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2026/0275 (COD)

Proposal for a

DIRECTIVE OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL

on the recognition of qualifications of third-country nationals

{SEC(2026) 990 final} - {SWD(2026) 989 final} - {SWD(2026) 990 final} - {SWD(2026) 991 final}

(Text with EEA relevance)

EXPLANATORY MEMORANDUM

1. CONTEXT OF THE PROPOSAL

• Reasons for and objectives of the proposal

The Treaties, the Charter of Fundamental Rights of the European Union and the European Pillar of Social Rights establish a broad framework supporting access to employment, skills development and participation in the Union labour market. While the free movement of workers, freedom of establishment and freedom to provide services enshrined in the Treaties are rights of Union citizens, third-country nationals who are legally resident in the Union can also benefit from this broader framework, in accordance with the conditions and within the scope laid down in Union law. The European Pillar of Social Rights, proclaimed in 2017, emphasises the importance of skills and employability in its first chapter on equal opportunities and access to the labour market. In particular, Principle 1 on education, training and lifelong learning recognises everyone's right to maintain and acquire skills enabling full participation in society and the labour market, and Principle 4 provides for the right to active support to find or change jobs, including through re-skilling and job-search assistance.

This long-standing framework is reflected in the Commission's Political Guidelines for 2024–2029, which emphasise the importance of skills portability and of enabling people to make effective use of their skills in the Union. In her Political Guidelines for 2024–2029, the President of the Commission underlined the need to ensure that the Union benefits from high-quality skills, irrespective of where and how they were acquired, and to facilitate the recognition of skills acquired in one country in another. These objectives are also reflected in the 'One Europe, One Market' roadmap, launched in April 2026 with the objective of further deepening and completing the Single Market by the end of 2027, including by removing remaining barriers, reducing administrative burden and strengthening the Union's competitiveness.

While the EU labour market has reached record-high employment levels, it faces widespread and structural skilled labour shortages, particularly in sectors such as healthcare, ICT, construction, energy, and transport, driven in part by an ageing population and a shrinking working-age workforce. These shortages coexist with persistent 'skills waste', overqualification and the underutilisation of skills being significantly more pronounced among third-country nationals than among the domestic workforce. This mismatch also depresses earnings for those working below their qualification level and risks contributing to downward wage pressure and reducing the return on skills for employers and represents a loss of overall productivity for the Union economy at a time of skills shortages. Whether already residing in a Member State or seeking to migrate to the Union, third-country nationals face recognition procedures for their qualifications that are fragmented, complex and lacking in transparency, leading to uncertain and inconsistent outcomes. Two distinct but often interconnected types of procedure are concerned: formal recognition for access to a regulated profession, and qualification or skills checks carried out as part of a procedure to obtain a long-stay visa or a residence permit (for instance under the EU Blue Card or national highly-skilled-worker schemes). The average recognition procedure is estimated to cost EUR 1,500 and to take 14.2 months, with 70.4% of third-country nationals surveyed considering the length of the process a 'big' or 'very big' problem. Nearly half of third-country nationals who initiated recognition procedures were seeking access to a regulated profession in healthcare, a sector facing acute shortages across the Union. Unlike EU nationals, who benefit from the mutual recognition mechanisms of Directive 2005/36/EC (the Professional Qualifications Directive), third-country nationals have no comparable EU framework. This gap undermines

the effectiveness of the Union's talent-attraction ecosystem — including the EU Blue Card, the EU Talent Pool, Talent Partnerships with priority third countries and the European Legal Gateway Office pilot — whose value for employers and jobseekers depends on recognition systems functioning adequately. Procedures for recognition of qualifications for access to further learning are outside the scope of this proposal.

This proposal responds to a clear and repeated political mandate. The Political Guidelines of Commission President von der Leyen committed to a Skills Portability Initiative 'to ensure a skill acquired in one country is recognised in another' and to 'make it easier to attract the right talent with harmonised rules on the recognition of qualifications'. The March 2025 Communication on the Union of Skills confirmed this commitment, and the Letta report on the Single Market highlighted the need to extend automatic recognition of qualifications to help address persistent labour shortages. The European Council, meeting on 19 March 2026, called for a Commission proposal on the portability of qualifications and skills, including third-country nationals, by autumn 2026. The proposal is part of the Skills Portability Initiative and its general objective is to facilitate the recognition of qualifications of third-country nationals in order to address labour and skills shortages in the Union. Three specific objectives are pursued: (i) streamlined recognition systems within and between Member States; (ii) reduced legal and administrative complexity for third-country national applicants, employers and authorities; and (iii) increased trust in, and understanding of, qualifications obtained in third countries.

- **Consistency with existing policy provisions in the policy area**

The proposal is complementary to, and does not overlap with, existing EU instruments. The Professional Qualifications Directive provides a robust framework for the recognition of professional qualifications, but its Single Market legal basis confines its personal scope to EU nationals; it does not, and cannot, extend to third-country nationals. Existing EU migration instruments contain only limited provisions on recognition, generally limited to equal treatment with nationals of the Member State concerned. None of these instruments regulate the organisation, structure or functioning of recognition procedures as such, or require Member States to simplify or coordinate such procedures. Commission Recommendation (EU) 2023/2611 is the only EU-level instrument specifically addressing recognition of qualifications of third-country nationals and is non-binding and therefore cannot ensure consistent outcomes across the Union. The proposal is one of three interlinked actions under the Skills Portability Initiative. Action 1 addresses improving the availability of reliable, comparable and verifiable digitalised information on qualifications and skills in the EU. Action 2 modernises recognition procedures under the Professional Qualifications Directive for EU citizens. Action 3 — the subject of this proposal — addresses the gap in the EU legal and policy framework covering recognition of qualifications of third-country nationals (and is based on Article 79(2), points (a) and (b), TFEU).

The procedural guarantees in this proposal are aligned with those applicable to Union citizens under Directive 2005/36/EC as amended by Action 2 of the Skills Portability Initiative, and do not place third-country nationals in a more favourable position than Union citizens exercising free movement. The differences between the two frameworks reflect the practical challenges of assessing qualifications from third countries, which justifies the need for an extensive prior review of the learning programmes concerned benefitting from automatic recognition.

- **Consistency with other Union policies**

The proposal forms part of the Fair Labour Mobility Package. It responds to the Competitiveness Compass's identification of skilled labour shortages as a structural

competitiveness risk, to the Union of Skills and to the Single Market Strategy's call for digitalisation and procedural simplification of recognition. It complements and reinforces the effectiveness of the EU Talent Pool (established by Regulation (EU) 2026/1047), Talent Partnerships with priority third countries, the European Legal Gateway Office pilot, the EU's Visa Strategy, the Commission Recommendation on attracting talent for innovation, and the Action Plan on Integration and Inclusion, all of which rely on well-functioning recognition systems to deliver their intended results. The proposal also contributes to the objectives of the European Asylum and Migration Strategy adopted in January 2026 which aims at making the EU the most attractive place in the global race for talent in the next five years. The proposal is consistent with the Union's policy on trade, in particular as regards the framework on Mutual Recognition Agreements established in EU free trade agreements. The initiative also contributes to the 2030 Agenda for Sustainable Development, in particular SDG 1 (No poverty), SDG 8 (Decent work and economic growth), SDG 9 (Industry, innovation and infrastructure) and SDG 10 (Reduced inequalities).

2. LEGAL BASIS, SUBSIDIARITY AND PROPORTIONALITY

• Legal basis

The proposal is based on Article 79(2), points (a) and (b), TFEU, which empowers the European Parliament and the Council, acting in accordance with the ordinary legislative procedure, to adopt measures in the area of the conditions of entry and residence of third-country nationals and the definition of their rights, including the conditions governing freedom of movement and of residence in other Member States and access to employment. Recognition of qualifications is directly linked to the conditions of entry and residence within the meaning of Article 79(2)(a) TFEU, since access to employment — and therefore to residence for work purposes — often depends on whether qualifications obtained in a third country can be recognised. The proposal also supports the effective exercise of the rights of third-country nationals legally residing in the Union under Article 79(2)(b) TFEU, by facilitating access to employment corresponding to their qualifications and reducing the underutilisation of their skills. This legal basis is distinct from the Single Market legal bases (Articles 46, 49, 53 and 62 TFEU) used for Actions 1 and 2 of the Skills Portability Initiative, which are confined in personal scope to EU nationals exercising free movement rights. In accordance with Article 79(5) TFEU, the proposal does not affect Member States' right to determine the volumes of third-country nationals admitted to their territory to seek work, whether employed or self-employed.

• Subsidiarity (for non-exclusive competence)

Article 79 TFEU falls within Title V TFEU (the Area of Freedom, Security and Justice), which Article 4(2)(j) TFEU identifies as a shared competence between the Union and the Member States. The objectives of streamlined, simple and trusted recognition procedures for third-country nationals cannot be sufficiently achieved by Member States acting alone. Divergent national systems, combined with the absence of any legal framework comparable to Directive 2005/36/EC, generate cross-border uncertainty and burden that individual Member States cannot resolve alone; recognition procedures interact structurally with EU migration instruments whose effectiveness depends on their functioning adequately; and the lack of trust in third-country qualifications would best be addressed through EU-level tools that generate economies of scale which would be inefficient to replicate separately across 27 national systems. This necessity was confirmed in the Public Consultation, in which 95.3% of respondents considered EU-level action very or somewhat necessary. Action at Union level is more effective than action at national level and delivers clear added value: it would allow

third-country nationals to better understand requirements, prepare applications and anticipate outcomes; it would lower the administrative burden faced by employers, particularly SMEs, in navigating divergent national systems; and it would strengthen the EU's position in the global competition for talent by supporting instruments such as the EU Blue Card, the EU Talent Pool and Talent Partnerships. The preferred policy option is estimated to generate aggregate administrative savings for competent authorities, employers and third-country nationals amounting to approximately EUR 22.3 million per year, monetised time savings for applicants of approximately EUR 300 million per year, and a reduction in employer-borne administrative costs of approximately EUR 20 million per year — benefits that could not be achieved as efficiently through 27 separate national approaches. The proposal does not transfer Member States' competence over the definition of regulated professions, national education and training systems, or migration and admission decisions.

- **Proportionality**

The Impact Assessment examined three policy options: a non-binding option based on soft measures and guidance (PO1); a binding option establishing common procedural rules, including an EU authenticity-verification service and interoperable national databases (PO2); and a binding option combining these common rules with automatic recognition for a defined set of professions, grounded in prior verification of third-country learning programmes (PO3, the preferred option). Each option was assessed against the principles of subsidiarity and proportionality: PO1 imposes no new obligations on Member States; PO2 addresses procedural requirements without harmonising substantive assessment standards; and PO3, while going further, remains grounded in the existing framework of minimum training requirements under the Professional Qualifications Directive, preserves Member States' competence over qualification standards and admission decisions, and makes participation by third-country institutions in the automatic-recognition register voluntary. PO3 was identified as the preferred option because it generates aggregate net benefits substantially larger than the alternatives (an overall comparative score of 9, against 6 for PO2 and 3 for PO1, across the criteria of effectiveness, efficiency and coherence), while remaining limited to what is necessary: it does not create a 'once-only' EU-wide validity of recognition, does not harmonise which professions are regulated, and does not alter or interfere with Member States' competence over migration and admission decisions. Implementation obligations are proportionate to the improvements it delivers and sit within the established EU legislative tradition of minimum harmonisation in the field of recognition of qualifications. The measures in the proposal are directly linked to the scale and persistence of the problems associated with recognition of qualifications in the wider context of talent attraction. The general system simplifies procedures without harmonising substantive assessment standards. The automatic recognition system is grounded in prior programme verification. The system preserves Member State competence over qualification standards and admission decisions; participation by third-country institutions is voluntary and the system will expand based on demonstrated interest by the institutions, limiting the risk of unintended effects on origin country skills systems. The proposal does not affect Member State competence to take recognition decisions or manage migration and admissions. Further detail on the comparative assessment of policy options and their proportionality is set out in Sections 6 and 7 and the Preferred Option section of the Impact Assessment (SWD) accompanying this proposal.

