



Brussels, 20.2.2026
COM(2026) 86 final

**REPORT FROM THE COMMISSION TO THE EUROPEAN PARLIAMENT, THE
COUNCIL, THE EUROPEAN ECONOMIC AND SOCIAL COMMITTEE AND THE
COMMITTEE OF THE REGIONS**

**on the implementation of Directive 2005/36/EC of the European Parliament and of the
Council of 7 September 2005 on the recognition of professional qualifications**

{SWD(2026) 64 final}

TABLE OF CONTENTS

1.	Policy context: labour and skills mobility in a context of shortages	4
2.	The Professional Qualifications Directive provides crucial support to mobility in the Single Market	5
3.	Overall user experience	9
3.1.	Availability and exchange of information	9
3.2.	Recognition systems	10
3.2.1.	The general system of recognition	10
3.2.2.	Automatic recognition based on professional experience	11
3.2.3.	Automatic recognition based on minimum training requirements	12
4.	Mutual trust and administrative cooperation are essential to the functioning of the regulatory framework.	15
4.1.	Notifications	15
4.2.	The alert mechanism.....	16
4.3.	Updates to the automatic recognition system based on minimum training requirements	17
5.	Digitalisation.....	19
6.	Conclusions.....	20

The effective functioning of the single market depends on the freedom of qualified professionals across all sectors and competence levels to move and work wherever their skills are needed. European competitiveness relies on the strength and completeness of the single market, which remains the EU's core economic engine. However, a truly integrated market cannot function effectively without enabling mobility of people and the free circulation of skills. This is why, in the context of her Political Guidelines, President von der Leyen has announced that the Commission will put forward a skills portability initiative to ensure that a skill acquired in one country is recognised in another. The 2025 single market strategy also emphasises the importance of professional mobility and identifies recognition of professional qualifications as one of the most significant barriers to the free movement of services and workers across the EU. The capacity of professionals to move and have their qualifications recognised across borders is essential for them to thrive, for firms to access the talent they need, for innovation to spread, and for productivity to increase.

Formal recognition of qualifications by the competent authorities of a Member State is only needed where access to the profession is regulated¹ in that country. Regulation of professions remains the competence of the Member States' competence in compliance with within the limits of EU law, including the principles of non-discrimination and proportionality. At present, over 5 700 professions are regulated in the EU Member States², with considerable variations between them. According to the latest available estimates, approximately 22% of those employed in the EU work in a regulated profession³. Justified and proportionate regulation may play an important role in protecting public policy objectives, protecting consumers and ensuring the safety of the public, and in protecting consumer protection, public security and the protection of health and the environment. Nevertheless, diverging access requirements to regulated professions across the EU can limit professional mobility across borders.

The Professional Qualifications Directive⁴ continues to play a decisive role in making that mobility a reality, both for workers and the self-employed, while safeguarding general interest objectives such as service quality and public safety. It sets out procedural rules on the recognition of professional qualifications across Member States⁵, enabling professionals to access and pursue regulated professions in another Member State, either on a permanent or temporary and occasional basis. The steady flow of recognition decisions following the rules set out in the Directive confirms its support to professional mobility. Many of the recognition decisions concern shortage occupations in essential sectors marked by high demand for skilled labour like healthcare and education. Without the Directive, general

¹ In the meaning of Article 3(1)(a) of Directive 2005/36/EC, as amended.

² [Regulated Professions Database](#).

³ See [Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions on reform recommendations in professional services](#) (COM (2016) 820 final).

⁴ Directive 2005/36/EC of the European Parliament and of the Council of 7 September 2005 on the recognition of professional qualifications (hereafter: the Directive) was adopted to consolidate several earlier instruments covering the recognition of professional qualifications across the EU. Following its transposition into national law by October 2007, the Directive has undergone several important amendments to modernise and adapt it to evolving professional and regulatory contexts. The most significant reform was adopted in 2013 and implemented by 2016, introducing the European Professional Card, an alert mechanism, a streamlined recognition procedure and the possibility of partial access for cross-border professionals. This revision also empowered the Commission to adopt delegated and implementing acts which adds flexibility to the system. Subsequent delegated and implementing acts ensured regular updates of the Directive, contributing to maintaining trust in the system and free movement within the EU's single market while safeguarding service quality and public safety.

⁵ The rules under Directive 2005/36/EC, as amended, with very limited adaptations, also apply to Iceland, Liechtenstein and Norway through the Agreement on the European Economic Area. Certain rules under Directive 2005/36/EC also apply to Switzerland through the EU-Swiss Agreement on Free Movement of Persons. This report covers specifically the implementation of the Directive in the EU Member States.

care nurses, medical doctors, teachers, architects, electricians, plumbers and many more professionals wanting to have their qualifications recognised in another Member State would face increased complexity and have to navigate different national recognition rules and procedures. By providing a legally binding, harmonised framework that regulates recognition processes throughout the EU, the Directive offers easier access to the benefits of the single market to regulated professions and vocational trades that are essential to the EU's competitiveness.

However, the experience of professionals navigating the existing regulatory framework reveals that recognition can often remain a complex and time-consuming process. While the framework's foundations are fundamentally sound, lengthy procedures, uneven digitalisation of national processes and procedures, and heavy documentation requirements risk undermining its potential. Stakeholders welcome the Directive's achievements but call for a renewed focus on simplification, transparency, and digital transformation to meet the needs of today's mobile workforce. In its 2024 special report on the recognition of professional qualifications in the EU, the European Court of Auditors also noted that the application of the Directive by the Member States had shortcomings, including the lack of electronic procedures, gaps and inconsistencies in the information provided to the public, costly and cumbersome processes and deficiencies in the use of the alert mechanism intended to help ensure patient and consumer safety.

This report assesses the implementation of the Directive. It fulfils an obligation set in Article 60(2) of the Directive which requires the Commission to publish a report on the implementation of the Directive every five years.⁶ The present implementation report, which focuses on the period 2020-2024⁷, aims to identify gaps, issues and challenges related to the Directive's implementation in the current policy context. More specifically, the report looks at how the Directive facilitates the mobility of professionals in the single market (Section 2) and potential improvements to the overall user experience under the various recognition regimes (Section 3). It also analyses how the legal framework fosters trust and administrative cooperation between the relevant authorities in the Member States (Section 4) and the to what extent digital tools are used in support of procedural aspects of the framework (Section 5). The report draws on desk research and extensive stakeholder consultations, involving members of the Group of Coordinators for the recognition of professional qualifications⁸ as well as competent authorities, regulators, professional associations, civil society, social partners and citizens.⁹

⁶ Some data covers the period 2018-2023 for the following reasons. Firstly, to give a better comparison with previous years as there was a decrease in the number of recognition decisions in the COVID-19 period. Second, data on recognition decisions for the year 2024 is not yet fully available since Member States are obliged to notify such statistics to the Commission on an annual basis and often do so towards the second half of the following year as they first need to collect them from the competent authorities.

⁷ The [latest implementation report](#) was published by the Commission on 11 May 2020, together with [an accompanying staff working document](#). That implementation report covered a period of five years (2014-2019) and focused on the new elements under Directive 2013/55/EU, including the European Professional Card, the modernisation of the knowledge, skills and competences for the sectoral professions, the common training principles and the special upgrading programme for Romanian nurses. The 2020 implementation report concluded that the legal framework under the Professional Qualifications Directive effectively facilitated the mobility of professionals across the Member States and that implementation had improved due to the enforcement actions taken by the Commission. However, the report also pointed out several areas for concern, including procedural requirements that imposed significant administrative and financial burden on applicants, and shortcomings in the operation of the national points of single contact and the alert mechanism.

