



Reform of the Working Hours Act

Greater flexibility or more bureaucracy?

Speakers



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Overview of Topics

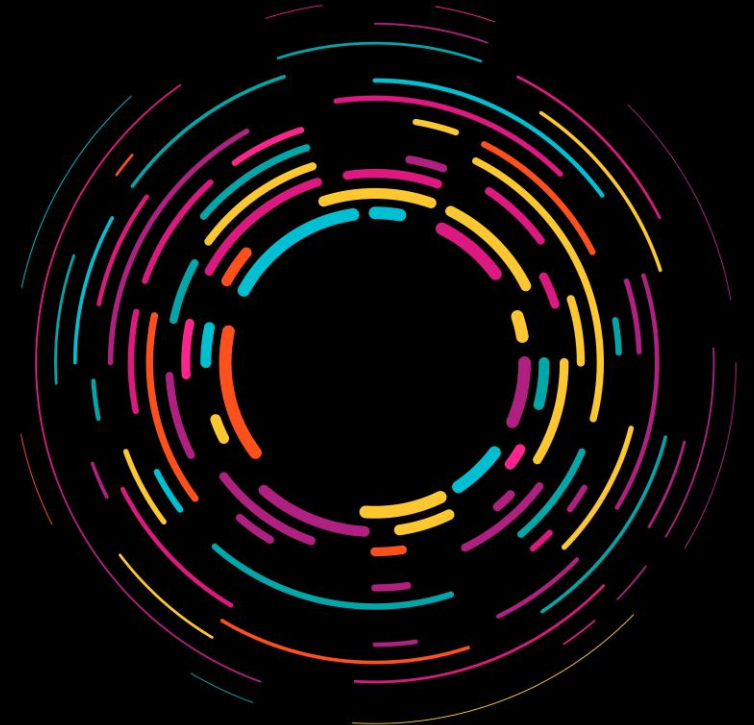
I. The Current Working Hours Act (ArbZG)

1. Flexibility in Organizing Working Hours
2. Time Tracking According to the Federal Labor Court (BAG) and the European Court of Justice (ECJ)

II. The ArbZG After the Reform

1. More Flexibility in Organizing Working Hours?
2. More Bureaucracy in Time Tracking?

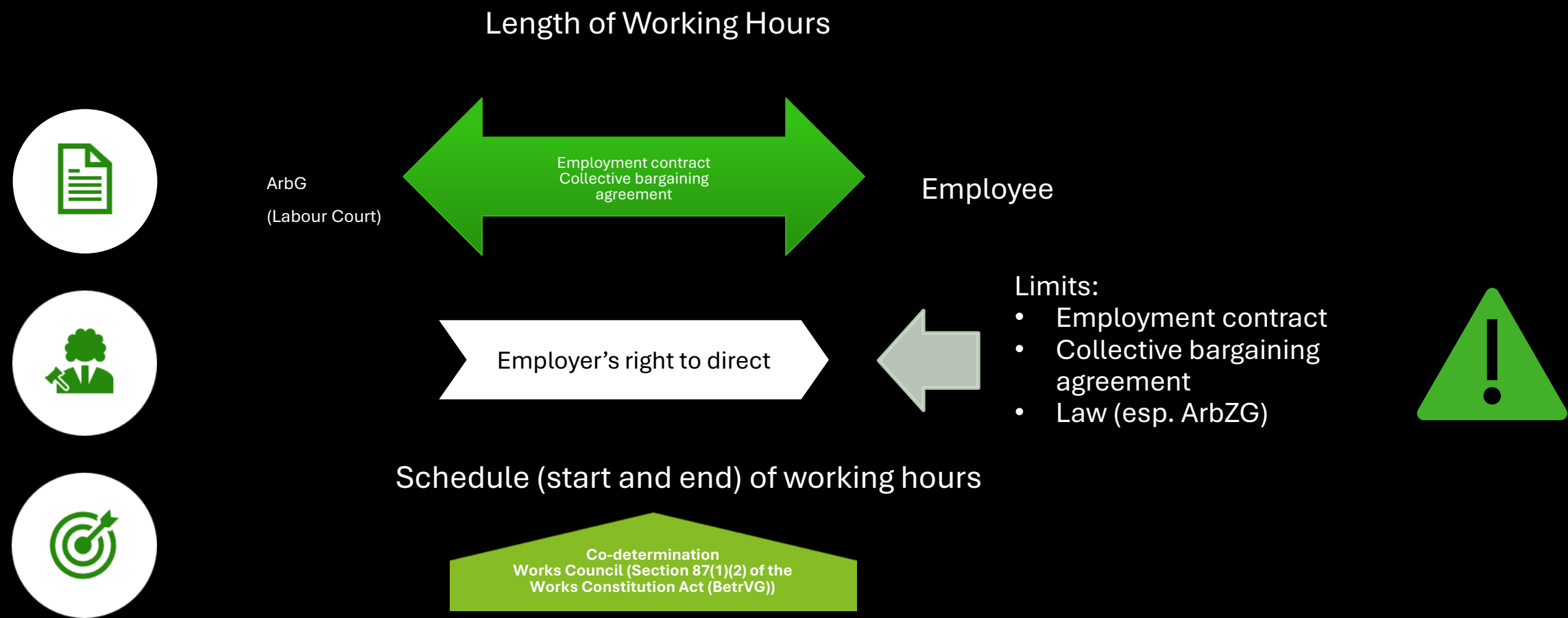
III. Special Considerations for Modern Forms of Work



I. The Current Working Hours Act (ArbZG)

1. Flexibility in organizing working hours (1)

Determined by Contract and Based on the Employer’s Right to Direct



1. Flexibility in organizing working hours (2)

Definitions of working time

Working hours under the employment contract: regular working hours, overtime, employer's right to direct work, etc.

