# **Appendix II**

## **Estonia**

The Government is requested to include in the reports due

between 1 June and 1 September 2025

replies to the points raised in the following comments made by the Committee of Experts on the Application of Conventions and Recommendations



C100 - Equal Remuneration Convention, 1951 (No. 100)

#### **Estonia**

Direct Request, 2023

Articles 1 to 4 of the Convention. Assessing and addressing the gender pay gap and its underlying causes. The Committee notes the Government's indication, in its report, that according to Statistics Estonia, the gender pay gap in the average gross hourly earnings of women and men was estimated at 14.9 per cent, in 2021 (compared to 15.6 per cent in 2020). The Government adds that two factors have contributed to the continuing decrease of the gender pay gap over the years, namely a 52 per cent increase of the minimum wage between 2016 and 2022, as well as several steps taken to ensure adequate wages in female-dominated sectors. The Committee however observes that, according to Statistics Estonia, in 2021, the gender pay gap was still over 15 per cent in occupations where women are traditionally highly concentrated, such as administrative and support service activities and education. Furthermore, the gender pay gap remains high in several sectors, including financial and insurance activities (25.7 per cent), wholesale and retail trade (24.2 per cent), health and social work activities (23.8 per cent) and information and communication (23.5 per cent). The Committee notes the Government's indication that the "Reducing the Gender Wage Gap" (REGE) Research Project, carried out from 2019 to 2022, was able to explain 40 per cent of the gender pay gap, and showed that individual characteristics, such as level of education, labour market status, age, and nationality, explain only a marginal share of the pay gap, while the average salary paid and the share of women employed by the employer play a more substantial role. Occupation and sector of economic activity are moderately important in explaining the gap. The Committee welcomes the adoption of the Welfare Development Plan for 2023-2030 which sets as a specific sub-goal the enhancement of gender equality and equal treatment, including by: (1) continuing to identify the causes of the pay gap and design measures to improve pay transparency; and (2) supporting employers with knowledge and user-friendly tools to identify and reduce the pay gap in their organizations. The Committee observes that the Plan acknowledges that although the gender pay gap has been on a downward trend over the last decade, it shows significant gender inequalities in the labour market and in the economic independence of women and men, with women being more likely to work in less valued and therefore lower paid occupations as a result of gender segregation in the labour market. In that respect, the Committee refers to its direct request on the application of the Discrimination (Employment and Occupation) Convention, 1958 (No. 111). While welcoming the efforts made by the Government to reduce the gender pay gap, the Committee observes that the gender pay gap only declined in a limited manner over the past five years and remains very high. In that regard, the Committee notes that, according to Eurostat, the highest unadjusted gender pay gap in the European Union (EU) was still registered in Estonia, in 2021, being estimated at 20.5 per cent (compared to 12.7 per cent on average at EU level) and only slightly decreased by 1.3 percentage points since 2018. The Committee further notes that, in its 2020 conclusions, the European Committee of Social Rights (ECSR) concluded that the situation in Estonia was not in conformity with article 20(c) of the European Social Charter on the ground that sufficient measurable progress in respect of the obligation to promote the right to equal pay was not achieved. *In light of the* persistently high gender pay gap, the Committee asks the Government to strengthen its effortsin order to identify and address the underlying causes of the gender pay gap, such as occupational gender segregation and gender stereotypes. It asks the Government to provide information on: (i) any measures implemented to that end, in particular in the framework of the Welfare Development Plan 2023-2030, and their impact; (ii) the earnings of men and women, in both the public and private sectors, disaggregated by economic sector and occupation, if possible; and (iii) any statistical data or study available on the gender pay gap.