⁸ The Group of Coordinators for the recognition of professional qualifications (GoC) was created by the Commission Decision of 19 March 2007 (2007/172/EC) to promote a uniform application of the Directive and to collect all the information which is relevant for its application. The group is comprised of national coordinators designated by the Member States.

⁹ See the staff working document accompanying this report for more details about the consultation strategy and the various sets of questions raised with the different stakeholder groups.

1. Policy context: labour and skills mobility in a context of shortages

Following the COVID-19 pandemic, the EU labour market quickly bounced back and surpassed its pre-pandemic performance, resulting in record low unemployment rates. The gradual slowdown in employment growth that started in 2022 continued in the first half of 2025, but the EU currently remains on track to meet its headline employment target of 78% by 2030.¹⁰ With minor fluctuations, labour market slack of the extended workforce in the EU has been decreasing steadily from 18.6% in 2015 to the record low level of 10.9% in Q2 2025.¹¹

Meanwhile, labour and skills shortages remain a significant and persistent challenge across the EU. Despite a decrease from their peak in 2022, they are still high by historical standards and continue to undermine the EU's competitiveness in the global economy.¹² Shortages affect small and medium enterprises (SMEs) in particular. They are especially acute in administrative and support services; professional, scientific and technical activities; transport; accommodation and food services; construction; and information and communication. As regards occupations, most countries classify the following occupations as facing critical shortages: information and communications technology (ICT), healthcare and transport (e.g. professional drivers). Structural factors, such as demographic change and skills demands from the digital and green transition, as well as poor working conditions in some sectors are likely to sustain shortages in the foreseeable future. As digitalisation and the uptake of artificial intelligence (AI) accelerate, many jobs will require new, adapted or enhanced skill sets, which may exacerbate existing shortages if the supply of appropriately trained professionals lags.

At the same time overqualification remains a persistent structural feature of the EU labour market. While tertiary education levels have been steadily increasing across the EU, many professionals do not make the best possible use of the skills they have, in particular when moving across borders.¹³ These points towards skills being underused and inefficiencies in the labour force allocation.

Against this background, the Union of Skills¹⁴, adopted by the Commission in March 2025, represents a comprehensive and coordinated strategy to strengthen EU competitiveness by developing and making the best possible use of the EU's human capital and by attracting and retaining talent, including from non-EU countries. The strategy aims at building skills for quality jobs and lives, including through a strong educational foundation which addresses labour market needs. It brings together education, training, employment, migration, and industrial policies to boost upskilling and reskilling at all levels and across all sectors, to foster lifelong learning and to tackle labour and skills shortages across Member States. In the same context, the Commission first-ever proposal for a Council Recommendation on human capital as part of the European Semester calls for urgent action to tackle human capital-related structural challenges that can damage the EU's competitiveness. To address such labour and skills shortages, the Commission is also working on specific initiatives for attracting talent from abroad, including the EU Talent Pool, the first EU-wide platform aimed at facilitating international recruitment and providing opportunities for jobseekers from third countries that are interested and have the skills required to work in EU-wide shortage occupations. In the context of the EU Visa Policy Strategy,

¹⁰ [Proposal for a Joint Employment Report 2026.](#)

¹¹ [European Economic Forecast. Autumn 2025.](#)

¹² [Proposal for a Joint Employment Report 2026.](#)

¹³ In 2024, the overqualification rate of people born in another Member State stood at 30.3% compared to 20.2% of those born in the country of work. Source: [Eurostat, Migrant integration Statistics.](#)

¹⁴ [Communication from the Commission to the European Parliament, the European Council, the Council, the European Economic and Social Committee and the Committee of the Regions on the Union of Skills, COM \(2025\) 90 final.](#)

the Commission also presented a Commission Recommendation on attracting talent from abroad, focused on students, researchers, highly skilled workers, innovative entrepreneurs and start-up founders.

Skills portability also plays a central role in the Union of Skills. By enabling workers' abilities and qualifications to be recognised and valued across borders, sectors and learning systems, it ensures that individuals can move freely within the single market without their skills losing value. This supports labour mobility, improves skills allocation and helps to alleviate regional and sectoral skill mismatches.

The Directive is a crucial instrument in the EU's policy toolbox to facilitate mobility for access to regulated professions within the single market. The Proportionality Test Directive (EU) 2018/958 acts as a preventative gatekeeper, requiring Member States to carry out a proportionality test before the adoption of any new and before amending the existing professional regulations to ensure that they are non-discriminatory, necessary and proportionate to the objectives pursued. The Professional Qualifications Directive, in turn, provides a comprehensive regulatory framework governing the mutual recognition of professional qualifications across Member States whenever specific qualifications are required by law for practising professional activities. More specifically, the Directive establishes automatic recognition for certain sectoral professions with harmonised minimum training requirements and, for some types of economic activity in trade and commerce, based on professional experience, as well as clear rules on the assessment and the recognition of professional qualifications obtained in other EU countries for access to any regulated profession. The Directive also imposes procedural deadlines and promotes cooperation between national contact points and competent authorities in the Member States. Together, these mechanisms aim at ensuring fair, consistent and timely recognition of professional qualifications across the EU.

To allow workers and businesses to fully exploit the potential of professional mobility in the single market, the Commission's Union of Skills Communication has announced a skills portability initiative. This will be part of a broader fair labour mobility package to be adopted in 2026, which aims at facilitating the exercise of the right of free movement of workers and services. This package will also include proposals for a European Social Security Pass, a stronger mandate for the European Labour Authority and measures to address the further modernisation and simplification and better implementation of the labour mobility rules and practices, as also recommended by stakeholders participating in the recent Implementation Dialogue with Executive Vice-President Mînzatu on fair labour mobility. This report on the implementation of the Directive contributes to informing the skills portability initiative by assessing the overall functioning of the regulatory framework applicable to the recognition of professional qualifications in the context of regulated professions and by identifying key implementation gaps and potential areas for further improvement.

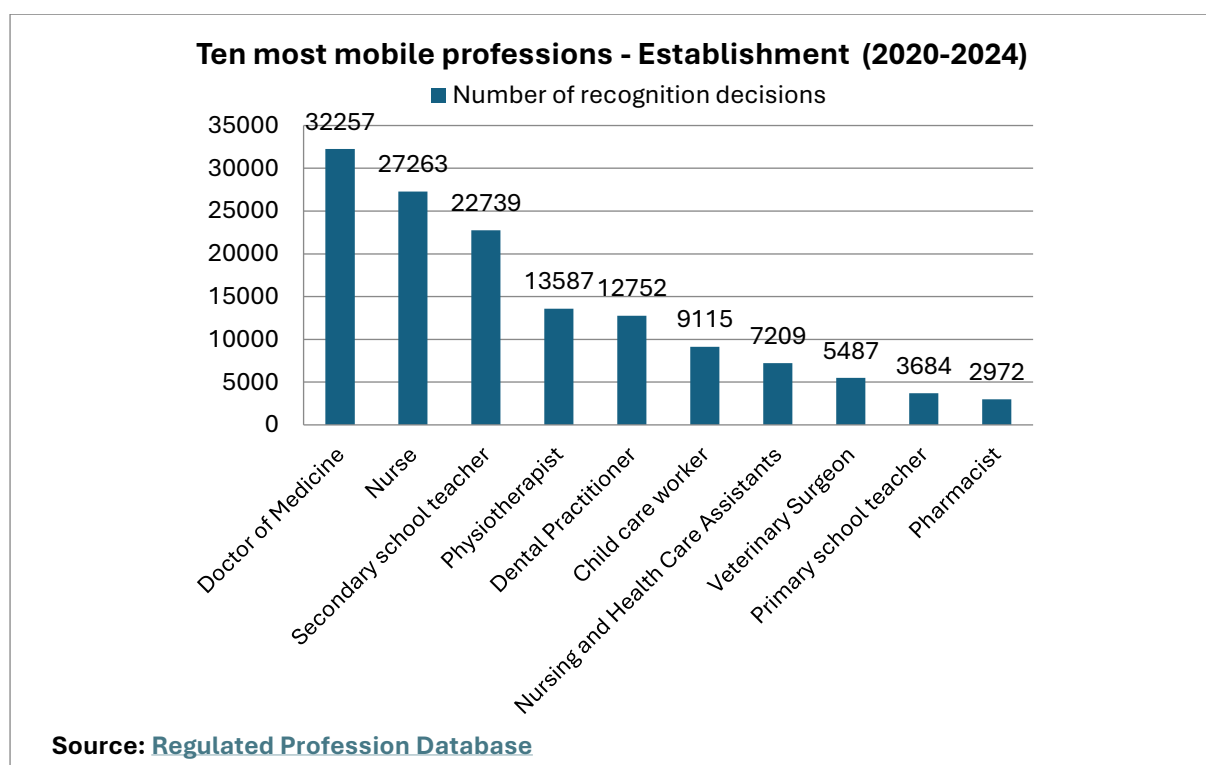
2. [The Professional Qualifications Directive provides crucial support to mobility in the Single Market](#)

