	1	1
Professional, scientific and technical activities	4	2	2	7	5	2	3	2	1	2	1	1
Administrative and support service	12	8	4	10	9	1	12	8	4	20	14	6
Public administration and defence; compulsory social security	86	75	11	129	100	29	111	102	9	89	74	15
Education	23	10	13	13	6	7	11	1	10	19	5	14
Human health and social work	43	15	28	49	12	37	37	9	28	26	12	14
Arts, entertainment and recreation	4	-	4	5	3	2	3	1	2	2	1	1
Other services	2	1	1	1	-	1	3	1	2	-	-	-

Source: National Bureau of Statistics

► Table 3.5. Number of fatal work accidents by sector and sex, 2017-2020

	2017			2018			2019			2020		
	Total	Men	Women	Total	Men	Women	Total	Men	Women	Total	Men	Women
Total	41	41	-	38	37	1	36	34	2	31	31	-
Agriculture, forestry and fishing	11	11	-	2	2	-	6	6	-	4	4	-
Mining and quarrying	4	4	-	-	-	-	1	1	-	-	-	-
Manufacturing	2	2	-	6	5	1	5	5	-	9	9	-
Electricity, gas, steam and air conditioning supply	-	-	-	1	1	-	-	-	-	-	-	-
Water supply; sewerage, waste management and remediation	-	-	-	3	3	-	-	-	-	-	-	-
Construction	8	8	-	6	6	-	11	11	-	3	3	-
Wholesale and retail trade; repair of motor vehicles and motorcycles	2	2	-	6	6	-	5	4	1	1	1	-
Transportation and storage	8	8	-	9	9	-	4	4	-	9	9	-
Accommodation and food service	-	-	-	-	-	-	-	-	-	-	-	-
Information and communication	-	-	-	-	-	-	1	1	-	1	1	-
Financial and insurance	-	-	-	-	-	-	-	-	-	-	-	-
Real estate	1	1	-	1	1	-	-	-	-	-	-	-
Professional, scientific and technical activities	-	-	-	1	1	-	1	1	-	-	-	-

	2017			2018			2019			2020		
	Total	Men	Women	Total	Men	Women	Total	Men	Women	Total	Men	Women
Administrative and support service	2	2	-	1	1	-	-	-	-	-	-	-
Public administration and defence; compulsory social security	2	2	-	1	1	-	-	-	-	3	3	-
Education	1	1	-	-	-	-	-	-	-	1	1	-
Human health and social work	-	-	-	-	-	-	2	1	1	-	-	-
Arts, entertainment and recreation	-	-	-	1	1	-	-	-	-	-	-	-
Other services	-	-	-	-	-	-	-	-	-	-	-	-

Source: National Bureau of Statistics

► Table 3.6. Number of days lost due to temporary incapacity of work by sector, 2017-2020

	2017		2018		2019		2020	
	Total	Ave.	Total	Ave.	Total	Ave.	Total	Ave.
Total	15,199	34	16,123	32	15,877	32	11,673	28
Agriculture, forestry and fishing	1,359	40	1,121	62	1,119	37	717	48
Mining and quarrying	125	25	115	115	156	78	209	70
Manufacturing	3,187	41	3,157	32	2,617	34	2,326	27
Electricity, gas, steam and air conditioning supply	216	27	373	27	629	35	61	12
Water supply; sewerage, waste management and remediation	486	49	307	24	519	35	282	18
Construction	1,140	35	1,280	53	1,901	44	1,422	38
Wholesale and retail trade; repair of motor vehicles and motorcycles	1,325	27	1,842	30	2,055	30	1,279	26
Transportation and storage	1,602	47	959	25	1,344	34	709	21
Accommodation and food service	212	42	□	□	79	20	61	15
Information and communication	116	17	192	24	193	21	389	43
Financial and insurance	121	24	127	21	29	15	6	6
Real estate	167	24	65	16	75	15	113	57
Professional, scientific and technical activities	88	22	172	25	26	9	108	54
Administrative and support service	269	22	198	20	273	23	673	34
Public administration and defence; compulsory social security	2,150	25	3,812	30	3,266	29	1,999	22

	2017		2018		2019		2020	
	Total	Ave.	Total	Ave.	Total	Ave.	Total	Ave.
Education	1,151	50	910	70	601	55	799	42
Human health and social work	1,379	32	1,373	28	886	24	510	20
Arts, entertainment and recreation	79	20	111	22	68	23	10	5
Other services	27	14	9	9	41	14	–	–

Source: National Bureau of Statistics.

