### FIT FOR FUTURE Platform Opinion

<table>
<thead>
<tr>
<th>Topic title</th>
<th>Fostering professional mobility in the Single Market</th>
</tr>
</thead>
<tbody>
<tr>
<td>Legal reference</td>
<td></td>
</tr>
<tr>
<td>Date of adoption</td>
<td>28 November 2023</td>
</tr>
<tr>
<td>Opinion reference</td>
<td>2023/5</td>
</tr>
<tr>
<td>Policy cycle reference</td>
<td>□ Contribution to ongoing legislative process</td>
</tr>
<tr>
<td></td>
<td><strong>CWP 2023</strong></td>
</tr>
<tr>
<td></td>
<td>Commission work programme reference</td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>□ Contribution to the (ongoing) evaluation process</td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>□ Included in Annex VI of the Task force for subsidiarity and proportionality</td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>✓ Other</td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>This opinion is inscribed in the celebrations of the 30th anniversary of the single market and linked to the Commission’s non-legislative initiative Single Market at 30. The Platform’s opinion would contribute to identifying further growth potential in the single market, in the area of free movement of professionals. Also, especially considering that 2023 will be declared as the European Year of Skills, the Platform would analyse how new technologies and the digital transformation could be used in that respect. Finally, the Platform’s suggestions would point to new ways of facilitating and simplifying the access to European aids or projects in order to make them more familiar to citizens.</td>
</tr>
</tbody>
</table>
Have your say: Simplify!

No relevant suggestions on this topic have been received from the public.

<table>
<thead>
<tr>
<th>Commission follow up</th>
<th>REFIT Scoreboard: Recognition of professional qualifications</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Annual Burden Survey: The EU's efforts to simplify legislation (2023)</td>
</tr>
</tbody>
</table>
SUGGESTIONS SUMMARY

Suggestion 1: Extend the professions covered by the European Professional Card
Suggestion 2: Implement the provisions of the Common Training Principles
Suggestion 3: Encourage continuing Professional Development
Suggestion 4: Improve of the information provided in the database of regulated professions
Suggestion 5: Lead the establishment of EU-wide Codes of Conduct and Quality charters
Suggestion 6: Improve access to information
Suggestion 7: Improve compulsory training programs
Suggestion 8: Improve access to finance
Suggestion 9: Enhance communication between stakeholders and the Commission
Suggestion 10: Clarify situation of mixed qualifications
Suggestion 11: Update restrictiveness indicator

SHORT DESCRIPTION OF THE LEGISLATION ANALYSED

In the absence of harmonisation, the regulation of professional services is the Member States’ competence that must be exercised with due regard to the principle of non-discrimination and proportionality. At present, according to the information provided by the Member States in the regulated professions database, there are almost 6 000 regulated professions across the EU, with the numbers varying greatly by country. Based on an EU-wide survey, around 22% of the European labour force, or over 47 million citizens, is directly affected by professional regulation.

Directive 2005/36/EC on the recognition of professional qualifications (Professional Qualifications Directive) is the cornerstone of EU regulations for professionals. The directive provides a modern EU system of recognition of professional qualifications and experience and promotes automatic recognition of professional qualifications and professional experience across the EU. It aims to provide access to labour markets for professionals in other EU countries, further facilitate cross-border service provision and simplify administrative procedures. It lays down rules on the mutual recognition of professional qualifications. It introduced a mutual evaluation of national professional regulations and a transparency exercise (i.e. screening the entry and exercise restrictions for professions and assessing their necessity). It also contains ongoing transparency obligations requiring all EU countries to report on the professions they regulate, to communicate to the European Commission the reasons for considering that existing or new requirements comply with the principles of non-discrimination and proportionality and to report on requirements that have been removed or made less stringent. It was amended by Directive 2013/55/EU, which brought in a number of changes to the framework governing the recognition of professional qualifications to modernise and facilitate the safe mobility of professionals across Europe. It placed a strong emphasis on the use of modern technology in recognition procedures to cut red tape and to speed up the formalities that enable professional mobility across Europe. The aim was to make it easier for
professionals to have their qualifications recognised, whilst guaranteeing a higher level of protection for consumers and citizens. In May 2020 the Commission published a report on the implementation of certain new elements introduced by Directive 2013/55/EU, which demonstrated significant problems with timely transposition and application of the new rules. Directive (EU) 2018/958 on a proportionality test before adoption of new regulation of professions establishes rules for proportionality assessments to be conducted by EU Member States before adopting new professional regulations or amending existing regulations. It aims to prevent undue restrictions on access to or the pursuit of professional activities and ensure transparency as well as the proper functioning of the internal market.