Measures to promote equal remuneration. Pay transparency. The Committee notes the Government's statement that amendments to the Gender Equality Act (GEA), that would have obliged employers in the public sector to carry out equal pay audits, were submitted to Riigikogu (the Parliament) but dropped from the proceedings due to expiry of the mandate of the Parliament in February 2019. The Committee however notes that a digital tool for analysing the gender pay gap, known as the "Palgapeegel" ("Pay Mirror") platform is being developed, in collaboration with Statistics Estonia, and should be ready for use in 2024. The Committee observes that the Directive (EU) 2023/970 of the European Parliament and of the Council of 10 May 2023 to strengthen the application of the principle of equal pay for equal work or work of equal value between men and women through pay transparency and enforcement mechanisms ("EU Pay Transparency Directive") entered into force on 6 June 2023, and that EU Member States must implement it within three years. In this regard, it notes the Government's statement that amendments to the GEA are planned to be introduced in line with the EU Directive. The Committee also notes that the Government's Action Plan for 2021-2023 formally includes a task for the Minister of Social Protection to present to the Government amendments to the GEA aimed at reducing the gender pay gap. The Committee asks the Government to provide information on any developments, including

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legislative developments, introduced to improve pay transparency, in particular in the context of the transposition of the EU Pay Transparency Directive. Noting that the Government intends to develop further voluntary approaches to help employers identify and correct pay gaps, the Committee asks the Government to provide information on any progress made in this regard, in particular regarding the "Pay Mirror" platform, including with a view to implementing section 11(2) of the Gender Equality Act.

Articles 2(2)(c) and 4. Collective agreements and cooperation with employers' and workers' organizations. The Committee notes with **regret** the repeated lack of information provided by the Government in that regard. The Committee observes that the number of workers covered by collective agreements remains low, being estimated at 13.3 per cent in 2018. In light of the persistent and wide gender pay gap, the Committee draws the Government's attention to the important role to be played by the social partners in giving effect in practice to the principle of the Convention. The Committee asks the Government to provide information on: (i) any actions undertaken to promote the implementation of the principle of equal remuneration for men and women for work of equal value, with the cooperation of the employers' and workers' organizations, and the results of such initiatives; and (ii) the number of collective agreements in force containing clauses providing for equal remuneration for men and women for work of equal value.

Enforcement. The Committee notes the Government's indication that the number of cases regarding gender-based discrimination in employment remains low and that no court decision has been issued regarding more specifically, cases of unequal remuneration between men and women for equal work or work of equal value. The Committee notes the Government's statement that amendments to the Gender Equality Act that would have given the Labour Inspectorate the mandate to monitor the observance of the principle of equal pay by employers in the public sector were submitted to Parliament but dropped from the proceedings due to expiry of the mandate of the Parliament in February 2019. Taking note of this information, the Committee recalls that where no cases or complaints, or very few, are being lodged, this is likely to indicate a lack of an appropriate legal framework, lack of awareness of rights, lack of confidence in or absence of practical access to procedures, or fear of reprisals (see the 2012 General Survey on the fundamental Conventions, paragraph 870). The Committee asks the Government to provide information on: (i) the proactive measures taken to raise public awareness of the principle of the Convention, the procedures and remedies available; (ii) the impact of such measures on the persistent wage disparities between men and women; and (iii) the number of cases of gender pay inequality dealt with by the labour inspectors, the Gender Equality and Equal Treatment Commissioner, the Chancellor of Justice, the courts or any other competent authority, specifying any sanctions imposed and remedies granted.

C111 - Discrimination (Employment and Occupation) Convention, 1958 (No. 111)