Working hours under compensation law: What compensation does the employee receive for work performed?



Occupational safety and health under public law as defined by the ArbZG: Maximum working hours, breaks, etc.

Definition of working hours under the right to co-determination (Section 87, Nos. 2 and 3 of the Works Constitution Act (BetrVG)): Start and end of the daily working hours; temporary reduction or extension of the standard working hours at the company

1. Flexibility in organizing working time (3)

Scope of Application of the ArbZG

Geographical Scope Territoriality principle

Applicability to employees of foreign employers in Germany

No application to employees of German employers abroad



By law, the provisions of the ArbZG do not apply to business trips abroad

Personal scope General definition of “employee”

Not applicable (Section 18(1) No. 1 ArbZG) especially for executive employees within the meaning of § 5(3) of the Works Constitution Act (BetrVG)

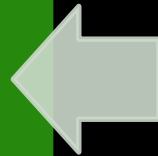
A management position determined by one’s status within the company or business, in particular:

- Authority to hire and fire
- General power of attorney/prokura
- Important business responsibilities

1. Flexibility in organizing working hours (4)

What constitutes work?

Work = Work is deemed to exist when the employee is available to perform the agreed services at the place designated by the employer, regardless of whether an economically productive work performance is actually required



Readiness to work: “A period of alert attention while in a relaxed state” (e.g., monitoring production) = work as defined by the ArbZG

On-call duty: A period during which an employee must remain at a location designated by the employer within or outside the workplace—but not at the specific workstation—in order to be able to resume work promptly = work as defined by the ArbZG

On-call duty: A period during which an employee may remain at a location of their own choosing, provided that the location is communicated to the employer, and is reachable at any time. On-call status does not constitute working time within the meaning of the German Working Hours Act (ArbZG); however, any time spent actually working qualifies as working time under the ArbZG

Case law of the ECJ and the Federal Labour Court (BAG) on on-call duty is still evolving. The assessment depends on the required response time and the frequency of call-outs (key consideration: the employee may be required to work at any time)



1. Flexibility in organizing working hours (5)

Issue: Travel time

Travel time spent by an employee traveling to a location outside the regular workplace for the purpose of carrying out official duties (BAG)



Commuting time: Travel from home to the workplace and back = not working time as defined by the ArbZG



Until clarified by case law, contractual or collective bargaining provisions regarding activities during travel are recommended

Completion of the official business on site = working time as defined by the ArbZG

“Actual” travel time and other stays (e.g., overnight stay at a hotel): problematic:

- ECJ: A geographical restriction on the employee imposed by the employer is sufficient to establish working time; the decisive factor is that the employee is at the employer's disposal and cannot freely dispose of his or her time
- Prevailing view in legal literature: Travel required by the employer using any means of transportation, to which no recreational value can be attributed, is sufficient to constitute travel time
- (Still) prevailing opinion: the "demand theory"
 - If driving is part of the employee's primary duty (e.g., truck drivers) = work as defined by the ArbZG
 - If the employee is required to perform work during the trip (e.g., reading files, making phone calls, writing emails, preparing presentations) = travel time within the meaning of the ArbZG
 - If the employee is free to spend the travel time as they wish, i.e., including on their own activities = no work within the meaning of the ArbZG

1. Flexibility in organizing working hours (6)

An Overview of the ArbZG's Legal Structure (1)

Definitions (Section 2 of the Working Hours Act (ArbZG)):

- Working time: the time from the start to the end of work, excluding rest breaks
- Night work: any work that includes more than two hours during nighttime
- Nighttime: the period from 11 p.m. to 6 a.m. (in bakeries and pastry shops, the period from 10 p.m. to 5 a.m.)

§ 3 ArbZG: Principle

- Employees' working hours on a workday may not **exceed eight hours**
- Extension to **up to ten hours** if *within six calendar months or within 24 weeks* the average of eight hours per working day is not exceeded
- Night workers: up to **ten hours**, provided that *on average, eight hours per working day* is not exceeded (§ 6(2) ArbZG)

§ 4 ArbZG: Rest Breaks

- Pre-scheduled rest breaks of at least 30 minutes for work shifts lasting more than six but no more than nine hours (15-minute intervals are permitted)
- and 45 minutes for a workday exceeding nine hours
- Maximum duration of employment without rest breaks: six consecutive hours

§ 5 ArbZG: Rest Period

- An uninterrupted rest period of at least eleven hours following the end of the daily working hours



Compliant with European law?

1. Flexibility in organizing working hours (7)

An Overview of the Legal Structure of the ArbZG (2)



In **collective bargaining agreement** or in a **works agreement** based on a collective bargaining agreement:

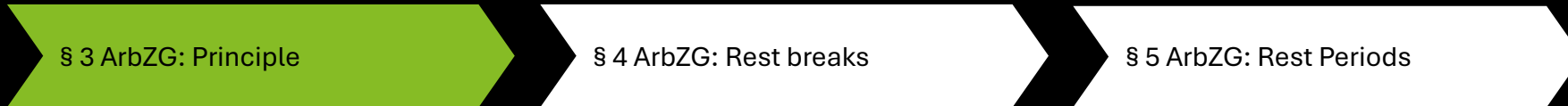
- **More than ten hours** may be extended on each workday if the working hours regularly and to a significant extent include on-call duty or standby duty
- Establishment of a different compensation period
- Special provisions for agriculture, treatment/care/support services, and public enterprises
- Allocation of the total duration of rest breaks in shift-based operations and public transportation systems into short breaks of appropriate duration
- Reduction of rest periods by up to two hours if the nature of the work requires it and the reduction is compensated for within a compensation period to be determined