(4) Statistics of work-related social security benefits

Table 3.7 presents the data on social security benefits for work-related injuries and deaths provided by the National Office of Social Insurance. The sickness benefits correspond to work accidents that resulted in temporary incapacity for work, disability benefits for permanent disability correspond to severe accidents, and death grants and survivors' pensions correspond to fatal accidents, although the correspondence are not exact.

There was a sharp decrease (by more than 50%) in the number of sickness benefits in 2018 when the inspection responsibility was split between the State Labour Inspection and 10 institutions. It is considered that a large number of work-related injury cases were treated as non work-related during that period, despite the fact that the benefits for non work-related injury or death are lower than the work-related benefits.

It is also observed that the number of disability benefits (pensions) for permanent loss of capacity for work is five to six times more than the number of severe work accidents reported by the State Labour Inspection. This suggests that many accidents that were classified as temporary incapacity for work resulted in permanent loss of capacity for work. At the same time, the number of death grants is below the number of fatal work accidents, which suggest that certain number of the family members of deceased workers did not receive the benefits or received benefits on grounds of non work-related death.

► **Table 3.7. Number of employment injury benefits by type, 2016-2019**

	2016	2017	2018	2019
Non work-related sickness benefits (temporary incapacity for work)	281,138	279,129	257,297	217,590
Work-related sickness benefits (temporary incapacity for work)	998	1,076	507	407
Work-related disability benefits (permanent disability for work)	316	317	302	311
Work-related death grants (and survivors' pensions)	13	14	15	12

Source: National Office of Social Insurance.

(5) Concluding remarks

The available national data on work accidents are partly compliant to Eurostat and NACE standards, providing selected key information on work accidents. In this regard, the methodology of Eurostat's European Statistics on Accidents at Work (ESAW) provides a number of relevant variables which are non-existent in Moldova.⁶

To formulate an evidence-based occupational safety and health policy, it is desirable to analyse the work accident data in Moldova by occupation, employment status, age, size of the enterprise, type of injury, part of body injured, and working environment.

► 3.2. Under-reporting of work accidents

Numerous evidence suggests that the official statistics on work accidents and occupational diseases in Moldova cover only a small portion of the actual figures in particular non-fatal or non-severe accidents. Table 3.8 compares the average incidence rates of work accidents between 2014 and 2018 by type for Moldova and selected European countries. For Moldova, official statistics of National Bureau of Statistics were used. For the other countries, the statistics were taken from Eurostat.

► **Table 3.8. Incidence rates of total and fatal work accidents in Moldova and select EU countries, average 2014-2018**

	Work accidents		Fatal work accidents		
	per 100,000 employees	Index: Moldova = 1	per 100,000 employees	Index: Moldova = 1	Reciprocal of the index
Moldova	77	1.0	5.90	1.00	1.0
Romania	79	1.0	4.88	0.83	1.2
Bulgaria	83	1.1	3.52	0.60	1.7
Latvia	210	2.7	3.52	0.60	1.7
Lithuania	299	3.9	3.62	0.61	1.6
Hungary	605	7.8	2.13	0.36	2.8
Estonia	1,014	13.1	2.59	0.44	2.3
Netherlands	1,185	15.3	0.57	0.10	10.4
European Union – 28	1,552	20.1	1.73	0.29	3.4
Germany	1,880	24.4	0.96	0.16	6.2
Spain	2,781	36.0	2.02	0.34	2.9
France	3,357	43.5	2.68	0.45	2.2

Notes: ILO own calculation.

Sources: For Moldova, National Bureau of Statistics. For other countries, Eurostat.