Sources:
30 years of Single Market – taking stock and looking ahead, Single market economic papers, December 2022
Commission communication on taking stock of and updating the reform recommendations for regulation in professional services of 2017, COM(2021) 385 final, 9 July 2021
Directive (EU) 2018/958 on a proportionality test before adoption of new regulation of professions

Problem description

Existing evidence suggest the following issues:

The European single market became reality on 1st of January 1993. Its overarching ambition has been to integrate the European economies by guaranteeing the free movement of goods, services, people and capital, making life easier for people and opening up new opportunities for businesses. Completion of the single market is an ongoing process, with new challenges and global developments shaping its form and functioning.

As established by the Commission’s economic paper taking stock of the single market’s 30 years of functioning, intra-EU trade integration in services continues to be below integration in the area of goods, despite the much larger size of the EU services market. The paper also concluded that despite noticeable progress, many services barriers appear to be persisting in the single market, with around 60% of barriers identified in 2002 reported still by service providers as important obstacles in 2020. The types of obstacles commonly reported were often related to a large quantity and variety of national rules, administrative procedures and generally business environment including at a multitude of regional and local levels.

According to the stock-tacking paper referenced above, the domain of professional qualifications in the EU continues to face barriers, which include: differences between Member States regarding activities considered to be "regulated professions", aptitude tests, differences regarding the fields of activity covered by a particular professional qualification or diverse
professional liability insurance schemes. The cumulative effects of the requirements in restricting the markets for professional services can be significant. Analysing implementation of the Commission reform recommendations for regulation in professional services and the restrictiveness indicator for seven professional services, the paper concluded that despite the specific guidance provided by the Commission, Member States have not made much progress in re-evaluating and removing unjustified or disproportionate professional regulation. Only a few Member States have taken action to remove unjustified or disproportionate regulation, often prompted by infringement procedures. Overall, the reforms only partially addressed the Commission’s 2017 recommendations, leaving significant room for further regulatory improvements in most Member States. By contrast, a number of Member States have recently tightened their regulations of certain professions.

Some emphasis needs to be put as well on ensuring a robust transposition and application of the Proportionality Test Directive, a major preventive tool to ensure that Member States do not unnecessarily restrict the functioning of the single market for professional services when adopting new, or modifying the existing, regulations of professions.

The focus of this opinion is on the free movement of professionals, even more relevant in the context of the European Year of Skills. Currently, more than three quarters of companies in the EU report difficulties in finding workers with the necessary skills, and latest figures from Eurostat suggest that only 37% of adults undertake training. When it comes to shortage occupations, the EURES Report on labour shortages and surpluses in Europe in 2022 confirms an excess demand rather than excess supply across a majority of Member States. The overall challenges lie in the need to improve job quality and attractiveness as well as access to skills development across the whole population. Moreover, the Digital Economy and Society Index shows that 4 out of 10 adults and every third person who works in Europe lack basic digital skills. The 2030 Digital Compass sets, amongst others, the EU target that by 2030, at least 80% of the population aged 16-74 should have at least basic digital skills. The European Year of Skills will build on many EU initiatives already ongoing to support skills and increase their take-up. In the present opinion the Platform analyses how new technologies could be used for professional services.

---

1 The 2022 Annual Single Market Report highlighted infringements launched under the Professional Qualifications Directive to address restrictive regulation of professions and issues related to recognition procedures (such as the European Professional Card, alert mechanism, partial access to or language requirements in professional services) covering services such as accountants, tax advisers, architects, lawyers, doctors, veterinarians and pharmacists;
2 A composite indicator, developed in 2017 to assess the cumulative burden of multiple regulatory requirements, providing a quantitative basis for benchmarking the Member States’ regulatory frameworks for the seven professions by measuring their restrictiveness on a scale from zero (least restrictive) to six (most restrictive). It follows a broadly similar methodology as the 2018 edition of the OECD Product Market Regulation (PMR) indicators;
3 Architects, civil engineers, lawyers, accountants and tax advisers, patent/trademark agents, real estate agents and tourist guides;
4 For example, two Member States have started regulating the profession of real estate agent (with a regulatory initiative pending in one more country), which was previously unregulated in these countries. A number of Member States have brought in restrictions on certain aspects of entry and exercise of legal, architectural and engineering services;
6 European Skills Agenda, Pact for Skills, the Structured Dialogue with the Member States on Digital Education and Skills, EU Talent Pool and Talent Partnerships with selected third partners, New European Innovation Agenda, and more, as well as significant EU funding and technical support including the European Social Fund Plus (ESF+), Recovery and Resilience Facility, Digital Europe Programme, Horizon Europe, Erasmus+ and many more;
in that respect and point to new ways of facilitating and simplifying the access to European aids or projects in order to make them more familiar to citizens.