Employers not bound by collective bargaining agreements may adopt provisions from such agreements through works agreements or—if there is no works council—through reference clauses in employment contracts (§ 7(3) ArbZG)

1. Flexibility in organizing working hours (8)

An Overview of the ArbZG's Legal Structure (3)



- Temporary work in emergencies and exceptional cases that occur independently of the will of those affected and whose consequences cannot be remedied in any other way, particularly when raw materials or foodstuffs are in danger of spoiling or work results are at risk of failure
- Temporary assignment of a relatively small number of employees to tasks whose non-completion would jeopardize the outcome of the work or result in disproportionate damage (Note: a lower threshold applies to work done from home due to the lesser intrusion into privacy)
- Research and teaching / urgent work related to the treatment, care, and support of people or the treatment and care of animals on specific days



- For continuous shift operations to achieve additional days off
- For construction and assembly companies
- For seasonal and campaign-based operations



Risk: ArbG

1. Flexibility in organizing working hours (9)

An Overview of the ArbZG's Legal Framework (4)



- Maximum weekly working hours: 48 hours
- Work weeks of up to 60 hours are possible with compensatory time off
- For a five-day workweek: daily working hours of up to 9.6 hours are possible due to compensatory time off
- For a four-day workweek: daily working hours of up to 10 hours are permitted with compensatory time off (ArbZG: 6-day workweek)



Example 1:

A, a web designer at an advertising agency, works from home. Due to an upcoming deadline, he had already been working on a presentation from 8:00 a.m. to 6:00 p.m. on Monday when his team leader scheduled an online meeting for 8:00 p.m. to 9:00 p.m.

A is not permitted to participate in the online meeting. Because he worked from 8:00 a.m. to 6:00 p.m., A has reached the maximum daily working hours subject to compensatory time off. Participating in the meeting would cause him to exceed this limit. A is not on on-call duty or standby duty, and no collective bargaining agreement applies to him that would allow for a different distribution of working hours.

Example 2:

A informs the team leader that he will not participate in the online meeting because he has exceeded the maximum permissible daily working hours. However, when he receives an urgent email from the client at 11:00 p.m., he responds to it by 11:10 p.m. The next day, he does not start work until 10:11 a.m. in order to observe the 11-hour rest period.

If § 5 ArbZG is interpreted literally, A is acting correctly; he would not be required to start work before 10:11 a.m. The employer, on the other hand, would be obligated to pay for the entire day (business risk). It seems more likely that, in the case of a minor interruption, the rest period continues to run (threshold of materiality based on a teleological interpretation of § 5 ArbZG).

1. Flexibility in organizing working hours (10)

Details (1)

Section 3 of the ArbZG is a prohibitory provision and establishes a statutory prohibition on employment that sets limits on the employer's right to issue instructions

Section 22 of the ArbZG: Employing workers in violation of Section 3 of the ArbZG constitutes an administrative offense punishable by a fine of up to 30,000 EUR

Section 23 of the ArbZG: A criminal offense is committed in cases of intentional violation and endangerment of health or persistent violation

Flexible working hours, overtime, work performed before or after the scheduled shift, and secondary employment are permitted, provided that the working hours on the respective day, excluding breaks, remain within the 10-hour limit

The provisions of the ArbZG also apply to agile forms of work, in particular to working from home (telework) and mobile work

The 24-week/6-month reference period for extending the workday to 10 hours (Section 3, sentence 2, ArbZG) must be applied "forward and backward"

A work-free Saturday serves as a compensatory day and allows for 9.6 hours of work on each of five days (applies accordingly to other work-free days in a rolling system)

1. Flexibility in organizing working hours (11)

Details (2)

§ 14 ArbZG: Does not impose an obligation on employees to continue working; such an obligation must arise from an employment contract, collective bargaining agreement, works agreement, or a general duty of loyalty

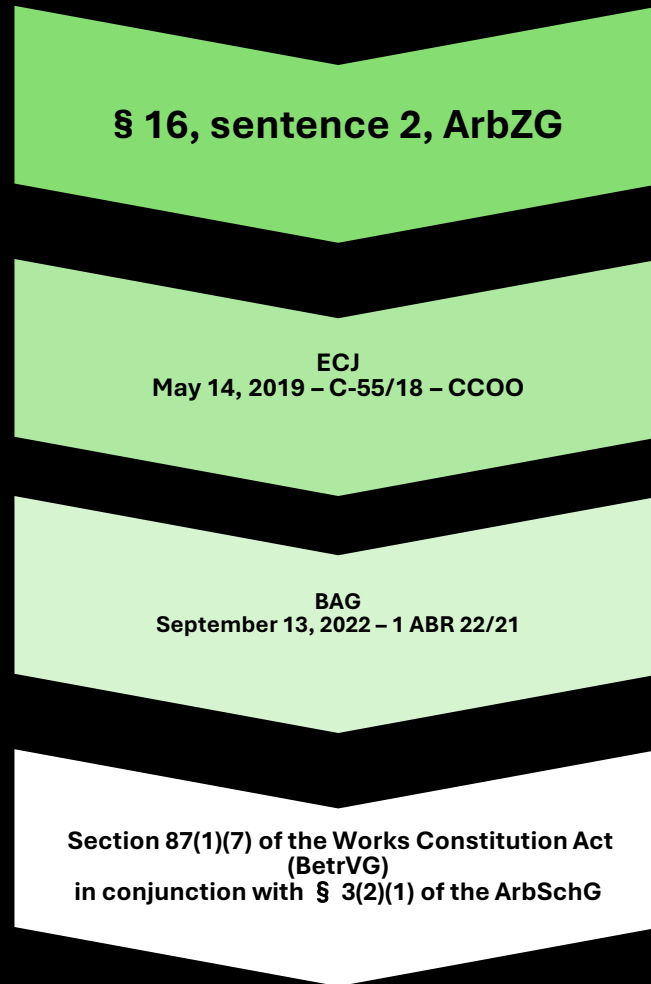
If there is an obligation to continue working: An employee's refusal may justify a written warning and, if applicable, termination for cause