- **Choice of the instrument**

The proposal takes the form of a Directive laying down minimum requirements for the recognition of qualifications of third-country nationals. A Directive is considered the most appropriate instrument, as it establishes binding common rules while leaving Member States the discretion to organise their competent authorities and to integrate the new rules within

their own administrative and procedural traditions, consistent with the degree of harmonisation traditionally applied in this field (including under Directive 2005/36/EC). A Regulation was considered disproportionate and unsuitable given that the proposal lays down only a harmonised minimum set of rights and guarantees, leaving Member States free to introduce or maintain more favourable systems; the common rules must be integrated into the highly diverse recognition and migration procedures currently in place across Member States; and the common rules would not regulate the matter exhaustively.

3. RESULTS OF EX-POST EVALUATIONS, STAKEHOLDER CONSULTATIONS AND IMPACT ASSESSMENTS

• Ex-post evaluations/fitness checks of existing legislation

There is no existing EU legislation specifically addressing the recognition of qualifications of third-country nationals, and therefore no ex-post evaluation or fitness check of such legislation exists. The only EU-level instrument in this field, Commission Recommendation (EU) 2023/2611, is non-binding and has not been subject to formal ex-post evaluation. The problem analysis underpinning this proposal is instead based on extensive desk research, primary fieldwork and stakeholder consultation, described in the Impact Assessment, which quantifies the practical consequences of the current fragmented landscape, including the average cost (EUR 1,500) and duration (14.2 months) of recognition procedures for third-country nationals.

• Stakeholder consultations

A Call for Evidence covering the Skills Portability Initiative, its three actions and envisaged policy options was published on 5 December 2025 and remained open until 27 February 2026. A Public Consultation ran in parallel from October 2025 to April 2026. Targeted consultations were conducted between October 2025 and April 2026 with national competent authorities, healthcare professional organisations (including CPME, EFN and UEMO), employers, civil society organisations and third-country national applicants, including a dedicated third-country national survey, together with bilateral meetings and written contributions from Member State governments. Employer, third-country national, civil-society and professional-organisation respondents were broadly supportive of binding common procedural rules; Member State positions were more nuanced. Some Member States explicitly supported common rules modelled on the general system of Directive 2005/36/EC; others offered conditional support tied to avoiding new administrative burden and maintaining alignment with existing national frameworks. These positions, and the Commission's assessment of how they have been reflected in the preferred option, are summarised in Annex 2 (Stakeholder consultation synopsis report) of the Impact Assessment.

• Collection and use of expertise

The Impact Assessment draws on a study conducted by an external contractor (a consortium led by EY Italy in collaboration with the Istituto Ricerca Sociale, IRS). The call for tenders was launched on 25 July 2025 and the study was awarded on 16 October 2025, with a kick-off meeting on 24 October 2025, an inception report delivered on 16 December 2025, a draft interim report on 3 March 2026 and a final report on 30 April 2026. An Inter-Service Steering Group, comprising more than twenty Commission services, met three times to steer the preparation of the Skills Portability Initiative, complemented by a dedicated steering group for the external study and other bilateral meetings.

- **Impact assessment**

This proposal is supported by an Impact Assessment. The draft Impact Assessment was submitted to the Regulatory Scrutiny Board on 15 June 2026 and examined by the Board on 15 July 2026. The Regulatory Scrutiny Board issued a positive opinion with comments on the draft Impact Assessment on 17 July 2026. Three policy options were compared against a 'do-nothing' baseline: PO1 (non-binding soft measures), PO2 (common binding procedural rules) and PO3 (common binding procedural rules with automatic recognition for a defined set of regulated professions, the preferred option). PO3 scored highest across all three comparative criteria (effectiveness, efficiency and coherence), generating aggregate administrative savings estimated at EUR 22.3 million per year, monetised time savings for applicants of approximately EUR 300 million per year, and a reduction in employer-borne administrative costs of approximately EUR 20 million per year, against implementation costs of EUR 28.7–50.7 million one-off and EUR 3.7–6.0 million per year, borne mainly at EU level. The final policy proposal reflects the preferred option identified in the Impact Assessment.

- **Regulatory fitness and simplification**

While this is not a REFIT initiative in the strict sense, the proposal is designed to reduce, rather than add to, the administrative burden currently faced by third-country nationals, employers and competent authorities. Common procedural rules are estimated to reduce certified translation needs by around one third, while the new support services for assessment of authenticity will reduce the burden associated with verifying documents. Mandatory coordination between recognition and migration authorities eliminates duplicate qualification assessments across parallel administrative procedures. In line with the simplicity by design principles applied to this proposal, the following elements were assessed and addressed: (i) digital-by-default delivery, (ii) the "once-only" principle for organisation of recognition procedures, and (iii) proportionality for small administrations and employers. For the professions covered by automatic recognition, processing times are projected to fall from 14.2 months to approximately 4 months freeing competent authority capacity for more complex cases. Employers stand to benefit from faster recruitment and more predictable timelines, with administrative costs for hiring a recognised professional estimated to fall by 35–50% for sectoral professions, generating indicative aggregate savings of EUR 14–30 million per year. No new administrative costs are expected for citizens or businesses, consistent with the 'one in, one out' approach; the proposal does not impose compliance obligations on economic operators, notably SMEs and micro-enterprises, and therefore does not require a specific exemption for micro-enterprises. A dedicated SME panel survey captured the specific experiences and views of SMEs to gather their understandings of the costs, administrative burden and expected benefits associated with EU-level action. The SME Panel Survey (2026, n=159) found that 68% of respondents identify reduced administrative burden during recruitment as the primary anticipated benefit of a more common EU recognition framework, 61% identify faster recruitment processes, and 70% identify faster and more transparent procedures as a structural factor in attracting qualified third-country professionals. Faster, more predictable procedures are expected to generate monetised time savings for employers of around EUR 20 million per year. The proposal is designed to be internet-ready: it requires that all requirements, procedures and formalities in recognition procedures may also be completed remotely and by electronic means and that relevant information is made available on existing EU digital tools and platforms.

- **Fundamental rights**

The proposal reduces procedural barriers to recognition, enhancing access to occupations and employment rights (Articles 15 and 20 of the Charter of Fundamental Rights of the European

Union; Principle 4 of the European Pillar of Social Rights). It introduces enforceable procedural guarantees — binding timelines, defined documentation requirements and appeal rights — giving third-country nationals an effective remedy against procedural failures (Article 47 of the Charter) and supporting the right to good administration (Article 41). By enabling access to regulated professions commensurate with qualifications of third-country nationals, it improves fair and just working conditions (Article 31 of the Charter; Pillar Principles 5 and 6). A common procedural baseline applicable irrespective of nationality reinforces compliance with the principle of non-discrimination and promotes equal opportunities (Articles 21 and 23 of the Charter; Pillar Principles 2 and 3); the automatic recognition channel addresses the risk of undeclared work disproportionately borne by women in care and nursing professions, with a direct gender-equality dimension, and tailored information and support are provided for refugees and other vulnerable applicants. The proposal also gives effect to the requirement of a high level of human health protection (Article 35 of the Charter), as recognition of medical qualifications remain conditional on meeting the applicable minimum training requirements, compensation measures and language controls. Processing of personal data by Member States' competent authorities under this Directive is carried out in accordance with Regulation (EU) 2016/679 (GDPR); processing by the Commission, including for the support services for assessment of authenticity, is carried out in accordance with Regulation (EU) 2018/1725 (EUDPR).

4. BUDGETARY IMPLICATIONS

The proposal entails budgetary implications for the Union, principally linked to the establishment and operation of the support services for assessment of authenticity (Article 28), to be procured externally, the review architecture underpinning automatic recognition (trusted review bodies and the associated delegated-act framework under Articles 12, 14 and 16), and the secretariat of the group of coordinators for the recognition of qualifications of third-country nationals (Article 33).

The resources needed may be provided in the Commission’s proposal for the next MFF 2028-2034, in particular the EU Facility under the National and Regional Partnership Plans. The Commission assesses that part of the existing staff can be redeployed to meet the needs generated by this proposal, and an additional three full-time equivalents will be necessary to complement the overall needs.

The estimated impact on expenditure and staffing for 2028 and beyond is added for illustrative purposes only and does not pre-judge the next Multiannual Financial Framework. The source of financing and scope of Union financial commitment in the post-2027 period remain subject to the outcome of interinstitutional negotiations on the MFF 2028-2034 and thereafter shall be determined through the annual budgetary procedure. All appropriations and staffing allocations as of 2028 are indicative.

5. OTHER ELEMENTS

- **Implementation plans and monitoring, evaluation and reporting arrangements**

A group of coordinators for the recognition of qualifications of third-country nationals is established as an advisory group to the Commission (Article 33), tasked with facilitating cooperation between Member States and the Commission, supporting implementation, and ensuring coordination with other relevant expert groups. The existing network of national contact points designated under Article 57 of Directive 2005/36/EC will also cover matters arising under this Directive (Article 34). Monitoring will be based on headline indicators for each specific objective. From the date of application, Member States will submit annual

statistics on applications, processing times, information exchanges and use of the automatic recognition channel and the authenticity-verification service (Article 35); operational data from the support services for assessment of authenticity will feed directly into this monitoring without additional national reporting obligations. Member States will submit implementation reports to the Commission, and the Commission will report to the European Parliament and the Council no sooner than seven years after the date of transposition (Article 37), covering processing times, outcomes, user experience and identified bottlenecks. A formal evaluation of the Directive's effectiveness, efficiency, coherence and EU added value is envisaged no sooner than seven years after the date of transposition, examining in particular whether processing times and administrative costs have fallen, the uptake of the automatic recognition channel, and whether trust in third-country qualifications has increased.

- **Detailed explanation of the specific provisions of the proposal**

Title I — General provisions (Articles 1–3)

Article 1 sets out the subject matter: minimum requirements for the recognition of qualifications obtained in a third country or another Member State, held by third-country nationals, where recognition facilitates access to a regulated profession or is part of a procedure to obtain a long-stay visa or a residence permit. Article 2 defines the personal and material scope, covering third-country nationals already legally residing in a Member State and those seeking entry and residence who demonstrate a clear intention to migrate (for instance through an ongoing procedure to obtain a long-stay visa or a residence permit, a job offer, or registration on the EU Talent Pool). Article 3 sets out the definitions used throughout the Directive, including 'recognition of professional qualifications', 'recognition in the context of a procedure to obtain a long-stay visa or a residence permit', and 'digital credential'.

Title II — Recognition to access a regulated profession (Articles 4–20)

Chapter 1 (Articles 4 to 6) sets out the general effects of recognition for access to regulated professions, the conditions for partial access, and the processing of qualifications already obtained within the Union. Chapter 2 (Articles 7 to 10) establishes a general system for the recognition of evidence of training issued in third countries, modelled on the general system of Directive 2005/36/EC, including the conditions for recognition (Article 8), the compensation measures that may be imposed where substantial differences exist (Article 9), and the minimum training requirements applicable to certain sectoral professions (Article 10). Chapter 3 (Articles 11 to 15) establishes the automatic recognition mechanism for a defined set of professions (doctors, nurses responsible for general care, dental practitioners, midwives, veterinary surgeons, pharmacists and architects) obtained in a third country, on the basis of training programmes reviewed by a 'trusted review body' against the applicable quality-assurance and minimum-training frameworks. Article 13 sets out the review criteria, Article 14 the methodology and the composition of the review team; Article 15 provides a right to appeal review decisions and a Member State challenge mechanism; Article 12 defines which bodies may act as trusted review bodies; and Article 16 empowers the Commission to recognise third countries whose education and training systems provide sufficient guarantees, simplifying or waiving the review requirement for institutions established there. Chapter 4 (Articles 17 to 20) sets out rules for pursuing the profession once recognised, covering language requirements, use of academic and professional titles, and approval by health insurance funds.

