To: President of Ukraine
Volodymyr Zelenskyy
E-mail: Letter@apu.gov.ua

To: Prime Minister of Ukraine
Serhiy Koretskyy
E-mail: 1545@ukc.gov.ua

kbr/ef/ds/jg/065

Geneva, November 3, 2026

Concerns: Appeal to the President of Ukraine; Prime Minister of Ukraine

Dear Mr. President,

Dear Mr. Prime Minister,

The International Union of Food, Agricultural, Hotel, Restaurant, Catering, Tobacco and Allied Workers' Associations (IUF), representing over 10 million workers worldwide, and the European Federation of Food, Agriculture and Tourism Trade Unions (EFFAT-IUF Europe), representing 2.6 million trade union members in Europe, address you with this joint letter to express our deep concern and to support the position of our member organizations in Ukraine.

We closely monitor the process of legislative reform in Ukraine and deeply respect the efforts of the Ukrainian State on its path toward European integration, carried out under the extremely difficult conditions of defending its sovereignty and territorial integrity against Russia's full-scale military aggression. However, we are compelled to state that the draft Law No. 10147 "On Safety and Health of Workers at Work," adopted by the Verkhovna Rada of Ukraine in its second reading and as a whole on October 12, 2026, causes serious concern within the international trade union community.

Presented as a European integration step to implement Council Directive 89/391/EEC, this Law instead contains provisions that contradict the EU social acquis, the Association Agreement between Ukraine and the EU and international labor standards. Our position is based on the following critical aspects:

1. **Restriction of the rights and role of trade unions:** The exclusion of trade unions from the definition of the term "workers' representatives" virtually removes them from effective public oversight of occupational safety. This directly contradicts ILO Convention No. 135 on Workers' Representatives, ratified by Ukraine, and undermines the foundation of social partnership. It also undermines the right of workers to be consulted and participate in health and safety matters, as set out in the EU Occupational Safety and Health (OSH) Framework Directive 89/391/EEC. The exclusion of trade unions prevents workers from effectively exercising these rights.
2. **Risk of lowering existing guarantees:** Replacing the current occupational safety model creates a threat of losing compensations, benefits, and protection mechanisms for workers engaged in jobs with harmful and hazardous working conditions. This violates the principle of non-regression (non-degradation) of the level of protection of workers' rights, enshrined in Article 296 of the Association Agreement between Ukraine and the EU, as well as Article 22 of the Constitution of Ukraine.
3. **Disregard for social dialogue:** The reform of labor legislation and occupational safety must take place exclusively on the basis of a tripartite consensus between the Government, employers, and trade unions, involving the expertise of the International Labour Organization (ILO), especially during the preparation of the new Labor Code of Ukraine. This approach is difficult to reconcile with the EU's commitment to social dialogue and the involvement of social partners, as reflected in Articles 151 and 152 of the Treaty on the Functioning of the European Union (TFEU) and Principle 8 of the

European Pillar of Social Rights. Meaningful consultation with trade unions and other social partners is essential to ensuring that labour reforms are effective, inclusive and consistent with European standards.

Preserving the human life, health, and working capacity of Ukrainian workers, who daily ensure the country's food security and economic resilience during the war, is an absolute priority. The European future of Ukraine must be built on high standards of labor protection and respect for workers' rights.

In light of the above, **IUF and EFFAT jointly call upon the President of Ukraine to exercise his constitutional right of veto regarding draft Law No. 10147** and return it to the Verkhovna Rada of Ukraine for substantial revision with the mandatory and full consideration of the proposals of the Ukrainian trade union movement.

We also call upon the Government of Ukraine to ensure a transparent, inclusive and genuine social dialogue during the further reform of labor legislation and the drafting of the new Labor Code of Ukraine.

IUF and EFFAT stand ready to provide comprehensive expert support and to appeal to the European Commission and the ILO for a joint search for a balanced solution that aligns with genuine European values.

Kristjan Bragason
Acting General Secretary

Enrico Somaglia
General Secretary of EFFAT