Sources:
30 years of Single Market – taking stock and looking ahead, Single market economic papers, December 2022
Commission communication on reform recommendations for regulation in professional services, COM(2016) 820 final, 10 January 2017
Commission communication on taking stock of and updating the reform recommendations for regulation in professional services of 2017, COM(2021) 385 final, 9 July 2021
Annual Single Market Report 2022, SWD(2022) 40 final, 22 February 2022
European Year of Skills
EURES Report on labour shortages and surpluses in Europe in 2022

The Fit for Future Platform has acknowledged the issues raised by the legislation concerned as follows:

The aim of this opinion is to focus on innovative ideas to encourage and simplify mobility in those professions and areas which have a growth potential. Therefore, this opinion is not focused on aspects related to the different regulations of professions in the Member States, a subject widely addressed and developed by the European Commission, but on tools and measures that are valuable for fostering professional mobility but not sufficiently considered by the European Commission. It should be well noted, however, that the suggestions in this opinion are not aimed at favouring a greater number of regulated professions or at promoting greater regulation in any way.

Some of the mobility tools that were introduced by Directive 2005/36 and Directive 2013/55 on the recognition of professional qualifications are not being used to their full potential today (e.g. the common training principles or the professional card). Moreover, especially given the launch of the "European Year of Skills", it is interesting that the European Commission finds ways in which new technologies can be used to make sure that concepts included in the Directive such as continuous professional development are put into practice in an interoperable and interconnected way as today the EU is not exploiting their full potential.

Another piece of legislation that falls within this framework is the Directive 2006/123/EC on services in the internal market, which contains interesting provisions that are not being developed and that would have a positive impact on professional mobility. This opinion also addresses, in this context, the development of EU-wide Codes of Conduct and Quality charters of Service Policy.

Having pointed out these references specific EU legislation, it should be borne in mind that sometimes the problem does not stem from a lack of European initiatives. There are many instruments and mechanisms that could help the development and mobility of professionals. But they lack the necessary communication. Access to funding and information is fundamental.
SUGGESTIONS

Suggestion 1: Extend the professions covered by the European Professional Card

Description: The European Professional Card (EPC) regulated under article 4a of Directive 2013/55 is available from 18 January 2016 for five professions (general care nurses, physiotherapists, pharmacists, real estate agents and mountain guides). Several other professions could also benefit from this tool and the European Commission should therefore consider extending it to other professions. To this end, it is proposed:

- Analysis by the Commission in close cooperation with Member States on how the EPC is used in existing professions: improvement areas and challenges.

- Replicate part of the action plan that was carried out by the Commission between 2011 and 2015 and which proved its effectiveness for the five professions that currently have an EPC. That is:
  
  - Call for expression of interest: the Commission should invite professional organisations and associations to express an interest in the introduction of the EPC for their respective professions.
  
  - Consider the possibility to establish specific subgroups within the Group of Coordinators under Directive 2005/36/EC (2007/172/EC: Commission Decision of 19 March 2007 setting up the group of coordinators for the recognition of professional qualifications) comprising representatives of national administrations of EU countries, professional organisations and relevant social partners to assess the suitability of the EPC to a given profession.
  
  - Launching of a stakeholder consultation with the involvement of the professional organisations and social partners in the process on introducing the EPC for the selected professions. The aim of the consultation would be to:
    
    ▪ collect data on mobility, application procedures, fees, authorities and professional recognition,

    ▪ assess whether the card is appropriate for these professions,

    ▪ estimate the impact on EU countries.

