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ЕВРОПЕЙСКА АСОЦИАЦИЯ НА СТАРШИТЕ БОЛНИЧНИ ЛЕКАРИ**

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AUSTRIAN FEDERAL BODY  
OF EMPLOYED DOCTORS



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Vienna, 10.07.2008  
Dr.S/Wit

**subject: Revision of the European Working Time Directive 2003/88 -  
Austrias Point of View**

Dear Sirs!

The Austrian Federal Body of Employed Doctors has decided the following issues for the purpose of improving the working situation at European Union level:

- a. the private and public sector comply with the same rules – no different rating
- b. effective controls and sanctions in case of violations, also in the public sector
- c. the aim is to maintain the Austrian working time act for hospitals in its present form, as well as to guarantee the observance of maximum limits of working time, in order to protect patients and hospital employees.
- d. The current definition of working time shall be maintained.
- e. All periods of working time accomplished by doctors at their workplace, including stand-by duty, have to be considered as working time and have to be remunerated accordingly.
- f. Hours of stand-by duty (also inactive) can never be regarded as rest periods, and therefore have to remain unconsidered within daily, weekly and compensatory rest time.
- g. The “opt-out regulation” should be completely withdrawn from the Directive.
- h. The best solution, however, would be to raise the 48 hours limitation, as set out in Article 6 of the EU Working Time Directive 2003/88, to an average of up to 60 hours by means of works agreements and the consent of employee representatives, i.e. at collective and not at individual level.

The European Working Time Directive 2003/88 should be amended accordingly.

We request to kindly consider these issues.

Yours sincerely

Dr. Harald Mayer  
Chairman

MR Dr. Walter Dorner  
President