Title III — Recognition in the context of a procedure to obtain a long-stay visa or a residence permit (Articles 21 to 26)

This Title applies where recognition or assessment of a qualification is a condition for, or influences the outcome of a procedure to obtain a long-stay visa or a residence permit. Article 22 establishes the right to assessment of qualifications where this is part of a procedure to obtain a long-stay visa or a residence permit. Article 23 requires that recognition procedures under this Title be limited to what is necessary and be integrated into the relevant procedure to obtain a long-stay visa or a residence permit wherever possible, avoiding duplicate assessments, separate applications or additional fees. Article 24 requires that qualification levels be assessed using the European Qualifications Framework; Article 25 sets out a learning-outcomes approach for cases going beyond a simple level comparison, including the compensation measures available where substantial differences are identified. Article 26 gives applicants the option of an integrated procedure combining migration-related recognition with recognition of qualifications for access to a regulated profession, avoiding duplication of effort.

Title IV — Common provisions (Articles 27 to 32)

Article 27 limits the documents and formalities that competent authorities may require to those listed in Annex VII of Directive 2005/36/EC, and provides for alternative methods of verification where confirmation from a third country is unfeasible within the applicable deadline. Article 28 establishes support services for assessment of authenticity, provided by the Commission to Member States as advisory (non-binding) assessments of the authenticity of qualifications submitted by applicants, operating in accordance with Regulation (EU) 2018/1725. Article 29 sets binding procedural deadlines for recognition decisions (in principle three months from the submission of a complete application), together with information and appeal rights. Article 30 requires that recognition procedures under Title II and III can be completed remotely and electronically, and provides safeguards on residence permits during the procedure. Article 31 sets criteria for any fees charged. Article 32 requires Member States to provide third-country nationals with timely, comprehensive and user-friendly information on recognition procedures, including tailored information for refugees and other vulnerable applicants.

Title V — Reporting and final provisions (Articles 33 to 42)

Article 33 establishes a group on the recognition of qualifications of third-country nationals as an advisory group to the Commission. Article 34 extends the role of existing assistance centres designated under Directive 2005/36/EC to matters covered by this Directive. Article 35 extends the application of the alert mechanism of Directive 2005/36/EC to third-country nationals. Article 36 sets out the conditions for the exercise of the delegated powers conferred on the Commission. Article 38 sets out the conditions for the exercise of the implementing powers conferred on the Commission. Article 39 establishes implementation and reporting obligations. Articles 40 to 42 contain the standard final provisions on transposition, entry into force and addressees.

2026/0275 (COD)

Proposal for a

DIRECTIVE OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL

on the recognition of qualifications of third-country nationals

(Text with EEA relevance)

THE EUROPEAN PARLIAMENT AND THE COUNCIL OF THE EUROPEAN UNION,

Having regard to the Treaty on the Functioning of the European Union, and in particular Article 79(2), points (a) and (b), thereof,

Having regard to the proposal from the European Commission,

After transmission of the draft legislative act to the national Parliaments,

Acting in accordance with the ordinary legislative procedure,

Whereas:

(1) To enhance labour market efficiency, foster fair integration, and strengthen the Union's economic resilience and competitiveness, it is necessary to establish a clear, common and predictable framework for the recognition of the qualifications of third-country nationals, obtained in another Member State or in a third country, for the purposes of access to a regulated profession in a Member State and of obtaining a long-stay visa or a residence permit.

(2) Third-country nationals, whether already legally residing in a Member State or seeking to enter and reside in the Union, encounter recognition procedures for their qualifications that are often fragmented, overly complex, and lacking transparency, resulting in uncertainty, delays, and inconsistent outcomes across Member States. Member States have taken commitments under the Lisbon Recognition Convention[1] and the Global Convention on Higher Education[2], yet national rules still present varying requirements, procedures, and outcomes depending on the Member State, the profession concerned, and the competent authority. Those disparities and complexity create unnecessary barriers to labour market integration, contribute to skills waste, and undermine the Union's ability to attract and retain the talent needed to address persistent skills shortages.

(3) This Directive forms part of a package together with [Regulation xxxx/xx/EU establishing a framework for portability of skills and qualifications and amending Regulation (EU) 2018/1724 ('Skills Portability Act')] s and [Directive xx/xxx amending Directive 2005/36]. Digital qualification attestations issued under that Regulation should be accepted as digital credentials for the purposes of this Directive.

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[1] Council of Europe and UNESCO, "Convention on the Recognition of Qualifications concerning Higher Education in the European Region", ETS No. 165, Lisbon, 11 April 1997. coe.int.

[2] UNESCO, "Global Convention on the Recognition of Qualifications concerning Higher Education", Paris, 25 November 2019. https://www.unesco.org/en/legal-affairs/global-convention-recognition-qualifications-concerning-higher-education.

Where a third-country national holds a qualification obtained in the Union, recognition should take place under this Directive by applying the rules of Directive 2005/36/EC accordingly, in order to avoid parallel procedures.

(4) The Union's ability to attract and retain skilled third-country nationals is a key determinant of its long-term competitiveness. The Union currently competes at a disadvantage in the global market for talent, with skilled third-country nationals often favouring other destinations, among others, due to the fragmented, complex and unpredictable procedures they face in seeking recognition of their qualifications in the Union.

(5) Existing Union instruments on migration, such as Council Directive 2003/109/EC[3], Directives 2014/36/EU[4], 2014/66/EU[5], (EU) 2016/801[6], (EU) 2021/1883[7], and (EU) 2024/1233[8] of the European Parliament and of the Council, do not establish rules on the organisation, structure or functioning of recognition systems, nor rules for Member States to simplify, harmonise or coordinate recognition procedures, in cases where recognition is required for migration purposes. Consequently, divergences in national approaches persist, and the structural misalignment between migration systems and qualification recognition frameworks remains unaddressed. Faster and more effective recognition of qualifications would also strengthen the effectiveness of the EU Talent Pool established by Regulation (EU) 2026/1047 of the European Parliament and of the Council[9]. Once operational, the EU Talent Pool will provide the first Union-wide platform addressing labour shortages at the Union level by facilitating the recruitment of third-country nationals. In that regard, it is key to support employers' understanding of the qualifications of third-country nationals, and the confidence of Member States' competent authorities that the qualifications presented correspond to recognised levels of skills. Streamlined and reliable recognition of qualifications therefore supports the functioning of the EU Talent Pool by providing the necessary assurance to employers and host Member States, and by reducing the administrative burden on third-country nationals. By reducing the mismatch between the qualifications held by third-country nationals and the level of employment they actually obtain, this Directive also

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3 Council Directive 2003/109/EC of 25 November 2003 concerning the status of third-country nationals who are long-term residents (OJ L 16, 23.1.2004, p. 44, ELI: http://data.europa.eu/eli/dir/2003/109/oj).

4 Directive 2014/36/EU of the European Parliament and of the Council of 26 February 2014 on the conditions of entry and stay of third-country nationals for the purpose of employment as seasonal workers (OJ L 94, 28.3.2014, p. 375, ELI: http://data.europa.eu/eli/dir/2014/36/oj).

5 Directive 2014/66/EU of the European Parliament and of the Council of 15 May 2014 on the conditions of entry and residence of third-country nationals in the framework of an intra-corporate transfer (OJ L 157, 27.5.2014, p. 1, ELI: http://data.europa.eu/eli/dir/2014/66/oj).

6 Directive (EU) 2016/801 of the European Parliament and of the Council of 11 May 2016 on the conditions of entry and residence of third-country nationals for the purposes of research, studies, training, voluntary service, pupil exchange schemes or educational projects and au pairing (OJ L 132, 21.5.2016, p. 21, ELI: http://data.europa.eu/eli/dir/2016/801/oj).

7 Directive (EU) 2021/1883 of the European Parliament and of the Council of 20 October 2021 on the conditions of entry and residence of third-country nationals for the purpose of highly qualified employment, and repealing Council Directive 2009/50/EC (OJ L 382, 28.10.2021, p. 1, ELI: http://data.europa.eu/eli/dir/2021/1883/oj).

8 Directive (EU) 2024/1233 of the European Parliament and of the Council of 24 April 2024 on a single application procedure for a single permit for third-country nationals to reside and work in the territory of a Member State and on a common set of rights for third-country workers legally residing in a Member State (OJ L, 2024/1233, 30.04.2024, ELI: http://data.europa.eu/eli/dir/2024/1233/oj).

9 Regulation (EU) 2026/1047 of the European Parliament and of the Council of 29 April 2026 establishing an EU Talent Pool (OJ L, 2026/1047, 12.5.2026, ELI: http://data.europa.eu/eli/reg/2026/1047/oj).

contributes to strengthening the labour market participation of disadvantaged groups within the Union.

(6) For the purposes of this Directive, recognition of qualifications should be understood as covering both recognition for the purpose of access to a regulated profession and recognition in the context of a procedure to obtain a long-stay visa or a residence permit. This Directive should therefore apply to third-country nationals seeking either form of recognition, independently of whether their qualifications were obtained in a Member State or a third country, and irrespective of whether they are already legally residing in the Union or are seeking to migrate to it with a demonstrated intention to do so, such as through the EU Talent Pool.

(7) The provisions of this Directive should be without prejudice to the competence of Member States to regulate professions or determine the requirements for issuing a long-stay visa or a residence permit regulated under national law, and, in accordance with Article 79(5) TFEU, to their right to determine the volume of third-country nationals admitted to their territory for the purpose of seeking work.

(8) Access to regulated professions depends on the possession of the required professional qualifications or of professional qualifications that can be recognised as equivalent to those qualifications required to practise in the host Member State. Third-country nationals face significant disparities in recognition procedures across Member States. Differences in required documentation, compensation measures and assessment methods risk encouraging applicants to target jurisdictions with more lenient procedures before relocating, which undermines fairness and places the Union at a competitive disadvantage in attracting global talent.

(9) In order to ensure equal treatment and non-discriminatory access to the profession, recognition of professional qualifications should enable third-country nationals to access and pursue in the host Member State the same profession as that for which they are qualified in another Member State or in a third country, under the same conditions as nationals of the host Member State. For third-country nationals, access to the profession should remain subject to applicable requirements relating to residence, employment and other legal conditions, and should not create new entry or residence rights. Access under the same conditions should also mean that, where nationals of the host Member State are required, in order to pursue the profession, to satisfy additional requirements, such as providing evidence of a clear criminal and professional record, the host Member State may apply the same requirements to third-country nationals.

(10) In order to avoid imposing disproportionate requirements on applicants, where the regulated profession in the host Member State covers activities going beyond those for which the applicant is qualified, and full compensatory measures would in practice amount to requiring completion of an entire training programme, the host Member State should be able to grant partial access, provided that the relevant activity can objectively be separated from other activities covered by the profession and subject to the case-law of the Court of Justice of the European Union on overriding reasons of general interest.

(11) In order to ensure the consistent treatment of qualifications obtained within the Union, while respecting the distinction with the freedom to provide services under Article 56 TFEU, where third-country nationals hold attestations of competence, evidence of formal qualifications or professional experience acquired in a Member State that would enable a Union citizen to access a regulated profession under Title III of

Directive 2005/36/EC of the European Parliament and of the Council[10], the relevant provisions of that Directive concerning the right of establishment should apply *mutatis mutandis* to them.

(12) To enable third-country nationals to make full use of those qualifications obtained in a third country, while ensuring that recognition is subject to appropriate safeguards, two complementary recognition systems should be established. First, a general system, closely mirroring Title III, Chapter I of Directive 2005/36/EC and adapted to the context of third-country qualifications; and, second, a system for the automatic recognition of selected qualifications that meet Union minimum training and quality standards, also adapted to reflect the specific challenges of assessing qualifications obtained outside the Union.

(13) In order to ensure that all applicants have access to an appropriate assessment pathway, qualifications acquired in a third country that do not benefit from automatic recognition should be assessed under the general system, modelled on the general system established by Directive 2005/36/EC but adapted to reflect the specific difficulties of assessing qualifications and professional experience acquired outside the Union.

(14) This Directive should also allow Member States to rely on alternative, reliable methods of verification where the necessary documentation cannot reasonably be obtained from a third country, so that recognition procedures are not obstructed by circumstances outside the applicant's control.