The Commission should also consider ex officio consultation of those professions for which it considers that the European Professional Card could be of interest, promoting legislative initiatives related to the development of the EPC on the professions that wish to implement it and promoting ex officio the EPC in those professions in which it considers its application to be advantageous. In this same sense, the European Parliament has recently requested the Commission to increase the number of professions in which the EPC is applied (Resolution of January 20, 2021, on strengthening the single market: the future of the free movement of services (2020/2020(INI)).
The Platform wishes to point out, in any case, that the best and greatest use of this tool should not lead to regulating a greater number of professions but to simplify the current recognition procedures.

It should also be noted that lately the Commission has carried out, within the Group of Coordinators under directive 2005/36/EC, an initial survey among Member States, for getting views about possible extension of EPC to more professions with a higher rate of mobility. The results of the survey are still under assessment by the Commission and they should be awaited before any expansion of EPC is initiated.

**Expected benefits:** The EPC has demonstrated to be a useful tool to facilitate and expedite the recognition of professional qualifications, reduce unjustified or disproportionate barriers and facilitate access to and exercise of professions. The correct implementation of the EPC saves time and money for professionals and competent authorities by reducing the bureaucracy and complexity of the qualification recognition process. It also improves professional mobility, which contributes to the economic growth and development of the EU. Better consumer protection: provided that the recognition of the EPC has not been tacit, the EPC makes it possible to verify the professional qualification of the service provider and contributes to the improvement of service quality and the reduction of fraud or malpractice.

---

**Suggestion 2:** Implement the provisions of the Common Training Principles

**Description:** The European Commission has to use the possibilities offered by Article 49a and 49b of Directive 2013/55 which cover automatic recognition on the basis of the so-called Common Training Principles. To date, there is only a Commission Delegated Regulation (EU) 2019/907 of 14 March 2019 establishing a common training test for ski instructors under Article 49b. The European Commission should take the lead in promoting the use of this valuable tool for professional mobility and work with European professional organisations to select professions that can serve as a pilot project, as was done with the EPC. Professions selected for the pilot project must meet the requirements set out in article 49 a (2) of the Professional Qualifications Directive (2005/36/EC). The European Commission is invited to explore the possibility of setting up a specific ad hoc group on Common Training Frameworks (CTF) to develop those in cooperation with professional organisations. The same scheme of action proposed for the EPC can be applied and it should always be ensured that CTFs are not used to seek further regulation but to encourage simplified professional mobility:

- Call for expression of interest: the Commission should invite professional organisations and associations to express an interest in the introduction of the Common Training Principles for their respective professions.

- Creation of an ad hoc group on Common Training Principles within the framework of the European Commission with representatives of the European Commission, representative

---

7 Since the Treaty on the Functioning of the European Union excludes any harmonisation in the field of Member States’ educational system, a Common Training Framework can only build on existing commonalities and divergence in terms of training for a specific profession. A suitable candidate profession for a Common Training Framework should already have a relatively high level of cross-border mobility;
organizations of the professions at the EU level and professional organizations and competent authorities of the Member States to analyse ex officio which professions may be suitable for the establishment of the Common Training Principles and to work specifically with those professions that have already expressed a direct interest in the development of this tool for mobility. A strict coordination between the ad hoc group on CTP and the Group of Coordinators for the recognition of professional qualifications should be ensured.

- More active support for the professional groups that have already expressed the interest in a Common Training Framework towards reaching the necessary agreement for the implementation of these CTFs.

In the same sense, the European Commission itself pronounces itself in its Staff Working Document of January 31\(^8\): «The introduction of the European Professional Card and of a Common Training Test have facilitated the more efficient recognition of professional qualifications in recent years. The use of these instruments is currently focussed on a number of professions and a wider application could offer faster and more easily accessible systems of recognition to more citizens and promote labour mobility». It should also be recalled that in the course of 2022 the Commission actually consulted Member States, within the Group of Coordinators under directive 2005/36/EC, about the opportunity to introduce a CTF for a number of professions assuming their economic relevance in the EU, a high mobility of the professionals concerned and a high level of standardization in training. Furthermore, the Commission engages actively and regularly with professional associations who have expressed interest in a Common Training Framework.

The Platform considers that it would be useful for the Commission and Member States to work with relevant services to establish a link between ESCO and the Common Training Framework.

The Platform supports the validation done within the framework of EQF.

In the process of designing the CTFs, the Commission should promote an appropriate dialogue with the social partners.