Section 87(1)(2) and (3) of the Works Constitution Act (BetrVG): The works council has the right to co-determination in cases requiring continued work, including in urgent cases (exception: emergencies)

§ 15 ArbZG: The decision is at the discretion of the supervisory authority (discretionary power); the employee's obligation must be based on an employment contract, collective bargaining agreement, works agreement, or a general duty of loyalty

2. Time tracking according to the ECJ and the Federal Labor Court

Development of the Law through Case Law



“The employer is obligated to record the employees’ working hours exceeding the regular workday as defined in § 3, sentence 1, and to maintain a list of employees who have consented to an extension of working hours pursuant to § 7(7). The records must be retained for at least two years.”

Articles 3, 5, and 6 of the Working Time Directive, in conjunction with Article 31(2) of the Charter of Fundamental Rights of the European Union, preclude a national regulation under which employers are exempt from the obligation to maintain an **effective, reliable, and transparent system** for documenting working hours with respect to the start and end of the daily work

From Section 3(2)(1) of the ArbSchG, it follows—from a Union law perspective—that there is a statutory obligation to introduce working time recording systems in all workplaces that record the start and end of employees’ individual working hours of employees—and, consequently, the duration of the daily hours worked, including any overtime incurred, are recorded

The works council has the right of initiative regarding the design of a (not necessarily electronic) time-recording system (“how,” not “whether”)

2. Time Tracking According to the ECJ and the Federal Labor Court (2)

Details

“objective” = free from subjective influences and minimizing the potential for manipulation

“reliable” = as tamper-proof as possible; start, end, and duration of working hours must be accurately recordable (guarantee of accuracy)

“accessible” = access to the recorded data at any time (**ECJ**)

Time recording need not be electronic but may be done on paper and may be delegated to employees (**BAG**)

Time tracking must cover the start and end times and “thereby” the duration of working hours; the timing of breaks does not need to be recorded (**BAG**)

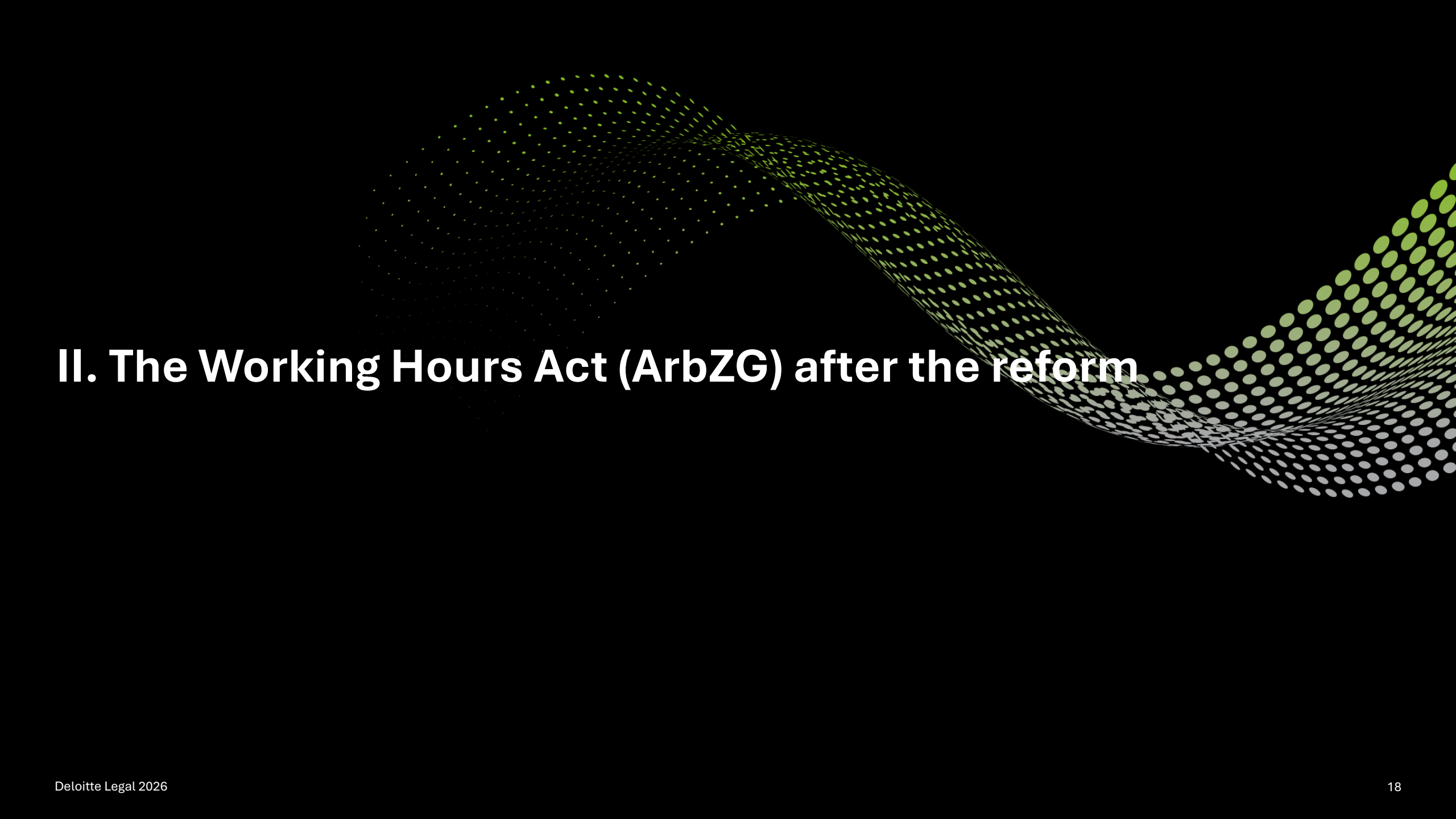
Recommended procedure: Date of work performance, start and end of working hours, and duration of working hours; this makes break times (duration) identifiable; otherwise, the entire recorded time (start/end) is considered working time (risk under the Labor Code)