⁶ Missing ESAW variables in Moldovan statistics include: occupation of the victim, employment status, age of victim, nationality of victim, date and time of the accident, size of the enterprise, type of injury, part of body injured, workstation, working environment, working process, specific physical activity, deviation, contact and mode of injury, material agent.

Caution should be paid when comparing accident incidence rates between countries because they depend on countries' sectoral composition which exhibit different occupational risks. With this in view, we can make the following observations:

- The incidence rate of total work accidents in Moldova was the lowest of all the listed countries. The officially reported data of Moldova is comparable with neighbouring Romania and Bulgaria (which also suffer high degree of under-reporting), but three to eight times less than Lithuania, Hungary and Estonia, and 20.1 times less than the EU 28 average and 43.5 times less than France which reported the highest rate of work accidents.
- On the contrary, the incidence rate of fatal work accidents in Moldova was the highest of all the listed countries. The officially reported data of Moldova is 3.4 times higher than the EU 28 average, 6.1 times higher than Germany and 10.4 times higher than the Netherlands which reported the lowest rate of fatal work accidents.

Facing the contradictive picture regarding the incidence rates of total and fatal work accidents, the Eurostat notes that "particularly low incidence rates for non-fatal accidents may reflect an under-reporting problem linked to: poorly-established reporting systems, little financial incentive for victims to report, non-binding legal obligations for the employers, and so on. In the same way, well-established reporting/recognition systems may often explain the high incidence rate in some countries. While the phenomenon of low non-fatal incidence rates can in part be considered to reflect under-reporting, the situation for incidence rates of fatal accidents is different as it is much more difficult to avoid reporting a fatal accident."⁷ This reasoning seems to apply to Moldova which exhibits low incidence of reported non-fatal or non-severe accidents but high incidence of fatal accidents.

In this regard, it should be also noted that the State Labour Inspection reports include cases of fatal accidents outside work (10 cases in 2019) as well as accidents involving persons performing undeclared work (3 cases in 2019). In these cases, the accident is investigated and classified as a work accident only after the court's decision of the existence of labour relations. The legal examination involves a complex process that could take several years.

As a supplementary attempt to estimate the level of under-reporting in Moldova, Table 3.9 compares the ratio of total and fatal accidents in Moldova and selected European countries. The indices shown in the last column roughly indicate the potential level of the incidence rates of work accidents. For instance, if one assumes that Moldova has the same ratio of total and fatal accidents as Romania and Bulgaria, then the actual total work accidents in Moldova would be more than the reported number by 1.2 times and 1.8 times, respectively. As the table shows, the disparity can exceed 100 times. If one compares Moldova with countries which have a relatively low share of fatal accidents, the resulting ratio must be interpreted as an overestimation. However, these results strongly suggest a considerable degree of under-reporting in Moldova.

► **Table 3.9. Ratio of total and fatal reported work accidents in Moldova and select EU countries, average 2014-2018**

	Ratio of total and fatal accidents	Index: Moldova = 1
Moldova	13	1.0
Romania	16	1.2
Bulgaria	24	1.8
Latvia	60	4.6

⁷ https://ec.europa.eu/eurostat/statistics-explained/index.php?title=Accidents_at_work_statistics#Standardised_incidence_rates

	Ratio of total and fatal accidents	Index: Moldova = 1
Lithuania	83	6.3
Hungary	284	21.7
Estonia	391	29.9
European Union – 28	899	68.7
France	1,254	95.8
Spain	1,377	105.2
Germany	1,958	149.7
Netherlands	2,093	160.0

Notes: ILO own calculation.

Sources: For Moldova, National Bureau of Statistics. For other countries, Eurostat.

► 3.3. Challenges of under-reporting and mis-reporting

Under-reporting and mis-reporting of work accidents obstruct the development of effective national OSH strategic actions for prevention of work accidents and occupational diseases with a focus on high-risk sectors. They also prevent employers and employees from properly assessing risks at the work place. In terms of compensation, many cases of work accidents treated as general incapacity for work and an insignificant number of established occupational disease cases result in smaller cash benefits, as well as lack of access to benefits such as medical rehabilitation, recuperation of work ability, professional rehabilitation, or temporary transfer to other jobs.