**Expected benefits**: The system of automatic recognition of professional qualifications has proven to be highly effective. Its extension to other professions through the Common Training Principles would be a way to reduce time, money and bureaucracy associated with recognition processes. This would favour greater ease for those professionals who wish to practice outside their states of origin.

---------------------------------------------

**Suggestion 3:** Encourage continuing Professional Development

**Description:** Under Article 22(b) of the Directive 2005/36/EC, Member States shall ensure - in accordance with their own procedures - by encouraging CPD, that professionals covered by Chapter III Title III of the Directive are able to update their knowledge skills and competences in order to maintain a safe and effective practice and keep abreast of professional developments.

Regarding professions other than the ones covered by Title III Chapter III, in line with Article 14(5), any knowledge, skills and competences acquired by the applicant in the course of his professional experience or through lifelong learning, and formally validated to that end by a relevant body, in any Member State or in a third country, must be taken into account by the host Member State when assessing the qualifications of the applicant under the general system of recognition. Article 56(4)(d) of Directive 2005/36/EC tasks national coordinators with exchanging information and best practices for the purpose of optimising continuous professional development. It should be added that article 59(3) of Directive 2005/36/EC requires Member States to ensure that any mandatory continuous professional development requirements and justified and proportionate.

The European Pillar of Social Rights defines in the first principle right to Lifelong Learning and training for all in the EU. The implementation of this principle is important to ensure that such a right (which constitutes a guarantee for the users of the services) is provided to all workers, including to those who fall under the recognition of professional qualifications of the Directive 2005/36. The current scenario shows that there are fragmented and non-uniform systems in the EU as regards the validation of the continuing training and the continuing professional development of the professionals. The general process is that CPD is not provided to the workers in most of the regulated professions and it is their professional responsibility to participate in CPD paid from their own budget outside of working hours.

Always bearing in mind that we are facing a question that falls within the competence of the member states, including social partners in the national labour market, it is proposed that the Commission analyse (e.g. through a study) the provision on CPD systems, considering also the governance, regulations on professions and professional organisations and social partners’ involvement in the systems in Europe for the different professions, their use and validation within the mobility of professionals and their integration into the system of recognition of professional qualifications. Collective bargaining and social dialogue could play a key role in the process of validating non-formal education and lifelong learning.

The results of this study will allow to analyse ways to facilitate the access to the right to LLL and training in Member States, while bearing in mind that in the absence of harmonisation and duly taking into account the need for any regulation to be justified and proportionate, education and training (including continuing education and training) falls within the competence of the Member State.

**Expected benefits**: Access to quality and including upskilling and reskilling for professionals enhances their employability and professional prestige, as well as efficiency in recruitment, national and international mobility and the general benefit of patients, clients, companies and citizens. It also contributes to the growth and quality of professional services.
Suggestion 4: Improve of the information provided in the database of regulated professions

Description: According to Article 59(1) of Directive 2005/36/EC, the Commission shall establish and maintain a publicly accessible database of regulated professions, including a general description of the activities covered by each regulated profession. The database contains information on regulated professions, statistics on migrating professionals, contact points and competent authorities, as provided by EU Member States, EEA countries, the UK\(^9\) and Switzerland. Each country is responsible for updating information on its regulated professions, competent authorities and statistics. The Commission must ensure that the information provided is easily understood by citizens, accessible and homogeneous, an issue that currently has significant room for improvement. It is important that the Commission shall provide sufficient training and guidance to the competent authorities of the Member States on the use of the regulated professions database in order to ensure consistency of information in the database.

The information provided must be comprehensible to the public. The section on 'screening information' in the database is particularly useful to see how each profession often has a different name and qualification for specific tasks. However, in some cases, there is a different degree of accuracy in the information available that may limit professional mobility. Member States should properly fill in the database and keep it up-to-date with the requested information, an action to be duly supervised by the European Commission. This is the real added value of this important source of information to get comparable data. It is considered important that all professions have the same information available and that it is presented in a homogeneous way: name, detailed description of the profession (activities, productive sectors, objectives), standard(s) regulating the profession with direct access to them in English (if possible), specific qualifications giving access to the profession (diplomas or accreditations), corresponding EQF (European Qualifications Framework) level (in those cases where applicable), an organisation to contact for each question, professional organisations linked to the profession (in those cases where it is possible), requirements for the exercise of the profession in each Member State, among others.

This work shall be conducted by considering outcomes of the public consultation on Europass, and the possible merger of different European Commission’s information websites to people who want to live, work, and learn in the EU.