The employer must require employees to record their working hours (instruction); merely making a system available is not sufficient; a precise definition of working hours is required (no de minimis threshold)

Recording requirement for employees subject to the ArbZG, including “mobile” employees as well as those working from home or under a trust-based work schedule (not for executives)

For remote work: Recording the start and end of working hours via an app or login; creating keylogger logs constitutes employee monitoring that violates data protection and privacy rights

Trust-based working hours: still possible, but requires appropriate time tracking



II. The Working Hours Act (ArbZG) after the reform

1. Greater flexibility in organizing working hours? (1)

Coalition Agreement versus BMAS Draft Bill

Coalition Agreement:

“Employees and companies want more flexibility. That is why we intend to introduce, in accordance with the European Working Time Directive (), the option of a weekly rather than a daily maximum working time—also, and especially, to promote a better work-life balance ().”



In **collective bargaining agreement** or in **company agreement**
based on a collective bargaining agreement:

Section 7(1) No. 1 c ArbZG, as amended (Draft Bill of the BMAS)

“to agree on a weekly limit on working hours instead of a limit per workday, provided that special provisions simultaneously ensure that the health of employees is not endangered.”

1. Greater flexibility in organizing working time? (2)

European Union legal requirements

Art. 6(b) of the Working Time Directive: average working time *per 7-day period* may **not exceed 48 hours** , including overtime,

Art. 16b of the Working Time Directive: The reference period may be extended to up to four months

Art. 5 of the Working Time Directive: Minimum weekly continuous rest period of **24 hours**

Art. 3 of the Working Time Directive: Minimum rest period of **11 consecutive hours** per *24-hour period*

Art. 16a of the Working Time Directive: The reference period may be extended to up to 14 days



Weekly rest periods may not begin until daily rest periods have been taken (ECJ, March 2, 2023 – C-477/21)

1. More flexibility in organizing working hours? (3)

EU legal requirements (2)



- Maximum daily working time: up to 13 hours (with compensation, if applicable)
- Work weeks of up to 78 hours are possible in exchange for compensatory time off
- A continuous work cycle of up to 12 days with 13 working hours each is possible, followed by 48 hours of rest
- Due to the weekly basis, a more flexible distribution of the contractually required working hours across individual workdays is possible

Example:

A, a web designer at an advertising agency, works from home. Due to an upcoming deadline, he had already been working on a presentation from 8:00 a.m. to 6:00 p.m. on Monday when his team leader scheduled an online meeting for 8:00 p.m. to 9:00 p.m.

A's participation in the online meeting is permitted. He could even work continuously from 6:00 p.m. to 8:00 p.m. to prepare for the meeting. He would total 13 hours of work that day, thereby complying with the minimum rest period of 11 hours per 24-hour period. Any necessary compensation within a 7-day period can be achieved, for example, by A starting work later the following day



Differences from the current Working Hours Act (ArbZG):

- Maximum average weekly working hours: 48 hours
- Maximum average daily working hours: 13 hours versus 10 hours

1. Greater flexibility in organizing working hours? (4)

Starting points for new regulations

- *Definition of working time; clarification of problematic cases such as business trips, on-call duty, and minor incidents (evening emails)*
- *Weekly maximum working hours of 48 (or 60) hours instead of a daily maximum of 8 hours*
- *Maximum daily working hours of 10 hours (without an obligation to compensate)*
- *Exceptions for certain groups of employees, e.g., depending on:*
 - *Qualification ("knowledge workers")*
 - *Earnings (e.g., pension insurance contribution ceiling)*
 - *Autonomy over working hours*
- *Division of rest periods (Section 5 ArbZG) into two periods (goal: more flexible work in the morning and evening)*
- *Special provision for trust-based working hours*
- *Regulation of a "right to be unreachable" during rest periods*

Art. 17(1) of the Working Time Directive:

Subject to the general principles of the protection of workers' safety and health, Member States may derogate from Articles 3 through 6, 8, and 16 where, due to the specific nature of the work performed, working time is not measured and/or is not fixed in advance or can be determined by the workers themselves, in particular with regard to:

(...) persons with autonomous decision-making authority (...)

2. More bureaucracy in time tracking? (1)

Coalition Agreement vs. BMAS Draft Bill

Coalition Agreement:

“We will regulate the requirement for electronic recording of working hours in an unbureaucratic manner, while providing appropriate transitional rules for small and medium-sized enterprises. Trust-based working hours remain possible without time tracking, in accordance with the EU Working Time Directive.”