(15) In order to prevent compensation measures from being used as a disguised or disproportionate barrier to recognition, under the general system, compensation measures should remain limited to cases of substantial differences between the applicant's qualification and domestic requirements, and of justified doubts about the quality of the third country's education system. In light of the difficulties of assessing third-country qualifications, including variable training standards and legitimate doubts as to the quality of education systems, Member States should be afforded greater flexibility than under Article 14 of Directive 2005/36/EC in determining whether and which compensation measures to impose. To ensure that doubts concerning the quality of education and training systems of third countries are not invoked arbitrarily or without justification, Member States should notify the Commission of the country and profession concerned and explain the nature of the doubts. Moreover, any compensation measure should comply with the principle of proportionality, take due account of relevant knowledge, skills and competences already demonstrated by the applicant, and be applied in a manner that safeguards applicants' procedural rights and supports their effective integration into the profession.

(16) A system of automatic recognition speeds up recognition processes by removing the need for individual assessments, reducing administrative burdens and ensuring greater consistency in outcomes across Member States. It also has the potential to incentivise the development of third-country training programmes aligned with Union standards, expanding the pool of qualified professionals eligible to practise in the Union.

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[10] Directive 2005/36/EC of the European Parliament and of the Council of 7 September 2005 on the recognition of professional qualifications (OJ L 255, 30.9.2005, p. 22, ELI: http://data.europa.eu/eli/dir/2005/36/oj).

(17) The automatic recognition system should initially cover professions for which Directive 2005/36/EC has already established harmonised minimum training requirements, namely doctors, nurses responsible for general care, dental practitioners, midwives, veterinary surgeons, pharmacists and architects, given their importance for public health and safety and the persistent labour shortages affecting them. Its scope should also extend to any profession for which a Common Training Framework is adopted pursuant to Article 49a of Directive 2005/36/EC, ensuring the system remains adaptable over time.

(18) To ensure the trustworthiness of the automatic recognition system, evidence of formal qualifications benefiting from it should be issued following completion of a training programme reviewed by a trusted independent body and should be issued as a digital credential ensuring authenticity, security and ease of verification. The review process, including any negative outcome, and the underlying review report should be made public to ensure full transparency.

(19) A training programme should be regarded as 'reviewed' only where a trusted review body has confirmed its compliance with the applicable quality and content standards, including alignment with the minimum training conditions set out in Directive 2005/36/EC or the relevant common training framework. Given the greater variability in oversight and transparency across third-country education systems compared with the Union, such review requires more extensive scrutiny than in the context of qualifications obtained within the Union, so as to ensure that only qualifications meeting Union standards are eligible for automatic recognition.

(20) In order to ensure the rigour, credibility and transparency of the automatic recognition system, the review process should be carried out by a multidisciplinary team of independent experts with relevant subject-matter and quality assurance expertise, including through an on-site assessment of the training environment, delivery methods and quality assurance practices for the training programme. The 'reviewed' status granted to a training programme should be time-limited and subject to periodic renewal, to ensure that training standards continue to be met over time and that any subsequent changes to applicable minimum training requirements are properly reflected.

(21) In order to ensure the scalability and sustainability of the review system, a review should take place at the request of, and be funded by, the individual third-country training institution concerned, with results published. To ensure fairness and accountability, training institutions should have the right to appeal review decisions under the national law of the Member State where the trusted review body is established, which have to be resolved promptly and fairly.

(22) To further strengthen trust in the automatic recognition system, Member States should have a means of contesting a review decision where they have justified doubts as to its correctness, subject to appropriate safeguards against misuse of that mechanism.

(23) To ensure the reliability, independence, expertise and accountability of the review process, only quality assurance agencies established in the Union and meeting certain eligibility criteria should be recognised as trusted review bodies, and their authority should be limited to specified professions.

(24) In order to facilitate the recognition procedure for qualifications obtained in third countries whose education and training systems offer sufficient guarantees of quality,

oversight and administrative cooperation, the review requirement should be adjusted for the institutions established in those third countries.

(25) While applicants should have the language knowledge necessary to practise their profession in the host Member State, language controls should only be carried out after recognition of the qualification, to avoid creating unnecessary barriers within the recognition process itself, and should be proportionate to the profession and activity concerned.

(26) In the context of procedures for obtaining long-stay visas and residence permits for work purposes, Member States routinely assess the qualifications of third-country nationals as part of the applications, yet assessment criteria and approaches vary across Member States and legal pathways, often creating uncertainty for applicants and disparities in outcomes. To address those challenges, a common framework for recognition in the context of such procedures should be established, complementing and aligning with existing Union legal migration instruments and national rules, without adding procedural burdens or conflicting with more favourable provisions.

(27) This Directive should establish a right for third-country nationals to obtain the assessment of their qualifications where such recognition constitutes a prerequisite or material factor for a positive outcome of the procedures to obtain long-stay visas and residence permits, ensuring access to a fair, efficient and non-discriminatory procedure. Where a Member State already treats a foreign qualification as equivalent to a domestic one without requiring formal recognition, this Directive should not oblige that Member State to introduce an additional procedure.

(28) Formal recognition requirements should be avoided to access professions that are not regulated, in favour of transparency and comparability tools, such as the European Qualifications Framework[11] and Europass[12], which enable third-country nationals, employers and competent authorities to understand and compare qualifications and skills. Where a procedure to obtain a long-stay visa or a residence permit concerns access to a profession that is not regulated, Member States should rely on such tools rather than impose formal recognition requirements, and nothing in this Directive should be construed as requiring Member States to introduce such requirements for that purpose.

(29) In order to prevent gaps in the protection of applicants, a common set of minimum procedural rules should apply to all recognition processes carried out in the context of procedures for obtaining a long-stay visa or a residence permit, whatever their scope, depth or complexity. Those rules should always be applied proportionately to their purpose. Where a check is intended only to confirm that qualifications are genuine and relevant, or to verify a qualification's level, Member States should apply simpler and faster procedures than those used for recognition for access to regulated professions. Nothing in this Directive should be constructed as requiring Member States to establish new or standalone recognition procedures where the necessary assessment can be carried out within existing migration procedures.

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11 Council recommendation of 22 May 2017 on the European Qualifications Framework for lifelong learning and repealing the recommendation of the European Parliament and of the Council of 23 April 2008 on the establishment of the European Qualifications Framework for lifelong learning (OJ C 189, 15.6.2017, p. 15).

12 Decision (EU) 2018/646 of the European Parliament and of the Council of 18 April 2018 on a common framework for the provision of better services for skills and qualifications (Europass) and repealing Decision No 2241/2004/EC.

(30) In order to ensure a consistent and objective basis for assessing qualification levels across Member States, where procedures for obtaining a long-stay visa or a residence permit require an assessment of an applicant's qualification level, that assessment should be based on the descriptors and levels of the European Qualifications Framework, having regard to national qualifications frameworks and, where available, existing comparisons between third-country frameworks and the European Qualifications Framework. Where a more detailed assessment is required, going beyond a comparison of levels or a general classification of the field of study, a learning outcomes approach should be applied, comparing the applicant's acquired skills against those required in the host Member State. To avoid applicants unnecessarily completing compensation measures before a final decision on entry or residence, qualifications assessed under a learning outcomes approach should be provisionally recognised for the purposes of the procedure for obtaining a long-stay visa or a residence permit, with any compensation measure required only once entry or residence has been granted.

(31) To avoid that third-country nationals undergo parallel and duplicative procedures, Member States should offer applicants seeking both a long-stay visa or a residence permit and access to a regulated profession an integrated recognition procedure, and, where applicants do not choose that option, ensure effective coordination between the separate procedures, including referral mechanisms and reuse of prior verifications.

(32) Recognition procedures often impose significant administrative and financial burdens on applicants, in particular due to extensive documentation requirements, including diplomas, transcripts and evidence of professional experience, and the associated costs of translation. To alleviate this burden, Member States should limit the documents and certificates they require to the types of documents listed in Annex VII of Directive 2005/36/EC. Where the procedure to obtain a long-stay visa or a residence permit does not require recognition or assessment of qualifications that would give access to a regulated profession in its territory, Member States should limit documentary requirements to those directly related to the applicant’s qualifications. Since there may be exceptional reasons, such as non-cooperation, non-responsiveness or administrative dysfunction of a third-country authority, an applicant should be able to show that despite reasonable efforts, they were unable to obtain the requested documents. Member States should be able to employ reliable alternative methods to assess qualifications, skills or other evidentiary elements.

(33) In cases of justified doubts regarding the authenticity of submitted documents, or regarding an applicant's professional conduct or criminal record, Member States should be able to seek confirmation from the competent authorities of the third country or Member State where the qualification was awarded. However, in view of their inherent security and verification mechanisms, digital credentials should be presumed authentic, and their validity should not be challenged. Since third countries may nonetheless fail to provide such confirmation in a timely manner due to, for example, non-cooperation, non-responsiveness or administrative dysfunction, and in order to ensure that recognition procedures are not delayed or obstructed by circumstances outside the applicant's control, Member States should be able to rely on reliable alternative methods of attestation.

(34) Doubts about the authenticity of qualifications are a major obstacle to efficient recognition procedures. Verifying third-country qualifications often proves complex and resource-intensive for Member States, leading to delays, administrative burdens, and legal uncertainties. These challenges are particularly acute for documents issued in

countries with less strong institutional frameworks or conflicts, where verification is difficult. This problem is further compounded by the prevalence of fraudulent credentials and diploma mills, which undermine trust in qualification recognition procedures. While Member States have introduced stringent verification measures – such as certified translations, notarised copies, and legalisation – those measures, though aimed at ensuring authenticity, prolong processing times and increase costs for applicants and authorities alike. To support Member States in verifying the authenticity of qualifications obtained in third countries, the Commission will provide support services for the assessment of authenticity, by pooling expertise, digital tools and through cooperation with third countries and relevant educational and professional bodies. Since responsibility for the underlying recognition decision remains with the competent authorities of the Member States, in providing these services the Commission shall only have an advisory role, providing reasoned technical support rather than binding conclusions.

(35) The exchange of requests and responses between the Commission and the competent authorities of the Member States for the assessment of authenticity entails cross-border exchanges of data in support of the recognition of qualifications obtained in third countries. The authentication support services constitute a trans-European digital public service within the meaning of Regulation (EU) 2024/903 (the Interoperable Europe Act), given that their operation entails cross-border exchanges of data to support the recognition of qualifications of third-country nationals. Their operation should therefore be subject to an interoperability assessment as referred to in that Regulation, to be carried out through a delegated act.

(36) The processing of personal data by the Commission is necessary for the performance of a task carried out in the public interest, namely supporting Member States in assessing the authenticity of qualifications obtained in third countries, that task being laid down in this Directive. Such processing should therefore be based on Article 5(1), point (a), of Regulation (EU) 2018/1725.

(37) The duration and unpredictability of qualification recognition procedures constitute major obstacles for third-country nationals seeking to enter or integrate into the Union labour market. Beyond decision-making times, the overall duration is further prolonged by document collection, translation, legalisation and compensation measures, hampering individuals' professional integration and disrupting employers' recruitment processes. To enhance legal certainty and procedural efficiency, clear time limits for the acknowledgement of applications and the completion of recognition procedures should be set. Competent authorities should be required to keep applicants informed of the progress of their application. Recognition procedures should remain fully accessible to beneficiaries of international protection unable to provide documentary evidence of their qualifications, in accordance with Article 30(2) of Regulation (EU) 2024/1347 of the European Parliament and of the Council[13], while respecting the minimum training requirements provided for in Article 2(2) of Directive 2005/36/EC.

[13] Regulation (EU) 2024/1347 of the European Parliament and of the Council of 14 May 2024 on standards for the qualification of third-country nationals or stateless persons as beneficiaries of international protection, for a uniform status for refugees or for persons eligible for subsidiary protection and for the content of the protection granted, amending Council Directive 2003/109/EC and repealing Directive 2011/95/EU of the European Parliament and of the Council (OJ L, 2024/1347, 22.05.2024, ELI: http://data.europa.eu/eli/reg/2024/1347/oj).

(38) The time limits applicable to the recognition procedure should be without prejudice to, and should not extend, suspend or otherwise affect, deadlines laid down under national or Union law for examining applications for long-stay visas or residence permits. Member States should organise the recognition procedure so as not to undermine the timely processing of such applications.

