

**President Karl-Heinz Banse**  
**Association of Fire Brigades of the European Union**

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We are facing major problems in Sweden regarding the EU Working Time Directive and how it is being interpreted for full time firefighters. The purpose of the directive was to ensure that all firefighters receive their daily rest. In practice, however, the opposite has happened – firefighters are now required to work more hours to maintain operational readiness instead of receiving the rest that the directive prescribes.

One reason for the deteriorating working environment is that we believe SKR (The Swedish Association of Local Authorities and Regions) has misinterpreted the directive. SKR claims that firefighters may work a maximum of 20 consecutive hours, while we maintain that the directive allows 24 hours.

This interpretation has caused serious problems: more shifts, more travel, more administration, and less rest. Firefighters can no longer exchange shifts with each other and instead report sick. This results in overtime every shift and record levels of sick leave – an unsustainable working environment.

Sweden refers to the EU Working Time Directive 2003/88/EC as the reason why 24-hour shifts are no longer permitted in the fire service. But the directive does not prohibit 24-hour shifts.

The basic rule is that workers must have at least 11 hours of rest within each 24-hour period. However, Article 17 describes how compensatory rest should be provided after longer shifts. In Article 17.3, fire services, ambulance services and civil protection are explicitly mentioned as sectors where this provision applies.

This means that longer shifts are permitted in these sectors, provided that compensatory rest is granted immediately afterwards.

We believe that the Swedish interpretation has no basis in EU law and has caused major problems for both employers and firefighters. Today the EU is being blamed – but the problem is Swedish. SKR claims that the EU forbids 24-hour shifts, but this is incorrect. The European Court of Justice (Case C-151/02, Jaeger) clearly recognises that longer working periods may occur, as long as compensatory rest is granted immediately afterwards.

We therefore ask for the support of the Association of Firefighters of the European Union to help clarify the directive for full time firefighters across Europe.

We also believe that the European Commission should consider issuing an interpretative communication confirming that 24-hour (daily-based) shifts are permitted, provided that compensatory rest is given immediately afterwards.

**Kind regards,**  
**Anders Cederberg**  
**President**  
***National Association of Swedish Firefighters***