The Directive constitutes an essential pillar of the functioning of the single market. It provides professionals who have acquired their professional qualifications in a Member State with procedures ensuring that they may obtain recognition of their qualifications and thereby that they may access and pursue the same regulated profession in another Member State under the same conditions as nationals.

Broadly speaking, the Directive provides for three main recognition systems In addition to automatic recognition for sectoral professions based on minimum training requirements, there is automatic recognition based on professional experience for certain professions in the crafts, commerce and industry

sectors and the so-called general system of recognition for all other regulated professions with limited exceptions. The rules and procedures applicable in each of these three systems differ.

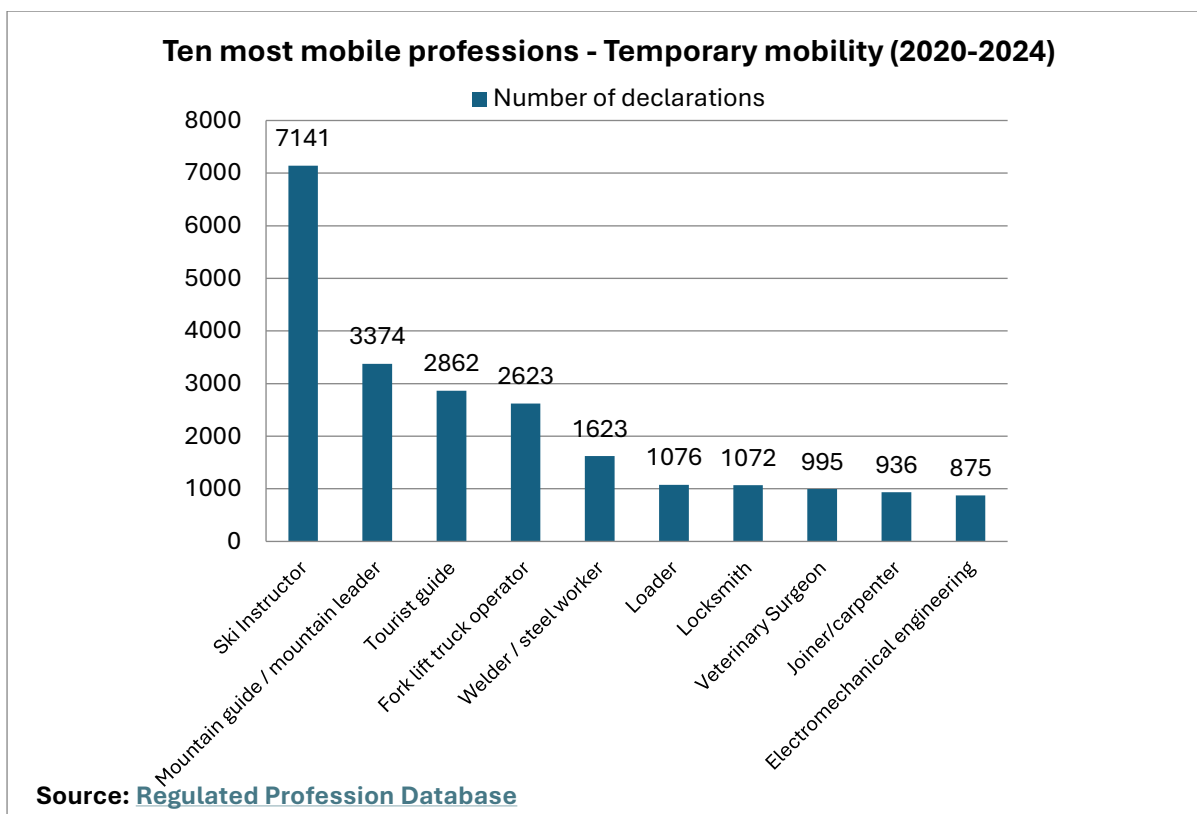
Evidence shows that the Directive facilitates the mobility of professionals, both for the establishment and for the temporary and occasional provision of services.¹⁵ Its main elements remain relevant in the current socio-economic environment, as confirmed by stakeholders. Between 2020 and 2024, despite the mobility restrictions imposed by COVID-19 pandemic, around 185 000 decisions were taken by EU Member States on recognition of professional qualifications for the purpose of establishment.¹⁶ More than 83% of these decisions were positive,¹⁷ and more than 140 000 concerned professions in essential sectors such as education and health. Over the same period, around 40 000 professionals submitted declarations to provide services on a temporary and occasional basis in another EU Member State. In only around 5% of these cases were providers not allowed to provide services, because of health and safety reasons.



¹⁵ Free movement of services covers two fundamental freedoms enshrined in the TFEU provisions (Articles 49 and 56). Establishment refers to a professional moving to another Member State to practice on a permanent or stable basis, which requires a formal recognition of their qualifications by the host country in order to practice under the host country professional title. In contrast, temporary service provision applies when a professional already established in his home country provides temporary services in another state on an occasional or time-bound basis under his home professional title. In case of temporary service provision, the professional has only to submit a yearly prior declaration and does not have to apply for a prior recognition of their professional qualification except for professions having public health and safety implications.

¹⁶ The figure was 230.000 for the period 2016-2019. The Regulated Professions Database provides more detailed statistical breakdowns by country, period, recognition system and generic names of professions. It can be accessed via the following link: [Regulated Profession Database](#)

¹⁷ Positive decisions are calculated as a percentage of the sum of positive decisions, negative decisions, decisions imposing an adaptation period and decisions under appeal.



The professions benefitting from automatic recognition —whether based on minimum training requirements or professional experience— are among those where severe shortages are reported. According to the latest European Employment Services (EURES) report on labour shortages and surpluses¹⁸, nursing professionals, generalist and specialist medical practitioners, pharmacists and dentists are ranked among the most widespread shortage occupations by number of countries and prevalence of high severity. In the context of the Directive, general care nurses, basic medical training and general practitioner training as well as 56 specialist doctors’ qualifications are covered by the automatic recognition regime based on minimum training requirements. The same applies to the basic and specialist qualifications of dentists and pharmacists. The most widespread shortage occupations in the EU also include many of the commercial, craft and industry professions subject to automatic recognition based on professional experience such as metal workers, construction workers, engineers and engineering technicians. This illustrates how the current rules framework already uses the possibility of automatic recognition to promote mobility precisely where it is most needed.