The recent Commission Implementing Decision (EU) 2023/423 of 24 February 2023 establishes a pilot project to integrate the database of regulated professions referred to in Article 59(1) of Directive 2005/36/EC into the Internal Market Information System (IMI). The Platform welcomes this initiative.

Expected benefits: The ongoing training and guidance to Member States by the European Commission as regards the information provided by the Member States in the database of regulated professions and the ongoing improvement of the information available in the database.

\(^9\) Information on UK regulated professions are now to be considered as ‘archived data’. Since the withdrawal from the EU, UK has ceased to feed and update the RegProf database;
'screening information' tab in the light of what is provided in the Directive 2018/958/EU, is essential for citizens, authorities and professionals to have easier access to detailed and transparent information.

Suggestion 5: Lead the establishment of EU-wide Codes of Conduct and Quality charters

**Description:** Article 37 of Directive 2006/123/EC of the European Parliament and of the Council of 12 December 2006 on services in the internal market provides that Member States shall, in cooperation with the Commission, take accompanying measures to encourage the drawing up at Community level, particularly by professional bodies, organisations and associations, of codes of conduct aimed at facilitating the provision of services or the establishment of a provider in another Member State, in conformity with Community law. Member States shall ensure that the codes of conduct referred to in paragraph 1 are accessible at a distance, by electronic means.

No steps have been taken in this respect, despite the fact that one of the essential elements of the provision of a service by a professional relies on the fact that this professional must comply with well-defined ethical, deontological and professional standards, the non-observance of which is often subject to a system of infringements and sanctions. In those cases in which professional mobility takes place, the professional is often unaware of the code of ethics or conduct to which he/she must submit, and sometimes there are even rules on professional conduct that are not congruent between Member States.

Closely related to this issue, Article 26 of the Services Directive establishes that Member States shall, in cooperation with the Commission, take accompanying measures to encourage providers to take action on a voluntary basis in order to ensure the quality-of-service provision, inter alia, by drawing up their own quality charter or participation in quality charters or labels drawn up by professional bodies at European Union level.

A regulatory improvement in this field requires the European Commission to promote the development of these articles and the establishment of European-wide codes of conduct and quality charters in the area of liberal professions.

**Expected benefits:** This will benefit not only professionals but especially the recipients of professional services who will be aware of the ethical and deontological regulations, as well as the professional organizations to which they can turn in the event of non-compliance by professionals. The creation of quality charters at the EU level will improve the quality of the services provided by professionals by making the rules more widely known and easier for them to comply with.

Suggestion 6: Improve access to information

**Description:** Information related to professional mobility is scattered in different European Union websites, making it difficult for professionals to access it quickly and easily. For
example, in 2020 the European Commission published an interesting guide on recognition of professional qualifications that should be more accessible to citizens. The YourEurope Portal should host all information related to the recognition of professional qualifications and in a homogeneous way for all professions and all Member States. EU portals that inform, advise and assist professionals wishing to provide their services on a cross-border basis (YourEurope portal itself, SOLVIT centres, one-stop shops, help desks, contact points, professional organizations in each Member State...) should be better promoted and the subject of communication campaigns. Furthermore, more efforts are needed to improve information regarding relocation assistance to support the logistics involved in moving country – e.g., finding accommodation, registering for tax purposes, finding a school for the children, possibly assistance in finding a job for partners, etc. This work shall be conducted by considering outcomes of the public consultation on Europass, and the possible merger of different European Commission’s information websites to people who want to live, work, and learn in the EU. Moreover, synergies should be drawn with the work of EURES.

**Expected benefits:** Better access to information promotes better use of European resources for professional mobility.

**Suggestion 7: Improve compulsory training programs**

**Description:** The necessary control of the respect of the requirements of the Directive 2005/36/EC concerning, in particular, the completion of the practical training period for certain professions updating the subjects taught is crucial in order to integrate new issues through an appropriate updating and periodic revision of Annex V of the Directive. Discussions on this topic among the competent authorities, professional organisations and social partners can be beneficial for an adequate implementation of the requirements of the Directive.

**Expected benefits:** The requirements of Directive 2005/36/EC regarding practical training are still not respected by all Member States and this leads to an inefficiency of the qualification recognition system. It is essential to recall that it is the Member States’ responsibility to implement these requirements but it is considered that the issue can be better addressed through a structured dialogue between the European Commission, competent authorities, professional organisations and social partners.