Section 17, para. 2–9 of the Working Hours Act (ArbZG), as amended (BMAS draft bill)

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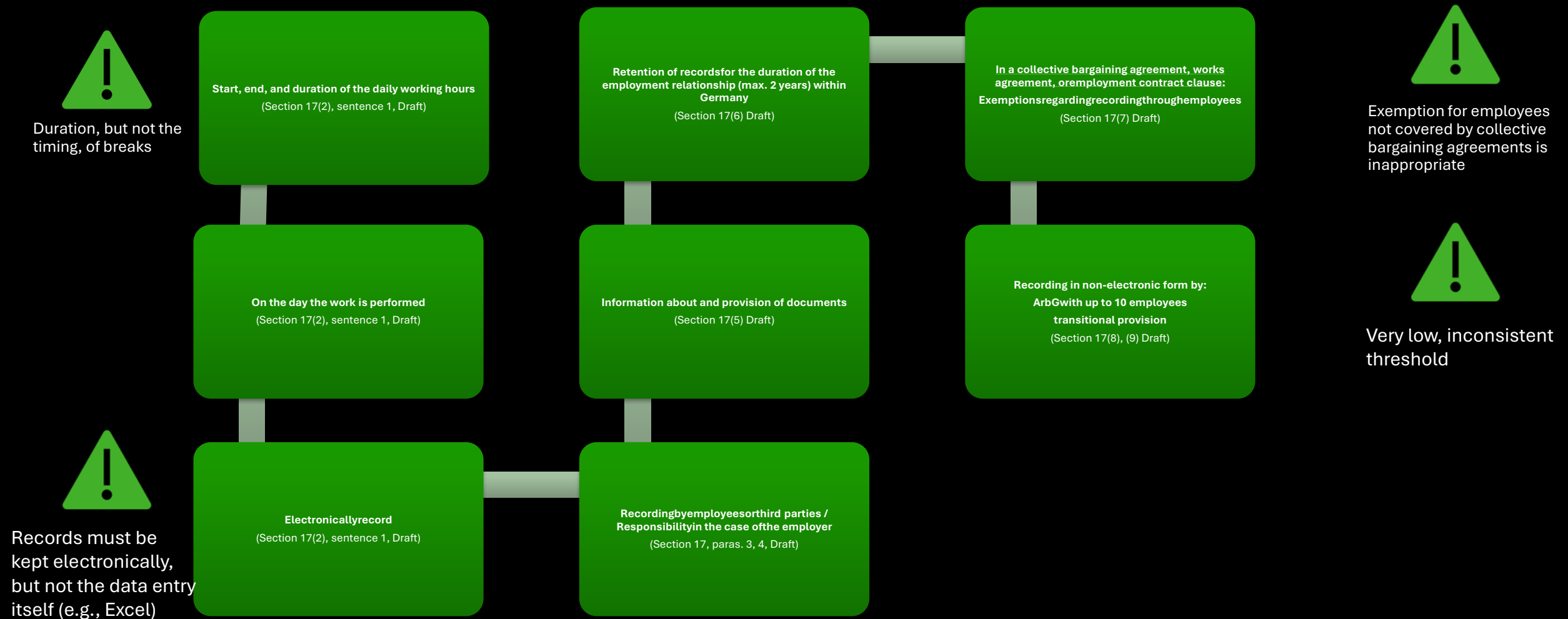
2. More bureaucracy in time tracking? (2)

“Unbureaucratic regulation” in the BMAS draft bill

- (1) “The employer is required to electronically record the start, end, and duration of employees’ daily working hours on the day the work is performed. The employer must maintain a list of employees who have consented to an extension of working hours pursuant to Section 7(7). The employer must retain the records referred to in sentences 1 and 2 for at least two years.
- (2) The record referred to in paragraph 2, sentence 1, may be made by the employee or a third party; the employer remains responsible for ensuring that the record is made properly.
- (3) If the record-keeping under paragraph (2), sentence 1, is performed by the employee and the employer waives the right to monitor the contractually agreed working hours, the employer must take appropriate measures to ensure that it is made aware of any violations of the statutory provisions regarding the duration and scheduling of working hours and rest periods.
- (4) Upon request, the employer must inform the employee of the recorded working hours as provided in paragraph 2, first sentence and provide the employee with a copy of the records.
- (5) The employer is required to keep the records necessary for monitoring compliance with working time regulations in Germany for the entire duration of the employees’ actual employment within the scope of this Act, at least for the duration of the entire work or service, but for no longer than two years in total, in the German language. At the request of the supervisory authority, the documents must also be kept available at the place of employment; in the case of construction work, on the construction site.
- (6) A collective bargaining agreement, or a company or service agreement based on a collective bargaining agreement, may permit that, notwithstanding paragraph 2, sentence 1, the record: 1. may be kept in non-electronic form; 2. may be kept on a different day, but no later than the end of the seventh calendar day following the day on which the work was performed. Within the scope of such a collective bargaining agreement, deviating collective bargaining provisions may be adopted in the workplace of an employer not bound by a collective bargaining agreement through a company or service agreement or, if there is no works council or staff council, through a written agreement between the employer and the employee. If, on the basis of such a collective bargaining agreement, deviating provisions may be established in a works or service agreement, this option may also be exercised in the establishments of an employer not bound by a collective bargaining agreement.
- (7) Notwithstanding paragraph 2, first sentence, an employer with up to ten employees may record working hours in non-electronic form. For domestic workers in a private household, working hours may be recorded in non-electronic form.
- (8) Notwithstanding paragraph 2, first sentence, an employer may record working hours in non-electronic form until ... [insert: the day and month this Act takes effect, as well as the year of the first year following its entry into force]. For employers with fewer than 250 employees, this exception applies until ... [insert: date (day and month) of this Act’s entry into force and the year of the second year following its entry into force], and for employers with fewer than 50 employees, until ... [insert: date) of this Act’s entry into force and the year of the fifth year following its entry into force].“

