



**Berufsvereinigung der Naturwissenschaftler in der Labordiagnostik e.V. (Professional Association of Scientists in Laboratory Diagnostics)**

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## **European Commission**

### **B – 1049 Brussels**

### **Belgium**

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Ladies and Gentlemen,

As scientists active in the health sector, we read the Commission's initiative on preparing the way for tomorrow's health systems with great interest. It points out quite rightly that scientific career options need to be promoted in schools and that the transborder mobility of the health sector workforce needs to be improved.

We are ourselves actively engaged in promoting an environment conducive to innovation and interdisciplinary cooperation on an equal footing between scientists and doctors in medical diagnostic fields such as laboratory and genetic diagnosis. However, we feel that these laudable principles are being hampered by the current legal situation.

The German Transfusions Act, for example, goes beyond the corresponding Directive in reserving various activities exclusively for doctors where there would appear to be no compelling reason to do so. This is also true of the draft Genetic Diagnosis Act. These rules make it impossible for scientists to undertake independent laboratory research because such research can only be performed under the responsibility of a physician. This is just one illustration of how the exclusive competence of physicians laid down in numerous laws can severely restrict or eliminate altogether the vocational possibilities of young scientists in the health sector. There is also discrimination in the form of differential pay for doctors and scientists for the same activity arising from the existing public sector collective pay agreements. As a result, fewer and fewer young people are interested in training for these occupations, or those completing their training seek jobs abroad, e.g. in Switzerland where no such obstacles are put in their way.

In our view, then, in order to ensure a future supply of scientists in the health sector, the following need to be secured through EU legislation:

1. Unrestricted access for scientists to independent activity in the field of laboratory diagnosis
2. Elimination of pay discrimination through disparate collective agreements
3. Admission to health care services within the statutory social

insurance systems.

Only by providing real career prospects for the future will it be possible to ensure a sustainable workforce in the health professions.

Yours sincerely,

Dr. Wolfgang Dick  
(Deputy Chairman)

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