(39) To safeguard applicants' rights, decisions on recognition, or failures to meet prescribed deadlines, should be subject to appeal under national law. Member States should also allow applicants to receive communications in either an official language of the host Member State or another language commonly used by third-country nationals there.

(40) Access to recognition procedures remains a significant challenge for third-country nationals residing outside the Union or lacking a legal pathway to enter a Member State solely for this purpose, particularly where procedures rely on in-person verification or national electronic identification is unavailable prior to entry. Member States should therefore enable applicants not yet residing in their territory but with a demonstrated intention to do so to complete the process remotely.

(41) Since recognition may be a precondition for the issuance or renewal of a residence or work permit, and since a residence permit may itself expire before an applicant completes a required compensation measure, Member States should ensure that third-country nationals already legally residing in their territory are not deprived of their residence status as a result of undergoing a recognition procedure, including by issuing or extending residence permits for the duration of any compensation measure.

(42) To further simplify recognition procedures, Member States should allow their completion remotely and by electronic means, without prejudice to the ability of competent authorities to request certified copies at a later stage where justified doubts arise.

(43) Recognition procedures often impose significant and unpredictable financial burdens on applicants, including application fees, translation and legalisation costs, and charges linked to compensation measures, with particularly high costs observed in some healthcare professions. Member States should ensure that any fees charged are transparent, justified and proportionate.

(44) Access to clear, comprehensive and user-friendly information is essential for third-country nationals seeking recognition of their qualifications, yet current information mechanisms across Member States often fall short of applicants' needs. Member States should ensure timely, accurate and user-friendly information on recognition procedures, including through digital platforms and national assistance centres, with particular attention to the needs of refugees, beneficiaries of international protection, and other applicants unable to access or understand such information autonomously.

(45) Member States should take into account the risk that facilitated recognition of qualifications obtained in third countries may contribute to the loss of skilled personnel from sectors or regions already affected by workforce shortages, in particular in the health sector. Member States should cooperate with third countries of origin, including through knowledge-sharing, support for skills development, and circular migration opportunities, so as to mitigate the risk of such losses while facilitating the fair recognition of qualifications for third-country nationals already present in, or seeking to move to, the Union. In the health sector specifically, Member States should have regard to the principles set out in the World Health Organization Global Code of Practice on the International Recruitment of Health Personnel, and to

the WHO Health Workforce Support and Safeguards List, when engaging in the recruitment of health personnel qualified in third countries identified in that List as facing critical health workforce shortages.

(46) To ensure effective and consistent implementation of this Directive, a group on the recognition of qualifications of third-country nationals should be established to support cooperation between Member States and the Commission and the exchange of experience and best practices. The assistance centres designated by Member States pursuant to Article 57b of Directive 2005/36/EC should also assume responsibility for matters relating to the recognition of qualifications of third-country nationals under this Directive, without prejudice to the responsibilities of other competent authorities under Union or national law.

(47) In order to achieve the objectives of this Directive, the power to adopt acts in accordance with Article 290 TFEU should be delegated to the Commission to establish and amend a list of trusted review bodies. It is of particular importance that the Commission carry out appropriate consultations during its preparatory work, including at expert level, and that those consultations be conducted in accordance with the Interinstitutional Agreement of 13 April 2016 on Better Law-Making[14]. In particular, to ensure equal participation in the preparation of delegated acts, the European Parliament and the Council receive all documents at the same time as Member States' experts, and their experts systematically have access to meetings of Commission expert groups dealing with the preparation of delegated acts.

(48) In order to ensure uniform conditions for the implementation of this Directive, implementing powers should be conferred on the Commission. Those powers should be exercised in accordance with Regulation (EU) No 182/2011 of the European Parliament and of the Council.[15]

(49) To enable effective monitoring of the implementation and impact of this Directive, and to support its continuous improvement, Member States should provide the Commission with annual statistics on the number of applications and decisions taken, and should report periodically on the practical application of the provisions of this Directive, including processing times, outcomes and stakeholder feedback, on the basis of which the Commission should report to the European Parliament and the Council.

(50) In accordance with Articles 1 and 2 of Protocol No 21 on the position of the United Kingdom and Ireland in respect of the area of freedom, security and justice, annexed to the Treaty on European Union (TEU) and to the TFEU, and without prejudice to Article 4 of that Protocol, Ireland is not taking part in the adoption of this Directive and is not bound by it or subject to its application. [Or: In accordance with Article 3 of Protocol No 21 on the position of the United Kingdom and Ireland in respect of the area of freedom, security and justice, annexed to the TEU and to the TFEU, Ireland has notified, by letter of XXX, its wish to take part in the adoption and application of this Directive.]

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14 OJ L 123, 12.5.2016, p. 1, http://data.europa.eu/eli/agree_interinstit/2016/512/oj.

15 Regulation (EU) No 182/2011 of the European Parliament and of the Council of 16 February 2011 laying down the rules and general principles concerning mechanisms for control by the Member States of the Commission's exercise of implementing powers (OJ L 55, 28.2.2011, p. 13, ELI: http://data.europa.eu/eli/reg/2011/182/oj).

(51) In accordance with Articles 1 and 2 of Protocol No 22 on the position of Denmark, annexed to the TEU and to the TFEU, Denmark is not taking part in the adoption of this Directive and is not bound by it or subject to its application.

(52) Since the objectives of this Directive, namely, to establish a streamlined and trusted framework for the recognition of third-country nationals' qualifications, cannot be sufficiently achieved by Member States but can, by reason of scale and effects, be better achieved at Union level, the Union may adopt measures in accordance with the principle of subsidiarity under Article 5 of the Treaty on the European Union. In accordance with the principle of proportionality, this Directive does not go beyond what is necessary to achieve those objectives.

(53) The processing of personal data under this Directive by the competent authorities of the Member States should be carried out in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council[16]. The processing of personal data under this Directive by the Commission, including for the support services for assessment of authenticity, should be carried out in accordance with Regulation (EU) 2018/1725 of the European Parliament and of the Council[17].

(54) The European Data Protection Supervisor was consulted in accordance with Article 42(1) of Regulation (EU) 2018/1725 and delivered an opinion on (…)],

HAVE ADOPTED THIS DIRECTIVE:

Title I
General provisions

Article 1

Subject matter

1. This Directive lays down minimum requirements for the recognition of qualifications held by third-country nationals.

2. This Directive shall not affect provisions of Union law and national law which are more favourable to third-country nationals, including provisions regarding procedures to obtain long-stay visas or residence permits where recognition forms part of such procedures. This Directive shall also apply without prejudice to relevant international instruments, including future or existing mutual recognition agreements for qualifications with third countries.

Article 2

Scope

16 Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation) (OJ L 119, 4.5.2016, p. 1, ELI: http://data.europa.eu/eli/reg/2016/679/oj).

17 Regulation (EU) 2018/1725 of the European Parliament and of the Council of 23 October 2018 on the protection of natural persons with regard to the processing of personal data by the Union institutions, bodies, offices and agencies and on the free movement of such data, and repealing Regulation (EC) No 45/2001 and Decision No 1247/2002/EC (OJ L 295, 21.11.2018, p. 39, ELI: http://data.europa.eu/eli/reg/2018/1725/oj).

1. This Directive shall apply to the recognition of qualifications held by third-country nationals:

   (a) legally residing in a Member State;

   (b) seeking entry to and residence in a Member State, and that are undergoing a procedure to obtain a long-stay visa or a residence permit in accordance with Title III;

   (c) seeking entry and residence in a Member State, and that apply for recognition remotely in accordance with Article 30, and who meet one of the following conditions:

      (i) they have obtained a job offer in that Member State;

      (ii) they are registered as a jobseeker on the EU Talent Pool established by Regulation EU(2026)1047 and have been selected for a job vacancy or have been contacted by an employer to start the recruitment process for a job in that Member State, where recognition of qualifications is required for the role.

   It does not apply to the recognition of qualifications for the purpose of access to further learning.

2. For the purposes of paragraph 1, this Directive shall apply where the recognition of those qualifications, whether obtained in another Member State or in a third country:

   (a) is a precondition to access and pursue a regulated profession within a Member State, on either self-employed or employed basis; or

   (b) constitutes a factor determining the outcome of a procedure to obtain a long-stay visa or a residence permit for work purposes.

3. This Directive shall not apply to third-country nationals who, under agreements between the Union and its Member States, on the one hand, and third countries, on the other hand, enjoy rights of free movement equivalent to those of Union citizens.

4. This Directive shall not apply to notaries who are appointed by an official act of government.

Article 3

Definitions

For the purposes of this Directive, the following definitions apply:

(a) ‘applicants’ means third-country nationals who apply to a host Member State for the recognition of their qualifications and/or to obtain long-stay visas or residence permits;

(b) ‘regulated profession’ means a regulated profession as defined in Article 3(1), point (a), of Directive 2005/36/EC;

(c) ‘professional qualifications’ means qualifications attested by evidence of formal qualifications, an attestation of competence and/or professional experience;

(d) ‘recognition of professional qualifications’ means the recognition by the host Member State of a professional qualification obtained in another Member State or in a third country for the purposes of access to or pursuit of a regulated profession in the territory of the host Member State;

(e) ‘evidence of formal qualifications’ means diplomas, certificates and other evidence issued by an authority in a Member State or a third country designated pursuant to legislative, regulatory or administrative provisions of that Member State or that third country and certifying successful completion of professional training;

(f) ‘attestation of competence’ means documentation issued by the competent authority in a Member State or third country designated in accordance with relevant legislative, regulatory, or administrative provisions, on the basis of one or more of the following:

(i) A training course not forming part of a certificate or diploma;

(ii) a specific examination without prior training;

(iii) full-time pursuit of the profession in a Member State or third country for three consecutive years or for an equivalent duration on a part-time basis during the previous 10 years;

(iv) general primary or secondary education attesting that the holder has acquired general knowledge;

(g) ‘recognition in the context of a procedure to obtain a long-stay visa or a residence permit’ means the recognition or assessment, by a Member State, of qualifications or skills obtained in a third country or in another Member State, and held by a third-country national, where it constitutes a factor determining the outcome of a procedure to obtain a long-stay visa or a residence permit, including within a points-based immigration system;

(h) ‘third-country national’ means a person who is not a citizen of the Union within the meaning of Article 20(1) TFEU;

(i) ‘competent authority’ means any authority or body empowered by a Member State or a third country specifically to issue or receive training diplomas and other documents or information, to receive applications, and take the decisions referred to in this Directive;

(j) ‘professional experience’ means the actual and lawful full-time or equivalent part-time pursuit of the profession concerned in a Member State or a third country;

(k) ‘adaptation period’ means an adaptation period as defined in Article 3(1), point (g), of Directive 2005/36/EC;

(l) ‘aptitude test’ means a test tailored to the applicant as defined in Article 3(1), point (h), of Directive 2005/36/EC;

(m) ‘test of professional competence’ means a standardised test, designed for a specific profession in order to evaluate an applicant’s knowledge and skills that are essential to pursue that profession in the host Member State;

(n) ‘bridging course’ means a targeted course designed for a defined target group of already qualified professionals to address specific typical gaps in professional knowledge, skills and competences and enable them to practise the regulated profession in the host Member State;

(o) ‘quality assurance agency’ means an independent body carrying out external quality assurance in higher education or in vocational education and training (VET);

(p) ‘European Quality Assurance Register for Higher Education (EQAR)’ means the register of quality assurance agencies that have demonstrated substantial compliance

with the Standards and Guidelines for Quality Assurance in the European Higher Education Area, in the applicable version at the relevant time;

(q) 'digital credential' means a credential issued in electronic form which provides information on qualifications, qualification levels, skills or learning outcomes, and which can be used to demonstrate that information in a reliable and verifiable manner.

Title II
Recognition to access a regulated profession

Chapter 1
General provisions

Article 4

Effects of recognition

1. The recognition of professional qualifications by the host Member State shall allow beneficiaries to gain access in that Member State to the same profession as the one for which they are qualified in the third country or in the other Member State where they obtained their qualifications under the same conditions as the nationals of the host Member State, provided the beneficiaries meet all necessary legal requirements for employment and residency.

2. For the purposes of this Directive, the profession which the applicant wishes to pursue in the host Member State shall be considered the same as the one for which they are qualified in a third country or in another Member State if the activities covered are comparable.