2. More red tape for time tracking? (3)

Overview of the Proposed Law



III. Special Considerations for Modern Forms of Work

1. Shift models

Legal framework:

- Maximum daily working hours of 8 hours / 10 hours with compensation within 6 months or 24 weeks (for night workers: 1 month or 4 weeks)
- Between the end of one shift and the start of the next: 11 hours of rest
- Rest on Sundays and holidays generally from 12:00 a.m. to 11:59 p.m. on the respective day; for multi-shift operations with regular night shifts, the rest period may be moved forward or backward by 6 hours
- At least 15 Sundays off per year; if work is performed on a Sunday or public holiday, a compensatory day off must be granted (Sunday work: within 2 weeks, including the day of work / public holiday work: within 8 weeks)
- Sunday/holiday rest and the 11-hour rest period must generally be combined to form a total rest period of 35 hours; this total may only be reduced if technical or organizational reasons prevent it
- Round-the-clock operation is only possible under a three-shift model (a four- or five-shift model is advisable to comply with legally mandated weekly working hours)

Health-Promoting Work Arrangements:

- Short shifts
- A maximum of 3 consecutive night shifts / a 24-hour rest period after a night shift whenever possible
- Weekend time off in blocks is better than individual days off
- A “forward” rotation direction is preferable (morning, evening, night shifts)
- Recommended start time for the early shift: 7:00 a.m.

2. Flexible Work Arrangements (1)

Preferences:

- Employers: flexibility based on business needs (economic considerations)
- Employees: work autonomy (health protection, “work-life balance,” gender-equitable distribution of care work)

Trust-based working hours:

- No longer possible in the sense that employees can freely decide when to work without recording their working hours
- But: the provisions of the Working Hours Act (ArbZG) apply in any case, even to trust-based working hours (*de lege lata*)
- Recording by employees and verification of proper recording by employers (random checks)

Working from home / Mobile work:

- Not popular because of working from home, but because of the freedom to manage one’s own time and a sense of independence (***Theory of job crafting***)
- Flexibility in the location of work, not (or only indirectly) flexibility in working hours
- Application of the provisions of the ArbZG
- Time tracking is necessary and possible
- Problem: Verifiability of hours worked (especially breaks for personal activities)

Four-day workweek:

- A trend toward greater freedom and less work intensity
- compatible with a 40-hour workweek due to time off in lieu (*as the law currently stands*; the Working Hours Act assumes a 6-day workweek)

2. Flexible forms of work (2)

Right to “unavailability”?

- **Thuringia Regional Labor Court, May 16, 2018:** Employees are not obligated to provide their private cell phone number to allow contact during their free time (not justified either for the performance of the employment relationship or for the purpose of personnel deployment)

Criticism:

- The obligation to provide a personal cell phone number exists for the purpose of on-call duty and/or to prevent damage in the event of genuine dangers or emergencies
 - The question of illegality arises only if the employer subsequently uses the employee’s private number
 - No less restrictive alternative exists (often there is no landline number)
- **Schleswig-Holstein Regional Labor Court, Sept. 27, 2022:** Employees are not obligated to check text messages during their free time, but only once their shift begins; reading text messages counts as working time and therefore constitutes a violation of the right to be unreachable
- **BAG, Aug. 23, 2023:** Employees’ obligation to take note of instructions from the employer, under certain circumstances even during their free time (based on a works agreement / ancillary obligation pursuant to Section 241(2) of the German Civil Code [BGB] regarding so-called performance-ensuring measures)

Recommendation:

- Regulation of the obligation to review messages during personal time in a works agreement (prerequisite: a reasonable balance between the employer’s interest in adjusting working hours and the employee’s interest in undisturbed personal time)
- Make permission to work from home and remotely contingent on the employee’s consent to be contacted via email, text message, or phone call during certain times
- Alternatively: Require employees to check their work schedules and work locations online
- Provision of company-issued smartphones

2. Flexible Forms of Work (3)

Issue: Does simply reading an email or text message notifying the employee of a change in the start time of work constitute working time under the Working Hours Act (ArbZG)?

Principle:

- Work is any activity that, as such, serves to satisfy the interests of another; this includes not only the actual work itself but also any activity or measure required by the employer that is related to the actual work (including the exercise of managerial authority by the employer)
- ➔ **View 1 (Federal Labor Court):** in any case, brief interruptions to leisure time that are caused by the employer are not considered working time under occupational safety and health law (materiality threshold)

Reasoning:

- The purpose of the law (health protection / rest) is not jeopardized by brief interruptions
- ➔ **View 2:** Regardless of how long it takes to read a text message or email or to answer a phone call, this time is considered working time under occupational safety and health law

Reasoning:

- The concept of “minor disruption” cannot be defined with legal certainty
- The burden may result from the content of the message, regardless of its duration



- Rest periods within the meaning of § 5 ArbZG are interrupted
- Is a vacation day interrupted, resulting in the need to grant a new vacation day?

