

## CED draft response – General Call for Evidence: Skills Portability Initiative

### **Action 2 – Facilitating, modernising and expanding the recognition process for regulated professions**

The Council of European Dentists (CED), representing over 340 000 dentists across Europe, acknowledges the importance of strengthening the transparency and accountability of skills, whether acquired throughout undergraduate dental training, including clinical or theoretical skills, postgraduate training or continuing professional development (CPD).

According to a study by the European Dental Students' Association (EDSA), conducted among 798 European dental students, 66,19% of undergraduate students reported their intention of practising in another EU country in 2024. Among these students, a limited 51% reported mandatory clinical internships in private practices. The high mobility rate among graduating and practicing dentists underscores the need for the European Commission to enhance recognition processes for regulated professions, by simultaneously, encouraging the alignment of clinical training across EU countries.

Future initiatives under action 2 of the Skills Portability Initiative must therefore ensure that acquired practical and clinical skills are thoroughly and accurately reflected and accounted for through digital credentials, as well as detailed under diploma supplements of undergraduate dental degrees. This includes modernising undergraduate training requirements under Directive 2005/36/EC. In order to support a more balanced, skilled, harmonized and mobile dental workforce, practical and clinical training set out in Articles 34(2) and 34(3)(e) of the Directive must be urgently clarified and strengthened, by the establishment of a minimum number of required clinical training hours in direct contact with patients. This update would contribute to bring minimum training requirements in line with other regulated professions under the Directive.

Secondly, all modernisation efforts to automatic recognition processes must strive to improve verification of credentials and protect the authenticity of diplomas obtained in the EU by establishing digital authenticity measures and fraud-proof digital credentials. Strong measures for verifiable and easily accessible digital credentials will help alleviate the falsification of certificates, prevent the risk of fraud, protect patient safety, thereby improving the cooperation between EU regulatory authorities, and improving the capacity of competent authorities to ensure that recognition processes remain transparent, efficient and seamless, improving the free movement of dental practitioners across the EU.

The CED therefore strongly supports modernising and improving administrative procedures for the recognition of dental qualifications through the extension of digital tools across all EU States. At the same time, the CED firmly emphasises that this must, by no means, result in expedited or rushed recognition processes or in the weakening of existing requirements or procedures for recognising EU diplomas.

The CED calls for the establishment of common tools for providing proof of equal and common clinical training skills, complementing the minimum theoretical and practical training requirements laid down under Article 34.2 of Directive 2005/36/EC. Such a system would allow a shared EU system to demonstrate and harmonise clinical skills across the EU, therefore improving transparency and comparability of clinical skills, and in turn, encouraging and facilitating mobility of dental professionals, including by increasing trust of competent authorities from Member States.

Commented [CL1]: Suggested addition by Portugal

### **Action 3 – Simplifying the recognition of third-country nationals**

In line with the Council of European Dentists (CED)'s position on the [Recognition of Dental Professional Qualifications acquired in Third Countries](#), as well as the 2023 Commission Recommendation on the recognition of qualifications of third-country nationals, the CED underscores the importance of improving existing EU automatic recognition of basic dental qualifications listed under Annex V.3.2 of Directive 2005/36/EC, and bridging the geographical coverage gap in practicing professionals. Such improvements are to be considered a central priority before any consideration of simplifying and expediting the recognition process for dental qualifications acquired in third countries.

The CED therefore calls for caution when considering the Commission's proposed action 3, on simplifying the recognition procedures of third-country qualifications, in the specific case of regulated professions.

The competence for defining and carrying out the recognition process for third-country diplomas must remain a Member State prerogative, in accordance to national law. Competent Authorities remain the best placed to assess the current national market, and the structure and needs of the dental workforce. Member States should ensure that the recognition of dental diplomas obtained in third countries strongly adheres to and equates to all minimum training requirements for regulated professions under the Directive 2005/36/EC.

Furthermore, the current European dental workforce is not undergoing any current acute shortages in the number of practising general dental professionals, on average across EU countries.

Measures intended under the Skills Portability Initiative seeking to simplify recognition procedures with the purpose of addressing workforce shortages must therefore be separately assessed and carefully considered in the case of general dentistry.

The CED therefore continues to recommend the rigorous scrutiny of Third Country Qualifications when considering recommendations for the improvement of national recognition process, the development of measures to ensure consistent and aligned messaging for recognition process standards, and clearer language requirements for registering dentists.

While the CED supports measures allowing for simplification and acceleration of the recognition procedures, including compensation measures which are required in certain individual cases, it is strongly against lowering the training and language requirements.

The CED supports initiatives to facilitate the free movement of dental professionals within the EU Single Market, while underlining that any simplification of recognition procedures must not compromise professional standards, patient safety, or minimum training requirements.

Finally, the CED strongly welcomes the Commission's proposal to develop adaptation periods and aptitude tests for third-country nationals in the process of applying for the recognition of their qualifications. These measures must be aligned and applied consistently in recognition processes across all EU countries. Additional supporting measures should be considered, such as the creation of support courses designed to train professionals on the institutional and healthcare systems of the host country, thereby facilitating their integration into national healthcare systems.

This would ensure a smooth and efficient recognition process for third-country qualifications when assessed, as necessary, by the relevant national competent authorities within the EU.