Stakeholders expressed overall satisfaction with the main elements of the Directive. Generally speaking, mobile citizens and businesses appreciate that setting common rules reduces uncertainty for professionals seeking to work in another Member State and provides a structured process for recognition. While stakeholders raise issues that may, in certain cases, prevent the Directive’s full potential from being realised and underline the need for improvements, they do not question its necessity, relevance, or benefits. They nevertheless call for fewer barriers to mobility and simpler recognition procedures, including through the use of digital tools, which is fully in line with the objectives of the Directive and its implementation.¹⁹

¹⁸ [EURES Report on Labour shortages and surpluses 2024.](#)

¹⁹ Chapter 10 of the staff working document provides more insights in the views of the various stakeholders concerned by the Directive, highlighting in particular the areas in which they see further room for improvement.

The Commission continued to implement and enforce the Directive in 2020-2025. Given the importance of uniform application, many Member States²⁰ have faced new infringement procedures in this period because of non-compliance with various aspects of the Directive. This included a batch of 22 cases related to incorrect implementation of Article 7(4) of Directive 2005/36/EC with prior checks of professional qualifications imposed for occasional and temporary service provision for professions not falling under its scope. As emphasised in the 2025 Annual Progress Report on Simplification, Implementation and Enforcement of Executive Vice-President Mînzatu, these enforcement actions are central to removing disproportionate administrative barriers and directly support the Commission's broader objective of enhancing professional mobility and ensuring coherent implementation of EU law across Member States.²¹

The Commission also continued its infringement actions concerning incorrect transposition of various aspects of the amended Directive that were started in two batches in 2018 and 2019 respectively. The first set of infringement procedures, launched in 2018, related to incorrect transposition covering new issues crucial to the functioning of the revised Directive, in particular the new European Professional Card, the alert mechanism, partial access to a professional activity, the proportionality of language requirements and the setting up of assistance centres. In addition, the Commission raised issues relating to the transparency and proportionality of regulatory obstacles in professional services following the Reform Recommendations on professional services.²² The second set of infringement procedures, launched in 2019, concerned compliance with the rules on freedom of establishment, freedom to provide services, professions benefiting from automatic recognition based on harmonised minimum training requirements, documentation and formalities, recognition of professional traineeships and administrative cooperation. Although this enforcement work focused on the main changes introduced by the amending Directive 2013/55/EU²³, it also addressed overall implementation of the revised Directive in the national legal frameworks.

Most non-compliance issues raised by the Commission relating to the Directive's transposition in the Member States' national legal frameworks have already been addressed. In the period 2020-2024, the number of unresolved infringement procedures open in 2018-2019 has decreased: three procedures were closed in 2020, four in 2021, nine in 2023, and two more in 2024. In 2025, eight Member States²⁴ continued to face active procedures. Two of the infringement cases resulted in judgements of the European Union Court of Justice.²⁵

²⁰ The European Commission opened 30 new infringement procedures in this period: 22 cases on issues relating to misapplication of Article 7(4) of Directive 2005/36/EC against AT, BE, BG, CY, CZ, DE, DK, EL, ES, FI, FR, HU, IE, IT, LU, LV, MT, NL, PL, RO, SE and SI; and 8 cases covering various issues under Directive 2005/36/EC: two cases against EL and the remaining 6 cases were open against BE, CY, DE, ES, IE and MT.

²¹ [2025 Annual Progress Report on Simplification, Implementation and Enforcement by Executive Vice-President Mînzatu, September 2025.](#)

²² [Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions on reform recommendations for regulation in professional services, COM\(2016\) 820 final.](#)

²³ The amending Directive 2013/55/EU introduced several major changes to the Directive, including the introduction of the European Professional Card, the alert mechanism, the use of the Internal Market Information System (IMI) and the concept of partial access.

²⁴ Currently, from the first batch of cases the procedures are still formally opened against BE, DE, EL, HR, and SK (two of them are in the process of being closed) and from the second batch, against BE, CZ (court ruling), DE, ES, SK (court ruling).

²⁵ Details about the enforcement of the Directive in the assessed period can be found in Chapter 9 of the staff working document.

3. Overall user experience

3.1. Availability and exchange of information

The functioning of the system for the recognition of professional qualifications within the EU relies on the accessibility of pertinent information. Information exchange between Member States is essential to support administrative cooperation. Ensuring that information on national regulation of professions, professional education and training, evidence of professional qualifications required for access to the given profession, contact data of competent authorities, conduct and experience is clearly understood and effectively disseminated is also crucial to allow citizens to benefit from the rights conferred on them by the Directive and by national implementation frameworks.

The Directive lays down several measures to ensure that stakeholders are well-informed and can easily access pertinent information concerning recognition of professional qualifications. One of the key measures is the establishment of national assistance centres²⁶, which serve as primary contact points for professionals and competent authorities seeking guidance and information. They support applicants by offering them information about the recognition process, helping them to understand requirements, and advising them on rights and obligations under EU and national law. They also foster cooperation between competent authorities, ensuring that mutual assistance and exchange of information are streamlined.

Assistance centres have proven to be a valuable source of information for the Commission about problems frequently encountered by mobile professionals. One of the issues reported that illustrates the importance of information and awareness raising is the limited understanding of the availability and purpose of the European Professional Card (EPC), which provides a simplified and faster electronic recognition for certain regulated professions²⁷. Respondents from several Member States observed that professionals often do not know that the EPC exists as an available option.²⁸ Consultation results showed that stakeholders expect broader communication and guidance on different possibilities for professional recognition, as well as capacity support and resourcing for Assistance Centres.

In addition to assistance centres, the Directive emphasises the significance of centralised and accessible online information. Points of single contact (PSCs) serve as digital gateways for obtaining information about administrative procedures on the recognition of professional qualifications and related professional activities. By consolidating various procedural details into a single, user-friendly portal, PSCs facilitate smoother and quicker interactions for applicants and competent authorities alike. They ensure that mobile citizens and competent authorities can access all necessary forms, guidance, and requirements without having to navigate through disparate information sources, thus promoting ease and efficiency.

Despite these various mechanisms, the information provided to the public is not always equally reliable and consistent. In its 2024 special report on the functioning of the Directive²⁹, the European Court of Auditors observed, for example, that the lists of regulated professions in the national databases

²⁶ Article 57b(1) of Directive 2005/36/EC lays down that each Member State must designate an assistance centre to provide information and assistance to citizens and authorities concerning the recognition of professional qualifications.

²⁷ The European Professional Card currently applies to the professions of general care nurse, pharmacist, physiotherapist, mountain guide and real estate agent.

²⁸ For example, Member States report that they do not always inform applicants of the EPC possibility for various reasons (see section 6.1 of the staff working document).

²⁹ [European Court of Auditors, Special Report, The recognition of professional qualifications in the EU, 2024.](#)

sometimes differ from the information notified by the Member States to the EU's Regulated Professions Database, which collects information on all regulated professions along with their specific requirements and competent authorities, in EU and EEA countries and Switzerland. Surveys carried out for the purpose of this report also noted inconsistencies between the information provided by home and host countries. In several instances, respondents seeking information from both sides received conflicting or incomplete guidance.³⁰ To remedy the issue, the European Court of Auditors recommended that the Commission ensure reliable and consistent information for the public, ideally through a single EU-level information source.