#### **Estonia**

Observation, 2023

Article 1 of the Convention. Protection against discrimination. Legislation. The Committee notes the Government's indication, in its report, that: (1) in January 2022, a Bill amending the Equal Treatment Act (ETA) was approved by the Government and succeeded in the first reading in Riigikogu (the Parliament); and (2) amendments were being prepared for the second reading in Parliament. It notes that the Bill aims at widening the scope of protection against discrimination on the grounds of religion or belief, disability, age and sexual orientation to the same level as it is currently on the grounds of nationality (ethnic origin), race or colour, for which protection against discrimination not only covers access to employment, occupation and vocational training, as well as working conditions, but also social protection (including social security and health care and social advantages) and education (sections 2(1)(5) and (6) of the ETA). Welcoming this information, the Committee however notes the repeated lack of information provided by the Government on any steps envisaged, in law or in practice, to address discrimination on the grounds of political opinion and social origin. The Committee therefore asks the Government to take steps, in particular in the context of the revision of the Equal Treatment Act, to explicitly prohibit in the national legislation discrimination based on at least all of the grounds listed in Article 1(1)(a) of the Convention, including political opinion and social origin, in all aspects of employment and occupation. It asks the Government to provide information on any progress made in that regard.

The Committee is raising other matters in a request addressed directly to the Government.

Direct Request, 2023

Article 1(1)(b) of the Convention. Additional ground of discrimination. Persons with disabilities. The Committee notes that, in its 2021 concluding observations, the United Nations Committee on the Rights of Persons with Disabilities (CRPD) expressed concerns about: (1) the slow progress towards achieving inclusive education and the prevalence of special schools and classes; (2) the prevalence of sheltered employment preventing persons with disabilities from entering inclusive work environments; (3) the lack of measures taken to ensure access of persons with disabilities to the open labour market; (4) the attitudinal barriers deterring employers from hiring persons with disabilities and the physical barriers in the work environment, in particular the reported lack of accessible transportation and accessible information, including for job seekers; and (5) the lack of a comprehensive strategy against all forms of exploitation, violence and abuse against persons with disabilities, in all settings, including at school and in the workplace (CRPD/C/EST/CO/1, 5 May 2021, paragraphs 30, 32, 46 and 52). The Committee asks the Government to provide information on: (i) any measures taken to facilitate access to education and vocational training and promote employment opportunities for persons with disabilities, in particular in the open labour market; (ii) the participation rates of men and women with disabilities in education, vocational training and employment, both in the public and private sectors; and (iii) any complaints regarding employment discrimination based on disability dealt with by the labour inspectors, the courts or any other competent authorities, and their outcomes.

Article 1(1) and (2) and Article 2. Inherent requirements of the job. Language requirements. Equal opportunity and treatment. Ethnic and national minorities. The Committee notes that, according to Statistics Estonia, in 2021, the ethnic distribution of the Estonian population included 69 per cent of Estonians, 24 per cent of Russians, 2 per cent of Ukrainians and other ethnic groups represented in a smaller proportion. It notes the Government's indication, in its report, that the "Cohesive Estonia Strategy 2030", approved in November 2021, aims at ensuring a cohesive and inclusive society and acknowledges that one of the reasons of persistent inequalities is insufficient Estonian language training at different levels of education, which does not help to ensure adequate language proficiency and therefore leads to language-based segregation in education and the labour market. In this regard, the Committee notes the Government's indication that: (1) several language-learning activities have been implemented by the Integration Foundation; (2) the Estonian Diversity Charter has been signed by 144 companies and institutions in the private and public sectors; and (3) the Diverse Workplace Label has been awarded to 32 organizations.

The Committee notes however that, as a result of amendments to the Language Act that entered into force in 2020, the Language Inspectorate was replaced by the Language Board which is now competent for checking the compliance with the Estonian language proficiency requirements in the public and private sectors. It notes, more particularly, that the Board has the right to: (1) make a proposal to an employer or to a person who is in charge of appointing public servants. to terminate an employment contract or to release a public servant from office, if the