Social partners state the following as the main reasons for under-reporting and mis-reporting:

- A large share of workers involved in informal work and self-employed (particularly agriculture) are not covered by labour inspection, and therefore only fatal or severe accidents are investigated.
- The State Labour Inspection has a limited capacity to conduct controls on unreported work accidents. In addition, it lacks a centralized electronic database on reporting and recording of work accidents.
- Employers do not have competent OSH specialists or capacity for setting up of committees for investigation of work accidents.
- Employees are sometimes reluctant to submit complains to State Labour Inspection in fear of losing the job, or perceived self-culpability in case of light accidents, despite the faulty work environment. Employees, particularly in small-sized enterprises, lack trade union representation.
- Medical doctors have limited awareness/knowledge on occupational health. They focus on treating patients' symptoms rather than inquire the cause that resulted in diseases (especially low number of diagnosed cases of occupational diseases).

Under-reporting and mis-reporting can be related with the provision of social security benefits according to the Law No. 756 of 1999 on Insurance of Work Accidents and Occupational Diseases. The following observations are made:

- Employees are not aware of the favourable benefits in case of work accidents compared to general benefits for incapacity of work.
- Applying for benefits related to work accidents requires a substantial amount of administrative work (the employee is required to submit a set of documents establishing the work accident or occupational disease), while a medical certificate is sufficient for applying benefits in case of general incapacity of work.
- There is a disparity in the legislation concerning employer's liability. Employers must pay the first 20 days of benefits in case of work accidents or occupational diseases, while they are liable for the first 15 days in case of general incapacity of work. For this reason, some employers discourage employees from reporting work accidents.

4. Conclusions and recommendations

Moldova has already developed a legal framework on the investigation of work accidents⁸ and occupational diseases,⁹ which is mostly aligned with ILO Code of Practice on Recording and Notification of Occupational Accidents and Diseases. However, Moldova lacks the institutional capacity to fully enforce the effective compliance with the legislation on reporting.

There is numerous evidence of under-reporting of work accidents, in particular non-fatal or non-severe accidents. Comparison between Moldova and selected European countries shows that the incidence rate of work accidents in Moldova was multiple times less the European countries, while the incidence rate of fatal work accidents in Moldova was multiple times higher than the European countries.

Furthermore, the data on social security benefits indicate a sharp decrease in the number of sickness benefits due to work accidents and occupational diseases in 2018 when the inspection responsibility was split between the State Labour Inspection and 10 institutions, suggesting that a large number of work-related injury cases were treated as non work-related during that period despite the lower benefits.

A considerable degree of under-reporting and mis-reporting of work accidents can be linked to the following:

- The State Labour Inspection investigates severe and fatal work accidents. With the limited capacity, the State Labour Inspection conducts up to 150 cases per year. The recent reform on the decentralization of state inspection also affected the efficiency of inspection. The State Labour Inspection also investigates whether notified fatal cases are classified as work accidents or out of work, and whether notified severe cases are classified as severe or temporary incapacity for work.
- Employers do not have competent OSH specialists or capacity for setting up of committees for investigation of work accidents. A disparity in the social security law results financial disincentive for employers to provide work-related benefits.
- A large share of workers involved in informal work and self-employed (particularly agriculture) are not covered by regular labour inspection. Employees are not fully aware of their right and benefits. Although work-related benefits are more favourable than general benefits, employees are discouraged to apply work-related benefits due to complex administrative burden and in some cases in fear of losing jobs.
- There is a serious deficiency in the reporting of occupational diseases. Despite the established procedure for establishing the diagnosis of occupational diseases is in place, the National Agency for Public Health and the Republican Center for Occupational Diseases report extremely low number of occupational disease cases. One reason for this is that medical doctors have limited awareness/knowledge on occupational health. They focus on treating patients' symptoms rather than inquire the cause that resulted in diseases.

