

Notes for implementation

When film productions interfere with road traffic (for example by laying cables, using traffic cones, road blocks, etc.), they must comply with the "[Guidelines for securing work sites on roads in accordance with traffic law](#)" (RSA 21). This has been updated and has been implemented within the Munich city area for construction sites and filming work since 01.01.2023.

Essential new points

- the guidelines require a responsible person who must provide evidence of an RSA 21 certificate ("expertise according to [MVAS](#)")
- a deputy must also prove the expertise (with certificate) in case of deployment as responsible person

Exceptions in Munich (no RSA 21 certificate required)

- Requests with stopping-only restrictions
- Filming with little effort, without traffic safety measures (if traffic cones are required, a certificate is needed)
- Filming in public green spaces without the use of footpaths and/or cycle paths, or if no special security and traffic measures are necessary (e.g. pure driving shots on bicycles in flowing traffic, or set-ups exclusively in the area of green spaces).

Basis: Communication from the Film Service Office of the City of Munich dated 10.01.2023 to the Film Commission Bayern

Critical issues

- the deputy must also be able to provide evidence of a certificate in the event of deployment as the person in charge
- only the authorities can decide whether filming with little effort does not require any protection under traffic law, so in case of doubt, make sure to ask

Recommendation

- It seems clear that Location Managers (or the person fulfilling this role), who are usually named as the "responsible person" when applying for permits / special uses, require certification. This position is responsible for the correct implementation of the traffic law order during the entire period of use.
- In a joint exchange between the Film Commission Bayern and representatives of the Bundesverband Produktion, Bundesverband Herstellungs- und Produktionsleitung, the Assistant Directors Union and the RSA advisor of the BG Bau, it was determined that it would make sense for set managers (and possibly 3rd ADs) to also obtain an RSA 21 certificate.
 - On the one hand, this would enable faster, expert clarification of questions on location.
 - Furthermore, this would prevent the shooting from being cancelled in the event of the person in charge being unavailable. This could be the consequence if the deputy (named in the application, or subsequently submitted) was not certified. Without a person in the chain of responsibility holding an RSA 21 certificate, there would be a breach of the authorities' requirements. This could result in the withdrawal of the permit and could have liability consequences for the production.

Contact

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<https://stadt.muenchen.de/infos/drehgenehmigungen.html>



Information on possible RSA seminars in the Production Guide, on our website at
<https://guide.film-commission-bayern.de/en/Road-Traffic-Regulations-Training>