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employee or the public servant does not know Estonian at required levels; (2) refer an employee or civil servant whose language proficiency is not in compliance with the requirements to the language proficiency examination; or (3) issue precepts to public or private employers or their employees for the termination of the violation of the language proficiency requirements. Upon a failure to comply with such precepts, the Board can apply fines to such entities or employees. Failure by an employer to apply the language proficiency requirements is also punishable by a fine (sections 30 to 32 and 37 of the Act). Observing the repeated lack of information provided by the Government on the application in practice of the Language Act and Regulation No. 84 of 2011, which provide that language requirements are determined in accordance with the nature of work and the language situations of the job or position, the Committee notes with concern that, as a result of the amendments introduced in 2020, punitive measures upon inspecting language proficiency of employees can be imposed on both employers and employees by the Language Board. In that regard, the Committee notes that, in its 2022 concluding observations, the UN Committee on the Elimination of Racial Discrimination (CERD) expressed concern about: (1) the continued reliance on punitive elements in Estonia's approach to the promotion of the official language, particularly in the realm of employment; and (2) the discrepancies between the employment and income levels of the Estonian and non-Estonian populations, including as a result of language proficiency (CERD/C/EST/CO/12-13, 26 May 2022, paragraphs 18 and 24). The Committee also notes that, in its 2022 report, the European Commission against Racism and Intolerance (ECRI) noted with concern that despite the education level of the Russian minority tending to exceed that of the general population, reports suggest that the performance gap between Estonian and Russian schools persists, worsening regional disparities and hindering mobility across the country because of the language barrier (ECRI, sixth monitoring cycle, 9 June 2022, paragraph 75). Recalling that the concept of inherent requirements must be interpreted restrictively and on a case-by-case basis so as to avoid an undue limitation of the protection against discrimination provided by the Convention, the Committee again asks the Government to provide information on: (i) the measures taken to ensure that language requirements do not lead to discrimination on the basis of race, colour, national extraction or social origin, in practice, in the access of ethnic and national minorities, in particular Russian-speaking minorities, to employment and occupation, both in the private and public sectors; (ii) any assessment undertaken, including in cooperation with the social partners, on the impact of language proficiency requirements on ethnic and national minorities' access to employment and occupation; and (iii) the enforcement of Regulation No. 84 of 2011 under the Language Act, including the number and nature of cases in which sanctions were imposed on employers and employees for non-compliance of language proficiency requirements. The Committee also asks the Government to provide information on any measures implemented to ensure equality of opportunity and treatment in education, training and employment of ethnic and national minorities, including by addressing stereotypes and promoting tolerance, in the framework of the Cohesive Estonia Strategy 2030 or otherwise, and the results thereof.

Articles 2 and 3. Equality of opportunity and treatment irrespective of race, colour or national extraction. Roma people. The Committee notes that, in its 2022 report, the ECRI highlighted the lack of reliable data on the living conditions of the Roma and the challenges the community experiences in access to their basic rights, including education and employment (ECRI, 2022, paragraph 102). The Committee asks the Government to provide information on: (i) the measures taken to ensure equality of opportunity and treatment in education, training and employment for Roma people; and (ii) the participation rates of Roma people in education, and professional and vocational training courses, including their placement in "special" schools, as well as in the labour market.

Equality of opportunity and treatment between men and women. The Committee notes that, according to data from Statistics Estonia, the labour participation rate of women (67.8 per cent) remained substantially below than those of men (74.6 per cent) in 2021. Management positions in the private sector are still mainly occupied by men (64 per cent). With regard to occupational gender segregation, the Committee refers to its direct request on the application of the Equal Remuneration Convention, 1951 (No. 100) regarding the wide and persistent gender pay gap. The Committee notes the Government's indication that: (1) several awareness-raising activities, including television series, radio shows and study materials for teachers and career counsellors, have been undertaken to address gender stereotypes and segregation in education and the labour market; (2) several projects are being elaborated with a specific focus on increasing the share of women in non-traditional fields of education and will be implemented between 2023 and 2029; and (3) the Welfare Development Plan for 2023-2030 sets as a specific sub-goal the enhancement of gender equality and equal treatment, while acknowledging that Estonia is still characterised by a high degree of vertical and horizontal occupational gender segregation, as well as persistent gender stereotypes about men's and women's occupational choices and roles in the society and the family. The Committee welcomes the adoption of several amendments, which entered into force in April 2022, to the national legislation with the aim of encouraging more parents to combine work and family life and especially fathers to increase their share in care responsibilities, namely: the increase in the length of paternity leave from 10 to 30 days; the allowance of 19 months of parental leave for fathers until the child turns three years old; and the right of employees to request opportunities for reconciliation of work and family life, including flexible working arrangements. The Committee asks the Government to strengthen its efforts to address vertical and horizontal occupational gender segregation and to enhance women's access to a