For matters regulated under national law in compliance with EU law, the competent authorities of the host country remain the authoritative source of information. To facilitate dissemination to citizens, detailed information on the practical steps of the recognition procedures, document requirements, fees and the choice between an adaptation period and aptitude test as potential compensation measures should be provided at EU level. Looking ahead, AI-powered large language models (LLM) can considerably improve how people search for information and might gradually replace the traditional information architecture of websites with a more intuitive and efficient way for citizens to access regulatory information.

3.2. Recognition systems

The experiences of mobile EU citizens seeking to have their qualifications recognised in another Member State for access to a regulated profession depend on the applicable recognition system.

3.2.1. The general system of recognition

Under the general system of recognition, an applicant seeking to establish themselves in another Member State must provide a number of documents including evidence of nationality, professional qualifications, and relevant experience, if applicable. The competent authority in the host Member State then compares the applicant's qualifications that give them access to a given profession in the home Member State with the national requirements for access to the same profession in the host state, on a case-by-case basis. If they are deemed equivalent, recognition is granted, allowing the applicant to practise. If substantial differences exist that cannot be compensated by professional experience and/or lifelong learning, the authority may require an aptitude test or adaptation period to bridge the gap. Once completed successfully, the applicant obtains recognition and may legally exercise the profession in the host state.

While the deadlines prescribed by the Directive are considered realistic and generally respected, several factors can cause delays. Under Article 51(2) of the Directive, the application for recognition under the general system must be examined as quickly as possible and within a maximum of four months after the date on which the applicant's complete file was submitted. Based on a sample analysis of four highly mobile professions³¹, this deadline is generally well respected. Nevertheless, incomplete applications as well as delayed expert evaluations or verifications of documents by the Member

³⁰ On this, see in particular section 8.2 of the staff working document.

³¹ To obtain precise and comparable input from the Member State authorities, the analysis focused on radiographers, secondary school teachers, health care assistants and social workers. These four professions were chosen, as they belong to the most mobile professions falling under the general system, based on the data in the Regulated Professions Database and based on their mobility patterns (covering a large number of Member States rather than only a few).

State in which the qualifications are obtained sometimes prolong the process. Delays are also caused by insufficient staffing at national level to process applications and the complexity of certain applications, in particular in cases where compensation measures are being considered.³²

The procedure involves considerable document requirements and is not always facilitated through electronic and/or digital means.³³ Annex VII of the Directive provides an exhaustive list of documents that may be required by national competent authorities for the purpose of establishment. Member States generally require a core set of documents for professional recognition applications: typically proof of nationality, qualifications, and professional experience. Requirements beyond these, such as attestations of good character, health certificates, or insurance coverage, vary widely between professions and countries. On average, applicants must provide between 5 and 10 documents, totalling about 10 to 20 pages, though this can be higher in some Member States. Increasingly, Member States are adopting digital procedures for submitting documents, but the extent of electronic processing still differs, with some countries maintaining partially digital or paper-based systems.³⁴ That being said, for the professions to which the European Professional Card applies, digitalised procedure is available in all Member States.

The complexity of recognition procedures under the general system depends on the degree of similarity in the regulation of professions between Member States. It is easier when the home and host Member States regulate access requirements to a profession in a similar way. If the regulations differ significantly, or if a home Member State does not regulate the profession and the host Member State does, recognition is still possible, but applicants face more difficulties collecting evidence to prove their professional qualifications.

A small number of recognition procedures under the general system end with a negative decision on recognition.³⁵ These decisions do not allow the applicants to exercise the profession of their choice. Further analysis is needed to determine the causes underlying these decisions, especially in cases where the applicants fail to deliver evidence required by a recognition authority. Some negative decisions could possibly also stem from rigid requirements that limit flexibility in accepting documentation. In some cases, applicants may also decide not to pursue their application when confronted with lengthy or cumbersome procedures. In others, the decision not to provide the documents could be linked to a lack of required formal qualifications, experience and/or a clean criminal record by the applicant.

³² See section 2 of the staff working document for more information about the duration of the procedure and the causes of possible delays.

³³ See section 2. of the staff working document for more information about the types of documents requested under the general system of recognition, beyond proof of nationality, proof of qualification and attestations of professional experience, as well as the varied degree at which completion of the recognition procedure can be done via electronic means in the Member States.

³⁴ With the exception of those professions to which the European Professional Card Procedure applies, the availability of fully electronic procedures (apart from those to which the European Card Procedure applies) varies by Member State and by profession. For example, for the profession of health care assistant only four MS (DK, FI, PT and RO) offer a fully electronic recognition procedure whereas for social workers the full recognition procedure via electronic means is available in all but three Member States. The use of available electronic procedures also varies considerably. To illustrate, while for the profession of radiographer mobile citizens can complete the full recognition procedure via electronic means in almost all Member States, applicants in different Member States opt for electronic procedure to widely varying degrees, ranging from 10% in HR to over 95% in IE, FI, PT, FI and DK. The staff working document accompanying this report provides additional illustrative data on this.

³⁵ For the period 2020-2024 this share stood at 7.4%.

3.2.2. Automatic recognition based on professional experience

Recognition based on professional experience pertains mainly to craft, trade, and industrial professions where EU-level minimum harmonised training requirements do not exist. More specifically, this recognition system applies to the professional activities listed in Annex IV of the Directive (e.g. painters, bricklayers, carpenters, catering managers, etc.). Under this system, a professional who has gained sufficient and verified experience in a regulated profession in one Member State can have their qualifications automatically recognised in another Member State, without undergoing further assessment. The applicant must provide evidence - such as certificates or attestations from competent authorities - showing that they have lawfully and effectively pursued the profession for a prescribed period (usually between two and six years, depending on the profession, employment status and level of training). The host Member State must then recognise the applicant's right to practise the same or comparable activity. This procedure simplifies mobility for experienced professionals while maintaining safeguards for service quality and public protection.

Despite the advantages it offers, this second recognition system is used sparsely. Compared to the general system, this second recognition system is usually faster, with recognition procedures taking between less than one month to up to three months following completion of the application. In addition, this system provides the advantage of referring to verifiable professional experience rather than formal training and involves relatively few documents. However, use of the system remains uneven, with only a minority of Member States using it on a regular basis and a large group reporting no or very limited use.³⁶ The reason for this is not clear-cut and requires further analysis, also due to the limited number of survey replies on this topic. For instance, the user-friendliness and currency of the system is perceived differently by different stakeholders in the same Member State. While many competent authorities and national experts view the current system as practical and find the assessment of professional experience relatively easy - particularly when supported by certificates from the home Member State - many others consider the procedure and its underlying lists of activities to be outdated.³⁷ These national experts deem the lists of professions in Annex IV and the underlying nomenclature to be unclear, with overlapping or imprecise definitions that complicate determining which professions qualify. Moreover, bureaucratic hurdles, lack of digital processes, and inconsistent documentation practices across Member States sometimes make applications cumbersome.

3.2.3. Automatic recognition based on minimum training requirements

Recognition of professional qualifications based on minimum training requirements is the most streamlined recognition system because the competent authority only needs to verify the authenticity of the document. This system is regulated in Title III, Chapter III of the Directive and is usually referred to as the 'automatic' recognition system. It applies to professions such as doctors of medicine, nurses responsible for general care, dental practitioners, veterinary surgeons, midwives, pharmacists, and architects (referred to as 'sectoral' professions).

Harmonised minimum training requirements for sectoral professions ensure a consistent baseline for education and training across the EU. These requirements maintain trust among Member

³⁶ Between 2020 and 2024, the five EU Member States that took the most recognition decisions based on professional experience (FR, RO, PL, PT and DE) accounted for over 72% of all decisions in the context of this system. Ten Member States reported to have taken 20 or fewer recognition decisions based on professional experience.