Q&A



**Thank you very
much**
for your attention

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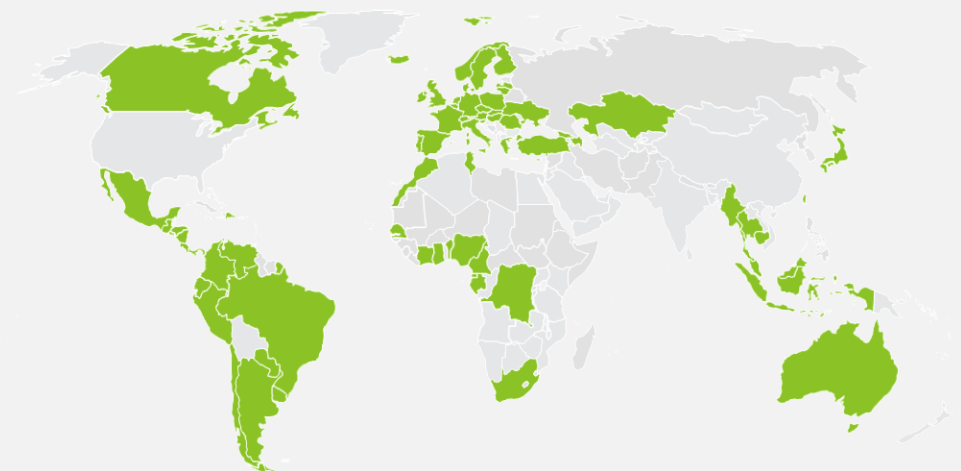
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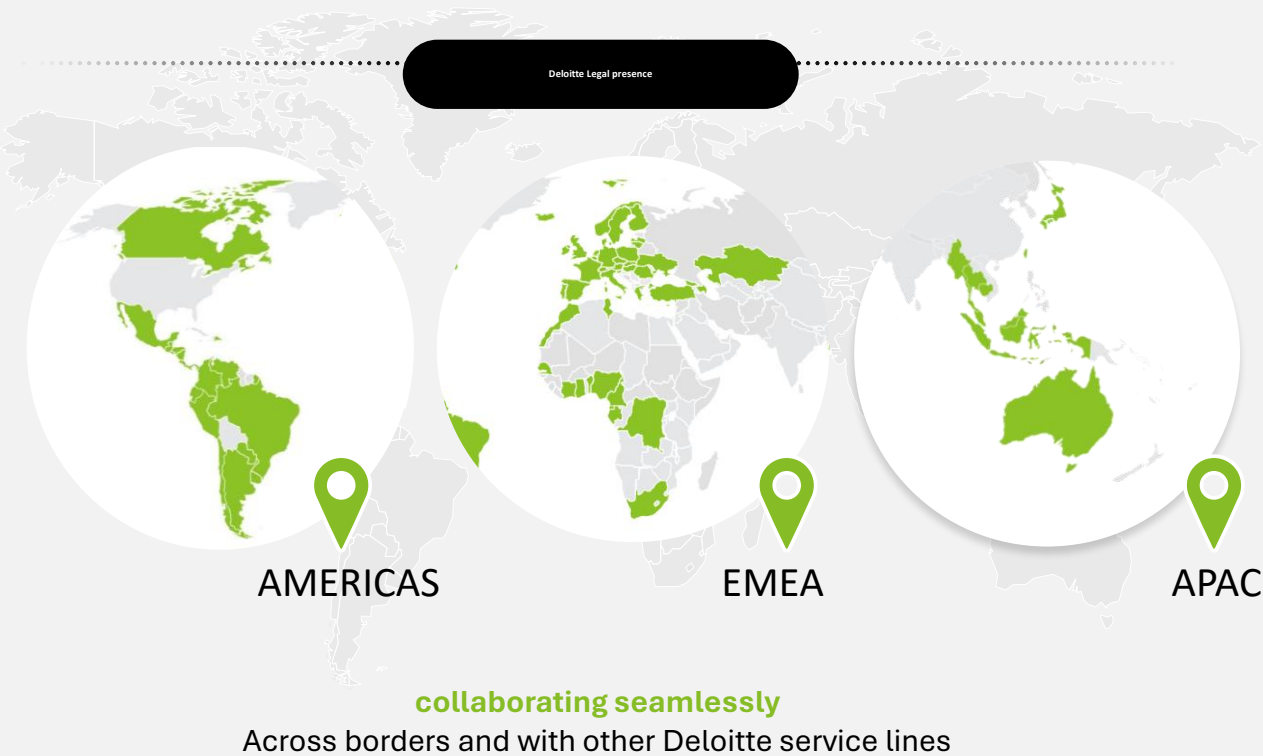
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| 5. Belgium | 30. Hong Kong SAR, China | 55. Portugal |
| 6. Benin | 31. Hungary | 56. Romania |
| 7. Brazil | 32. Iceland | 57. Senegal |
| 8. Cameroon | 33. Indonesia | 58. Singapore |
| 9. Canada | 34. Ireland | 59. Slovakia |
| 10. Chile | 35. Italy | 60. South Africa |
| 11. Colombia | 36. Ivory Coast | 61. Spain |
| 12. Costa Rica | 37. Japan | 62. Sweden |
| 13. Cyprus | 38. Kazakhstan | 63. Switzerland |
| 14. Czech Republic | 39. Latvia | 64. Taiwan |
| 15. Democratic Republic of the Congo | 40. Lithuania | 65. Thailand |
| 16. Denmark | 41. Luxembourg | 66. Tunisia |
| 17. Dominican Republic | 42. Malaysia | 67. Turkey |
| 18. Ecuador | 43. Malta | 68. Ukraine |
| 19. El Salvador | 44. Mexico | 69. Uruguay |
| 20. Equatorial Guinea | 45. Morocco | 70. United Kingdom |
| 21. Finland | 46. Myanmar | 71. Venezuela |
| 22. France | 47. Netherlands | |
| 23. Gabon | 48. Nicaragua | |
| 24. Georgia | 49. Nigeria | |
| 25. Germany | 50. Norway | |

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