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wider range of jobs and higher-level positions, including through measures aimed at combatting gender stereotypes. It asks the Government to provide information on: (i) any measures implemented to that end, including in cooperation with the social partners, in particular to raise awareness about gender inequalities and stereotypes; (ii) any measures implemented to encourage girls and women to choose non-traditional fields of study and professions, including in the framework of the Welfare Development Plan for 2023–30, and their results; and (iii) the participation of men and women in education, training and employment, both in the public and private sectors, disaggregated by occupation and economic sector.

Enforcement. The Committee notes from the Government's report that: (1) the number of cases regarding discrimination in court remains low; and (2) among the 102 complaints for discrimination in employment received by the Gender Equality and Equal Treatment Commissioner (GET), in 2021, 41 cases (that is, namely 40 per cent) referred to discrimination based on gender, while 7 cases referred to discrimination based on nationality and 5 cases to discrimination based on disability. The Committee however observes that: (1) in its 2022 report, the ECRI highlighted the need to allocate sufficient human and financial resources to the GET (ECRI, sixth monitoring cycle, paragraphs 4 and 5); and (2) the CERD also expressed concern that awareness among the population at large about equal treatment legislation and the available remedies remains insufficient (CERD/C/EST/CO/12-13, 26 May 2022, paragraphs 8 and 10). The Committee asks the Government to take steps to raise public awareness of the relevant legislative provisions, the procedures and the remedies available. It also asks the Government to provide information on: (i) any steps taken or envisaged to ensure that the GET is provided with sufficient human and financial resources to be in a position to effectively fulfil its mandate; and (ii) the number and nature of cases of discrimination in employment and occupation dealt with by the labour inspectors, the GET, the courts or any other competent authorities, including information on sanctions imposed and remedies granted.

## Labour administration and inspection

**C081** - Labour Inspection Convention, 1947 (No. 81)

C129 - Labour Inspection (Agriculture) Convention, 1969 (No. 129)

#### **Estonia**

Observation, 2023

In order to provide a comprehensive view of the issues relating to the application of ratified Conventions on labour inspection, the Committee considers it appropriate to examine Conventions Nos 81 (labour inspection) and 129 (labour inspection in agriculture) together.

Article 3(2) of Convention No. 81 and Article 6(3) of Convention No. 129. Additional functions entrusted to labour inspectors. Following its previous comments, the Committee notes the Government's indication in its report that, during inspections, labour inspectors verify the working conditions of migrant workers and whether they are treated equally compared to other employees. The Government indicates, however, that the right for migrant workers to work in Estonia is regulated by the Aliens Act, which is enforced by the police and by the border guard, and not by labour inspectors. The Committee notes that, according to the Government, labour inspectors notify the police and the border guard upon finding migrant workers who are not legally entitled to remain in the country, and that they cooperate with the police, the border guard and the Tax and Customs Board in joint inspections. On this issue, the Committee once again refers the Government to its 2006 General Survey on labour inspection, paragraph 78, and emphasizes that the objective of labour inspection can only be met if workers are convinced that the primary task of the inspectorate is to enforce legal provisions relating to conditions of work and protection of workers. The Committee also observes that the Government does not provide information on the measures taken by labour inspectors to enforce employers' obligations regarding the rights of migrant workers in an irregular situation, such as the payment of wages and social security benefits, for the period of their effective employment relationship. The Committee once again requests the Government to indicate how it ensures that labour inspectors' participation in joint inspections does not interfere with the effective discharge of their primary duties under Article 3(1) of Convention No. 81 and Article 6(1) of Convention No. 129. In addition, the Committee urges the Government to indicate the specific role, if any, played by the labour inspectorate in: (i) enforcing employers' obligations arising from the rights of undocumented migrant workers, such as payment of wages or social security benefitsfor the period of their effective employment relationship, especially in cases where workers are liable to expulsion from the country; and (ii) regularizing the employment relationship of migrant workers found to be working in an irregular situation, including the numbers of undocumented migrant workers assisted in each of these areas.

