

Letter from: *Bundesvereinigung der Deutschen Arbeitgeberverbände* [BDA — the German Employers' Federation]

To: European Commission, Directorate-General for Health and Consumers

Date: 26 March 2009

Subject: Consultation on the Green Paper on the European Workforce for Health / opinion of the German Employers' Federation

Sir/Madam,

Please find enclosed the opinion of *Bundesvereinigung der Deutschen Arbeitgeberverbände* [BDA — the German Employers' Federation] on the Green Paper on the European Workforce for Health of 10 December 2008.

The BDA welcomes the consultation launched by the Green Paper to stimulate public discussion of measures to ensure the sustainability and high quality of the workforce for health and to ascertain fundamental political considerations within the Member States.

However, in the BDA's view there are general concerns about the need for and feasibility of common European rules. Guidelines issued by the EU would involve a risk of intervention in the autonomy of the Member States, their national health systems and the various parties involved in those health systems, as well as higher bureaucratic costs. Furthermore, the measures and rules referred to in the Green Paper are often addressed to the Governments of the individual Member States. However, in Germany's federal structure, for example, the Government has neither the authorisation nor the necessary powers to implement such measures. The responsibility for the measures lies overwhelmingly with the relevant stakeholders in the healthcare sector and with their associations, since it is they who must draw up, negotiate, agree on and apply the measures.

We would request that you take account of the BDA's opinion on the EU Green Paper on the European Workforce for Health when considering possible future Community measures in this field.

Yours faithfully,

/signed/
Renate Hornung-Draus

/signed/
Gert Nachtigal

Enclosure

This paper represents the views of its author on the subject. These views have not been adopted or in any way approved by the Commission and should not be relied upon as a statement of the Commission's or Health & Consumers DG's views. The European Commission does not guarantee the accuracy of the data included in this paper, nor does it accept responsibility for any use made thereof.