

**Akiko Gono**

President  
Présidente  
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Presidenta

**Mr. Dimitar Kovachevski**

**President of the Government of the Republic of  
North Macedonia**  
Skopje, North Macedonia  
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**PERC/LEX-AL/PD/ES**

**27 April 2023**

**Amendments to legislation in violation of labour standards**

Dear Mr. Kovachevski,

We have been informed by our affiliates CCM and KSS about proposals by your government to change labour legislation by a fast-track procedure in the Parliament, without due consultation with social partners. These changes in particular would allow employers to circumvent working time regulations, and would introduce increase of the working time to 60 working hours per week.

The reform of the labour legislation has been on agenda of social partners for several years, but the recent initiative is a clear deviation from this process and is in violation of principles of social dialogue. To our knowledge that current change is at the instance and pressure from some actors in the private sector and their proposals are contrary to the principles of working time under international labour standards, it is not well balanced or harmonised with health and safety requirements and social needs of workers and will lead to the detriment of the entire Macedonian society.

We recall that the Committee of Experts of the ILO has emphasized the importance of the eight-hour day and the 48-hour week as a legal maximum for hours of work in order to provide protection against undue fatigue and to ensure reasonable leisure and opportunities for recreation and social life for workers; and called on governments when fixing limits to working hours, to take into consideration the health and safety of the workers and the importance of work–life balance.<sup>1</sup>

This is buttressed by the Universal Declaration of Human Rights and the United Nations International Covenant on Economic, Social and Cultural Rights which together provide a human rights approach to the regulation of working time stressing that everyone has the right to rest and leisure, including reasonable limitation of working hours and periodic holidays with pay.

The amendments proposed by your government therefore violate international labour standards, they will open the door to increased and uncontrolled occupational health and safety risks, accidents, injuries and deaths at work. In this regard, it is imperative that your government promote, respect and fulfil a healthy and safe working environment which is part of the ILO fundamental principles and rights at work.

Furthermore, the amendments proposed by government are in direct contravention of the EU acquis and Directive 2003/88/EC concerning certain aspects of the organisation of working time.

We fully support our affiliates and all the unions that fight for fundamental labour rights, enshrined in

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<sup>1</sup> See ILO General Survey on Working Time, 2018, page 20 [https://www.ilo.org/wcmsp5/groups/public/-/ed\\_norm/---relconf/documents/meetingdocument/wcms\\_618485.pdf](https://www.ilo.org/wcmsp5/groups/public/-/ed_norm/---relconf/documents/meetingdocument/wcms_618485.pdf)

the ILO Conventions, as well as the European Social Charter, the International Covenant on Economic, Social and Cultural Rights, and the EU acquis that, as a candidate country for the EU membership, your government has committed to implement.

On behalf of the International Trade Union Confederation (ITUC) that represents more than 200 million workers worldwide, I urge the Government of North Macedonia to abandon this initiative, to relaunch social dialogue and engage with social partners on revision of the labour legislation, with full respect of the International and European labour standards.

We call on you to ensure human and workers' rights protected by the international law are fully respected in law and in practice. We will not hesitate to support any formal procedure that our affiliates would consider it appropriate to initiate – within the ILO, Council of Europe or the European Union – to make that happen.

Yours sincerely,

A handwritten signature in black ink that reads "Owen Tudor". The signature is written in a cursive, flowing style.

**Owen Tudor**  
**Deputy General Secretary**