The Committee is raising other matters in a request addressed directly to the Government.

Direct Request, 2023

In order to provide a comprehensive view of the issues relating to the application of ratified Conventions on labour inspection, the Committee considers it appropriate to examine Conventions Nos 81 (labour inspection) and 129 (labour inspection in agriculture) together.

Articles 6 and 10 of Convention No. 81 and Articles 8 and 14 of Convention No. 129. Conditions of service of labour inspectors. Number of labour inspectors. Following its previous comments, the Committee notes the Government's indication and the information contained in the annual reports on the work of the Labour Inspectorate (Annual Labour Inspection Reports) regarding the remuneration levels of labour inspectors. The Committee also notes the Government's indication that labour inspectors are provided with flexible working hours and arrangements, necessary equipment such as laptops, and personal protective equipment. The Committee nevertheless notes that, based on the data from the Annual Labour Inspection Reports for the period 2017–21, the number of approved posts for labour inspectors is decreasing over time, from 113.5 in 2017 to 107.5 in 2021. The Committee therefore requests the Government to provide further information on the conditions of service of labour inspectors, including their career prospects, turnover rates, and the level of their remuneration compared to other public servants exercising similar functions, such as tax inspectors or officials of the Social Security Administration. Considering the decrease in the number of approved labour inspector posts, the Committee requests the Government to provide further information on the measures taken to ensure that the number of labour inspectors remains sufficient to secure the effective discharge of the duties of the inspectorate.

Article 12(1)(a), (b) and (2) of Convention No. 81 and Article 16(1)(a), (b) and (3) of Convention No. 129. Free access of labour inspectors to workplaces liable to inspection at any hour of the day or night without prior notice to carry out investigations. Following its previous comments, the Committee notes that the Government refers to sections of the Employment Contracts Act of 2008, and of the Occupational Safety Act of 1999, as amended,

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which provide that the Labour Inspectorate may apply the measures regarding special state supervision provided for under section 50 of the Law Enforcement Act. The Committee also notes the Government's indication that inspections are generally carried out in the presence of the employer, during the working day, between 7 a.m. to 11 p.m., and that labour inspectors send a written notice of the occurrence of the inspection. Nevertheless, the Government also indicates that a labour inspector can decide whether an inspection will be conducted with or without previous notice, and that the inspection will be conducted without previous notice when: (i) the Labour Inspectorate has received a complaint or a hint; or (ii) the employer may prevent the labour inspector from inspecting the working environment, or may destroy, forge or otherwise damage necessary evidence, or perform other activities that can significantly distort the results of the inspection. While taking note of this information, the Committee urges the Government to indicate whether there are specific provisions in national laws or regulations providing for the labour inspectors' power to carry out inspections without previous notice at any hour of the day or night, in any workplace liable to inspection. In addition, the Committee requests the Government to provide detailed information on the number of inspections conducted without previous notice out of the total number of inspections, the number of such inspections resulting from receipt of a complaint or a hint, and the results of such inspections conducted without notice.

