



**working time regulations - Emergency management in German industry
endangered in case of changes**

Background:

No working time limit to 48 hours a week.

National exceptions for working times, and with that the exception known as opt-out, must be maintained.

A change of current working time conditions would prohibit the current flexible working time systems common in German industrial and public fire brigades. By altering the existing possibilities for exceptions, the protection offered by the nationwide system of emergency response is endangered.

The German fire brigades, with 1.3 million firefighters, of which 100,000 are professional firefighters, are asking for assistance: **Fire brigades should be exempted from the directive working time,**

because the workload of hospital doctors is not comparable to that of firefighters. The active response times, particularly in the case of industrial fire brigades, are far lower than those for doctors working in hospitals.

It is therefore inappropriate to extend the directive covering hospital doctors, which is based on different occupational health issues, to firefighters.

WFVD position / recommendation / objective:

Current predominant practice with working time models in 24-hour services, normally in blocks of 8 hours working time each, active on-call time and inactive on-call time, ensures the necessary safety in the areas under jurisdiction, **outside of incidences without actual work in the on-call time periods.** Round-the-clock protection must be maintained.

Rationale / Reason why:

An abolition of opt-out would also endanger the professional fire brigades' existence. The necessary readiness of the fire brigades' services (in 24 hour-working time in line with the exception known as opt-out, and also legitimated in the existing EU-directive on working time and in German law) and with that the possibility of working times exceeding 48 hours a week, is reasonable and in accordance with the goal of maintaining a high level of flexibility for safety in fire prevention, technical assistance and rescue services.



**Bundesverband Betrieblicher Brandschutz
Werkfeuerwehrverband Deutschland e.V.**

Rationale / Reason why:

The abolition of the possibility to use opt-out would unavoidably lead to insufficient staff in the fire brigades, because fully-qualified firefighters are, and will be in the foreseeable future, in short supply on the labor market. In the end this will lead to deficits in safety.

Relevant contact partners

- important association contact

Bundesverband Betrieblicher Brandschutz Werkfeuerwehrverband Deutschland e.V.
(WFVD) (Vorsitzender R. Bücher)
Deutscher Feuerwehrverband (DFV)
BDI, BDA, BAVC (Wiesbaden, Brüssel) , IGBCE (Hannover)

- contact at regulatory institution EU and/or Berlin and/or town

European Commission
European Parliament
Bundestag
Bundesinnenministerium
Landtage
Gemeinderäte/Stadträte