

German hospitals' expectations of EU health policy

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As the umbrella organisation of Germany's 1,893 hospitals in public, non-profit and private ownership, the German Hospital Federation (DKG) has been constructively involved in health policy debates at EU level for many years. During the Covid-19 pandemic, German hospitals have demonstrated European solidarity and shown that they also act responsibly at European level in crises by supporting their European neighbours in the care of Covid-19 patients. The importance of the EU as a peace project is particularly evident in times of Russia's war of aggression against Ukraine which violates international law, and an increasing number of conflicts worldwide. Peace and peaceful coexistence are elementary components of cohesion and fundamental values in Europe. German hospitals are moreover showing European solidarity treating patients from Ukraine.

German hospitals have recognised from an early stage that health policy will play an increasingly important role in the European Union (EU). EU health policy can complement the health policy of the Member States, where joint action is more successful than national action. The EU will play an increasingly important role in the coming years, particularly in transformative change topics such as sustainability and digitalisation, but also when it comes to current challenges such as combating medicine shortages. Hospitals are prepared to play an active role in the further development of EU health policy and to contribute constructively to the discussion on suitable approaches to tackling the challenges ahead.

Prevent medicine shortages - ensure security of supply for medical devices

Supply shortages of medicines have increased significantly in recent years and often also affect medicines which are needed to treat life-threatening diseases in hospitals. Supply shortages pose a considerable problem for hospitals. In order to solve the urgent matter of supply shortages, overarching European solutions are needed in addition to measures taken on the national level.

The revision of the EU pharmaceutical legislation is a necessary first step that German hospitals appreciate. In addition to these important steps, however, a sustainable solution to the problem of supply shortages can only be achieved by strengthening the strategic autonomy through the production of important active ingredients in the EU. These objectives represent an important and indispensable element that is not directly addressed in the proposed revision of the EU pharmaceutical legislation.

Due to disruptions in global supply chains and especially bottlenecks at certification bodies, complex certification procedures and high costs for the certification and recertification of existing products, there is also a risk of supply bottlenecks for vital medical devices in the EU. Particularly with regard to niche products, there is an urgent need for special regulations to ensure long-term supply and to keep the development, manufacture and marketing of niche products economically viable - as well as retaining innovations in the EU. The mechanisms set out in the Medical Device Regulation (MDR), in particular national certifications for a short period of time, are by no means sufficient to solve these severe problems. In addition, the evaluation of the MDR should be brought forward so that structural improvements can be implemented in the short term.

Climate action is health protection – subsidise sustainable hospitals

Hospitals are aware of their social responsibility. They are playing their part in combating climate change and on the EU's path to make Europe the first climate-neutral continent in the world. Over 70% of German hospitals have already taken climate action into account in their actions. Moreover, many hospitals have established their own guidelines on energy saving, environmental protection and sustainability and are employing climate action managers. However, European healthcare systems are not sufficiently prepared for the consequences of climate change and need to become more crisis-resistant and structurally resilient. Meanwhile, many hospitals lack the financial resources to implement climate protection measures.

Legislative climate protection measures which almost always affect hospitals, also challenge them with major financial expenses. Possible financial consequences must therefore be considered for every legal measure.

In order to maintain and intensify their commitment to climate action and to implement climate adaption measures, hospitals are dependent on financial support. EU funding programmes in this area should therefore be expanded. The Hospital Future Fund [Krankenhauszukunftsfonds] which is financed by the European Recovery and Resilience Facility, could be a model for this. Funding programmes should furthermore be simplified so that smaller hospital operators can also apply for funding programmes.

Reduce bureaucracy - ease the burden on hospital staff

Bureaucracy caused by complex legal regulations and reporting obligations is increasingly exacerbating the already heavy daily workload of hospital staff, whose capacities are regularly stretched to their limits and beyond. On average medical and nursing staff is spending three to four hours of their work day on documentation.

Urgent measures are therefore needed to relieve hospital staff from at least the greatest excesses of unnecessary paperwork. Existing regulations and directives must therefore be critically reviewed and reduced to the necessary minimum. The costs and benefits of future planned legislation must be consistently scrutinised for proportionality. There should not be unnecessary regulatory overlap of the same parameters. In addition, the stakeholders concerned should be given a greater voice in the legislative process.

Combat labour shortages - strengthen healthcare professions

Freedom of movement within the EU and the automatic recognition of professional qualifications are major achievements of the EU and facilitate the recruitment of skilled labour from other European countries.

Nevertheless, German hospitals are suffering from the ongoing labour shortages. In nursing alone, around 30,000 positions cannot be filled, and this figure is increasing every year. In order to simplify the recruitment of skilled workers from third countries, the EU should conclude agreements with third countries on the automatic recognition of educational qualifications - as it is already the case for qualifications obtained in the EU.

Against the background of this shortage of skilled labour, there is also a continued need for flexible working time regulations in the healthcare sector. As part of an amendment to the EU Working Time Directive, the German Hospital Federation (DKG) is therefore calling for the introduction of a third time category (inactive periods of on-call duty), facilitation of compensatory rest periods and the continued application of the opt-out.

Promote digital transformation - make the healthcare system fit for the future

Digitalisation is of particular importance for German hospitals. German hospitals see great opportunities in the digitalisation of the healthcare system, for patients as well as hospital staff. Even in a digital world, hospitals are a trusted authority for patients, therefore IT security is an inherent part of patient safety. Not least for this reason, investments by the state and European funding programmes are needed to drive forward the digital transformation of healthcare systems. The Hospital Future Fund [Krankenhauszukunftsfonds] which is financed by the European Recovery and Resilience Facility, is a good example of this and should be continued.

European data infrastructures must be further developed and cloud-based infrastructures have to be expanded. Legislative initiatives, such as on health data, should be discussed as health issues and not just as digitalisation issues. We clearly welcome corresponding initiatives, such as the European Health Data Space.

Simplify funding programmes - strengthen Europe as a research location

The majority of medical research takes place in hospitals. International research networking is driven by hospital doctors. When it comes to climate action and research, hospitals are dependent on funding programmes in order to implement ambitious climate targets, become more resilient and advance medical research.

However, due to their complexity, EU funding programmes pose major challenges, in particular for small hospital operators. EU funding programmes should therefore be simplified from scratch.

Promote the development of new antibiotics - combat antimicrobial resistance

The development of new antibiotics is extremely complex while prices are generally kept low. We therefore welcome the efforts of the European Parliament, but also of the Council and Commission, to promote the development of new antibiotics as part of the fight against antimicrobial resistance.

Furthermore, the incorrect or unnecessary use of antibiotics is particularly problematic. Thus, German hospitals are calling for the introduction of a prescription requirement for antibiotics in all EU countries as well as mandatory diagnostic tests before prescribing antimicrobials. The European Commission's efforts in this regard are to be welcomed.

Achieve demographic stability - secure healthcare provision

An ageing population poses major challenges for many regions in Europe. Particularly in regions undergoing transformation processes, demographic change can have a significant impact on healthcare provision. Reasons for that are the shortage of skilled labour and an increasing demand for healthcare services.

This is why the EU should support model regions for the healthcare provision of the future. In this way, creative concepts can be developed and trialled at an early stage and healthcare provision can be made more demographically sustainable.

This funding should be particularly aimed at Member States' regions that are undergoing processes of structural change.



1.893 hospitals480.382 hospital beds



16.8 million inpatients22.1 million outpatients

Average length of hospitals stay 7.2 days



1.4 million employees207 294 doctors (173 233 FTE) and509 289 nurses (376 444 FTE)

Source: Destatis, BMG, DKG – figures from 2022



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