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Sent: Friday, 27 March 2009 13:59
To: SANCO HEALTH WORKFORCE
Cc: Heise, Siegfried (StMUG); Islebe, Sabine (StMUG); Heberer, Nadja (StK); Aures, Robert (StK)

Subject: Response from the Bavarian State Ministry for the Environment and Health to the Green Paper on the European Workforce for Health (COM/2008/725)

Dear Sir/Madam,

The Bavarian State Ministry for the Environment and Health would like to respond as follows to the Green Paper on the European Workforce for Health (COM/2008/725).

In particular, against the background of the ageing health workforce, we welcome the fact that the Commission is looking at the need to ensure the long-term availability of the necessary health workforce and at how to improve working conditions. We agree with the Commission that in an ageing Europe in which the cost of providing healthcare and the expectations of citizens and patients are both increasing, there is a need for a high-quality workforce. We particularly support the Commission's call for the promotion of entrepreneurship in the health sector and for investment with a view to training sufficient healthcare workers.

However, the framework conditions for the health workforce need to be created at the competent levels. State authorities, especially at the level of the German Länder, often do not have the necessary powers and instruments to take the measures proposed in the Green Paper, e.g. central steering of the choice of profession and professional activity, shaping of working conditions such as pay or motivation-boosting. The latter is the responsibility of healthcare organisations and institutions in conjunction with workers' representative bodies. The design of further training courses is not a matter for the State either, which is why the responsibility of training establishments and employers should be emphasised more. The proposed EU observatory to monitor the need for workers and training should be shelved, owing to the associated bureaucracy and the possibility of such a body being wrongly seen as a way of shifting responsibility to the State.

We would also criticise the idea of introducing new European statistics and data collection requirements, e.g. a system for observing healthcare worker migration flows. Producing regular statistics of this kind means an ongoing cost and administrative burden, which is not offset by sufficient benefits, and the production of such statistics is at odds with the Community's aim of reducing administrative costs. The plan to collect such data should therefore be abandoned.

Finally, we would make the point that the Member States are responsible for organising and shaping their national health systems, and this responsibility should not be impinged upon by any future measures at European level connected with the health workforce.

Yours faithfully,

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