

Letter dated: Munich, 4 February 2009

From: Hornung, Ludwig, Schaich – Attorneys-at-law

To: European Commission

Subject: **Green Paper on the European Workforce for Health**

Dear Sir/Madam,

I am writing on behalf of our client, the *Deutscher DentalhygienikerInnen Verband e.V.* (*DDHV* - German Association of Dental Hygienists), Veit-Pogner-Strasse 23, 81927 Munich. A power of attorney is available upon request.

We were provided with a copy of the Green Paper on the European Workforce for Health by Ms Gatermann, the director of the *DDHV*. Our first comment is that licensed dental hygienists are not mentioned in the Green Paper in spite of their considerable contribution to health management.

We would therefore ask you to include this association and the licensed dental hygienists of which it is composed and take them into consideration in the discussions on this topic. Our clients make a significant contribution to dental health and their profession is recognised in other Member States, though not to date in Germany. Preventive treatment in particular is of vital importance from the point of view of the association's members (i.e. licensed dental hygienists), since their job involves identifying problems with teeth and initiating early treatment, which can then be completed by local dentists.

Unfortunately, training in Germany has so far been insufficiently regulated and dentists and dentists' associations are opposing the accreditation of qualified dental hygienists in Germany.

The freedom of movement to which you refer in point 4.4 should make it possible for licensed dental hygienists who undertook their training in another European country, or in America, to practice in Germany without restriction.

This training has not been regulated to date in Germany, nor are there evidently any plans to regulate it in the future. Harmonised rules on training are therefore required within Europe, so that dental hygiene may become a recognised profession in Germany, too.

This issue relates to the cross-border provision of care in particular and licensed dental hygienists should be taken into consideration in any discussion of this topic.

Many licensed dental hygienists in Germany are obliged to go to the United States, Switzerland, the Netherlands, Denmark or Sweden for training, even to practice here within the EU. Circular migration is the only way that these dental hygienists can receive adequate training. Moreover, obtaining recognition of diplomas gained abroad is problematic, and while, clearly, there is no alternative, qualifications should be recognised on the basis of an EU-wide approach to training.

In Germany, the profession would have to be adapted through appropriate training programmes to match the standard already achieved abroad, allowing dental hygienists to make optimal use of new technologies as part of their training.

Licensed dental hygienists are usually self-employed or employees in dental practices and could, if German dentists stopped hampering them, make a considerable contribution to health.

In Germany in particular, chambers of dentists are digging in their heels and rejecting the regulation of training. Inclusion of this issue in the Green Paper would be required to make it possible for licensed dental hygienists to work anywhere in Europe.

We would therefore request on behalf of the *DDHV* that you take into consideration this profession, which has to date been neglected in Germany and held back by the dentists' associations.

It should also be noted that:

A worldwide exchange of information takes place through the International Federation of Dental Hygiene, which has existed for some years now and to which only licensed associations of dental hygienists may belong.

According to a SHIP study, prevention capacity in Germany is a mere 1.5%, in other words, the potential for preventive parodontitis therapy is massively underutilised in Germany.

Yours faithfully,

Hornung
Attorney-at-law

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