In Moldova, several institutions are responsible for collection of data on work accidents and occupational diseases. Work accident data are collected by the State Labour Inspection and the National Bureau

⁸ Government Decision on Approval of the Regulation on the Method of Investigation of Work Accidents, No. 1361/2005.

⁹ Government Decision on Approval of the Sanitary Regulation on the Method of Investigation and Establishing of the Occupational Disease (Intoxication) Diagnosis, No. 1282/2016.

of Statistics. In addition, the National Office of Social Insurance compiles data on benefits for work-related injury and death. There is no mechanism for coordination or a centralized electronic database on reporting and recording of work accidents at the national level.

The available statistical data on work accidents are partly compliant to Eurostat and NACE standards, providing selected key information on work accidents. To formulate an evidence-based occupational safety and health policy, it is desirable to analyse the work accident data by taking into account such factors as occupation, employment status, age, size of the enterprise, type of injury, part of body injured, and working environment.

Our analysis of the national reporting systems of work accidents and occupational diseases in Moldova leads to the following recommendations:

- As the single authority in charge of enforcement of occupational safety and health and investigation of work accidents, the State Labour Inspection should improve its institutional capacity to effectively conduct integrated inspections in accordance with international labour standards, in particular ILO Conventions No. 81 and No. 129. In this regard, there is a need to review the current legislation which is partly based on the tort system.
- There is a need to improve employers' compliance with work accident reporting. Necessary training and guidance should be provided to employers, particularly small-scale enterprises who lack designated OSH specialists. The recent ratification ILO Conventions No. 161 by Moldova could contribute in developing more options for OSH services.
- The current work accident report form by employers requires almost the same amount of data as the report form by labour inspectors. This is creating an excessive administrative burden on employers. While the report form should collect the essential information, it needs to be simplified to allow employers to complete it with less time and effort. The ongoing effort of online reporting system is also expected to improve the reporting by employers.
- Employees should be made aware of their rights and benefits in case of work accidents and occupational diseases and they should exercise them without any reluctance or feeling any fear of losing the job. At the same time, employees and trade unions should enhance their capacity in safety and health at work and the investigation of work accidents. It is crucial to formalize a large number of workers in the informal economy.
- The existing disparity in the social security law concerning employers' liabilities between work-related and non work-related benefits should be eliminated. The National Office of Social Insurance should review and facilitate the administrative procedure to apply work-related benefits.
- The State Labour Inspection and the National Bureau of Statistics should develop a coordination mechanism for collection and analysis of work accident statistics. The development of a national database work accidents and occupational diseases should be considered in order to ensure access and exchange of data by the relevant institutions. To serve as an evidence base for the OSH strategy, the work accident data should be analysed in more detail in line with the methodology of Eurostat's European Statistics on Accidents at Work (ESAW).
- There is an urgent need to reinvigorate the reporting and recording system of occupational diseases. As a first step for improvement, medical doctors should be trained and sensitised on the importance of detecting the underlying occupational risk factors at the stage of medical examinations.

As this report has revealed, there is a considerable room for improvement in the reporting and recording of work accidents and occupational diseases in Moldova. We hope that key findings and recommendations formulated in this report will contribute to building an effective national occupational safety and health system in Moldova.

The ILO has been supporting this process within the framework of the ongoing development cooperation project. In particular, the ILO is supporting the State Labour Inspection to build an online platform to enable electronic reporting of work accident reporting, as well as the capacity building for newly recruited labour inspectors to conduct integrated labour inspection in compliance with the international labour standards.

References

Websites of national and international institutions

State Labour Inspection	https://ism.gov.md
National Bureau of Statistics	https://www.statistica.md
National Agency for Public Health	https://www.ansp.md
National Office of Social Insurance	https://www.cnas.md
International Labour Organization	https://www.ilo.org
Statistical Office of the European Union (Eurostat)	https://ec.europa.eu/eurostat

Moldovan legislation

Texts are available from the State Register of Legal Acts of the Ministry of Justice at <https://www.legis.md>.

Labour Code of the Republic of Moldova, No. 154/2003.