³⁷ For example, 55% of competent authorities and 50% of national experts consider Annex IV to be adapted to the current needs of professionals. More data on how stakeholders assess the functioning of Annex IV is available in section 3.1 of the staff working document.

States and limit discrepancies in educational standards, guaranteeing a certain verifiable level of competence and contributing to the safety of patients and service recipients. The Directive stipulates specific minimum training requirements per profession, with certain requirements adaptable via delegated acts to remain aligned with scientific and technical progress. It respects the autonomy of national education and training systems, allowing Member States to exceed these minimum requirements according to their needs.

In general, stakeholders assess the functioning of the recognition system based on minimum training requirements more favourably than that of the other recognition systems. With generally low application fees, adherence to procedural deadlines, and manageable documentation requirements, this recognition system facilitates professional mobility in an efficient and cost-effective manner. For these reasons, stakeholders generally agree that the 'automatic' system of recognition based on minimum training requirements is a better solution than the general system of recognition whose effectiveness and efficiency depends on the level of harmonisation of the regulations in Member States. It is also better appreciated than recognition based on professional experience, the application of which is considered less straightforward by some authorities for the reasons outlined above.³⁸

In view of its advantages, there is a clear interest in extending 'automatic' recognition to additional professions. Extending automatic recognition to professions that are not currently covered would simplify and speed up the recognition process, thus facilitating recognition of professional qualifications and boosting professional mobility within the EU. This can be done in different ways. In addition to extending the list of professions for which minimum training requirements have been harmonised through legislative amendments, there is also a possibility to rely on common training frameworks (CTFs) or common training tests (CTTs) both of which can be adopted through delegated acts.

CTFs provide the most flexible option. They aim to enable more professionals to move across the EU by extending automatic recognition based on a common set of knowledge, skills and competences for the pursuit of a specific regulated profession. CTFs do not fully harmonise training requirements and allow Member States to keep both CTF-compliant and other trainings leading to the regulated professions. According to the Directive, a CTF can be established for professions which have a notable level of mobility or possess the potential for increased cross-border movement, and for which there is sufficient alignment on professional regulation and education and training in a minimum number of Member States. Specifically, at least one-third of EU Member States must regulate the profession and at least one-third must currently have in place the common set of knowledge, skills and competences on which the potential CTF would be based. The framework must also align with existing EU and national legislation and demonstrate that it serves the public interest in a proportionate way. The automatic recognition and common set of training requirements under a given CTF would only apply to national qualifications compliant with its requirements and between Member States participating in such a CTF. While CTFs facilitate recognition procedures and have generated interest from professional organisations seeking visibility at the EU level, no CTF has been established to date because the considered professions did not fully meet the requirements stipulated in the Directive as explained above. This was often due to the different national education and training requirements for access to the professional activities in question. A Common Training Test has been established in 2019 for the profession of ski instructor.

³⁸ See Chapter 4 of the staff working document for more details on the competent authorities' experience with and assessment of the system of automatic recognition.

Efforts are underway to establish a CTF for physiotherapists. In 2022 and 2023, the Commission discussed CTFs with the group of coordinators for the recognition of professional qualifications, which identified physiotherapists and civil engineers as potential candidate professions for a CTF. In March 2024, the sub-group on Common Training Frameworks was created under the umbrella of the Commission's expert group of coordinators for recognition of professional qualifications. The sub-group currently consists of representatives of Member States and of physiotherapy experts nominated by Member States and its work has focused exclusively on the feasibility of creating a CTF for the profession of physiotherapist. In particular, the expert sub-group has assisted the Commission to map the education, training and regulation of the profession across Member States. Based on the preliminary outcomes of the sub-group's work, the Commission is finalising the mapping on which it intends to base a Delegated Act for a CTF for physiotherapists as part of the skills portability initiative.

Moreover, in cooperation with the Member States, the Commission is working to identify additional professions for which CTFs could be developed in the future. At the same time, reflections are on-going on how to further streamline and structure the process for the selection, prioritisation and assessment of suitable professions for a CTF in the medium-term. These efforts require close cooperation with the Member States, as well as with the professional organisations concerned and other stakeholders.

In addition to extending automatic recognition to more professions, there is scope to streamline the automatic recognition procedure based on minimum training requirements itself. In principle, the process of checking whether the evidence of professional qualifications submitted by an applicant corresponds to the admissible evidence listed in Annex V of the Directive should be straightforward and swift. In practice, however, competent authorities sometimes spend significant time and effort to analysing the documents submitted by applicants. Evidence shows that the time needed to take a decision in various Member States or even across institutions within a single Member State varies.

The main issue seems to be verifying the authenticity of documents. This often involves contacts between the respective authorities. Although this process is supported by the Internal Market Information System (IMI)³⁹ the availability of resources, administrative structures and procedures, and the response time of competent authorities all influence how smoothly and quickly this verification is completed. Paradoxically, competent authorities sometimes consider technological advancements as an additional risk rather than an opportunity to streamline and improve the processes (e.g. it could be easier to forge documents by using latest technology).

To make the recognition system based on minimum training requirements truly automatic would require the use of new and emerging technologies such as LLMs to minimise administrative tasks. Where applicable, this could free up resources for substantive tasks related to the recognition process. Such solutions could include digital credentials and digital procedures in line with the wider digital policy initiatives of the Commission (see Section 5 below). However, this would require issuance of digital certificates for which underlying data can be easily checked and/or alternative procedural steps in which home Member States verify and confirm documents and data as an initial step for recognition (like in the EPC procedure).

³⁹ The Internal Market Information System is a secure, multilingual online database that facilitates the exchange of information between public authorities involved in the practical implementation of EU law.

While the Directive already integrates the possible use of digital tools, the current provisions could be further adapted to fully exploit the potential of digitalisation. Following the 2013 amendment, the legal framework introduced a degree of flexibility by allowing for instruments such as the EPC and greater use of the IMI system. These provisions demonstrated that the Directive can successfully integrate digital tools into recognition processes. Electronic procedures and cooperation platforms have reduced administrative complexity and illustrate the added value of integrating technological developments in the operational mechanisms of the Directive.⁴⁰ Nevertheless, the transition towards digital procedures is uneven across Member States. In many cases, competent authorities still require mobile workers and professionals to submit paper copies of documents, despite existing electronic submission options, because of signature verification or other security concerns. As digital technologies have evolved considerably, there is a clear opportunity to make better use of fully electronic and interoperable recognition procedures that are faster, more consistent, secure and more accessible for citizens and competent authorities alike.

4. Mutual trust and administrative cooperation are essential to the functioning of the regulatory framework

Mutual trust between the administrative authorities of the Member States is crucial to ensure the proper functioning of the regulatory framework established by the Directive. Maintaining a high level of trust requires transparent, consistent, and proportionate rules governing the regulation and recognition of professional qualifications in the Member States. It also crucially hinges on timely notifications by the Member States to ensure transparency and facilitate oversight and enforcement of the rules (4.1) and on the effective use of the alert mechanism put in place to share critical information about professionals who may pose a risk (4.2). Finally, maintaining trust in the regulatory framework requires regular updates of the framework to ensure that it reflects the latest scientific and technical developments (4.3).