**Suggestion 8: Improve access to finance**

**Description:** As stated in the European Commission's document: Action Lines for Bolstering the Business of Liberal Professions (Ref. Ares(2016)424583 - 26/01/2016): «Access to finance is a key issue for an enterprise to be able to invest, operate and grow. Due to their frequently small size, liberal professions' business models are based on few assets that can serve as collateral; this results in a personal liability of the owner (which often results in the owner having to his/her private assets as collateral), limited advance finance and heavy dependence on credit financing. As a consequence, financing represents for liberal professions a serious challenge, especially when it comes to financing modernisations or expansions, or even participating in EU programmes. Therefore, improved financing probably represents lever with
high potential to boost the growth of liberal professions». The Platform invites the European Commission to analyse the creation of specific funding opportunities for those professionals who want to move, export or expand their activity to other Member States so that, for instance, cover part of the travel, means and resources for the provision of the service in the country of destination, accommodation, or lines of credit for the establishment-

Expected benefits: Greater access to finance and mobility aids that are easily accessible and implemented would lead to increased professional mobility by encouraging professionals to practise outside their home states.

Suggestion 9: Enhance communication between stakeholders and the Commission

Description: It is generally considered that professional mobility would be enhanced if the representative organizations of the professions and other stakeholders could provide the European Commission with feedback based on their direct and constant dealings with professionals. The Commission should, in this respect, encourage close cooperation between the competent national authorities and professional organizations and the Commission. The coordination, synergies and information exchange also within the European Commission needs to improve. Working groups could be set up between the Commission and professional organisations to channel the exchange of information inviting also to the competent national authorities and social partners when considered necessary by the EC. The European Commission document Action Lines for Bolstering the Business of the Liberal Professions proposed, already in 2016, the creation of a Liberal Profession Forum: 'the Forum could meet once a year and bring together representatives of the European associations of liberal professions, of the main national associations, as well as other representatives or stakeholders playing a key role for the liberal professions. It could offer the liberal professions the opportunity to provide policy input to the European Commission, convey their needs and make proposals. It could be supported by an online forum to accompany and facilitate the work of the Working Group, i.e. the exchange of information, documents and various studies.' The Commission is encouraged to reassess this proposal expressly indicating the involvement of the competent national authorities.

Expected benefits: The exchange of information with stakeholders is a valuable source of information for the European Commission to learn first-hand about potential areas for regulatory improvement. The involvement of national authorities in the working groups would allow an intensive exchange of information that would be further strengthened through internal discussions with stakeholders and professional organisations. National authorities could effectively represent at EU level the interests of national professions and, moreover, could benefit from the European dialogue about common policies to improve national regulation. The participation of social partners would also be positive for a comprehensive dialogue and a full cooperation among institutions and civil society.
**Suggestion 10: Clarify situation of mixed qualifications**

**Description:** Sectoral professions often face a practical problem which should be addressed by the Commission in order to secure the mobility of young professionals in Europe: currently holders of mixed qualifications (university degree in one Member State and professional access/fulfilment of further requirements in another Member State) cannot benefit from automatic recognition when moving to a third Member State. It is important to support this mobility and secure the access to automatic recognition for mixed qualifications by clarifying interpretation of ‘host country’ or -if required necessary- a clarification of the Directive. In addition, the application of the Lisbon Recognition Convention in accepting the level of qualification is important.

**Expected benefits:** Ensure mobility of young professional in cases of mixed- qualification

**Suggestion 11: Update restrictiveness indicator**

**Description:** It is important to take into account that the Reform Recommendations on professional regulation are based on a Regulatory Restrictiveness Indicator that puts a disproportionate weighting (70%) on ex ante regulation (governing access to the professions) and only 30% on ex post regulation (governing practice of the profession).

It’s a problem that it doesn’t reflect the actual situation correctly as the Commission omits to make reference to practice requirements arising from ex post regulation. Practical examples show that this kind of regulation can cause quite a lot of practical barriers for professional mobility.

Therefore, it is important to re-think the concept of the restrictiveness indicator as well as the approach of the Reform Recommendations. It is suggested to re-consider the assessment basis of the restrictiveness indicator taking into account ex post professional requirements in the indicator.

**Expected benefits:** better economic analysis will lead to improvement in the measures taken based on these analyses.