3. By way of derogation from paragraph 1 of this Article, partial access to a profession in the host Member State shall be granted under the conditions laid down in Article 5.

Article 5

Partial access

1. The competent authority of the host Member State shall grant partial access, on a case-by-case basis, to a professional activity in its territory only when all the following conditions are fulfilled:

   (a) the professional is fully qualified to exercise in a third country or another Member State the professional activity for which partial access is sought in the host Member State;

   (b) differences between the professional activity legally exercised in the third country or in the other Member State and the regulated profession in the host Member State as such are so large that the application of compensation measures would amount to requiring the applicant to complete the full programme of education and training required in the host Member State to have access to the full regulated profession in the host Member State;

   (c) the professional activity can objectively be separated from other activities falling under the regulated profession in the host Member State.

For the purpose of the first subparagraph, point (c), the competent authority of the host Member State shall take into account whether the professional activity can be pursued autonomously in the third country or in the other Member State.

2. Partial access may be rejected if such rejection is justified by overriding reasons of general interest, suitable for securing the attainment of the objective pursued, and does not go beyond what is necessary to attain that objective.

3. Applications for the purposes of establishment in a Member State shall be examined in accordance with Chapter 2 of this Title and with Title IV.

4. By way of derogation from Article 19, the professional activity shall be exercised under the professional title of the third country or of the other Member State once partial access has been granted. The host Member State may require use of that professional title in the languages of the host Member State. Professionals benefiting from partial access shall clearly indicate to the service recipients the scope of their professional activities.

5. This Article shall not apply to professionals benefiting from automatic recognition of their professional qualifications under Chapter 3 of this Title, and in cases where Chapter II, III or IIIa of Title III of Directive 2005/36/EC have been applied to third-country nationals in accordance with Article 6 of this Directive.

Article 6

Evidence of professional qualifications obtained in the Union

Where third-country nationals hold an attestation of competence, evidence of formal qualifications, or professional experience obtained in the Union, and such qualifications or experience would allow a Union citizen to access or pursue a regulated profession in the host Member State pursuant to Title III of Directive 2005/36/EC, the provisions of that Directive shall apply to those third-country nationals accordingly when they seek recognition to access and pursue that profession in the host Member State.

Chapter 2
General system for the recognition of evidence of training issued in third countries

Article 7

Scope

This Chapter applies to situations which are not covered by Article 6, or by Chapter 3 of this Title or where the applicant does not satisfy the conditions laid down in Chapter 3 of this Title.

Article 8

Conditions for recognition

1. If access to or pursuit of a regulated profession in a host Member State is contingent upon possession of specific professional qualifications, the competent authority of that Member State shall permit applicants to access and pursue that profession, under the same conditions as apply to its nationals, if they possess an attestation of competence or evidence of formal qualifications, issued by a competent authority in

a third country, and required by a third country in order to gain access to and pursue that profession on that country's territory.

2. Access to, and pursuit of, a profession as referred to in paragraph 1 shall also be granted to applicants who have pursued the profession concerned on a full-time basis for one year or for an equivalent overall duration on a part-time basis during the previous 10 years in a third country which does not regulate that profession, and who possess one or more attestations of competence or evidence of formal qualifications issued by that third country which does not regulate the profession.

   Attestations of competence and evidence of formal qualifications shall satisfy both of the following conditions:

   (a) they are issued by a competent authority in a third country;

   (b) they attest that the holder has been prepared for the pursuit of the profession concerned.

3. By way of derogation from paragraphs 1 and 2 of this Article, the competent authority of the host Member State may refuse access to, and pursuit of, the regulated profession to applicants who only possess an attestation of competence, where access to or pursuit of that regulated profession in the host Member State requires a diploma certifying successful completion of a post-secondary course of at least four years, or for an equivalent duration on a part-time basis, which may in addition be expressed with an equivalent number of ECTS credits, at a university or establishment of higher education or another establishment of equivalent level.

4. When the applicant duly documents that, despite reasonable efforts, they were unable to obtain the attestation of competence referred to in paragraphs 1, 2 and 3, the host Member State shall assess the feasibility of, and where appropriate, employ alternative methods to assess qualifications, skills or other evidentiary elements. Those methods may include affidavits, third-party assessments, professional interviews or reputable evaluation frameworks like qualifications passports, designed for refugees and vulnerable migrants. The host Member State shall ensure that applicants are not unduly disadvantaged due to those circumstances and shall base its decisions on available and reasonable evidence.

Article 9

Compensation measures

1. Article 8 shall not preclude the host Member State from imposing on the applicant a compensation measure among those listed in paragraph 2 of this Article in one of the following cases:

   (a) the training that the applicant has received covers substantially different matters from those covered by the evidence of formal qualifications required in the host Member State;

   (b) the regulated profession in the host Member State comprises one or more regulated professional activities which do not exist in the corresponding profession in the third country where the applicant obtained the attestation of competence or evidence of formal qualifications, and the training required in the host Member State covers substantially different matters from those covered by the applicant's attestation of competence or evidence of formal qualifications;

(c) the Member State has justified doubts as to the quality of the education, training or qualification system under which the evidence of formal qualifications has been awarded.

For the purpose of this Article, 'substantially different matters' means matters in respect of which knowledge and skills acquired are essential for pursuing the profession and with regard to which the training received by the applicant shows significant differences in terms of content from the training required by the host Member State.

In case a Member State decides to impose compensation measures on the basis of justified doubts according to point (c), it shall notify the Commission of the country and profession concerned and the nature of the doubts.

2. If the host Member State makes use of the option provided for in paragraph 1, it shall indicate to the applicant which of the following compensation measures they are required to complete:

(a) an adaptation period, not exceeding three years, where the applicant undergoes supervised practice and, if necessary, additional training;

(b) an aptitude test;

(c) a test of professional competence;

(d) a bridging course, with a duration of up to one year.

3. Paragraphs 1 and 2 shall be applied with due regard to the principle of proportionality. In particular, if the host Member State intends to require the applicant to complete a compensation measure, it shall first ascertain whether the knowledge, skills and competences acquired by the applicant in the course of the applicant's 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, is of such nature as to cover, in full or in part, the substantially different matters.

4. The decision imposing a compensation measure shall be duly justified. In particular, the applicant shall be provided with the reasons for the compensation measure, information on the substantial differences, and, where relevant, why those differences cannot be compensated by knowledge, skills and competences acquired in the course of prior experience or other qualifications through lifelong learning formally validated to that end by a relevant body.

5. Member States shall ensure that an applicant who fails the aptitude test or test of professional competence referred to in paragraph 2, points (b) and (c), or one or more tests forming part of a bridging course or adaptation period, referred to in paragraph 2, points (a) and (d), is given the opportunity to retake the respective tests. Member States shall ensure that feedback detailing assessment results and areas for improvement is provided to applicants, and ensure that applicants are entitled to at least two further attempts to pass each test that they have failed.

6. Member States shall ensure that an applicant has the possibility of taking the aptitude test or the test of professional competence referred to in paragraph 2, points (b) and (c), not later than six months after the initial decision imposing an aptitude test or test of professional competence on the applicant. Member States shall also ensure that an applicant has the possibility to start a bridging course referred to in paragraph 2, point (d), no later than six months after the initial decision imposing the completion of a bridging course on the applicant.

Article 10

Minimum training requirements for certain professions

Where Articles 24, 25, 28, 31, 34, 35, 38, 40 and 44 of Directive 2005/36/EC set out minimum conditions on the training for certain professions, under this Chapter any recognition of evidence of formal qualifications in one of those professions shall be contingent upon fulfilment of those minimum conditions.

Chapter 3
Recognition on the basis of reviewed training programmes in accordance with minimum training conditions

Article 11

Principle of automatic recognition based on reviewed training programmes in third countries

1. Each Member State shall recognise evidence of formal qualifications giving access to the professional activities of doctor with basic training or specialised doctor, as nurse responsible for general care, as dental practitioner, as specialised dental practitioner, as midwife, as veterinary surgeon, as pharmacist, and as architect, obtained in a third country, and shall for the purposes of access to and pursuit of those professional activities, give such evidence the same effect on its territory as the evidence of formal qualifications which it itself issues, provided that all of the following conditions are met:

   (a) the evidence of formal qualifications has been obtained following successful completion of a training programme which has been reviewed in accordance with Articles 13 and 14 by a trusted review body within the meaning of Article 12;

   (b) the trusted review body has publicly disclosed the result of the review process and a review report;

   (c) the evidence of formal qualifications is issued as a digital credential.

2. Each Member State shall, for the purpose of access to and pursuit of a regulated profession that is covered by a common training framework pursuant to Article 49a of Directive 2005/36/EC, and where that Member State is not exempted from the obligation of introducing a common training framework in accordance with Article 49a(5) of Directive 2005/36/EC, give evidence of formal qualifications acquired in third countries the same effect in its territory as the evidence of formal qualifications which it itself issues, provided that all of the following conditions are met:

   (a) the evidence of formal qualifications has been obtained following successful completion of a training programme which has been reviewed in accordance with Articles 13 and 14 by a trusted review body as referred to in Article 12;

   (b) the trusted review body has publicly disclosed the result of the review process and a review report;

   (c) the evidence of formal qualifications is issued as a digital credential.

Article 12

Trusted review bodies

1. A quality assurance agency established in the Union may apply to the Commission to be listed as a trusted review body for higher education programmes if it fulfils all of the following criteria:

   (a) it is registered in the European Quality Assurance Register for Higher Education (EQAR) without interruption for a period of at least 10 years;

   (b) it has documented prior experience in conducting external quality assurance reviews, as a quality assurance agency, in at least three different third countries.

2. A quality assurance agency established in the Union may apply to the Commission to be listed as a trusted review body for vocational education and training (VET) programmes if it fulfils all of the following criteria:

   (a) it is competent, under national law, in the Member State in which it is established, for the quality assurance of VET programmes;

   (b) it has documented prior experience in conducting external quality assurance reviews, as a quality assurance agency, in at least three different third countries.

3. The Commission is empowered to adopt a delegated act supplementing this Directive by listing the trusted review bodies in accordance with Article 36. It shall list all quality assurance agencies that applied to be listed in accordance with paragraphs 1 and 2, and that comply with the requirements set out in those paragraphs.

4. Only trusted review bodies listed in the delegated act referred to in paragraph 3 shall be considered trusted review bodies for the purposes of this Directive, and only in relation to the professions indicated therein.

Article 13

Reviewed training programmes

For the purposes of Article 11, only training programmes that have been reviewed in accordance with Article 14 and found to fulfil the following criteria shall be considered as reviewed training programmes:

(a) The training programme is compliant with the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG), in the version applicable at the relevant time, in case the training programme is delivered through a higher education institution;

(b) Quality assurance measures comprising independent assessment, a competence-based assessment methodology, transparent outcomes, periodic external review, and an appeal or complaint mechanism have been implemented for the delivery of the programme, in case the training programme is delivered through vocational training;

(c) The institution delivering the programme is lawfully established in the third country concerned and authorised under the law of that country to award the qualification in question;

(d) For the professions listed in Article 11(1), the training programme is compliant with the minimum conditions on the training applicable to the relevant profession as set out in Articles 24, 25, 28, 31, 34, 35, 38, 40, 44, and 46 of Directive 2005/36/EC;

(e) In the cases of Article 11(2), the training programme is compliant with the applicable common training framework.

Article 14

Review of training programmes in third countries

For the purposes of Article 11, Member States shall ensure that the review of training programmes is carried out as follows:

(a) Upon request by a training institution in higher education or in vocational training outside the Union, a trusted review body pursuant to Article 12 assesses compliance with the criteria set out in Article 13.

(b) To this end, the trusted review body forms a review team which carries out the assessment of the training programme. For that purpose, the review team shall consist of:

(i) between five and nine reviewers selected by the trusted review body. Those reviewers shall include subject matter experts of the relevant discipline or disciplines, and specialists in quality assurance and evaluation methodologies; and

(ii) up to three reviewers that Member States appoint for the review following an invitation to all Member States by the trusted review body. For that purpose, each Member State shall appoint only one reviewer. Where more than three Member States intend to appoint a reviewer, a randomised process shall apply for the selection of the three reviewers.