4.1. Notifications

The Professional Qualifications Directive covers a number of notification requirements for Member States to ensure transparency and effective coordination of the recognition process. For example, Member States must inform the Commission of all professions to which they regulate access, along with the qualification requirements and competent authorities responsible for recognition in the regulated professions database. Under the Directive, Member States must also notify the Commission of the laws, regulations and administrative provisions which they adopt that have an impact on the national evidence of qualifications that is subject to automatic recognition under the Directive, based on the EU harmonised minimum training requirements. As a result, the introduction of any new training leading to issuance of national evidence of qualifications covered by Annex V of the Directive as well as any changes to evidence of qualifications/underlying training/awarding bodies that are already included in Annex V to the Directive should also be notified. Such notifications must be transmitted through the IMI. The Commission then updates Annex V via delegated acts. Member States must also report to the Commission the number of individual recognition decisions taken at national level which allows for transparency on the professional mobility between Member States and on recognition rates per profession and per country. Thanks to these notification obligations, the Directive ensures transparency, oversight and cooperation,

⁴⁰ One of the clearest benefits of the EPC procedure is its short processing time. Based on a survey of competent authorities, more than 60% of Member States complete recognition procedures within less than one month, while the remainder report timeframes of one to two months. No Member State reported durations exceeding two months.

which allows the information about qualifications and professional regulations to remain consistent, up to date, and trusted across the EU.

While 90% of competent authorities surveyed rate the notification system under the IMI as efficient, some describe the process as burdensome and time-consuming. Surveys carried out for the purpose of this Report have shown a high level of proficiency among competent authorities concerning the notification process.⁴¹ Competent authorities generally recognise it as an important tool for transparency, cooperation, and regulatory consistency across the EU. However, several authorities also describe the process as administratively burdensome and time-consuming, particularly when frequent updates or complex national reforms require multiple notifications. Some express concerns about limited guidance and differing interpretations of what information must be notified, which can lead to inconsistencies across countries. Others highlight technical difficulties with the electronic submission process and the need for better coordination between national ministries and professional bodies within their own Member State.

4.2. The alert mechanism

Since 2016, the Directive provides for an alert mechanism about professionals whose pursuit of professional activities on the territory of a Member State has been restricted or prohibited by national authorities or courts. Its main purpose is to enable rapid communication between competent authorities when a professional's right to practise has been restricted, suspended, or permanently withdrawn because of disciplinary or criminal sanctions-- especially in sectors that directly affect public safety, such as healthcare or education of minors. Member States are also bound to send alerts where professionals used falsified diplomas in the process of qualification recognition. **In light of the division of competences between the EU and the Member States, the latter play a crucial role in implementing and operating the alert mechanism system at the national level.** The Directive requires Member States to exchange information regarding any decisions taken to restrict or prohibit, even temporarily, the pursuit of professional activity by a given individual. However, Member States remain competent to define the reasons for doing so. As a result, the reasons may substantially differ across the EU in various areas. Member States thus remain responsible for implementing the alert mechanism at national level and for following up on the alerts received. Their competent authorities must identify relevant cases and are required to issue alerts through the IMI system within the specified time limits (typically three days). Member States are also responsible for ensuring that alerts are accurate, timely, and limited to what is strictly necessary under data protection rules. When alerts are received, it is the duty of the authorities in the receiving Member States to review the information, assess its relevance to their jurisdiction, and take appropriate measures under their own national laws. While the Commission operates the IT tool (the IMI) it does not take on any role as sender, recipient or controller in the information exchanges. Its role is to monitor the system's overall functioning, ensure consistent application across Member States and provide technical and procedural guidance through the IMI framework.

The alert mechanism should not be viewed in isolation. It does not replace any domestic registers that Member States may have to keep track of professionals who are suspended, prohibited or restricted from pursuing their professional activities; it complements other provisions embedded in the Directive

⁴¹ More than 90% of respondents confirm that they know how to notify via IMI, and the same percentage rate the notification system as efficient. More information about the views of stakeholders regarding submission and verification of notifications is provided in section 4.4 of the staff working document.

which enable national authorities to secure the interests of consumer and patients by verifying the absence of temporary or final suspensions from exercising the profession or the absence of criminal convictions.

Nevertheless, the significant variation in the number of alerts sent among Member States requires closer attention. Naturally, the differences in the number of alerts to some extent correlate with the size of the Member State and the number of professionals registered. However, other factors seem to matter at least as much including variations in administrative practices and legal frameworks (e.g. the existence and application of suspension measures and the reasons for doing so) and the availability of resources to monitor and enforce professional regulations. The trend towards an increasing number of alerts for administrative reasons⁴² highlights the need for further harmonisation across the EU and further improvements in the implementation of the alert mechanism to ensure consistency and effectiveness across the EU.

The Commission is taking measures to address the issues raised by Member States related to the alert mechanism's implementation. Several infringement procedures concerning the set-up of legal frameworks pertaining to the alert mechanism in the Member States were launched prior to 2020. They resulted in Member States introducing the necessary measures to enable compliance with the Directive. The Commission also introduced the possibility for sending authorities to distinguish between alerts triggered by “substantial reasons concerning the practice of the profession” and “other reasons”. The alert “for other reasons” includes, for example, cases in which a professional is suspended from exercising the profession for non-compliance with administrative requirements. While stakeholders appreciated this measure, some called for further clarification, amplified by the recommendation on this issue in the 2024 audit report of the European Court of Auditors. In response, the Commission is preparing a guidance document and hands-on trainings for competent authorities to clarify the categorisation of alerts and address other practical questions concerning alerts, raised by the Member States.

4.3. [Updates to the automatic recognition system based on minimum training requirements](#)

Keeping the Directive's minimum training requirements for professions eligible for automatic recognition up to date is vital for maintaining a dynamic and effective professional recognition system within the EU. Since 2013, the Commission has had the power to update these requirements through delegated acts to ensure that the qualifications benefiting from automatic recognition remain aligned with generally acknowledged scientific and technical developments across the EU. This process is crucial for maintaining mutual trust among Member States and for safeguarding public health, patient safety, and service quality, while ensuring that automatic recognition continues to reflect current professional realities rather than outdated standards.

The process for updating minimum training requirements is designed to consider the way in which the legal frameworks and curricula across the EU incorporate scientific and technical progress. The Directive respects the autonomy of national education and training systems and the diversity of training approaches across the EU. It seeks to reflect and accommodate changes in Member State legislation rather than to force conformity. It does this by setting out the minimum training requirements necessary for cross-border automatic recognition while allowing Member States to exceed or augment these requirements for the purpose of education and training provided on their territory according to their specific needs and educational contexts. The updating process involves technical and

⁴² See Chapter 8.1 of the accompanying staff working document.

scientific assessments, often supported by studies, expert consultations, and input from stakeholders such as professional associations, educational institutions, and Member State experts via the group of coordinators on the recognition of professional qualifications.

Discussions about updates to minimum trainings requirement are often complex and technical.

There is a continuous balance to be found between facilitating mobility by setting the common standard at an achievable level and ensuring that the minimum training requirements in the Directive reflect the current generally acknowledged practices and technological advances across the Member States. Scientific progress also has to be balanced with legal stability avoiding frequent or disruptive changes that complicate implementation.

So far, delegated acts to update minimum training requirements based on scientific and technical advancements have been adopted for the professions of general care nurse, dental practitioner, pharmacist and veterinary surgeons. The Commission has also contracted a study on profession of midwives. Based on the Commission's assessment of its conclusions, the minimum training requirements for midwives may also be updated.

Furthermore, regular updates to the list of evidence of professional qualifications benefiting from automatic recognition based on minimum training requirements are vital to preserve mutual trust in the system. Such updates are also done by means of delegated acts and each change to the list is triggered by an IMI notification from a Member State. Indeed, Member States are obliged under the Directive to notify the Commission of any changes in their national legal, administrative and executive provisions that have an impact on the evidence of qualifications that benefit from automatic recognition, and their timely cooperation is crucial for the efficient functioning of the system.