Law on Insurance for Work Accidents and Professional Diseases, No. 756/1999.

Law on State Labour Inspection, No. 140/2001.

Law on State Supervision of Public Health, No. 10/2009.

Law on Occupational Safety and Health, No. 186/2008.

Government Decision on Approval of the Regulation on the Method of Investigation of Work Accidents, No. 1361/2005.

Government Decision on Approval of the Sanitary Regulation on the Method of Investigation and Establishing of the Occupational Disease (Intoxication) Diagnosis, No. 1282/2016.

Government Decision on Creation of Department for Labour Protection of the Republic of Moldova, No. 61/1992.

Government Decision on Regulation of Controls, No. 395/2003.

Bibliography

Eurostat. European Statistics on Accidents at Work (ESAW) – summary methodology, 2013. <https://ec.europa.eu/eurostat/documents/3859598/5926181/KS-RA-12-102-EN.PDF>

ILO. Code of Practice for Recording and Notification of Occupational Accidents and Diseases, 1996. https://www.ilo.org/safework/info/standards-and-instruments/codes/WCMS_107800/lang--en/index.htm

ILO. List of Occupational Diseases, 2010. https://www.ilo.org/safework/info/publications/WCMS_125137/lang--en/index.htm

ILO. National System for Recording and Notification of Occupational Diseases – Practical Guide, 2013. https://www.ilo.org/safework/info/publications/WCMS_210950/lang--en/index.htm

ILO. Report on Improvement of National Reporting, Data Collection and Analysis of Occupational Accidents and Diseases, 2012. https://www.ilo.org/safework/info/publications/WCMS_207414/lang--en/index.htm

ILO. Overview of the informal economy in the Republic of Moldova: Factsheet. https://www.ilo.org/budapest/WCMS_751315/lang--en/index.htm

Kurppa, K. Severe Under-reporting of Work Injuries in Many Countries of the Baltic Region: An exploratory semi-quantitative study, Helsinki, 2015. http://www.balticseaosh.net/wp/wp-content/uploads/2015/10/Severe-Under-reporting_final-report_Kurppa.pdf

National Agency for Public Health. National Annual Report on the State Surveillance of Public Health in the Republic of Moldova, 2011-2017. <https://old.ansp.md/statistici-rapoarte>

National Bureau of Statistics. Annual statistical research reporting form AM, 2016. https://statistica.gov.md/public/files/Formulare_statistice/2019/Forta%20de%20munca/rom/AM.doc

National Office of Social Insurance. Annual reports on the execution of the state social insurance budget, 2016-2019. <http://cnas.md/lib.php?l=ro&idc=439&t=/Rapoarte/Rapoarte-privind-executarea-BASS/Rapoarte-anuale-privind-executarea-bugetului-asigurarilor-sociale-de-stat>

National Trade Union Confederation of Moldova. Situation of work accidents in the Republic of Moldova in the context of the reform of state control in the field of work security and health, 2020. <http://sindicat.md/wp-content/uploads/2020/09/AM-anii-2019-2020.pdf>

State Labour Inspection. Annual Activity Report of the State Labour Inspection, 2010-2017. <https://ism.gov.md/ro/content/raport-anual>

State Labour Inspection. Annual Activity Report of the competent authorities in the field of control of the compliance to the legislation of work safety and health, 2018-2019. <https://ism.gov.md/ro/content/raport-anual>

WHO. International Statistical Classification of Diseases and Related Health Problems, 2016. <https://icd.who.int/browse10/2016/en>

The collection, recording and notification of data on work accidents and occupational diseases are essential for formulating evidence-based occupational safety and health policies and setting priorities and targets for preventive action. However, Moldova is facing major challenges of under-reporting of non-fatal work accidents and the national register system of occupational diseases.

This report, conducted by the ILO, reviews the current legislative and institutional framework and the reporting and notification system of work accidents and occupational diseases in Moldova. It analyses the extent of under-reporting, its reasons and consequences. Based on these findings, the report provides recommendations for the improvement of the reporting and recording systems of work accidents and occupational diseases in Moldova.