Each of the reviewers selected pursuant to points (i) and (ii) shall declare, prior to participating in the review, the absence of any conflict of interest in relation to the institution under review, including any consultancy, advisory or other remunerated relationship with that institution within the preceding three years. A reviewer unable to make that declaration shall not participate in the review of the institution concerned.

(c) The trusted review body organises at least one on-site visit of the review team as an integral part of the assessment of the training programme.

(d) The trusted review body communicates its decision on the outcome of the assessment to the institution organising the reviewed training programme and to the Commission.

(e) Following a positive assessment of a training programme, the trusted review body grants the status of 'reviewed' on the basis that the applicable requirements laid down in Article 13 are satisfied. The status of 'reviewed' shall be valid for a period of five years or until the transposition deadline of any Commission delegated act, adopted pursuant to Article 21(6), second subparagraph of Directive 2005/36/EC, which updates the knowledge and skills referred to in Articles 24(3), 31(6), 34(3), 38(3), 40(3), 44(3), or 46(4) of Directive 2005/36/EC.

(f) After each assessment the trusted review body makes the result of the review process publicly available in a dedicated, clearly identifiable and easily accessible section of

its website or other publicly accessible online interface, no matter if the outcome of the review was positive or negative.

(g) If requested by the training institution with a reviewed programme, the trusted review body carries out a new review following the submission of a renewal application at least six months before the expiration of the current status of 'reviewed'. The training institution shall present detailed reports demonstrating continuous compliance with the training standards since the last review, alongside documentation outlining enhancements in training methodologies, assessment processes, and quality assurance practices. The trusted review body shall review the renewal application and communicate its decision to the institution organising the reviewed training programme and to the Commission within three months of application submission. The review team under point (b)(i) shall not be the same as the review team for the institution's immediately preceding review.

(h) Any fee or charge levied by the trusted review body for the review shall be transparent and proportionate to the costs of the service provided, and shall be commensurate with the complexity, scope and duration of the review carried out by the trusted review body. This shall not preclude the trusted review body from including in its fees a reasonable margin over its costs, provided that such margin does not render the fee disproportionate to the service provided.

Article 15

Right to appeal or contest review decisions

1. Training institutions whose training programmes received a negative result following the review in accordance with Article 14 shall be allowed to appeal that result under the national law of the Member State where the trusted review body is established. Member States shall establish procedures ensuring that such appeals are resolved fairly and promptly.

2. If a Member State has justified doubts on the review carried out pursuant to Article 14, that Member State may communicate its concerns in writing to the Commission. Within 15 working days after receipt of that communication, the Commission shall provide its views and invite the other Member States to express their views. In case at least 5 Member States express support for this concern to the Commission within two months following that invitation, the Commission shall inform all Member States in writing that they shall only consider the given training programme as reviewed once a second review has been carried out pursuant to Article 14.

3. If following the second review pursuant to paragraph 2 the training programme is granted the status of 'reviewed', the validity period referred to in Article 14, point (e) shall start from the date of that result.

4. If the result of the second review is negative, the programme shall not be considered as a reviewed training programme in the meaning of Article 13 and cannot benefit from recognition pursuant to Article 11.

Article 16

Listed third countries

1. For qualifications obtained in a third country listed in the delegated acts referred to in paragraph 2 of this Article, Member States shall ensure that trusted review bodies

automatically consider the criteria laid down in Article 13, points (a) and (b) as being fulfilled.

2. The Commission is empowered to adopt delegated acts in accordance with Article 36 to supplement this Directive by establishing and amending a list of third countries for which the learning quality assurance systems provide guarantees as regards all of the following elements:

   (a) public oversight or equivalent supervision of qualifications;

   (b) quality assurance or accreditation of the relevant institutions or training programmes;

   (c) authenticity, reliability and verifiability of the qualifications issued;

   (d) comparability and consistency of the intended learning outcomes or qualification standards relevant to the application of this Directive;

   (e) administrative cooperation with the competent authorities of the Member States and the Commission.

3. The Commission shall monitor whether the third countries listed in the delegated acts referred to in paragraph 2 continue to fulfil the conditions laid down in paragraph 2, points (a) to (e). Where the Commission has well-founded concerns that the conditions for the inclusion of a third country in the list are no longer fulfilled, it may adopt a decision suspending the application of paragraph 1 in respect of that third country. The Commission shall inform the third country concerned and the Member States of the suspension and the reasons without delay.

4. The suspension referred to in paragraph 3 of this Article shall apply until the Commission, following its assessment, either lifts it or adopts a delegated act in accordance with Article 36 removing the third country concerned.

Chapter 4
Rules for pursuing the profession

Article 17

Knowledge of languages

1. Professionals benefiting from the recognition of professional qualifications shall have a knowledge of languages necessary for practising the profession in the host Member State.

2. A Member State shall ensure that any controls carried out by, or under the supervision of, the competent authority for controlling compliance with the obligation under paragraph 1 shall be limited to the knowledge of one official language of the host Member State, or one administrative language of the host Member State provided that it is also an official language of the Union.

3. Controls carried out in accordance with paragraph 2 may be imposed if the profession to be practised has patient safety implications. Controls may be imposed in respect of other professions in cases where there is a serious and concrete doubt about the sufficiency of the professional's language knowledge in respect of the professional activities that that professional intends to pursue.

   Controls may be carried out only after the recognition of a professional qualification.

4. Any language controls shall be proportionate to the activity to be pursued. The professional concerned shall be allowed to appeal such controls under national law.

Article 18

Use of academic titles

Without prejudice to Article 19, the host Member State shall ensure that the right shall be conferred on the persons concerned to use academic titles awarded to them in another Member State or in a third country, and possibly an abbreviated form thereof, in the language of that other Member State or that third country. The host Member State may require that title to be followed by the name and address of the establishment or examining board which awarded it. Where an academic title of another Member State or of a third country is liable to be confused in the host Member State with a title which, in the latter Member State, requires supplementary training not acquired by the beneficiary, the host Member State may require the beneficiary to use the academic title of the Member State or third country where it has been issued in an appropriate form, to be laid down by the host Member State.

Article 19

Use of professional titles

1. If, in a host Member State, the use of a professional title relating to one of the activities of the profession in question is regulated, third-country nationals who are authorised to practise a regulated profession on the basis of this title shall use the professional title of the host Member State, which corresponds to that profession in that Member State, and make use of any associated initials.

2. Where a profession is regulated in the host Member State by an association or organisation within the meaning of Article 3(2) of Directive 2005/36/EC, third-country nationals shall not be authorised to use the professional title issued by that organisation or association, or its abbreviated form, unless they furnish proof that they are members of that association or organisation.

   If the association or organisation makes membership contingent upon certain qualifications, it may do so only under the conditions laid down in this Directive, in respect of third-country nationals who possess professional qualifications.

Article 20

Approval by health insurance funds

Member States which require persons who acquired their professional qualifications in their territory to complete a preparatory period of in-service training and/or a period of professional experience in order to be approved by a health insurance fund, shall waive this obligation for the holders of evidence of professional qualifications of doctor and dental practitioner acquired in other Member States or in other third countries.

Title III
Recognition in the context of a procedure to obtain a long-stay visa or a residence permit

Article 21

Scope

This Title applies where the recognition by the host Member State of a qualification or skills obtained in another Member State or in a third country, and held by a third-country national, constitutes a factor determining the outcome of a procedure to obtain a long-stay visa or a residence permit for work purposes, including within a points-based immigration system.

Article 22

Right to assessment of qualifications and skills in the context of a procedure to obtain a long-stay visa or a residence permit

1. Member States shall ensure that, where the recognition or assessment of qualifications or skills constitutes a factor determining the outcome of a procedure to obtain a long-stay visa or a residence permit for work purposes, applicants have the right to have assessed and taken into account the following for the purposes of that procedure:
   (a) their formal qualifications obtained in another Member State or in a third country;
   (b) their skills acquired through professional or other experience.
2. Where relevant to that procedure, that assessment may take into account information provided by a current or prospective employer of the applicant, in particular concerning the tasks, responsibilities and skills required for the position offered.
3. Member States shall ensure that qualifications and skills referred to in paragraph 1 are not refused solely on the ground that they were obtained in another Member State or in a third country.
4. Member States shall ensure that the recognition and assessment procedure is fair, does not impose unnecessary burdens on applicants, and is designed to facilitate the efficient processing of applications for a long-stay visa or a residence permit.
5. Member States shall ensure that the recognition or assessment results are presented to the applicant in a reasoned decision. That decision shall determine whether the qualifications or skills of the third-country national are:
   (a) recognised and thus treated as equivalent to the qualification level or other qualification requirements applicable in the context of the procedure to obtain a long-stay visa or a residence permit;
   (b) recognised provisionally, contingent upon the applicant completing compensation measures in accordance with Article 25(3);
   (c) not recognised.

Article 23

Procedural requirements

1. Member States shall ensure that any recognition or assessment referred to in Article 22 is carried out within the procedure to obtain a long-stay visa or a residence permit and in accordance with the principles of necessity, proportionality and simplification.

2. Where the procedure to obtain a long-stay visa or a residence permit does not require recognition or assessment of qualifications that would give access to a regulated profession in its territory, the host Member State shall assess qualifications or skills within the procedure to obtain a long-stay visa or a residence permit and shall not require a separate recognition or assessment procedure outside that procedure. In particular, that Member State shall:

   (a) not duplicate previous assessments or the requirement to submit evidence that is already available to, or capable of being obtained by, the competent authorities of that Member State;

   (b) integrate any request for information or supporting evidence to carry out the recognition or assessment in the application to obtain a long-stay visa or a residence permit, and not require a separate application for recognition of qualifications;

   (c) limit documentary requirements to those that are necessary for the assessment and reasonably available to the applicant or, with the applicant's consent, to a current or prospective employer submitting evidence on the applicant's behalf;

   (d) not charge any separate or additional fees for the assessment or recognition of qualifications or skills, other than fees that may be charged for the procedure to obtain a long-stay visa or a residence permit;

   (e) ensure that the assessment or recognition of qualifications or skills is carried out within the time limits of the procedure to obtain a long-stay visa or a residence permit and does not cause delay in the processing of the relevant long-stay visa or residence permit application.

Article 24

Recognition of qualification levels

1. Where, for the purposes of recognition in the context of a procedure to obtain a long-stay visa or a residence permit, Member States establish the level of a qualification, they shall apply the levels and descriptors of the European Qualifications Framework (EQF) as set out in [Annex III of Regulation xxxx/xx/EU establishing a framework for portability of skills and qualifications and amending Regulation (EU) 2018/1724 ('Skills Portability Act')].

   For that purpose, Member States shall take into account any relevant existing comparison of qualification levels or frameworks of third countries to the EQF.

2. The level of the qualification shall not constitute the only element of the assessment but shall be considered together with the qualification's intended learning outcomes, duration, content, workload, practical training, professional experience and, where relevant, the scope of professional activities to which it gives access in another Member State or the third country in which it was awarded.

Article 25

Recognition of qualifications without access to regulated professions

1. Where Member States evaluate qualifications for the purpose of recognition in the context of a procedure to obtain a long-stay visa or a residence permit, and where that evaluation goes beyond a comparison of qualification levels as provided for in Article 24 and a general classification of the field of study, they shall ensure that a learning outcomes approach is applied, focusing primarily on comparing the applicant's acquired skills to the relevant reference qualification. Where possible, the assessment shall also consider experiences gained through non-formal learning and skills acquired through professional or other experience. Where provided, and with the applicant's consent, information from a current or prospective employer relevant to the skills required for the position offered may also be taken into account.

2. Member States shall recognise a qualification in the context of a procedure to obtain a long-stay visa or a residence permit if all of the following conditions are met:

   (a) there are no substantial differences in qualification level;

   (b) there are no substantial differences in the intended learning outcomes;

   (c) there are no justified doubts on the quality of the education, training or qualification system under which the evidence of formal qualifications has been awarded in a third country.