Opinions differ as to whether the delegated powers of the Commission to update minimum training requirements under the Directive should be extended. According to some stakeholders, the existing possibility to update the Directive by means of delegated acts should be extended to more elements of the automatic recognition system to make it even more agile and responsive to changing circumstances. The staff working document accompanying this report provides more insights on this. It gives examples of the major elements (e.g. the duration of basic medical training) and technical elements (e.g. the generic names of medical specialties) which are not covered by the Commission's delegated powers. When asked about possibly extending of the Commission's delegated powers, stakeholders recommend focusing on technical updates only through delegated acts while preserving core content stability. A majority of those consulted opposed the use of delegated powers to amend substantial elements (such as the minimum duration of basic medical training) through delegated acts.⁴³

A separate question is whether the current process based on delegated acts could be automated. Automating part of the process of updating minimum training requirements is not without risk. In principle, the legal framework could be amended so that new evidence of qualifications subject to automatic recognition, names of the institutions issuing such evidence, reference dates, etc., could be automatically added or modified by the competent authorities in the Member States, without the need for processing notifications via the IMI, consultations with other Member States, and preparation of delegated

⁴³ Stakeholders in favour of updating minimum training requirements through delegated acts put forward flexibility and timeliness as arguments, while those who are more sceptical emphasise the need for stability of the standards and scrutiny by Member States. More information about the views of stakeholders on the use of delegated acts to update minimum training requirements is provided in section 4.3 of the staff working document.

Commission decisions. Although such a hypothetical process would be faster, the present system eliminates a lot of risks and errors. While the current way of updating minimum training requirement involves considerable resources, the built-in checks and controls and the involvement of all Member States have a generally positive effect on mutual trust and reliance on the automatic recognition system. Therefore, efforts could focus on improving the efficiency of current internal processes rather than replacing them entirely.

5. Digitalisation

The findings in this report highlight several procedural challenges that affect the efficiency and user-friendliness of professional recognition. These findings are echoed throughout the stakeholder feedback, where individuals, professionals, businesses and assistance centres consistently report complex, lengthy procedures, paper-based requirements in some Member States and wide disparities in online application processes.

The introduction of the European Professional Card (EPC) represented a step towards digitalisation by creating an EU-level electronic procedure for submitting applications.⁴⁴ For applicants, the key advantage is that the procedure offers a simplified, faster,⁴⁵ and more transparent electronic procedure for having their professional qualifications recognised in another EU country. According to the consultations conducted in the context of this report, competent authorities appreciate that the procedure reduces administrative duplication, improves transparency, and makes the overall process more user-friendly, especially for applicants moving repeatedly across borders. It also strengthens administrative cooperation through the IMI, fostering more efficient communication between authorities when verifying qualifications or professional status.

There are, however, limitations to the EPC which could be overcome through contemporary digital technologies. Some competent authorities report that the EPC can be complex and burdensome to operate, with procedural steps that do not always save time compared to the standard recognition system based on minimum training requirements or the general system. Technical and interoperability issues (linked to uneven levels of digitalisation across Member States) also hinder smooth functioning. A further drawback is low awareness among both professionals and authorities, resulting in limited use despite its potential benefits. Since the procedure does not automate or simplify processes for confirming authenticity or classifying documents, this remains one of the more time-consuming tasks to be done manually by many competent authorities.

The IMI, launched in 2008, plays a key role in the functioning of the Directive. It facilitates online exchange of information and notifications between competent authorities and the Commission. As an enabling platform, it does not by itself guarantee timely responses since it still relies on administrative input by national competent authorities. IMI processes are streamlined and harmonised across the EU. While they allow for submission of digital documents, they do not yet incorporate automated verification processes, which may already be available in several countries based on recent technical developments. While many Member States have begun to offer alternative, national digital submission channels in parallel,

⁴⁴ The EPC was initially introduced in 2016 for five specific regulated professions with the possibility to expand to more professions in the future.

⁴⁵ For both of the EPC professions examined in the staff working document, most Member States reported that the procedure is completed within less than one month (see section 6.1).

feedback shows that processes remain uneven, and several Member States continue to rely on paper documents and bureaucratic processes.

Building on the experiences with the EPC and IMI, a more unified digital approach could help to reinforce the safeguards and mutual trust that underpin the Directive while improving efficiency, transparency and user experience. Stakeholders stressed that the current legal framework, though flexible enough for incremental improvements, lacks the clarity and ambition needed to fully exploit the potential of digitalisation and simplification, with several contributions calling for stronger recognition of digital credentials, better interoperability across systems, a centralised electronic platform and faster processing. From the applicant's perspective, fully electronic and interoperable digital recognition procedures could make recognition processes simpler, faster and more predictable. For competent authorities, digitalisation could increase efficiency, consistency and data reliability. Such tools would preserve the final decision-making responsibility of competent authorities while supporting accuracy and efficiency. However, effective digitalisation would depend on the availability of comprehensive, up-to-date information on regulated professions and competent authorities, meaning the issues related to consistency of information described above in 3.1 must be addressed.

6. Conclusions

The legal framework governing the recognition of professional qualifications in the EU works generally well. It provides a clear legal basis for mobility, especially in highly regulated and mobile sectors such as healthcare, engineering, architecture, and education. By setting common rules, the Directive has reduced uncertainty for professionals seeking to work in another Member State and offered host authorities a structured process for recognition, as has been widely acknowledged by stakeholders. Between 2020 and 2024, around 185 000 decisions were taken for the purpose of establishment. This volume of positive decisions, with more than 140 000 concerning essential sectors like healthcare and education, demonstrates the Directive's crucial support for professional mobility in the single market.

Maintaining trust in the system is paramount. Rigorous enforcement, continuous updates to reflect the latest scientific and training developments, regular training, guidance, experience sharing and strong administrative cooperation are essential to maintain this trust. This is a joint responsibility of the Commission and the competent authorities in the Member States. Maintaining this trust also crucially hinges on the effective use of the alert mechanism to share critical information about professionals who may pose a risk to safety of patients and minors.

The Directive has proven flexible and responsive to new scientific and training developments in the Member States. The empowerments embedded in the regulatory framework allowed for updates to the minimum training requirements and lists of professional titles without the need for full legislative revisions. Expanding their use could allow for swifter updates. Nevertheless, this would need to be balanced with the push for further simplification, legislative oversight, and stakeholder engagement to preserve legitimacy and acceptance.

Even with the legal framework in place, professional mobility in the single market still faces barriers. Some of these are due to the differences in national regulatory frameworks and cannot be resolved through regulatory action at EU level alone. Under certain conditions, however, extending automatic recognition to additional professions by means of Common Training Frameworks could provide a viable way forward. Work in this area is currently on-going. In addition, there is still scope to improve the provisions of consistent and reliable information to the applicants and to simplify and streamline

recognition procedures through targeted interventions. The experience of professionals shows that recognition can still be a complex and time-consuming process as a result of lengthy procedures, uneven digitalisation and heavy documentation requirements.

Embracing the potential of digitalisation could make recognition processes faster and less cumbersome. By leveraging digital tools, procedures can be streamlined, administrative burden reduced, and a seamless experience provided for both applicants and competent authorities. Fully electronic and interoperable procedures, including the use of digital credentials that are secure and machine-readable, could enable instant verification of qualifications and significantly reduce processing times under the various recognition systems for both applicants and competent authorities. Such modernisation, simplification and improved implementation would not only address current inefficiencies but also pave the way for a more integrated and responsive professional recognition system within the EU. This is crucial for mobile professionals to thrive and reap the benefits of the single markets, for firms to access the talent they need, for innovation to spread, and for productivity to increase.