Article 14 of Convention No. 81 and Article 19 of Convention No. 129. Notification of industrial accidents and cases of occupational disease. Following its previous comments on this matter, the Committee notes that, according to the Government, the Labour Inspectorate takes measures, including through inspection visits, to improve the awareness of both employers and employees concerning the importance of reporting occupational accidents. The Government also indicates that pursuant to the Occupational Safety and Health Act of 1999, as amended, employers do not have to prepare a report on the results of investigations of minor accidents at work which did not result in temporary incapacity for work. The Committee notes that, according to the Annual Labour Inspection Reports for the period 2017–21, the number of occupational accidents reported fell from 5,184 in 2017 to 4,591 in 2021, the number of cases of occupational diseases registered has fallen from 37 in 2017 to 16 in 2021, and the number of cases of work-related illnesses registered fell from 78 to 38 in the same period. At the same time, the Committee observes that, according to the 2021 Annual Labour Inspection Report, it is still estimated that there are fewer occupational accidents officially reported than the number actually occurring. The Committee therefore requests the Government to continue to provide information on the measures taken to improve the level of awareness of both employers and employees concerning the importance of reporting occupational accidents and cases of occupational diseases. The Committee also requests the Government to indicate any impact of the 2019 amendments to the Occupational Safety and Health Act of 1999 on the number of occupational accidents reported.

Articles 20 and 21 of Convention No. 81 and Articles 26 and 27 of Convention No. 129. Annual labour inspection reports. Following its previous comments, the Committee welcomes that the Annual Labour Inspection Reports communicated by the Government, also published on the website of the Labour Inspectorate, contain information on all the subjects listed under Article 21(a)–(g) of the Convention No. 81. The Committee nevertheless observes that these Annual Labour Inspection Report do not always contain the information on the work of the labour inspection services in agriculture, as envisaged under Article 27 of Convention No. 129, particularly when it comes to statistics of inspection visits (Article 27(d)); statistics of violations and penalties imposed (Article 27(e)) and statistics of occupational diseases (Article 27(g)) in agriculture. The Committee requests the Government to continue to transmit copies of the Annual Labour Inspection Reportspublished on the website of the Labour Inspectorate, and trusts that future annual reports will contain all the information covered under Article 27 of Convention No. 129, including information in relation to paragraphs (d), (e) and (g) of this Article.

#### Issues specifically concerning labour inspection in agriculture

Articles 6(1)(a) and (b), and 15 of Convention No. 129. Enforcement and preventive activities in the field of OSH in agriculture. Local offices. Following its previous comments, the Committee notes the indication of the Government that the Labour Inspectorate's activities include information campaigns and other preventive activities, such as roundtable events. The Committee notes that the Government refers to the participation of the labour inspectorate in major fairs in 2016, including in the field of agriculture, and the establishment of guides by the Labour Inspectorate concerning OSH in agriculture and hazardous chemicals in the working environment. The Committee also notes the Government's statement that there are 16 local offices in Estonia, and that the Labour Inspectorate owns vehicles for official purposes, which can be used for the inspection of workplaces situated in remote areas. The Committee observes, however, that the 2020 and 2021 Annual Labour Inspection Reports do not contain statistics of inspection visits in the agricultural sector, and that, according to those reports, the focus of inspections for the past two years has rather been on construction, trade, and transport and storage. At the same time, the 2021 Annual Labour Inspection Report recorded 111 occupational accidents in agriculture, 356 in the timber industry, and 20 in forestry in 2021. The Committee therefore requests the Government to continue to provide detailed information onthe specific measures carried out by the labour inspection services in agriculture, particularly in areas where shortcomings were detected or identified as the cause of cases of occupational accidents or diseases.

Article 9(3) of Convention No. 129. Specific skills and training of inspectors for the performance of their duties in agricultural undertakings. Following its previous comments on specific training given to labour inspectors in

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areas relevant to agriculture, the Committee notes that the Government refers to training sessions conducted between 2016 and 2018, which includes sessions on chemicals in the working environment and the Biocidal Products Act, on ergonomics, and on personal protective equipment. The Committee requests the Government to continue to provide information on the frequency, content and number of participants in the training courses provided for labour inspectors in areas particularly relevant to agriculture.