3. If substantial differences in intended learning outcomes or levels of qualification are established, or if the Member State has justified doubts on the quality of the education, training or qualification system under which the evidence of formal qualifications has been awarded in a third country, provisional recognition shall be granted, contingent upon the applicant completing suitable compensation measures within a clearly defined timeframe laid down by the host Member State. For the purpose of the procedure to obtain a long-stay visa or a residence permit, the provisionally recognised qualification shall be treated as finally recognised. The host Member State shall, at the time provisional recognition is granted, inform the applicant in writing of the compensation measures required, the timeframe within which they shall be completed, and the consequences of failing to complete them within that timeframe. The successful completion of the compensation measures shall only be required if the applicant is subsequently granted a long-stay visa or a residence permit.

4. The compensation measures shall be designed to address identified gaps and shall be selected from one of the following:

   (a) an aptitude test;

   (b) a test of professional competence;

   (c) a bridging course, with a duration of up to one year.

5. By way of derogation from paragraph 3, if substantial differences in the learning outcomes or the level of qualification cannot be adequately remedied through compensation measures, Member States may refuse recognition of qualifications for the purpose of the procedure to obtain a long-stay visa or a residence permit. A decision to refuse recognition of qualifications shall not automatically result in the rejection of the application for a long-stay visa or a residence permit.

6. For the purposes of paragraphs 2, 3 and 4:

   (a) 'substantial difference in intended learning outcomes' means instances where the essential knowledge and skills, necessary for practising a given profession,

are not among the intended learning outcomes of the third-country national's training, resulting in significant differences in terms of the essential knowledge and skills obtained compared with those required by the host Member State;

(b) 'substantial difference in qualification levels' means instances where the qualification level of a third-country national is assessed to be two or more levels below the level of the training required by the host Member State, as determined by the descriptors of the EQF.

Article 26

Integrated procedure with the recognition of professional qualifications

1. Member States shall offer applicants seeking recognition of qualifications in the context of a procedure to obtain a long-stay visa or a residence permit, who also wish to access a regulated profession, the possibility of choosing an integrated recognition procedure. That procedure shall satisfy the requirements laid down in this Title and in Title II. Upon successful completion of the integrated recognition procedure, the applicant shall receive a recognition of qualifications for the purposes of the procedure to obtain a long-stay visa or a residence permit as referred to in Article 22(5), point (a), and for the access to the regulated profession, as provided for in Article 4.

2. For applicants not opting for an integrated recognition procedure, Member States shall ensure that recognition procedures in the context of the procedure to obtain a long-stay visa or a residence permit, and recognition procedures for access to regulated professions are coherent. Authorities shall take into account all prior assessments and verifications of the provided evidence that have already been carried out in previous procedures and shall not require applicants to resubmit documents that have already been provided in those procedures.

3. Member States shall ensure that information on both integrated and separate recognition procedures is readily available to applicants to support informed decision-making.

4. With the applicant's consent, Member States may inform a current or prospective employer of the outcome of the recognition or assessment referred to in paragraph 1, in particular where that outcome is relevant to a procedure for employment-based admission.

Title IV
Common provisions

Article 27

Documentation and formalities

1. Where the competent authorities of the host Member State decide on the recognition of a qualification by virtue of Title II or Article 26, those authorities may require solely the types of documents and certificates listed in Annex VII of Directive 2005/36/EC. Where the competent authorities of the host Member State decide on the recognition of a qualification by virtue of Articles 24 and 25 as part of a procedure to obtain a long-stay visa or a residence permit, for the purpose of the

recognition of the qualification those authorities may demand solely the types of documents listed in Annex VII of Directive 2005/36/EC, point 1(b). This limitation on the documents that can be required for the purpose of recognising a qualification is without prejudice to any other document requirements applicable under Union or national law for the part of the examination of the application for a long-stay visa or a residence permit that is unrelated to the recognition of the qualification.

2. For the purposes of this Directive, where the documents requested are to be provided by another Member State or a third country, the references to "home Member State" or "the Member State from which the foreign national comes" in Annex VII of Directive 2005/36/EC shall be understood as referring to the other Member State or the third country, as applicable.

3. Where the host Member State imposes requirements as to the date of issue of the documents referred to in Annex VII of Directive 2005/36/EC, point 1(d), (e) and (f), it shall accept documents issued within the three months preceding the date on which they are submitted.

   The Member States, bodies and other legal persons involved in the process shall guarantee the confidentiality of the information which they receive.

4. In cases of justified doubts, the host Member State may, after obtaining agreement from the applicant, require from the competent authorities of a Member State or a third country confirmation of the authenticity of the attestations and evidence of formal qualifications awarded in that other Member State or the third country.

5. Where a digital credential is issued under a trusted framework provided in Regulation (EC) No 910/2014 it shall be presumed authentic unless the competent authority has concrete and specific indications that the credential is not authentic.

6. In cases of justified doubt, where evidence of formal qualifications, as defined in Article 3(e), has been issued by a competent authority in a Member State and includes training received in whole or in part in an establishment legally established in the territory of another Member State, the host Member State shall be entitled to verify with the competent body in the Member State of origin of the award all of the following:

   (a) whether the training course at the establishment which gave the training has been formally certified by the educational establishment based in the Member State of origin of the award;

   (b) whether the evidence of formal qualifications issued is the same as that which would have been awarded if the course had been followed entirely in the Member State of origin of the award;

   (c) whether the evidence of formal qualifications confers the same professional rights in the territory of the Member State of origin of the award.

7. In cases of justified doubts, the host Member State may require from the competent authorities of a third country or of a Member State confirmation of the fact that the applicant is not suspended or prohibited from the pursuit of the profession as a result of serious professional misconduct or conviction of criminal offences relating to the pursuit of any of their professional activities.

8. Where the applicant duly documents that, despite reasonable efforts, he was unable to obtain the documents referred to in paragraph 1, or the host Member State cannot obtain the confirmations referred to in paragraph 4 or paragraph 7 of this Article,

from the third country, the host Member State shall assess the feasibility of, and where appropriate, employ alternative methods to assess qualifications, skills or other evidentiary elements. Those methods may include affidavits, third-party assessments, professional interviews, or reputable evaluation frameworks, like qualifications passports designed for refugees and vulnerable migrants. The host Member State shall ensure that applicants are not unduly disadvantaged due to those circumstances and shall base its decisions on available and reasonable evidence.

9. Where a host Member State requires its nationals to swear a solemn oath or make a sworn statement in order to gain access to a regulated profession, and where the wording of that oath or statement cannot be used by a third-country national, the host Member State shall ensure that the person concerned can use an appropriate equivalent wording.

10. Member States shall accept the documents referred to in paragraph 1 in any of the official languages of the Union.

Article 28

Support Services for the Assessment of Authenticity

1. The Commission shall provide support services for the assessment of authenticity.

2. In providing these services, the Commission shall support Member States in the recognition of qualifications obtained in a third country by offering assessments on the authenticity of submitted evidence of formal qualifications.

3. At the request of a competent authority of a Member State, the Commission shall assess the authenticity of qualifications, diplomas, certificates or other evidence of formal qualifications issued in a third country and submitted in the context of an application falling within the scope of this Directive, in particular by utilising digital tools, international databases and through cooperation with third countries and educational and professional bodies. Requests shall be submitted electronically and be accompanied by the documents necessary for the assessment and proof of payment of any applicable fee referred to in paragraphs 7 and 8.

4. The Commission shall provide the requesting Member State with a substantiated assessment of authenticity, including detailed explanations of the evaluation process and findings. That assessment shall be advisory in nature and shall not be binding on competent authorities of the Member States who shall remain solely responsible for the recognition decision.

5. For the purposes of paragraph 3, the Commission is empowered to conclude administrative arrangements, aimed at facilitating the exchange of information necessary for the assessment of authenticity, with the competent authorities of third countries and with international or professional bodies responsible for the issuance or accreditation of qualifications. The Commission shall cooperate, where relevant, with Union delegations to third countries and EU agencies. Such arrangements shall not create binding obligations under international law on the Union.

6. The Commission shall respond to a request submitted pursuant to paragraph 3 within three weeks of receipt of the complete documentation referred to in that paragraph. Where the Commission is unable to provide an assessment within that period, in particular due to the need to obtain information from a third-country authority or body referred to in paragraph 3, it shall inform the requesting competent authority

without delay, indicating the reasons for the delay and the anticipated timeframe for completion.

7. The Commission may charge a cost-recovery fee to the requesting competent authority for the provision of the assessment referred to in paragraph 3.

8. The Commission shall, by means of implementing acts, adopt uniform rules regarding:

   (a) the calculation methodology for determining cost recovery;

   (b) the applicable fee amounts and payment modalities;

   (c) specific cases where fee exemptions or reductions apply, in particular for beneficiaries of international protection or applicants in demonstrably vulnerable situations.

   Those implementing acts shall be adopted in accordance with the examination procedure referred to in Article 38.

9. In relation to personal data processed for the provision of support services for the assessment of authenticity, the Commission shall act as controller within the meaning of Article 3(8) of Regulation (EU) 2018/1725 and shall ensure, in accordance with Article 33 of that Regulation, the security of the processing by implementing appropriate technical and organisational measures, taking into account the nature of the personal data processed, including where submitted documents may incidentally contain special categories of personal data, referred to in paragraph 10.

10. For the purpose of carrying out the tasks referred to in paragraph 3, the Commission may process the following categories of personal data, to the extent strictly necessary for a given assessment:

   (a) the applicant's identification data as contained in the evidence of formal qualifications submitted;

   (b) data relating to the submitted qualifications, diplomas, certificates or other evidence of formal qualifications issued in a third country, including the awarding institution, date of issue, field and level of study, and any identifiers or security features of the document.

   The Commission shall not process special categories of personal data within the meaning of Article 10 of Regulation (EU) 2018/1725. Where documentation submitted by a competent authority incidentally contains such data, the Commission shall ensure that those data are not retained and are deleted without delay.

11. Personal data processed for the purpose of assessing authenticity shall be retained only for as long as necessary for that purpose and, in any event, for no longer than 12 months from the date on which the assessment is provided to the requesting competent authority, unless a longer period is necessary for the purposes of an ongoing appeal, audit or investigation, in which case the data shall be erased without delay thereafter.

12. The Commission shall periodically report on the support services for the assessment of authenticity to ensure transparency and continued improvement. Member States are encouraged to provide feedback to facilitate enhancements in service delivery.

13. The Commission is empowered to adopt delegated acts in accordance with Article 36 laying down the organisational and technical measures necessary for the provision of

the support services, and for the security of processing of personal data, including as regards the systems used for the exchange of requests and supporting documents between the Commission and the competent authorities of the Member States, access to such systems, the interfaces made available to competent authorities of the Member States, the data sources to be consulted and arrangements for keeping them up to date, and the administrative and operational management of these services.

Article 29

Recognition procedure

1. For procedures under Title II and under Article 26, the host Member State shall ensure that:

   (a) the competent authority acknowledges receipt of the application for recognition of professional qualifications within one month of receipt and informs the applicant of any missing document;

   (b) the procedure for examining an application for the recognition of professional qualifications is completed as quickly as possible and leads to a duly substantiated decision by the competent authority in the host Member State within three months after the date on which the applicant submitted the complete application with the required evidence.

   The deadline provided for in the first subparagraph, point (b), may be extended by one month except in cases falling under Title II, Chapter 3.

2. For procedures under Title III, except those covered by Article 26, recognition shall not extend, suspend or otherwise affect, any time limits or procedural deadlines applicable under Union or national law to the examination of and decision on the application for a long-stay visa or a residence permit. Member States shall ensure that the organisation of the recognition procedure does not undermine the effective processing of the application for a long-stay visa or a residence permit within the applicable time limits.

3. The decision on the application for recognition of professional qualifications, or failure to reach a decision, within the deadline, shall be subject to appeal under national law.

4. Applicants shall receive regular updates regarding the progress and current status of their application, including information on the specific stage within the procedural process.

5. The host Member State shall offer applicants the choice to receive communications, such as acknowledgments of receipt, decisions and any other information related to the procedure, in an official language of that Member State, or in at least one other language commonly spoken by incoming third-country nationals or third-country nationals already legally residing in that Member State.

Article 30

Access to recognition procedures

1. The host Member State shall ensure that recognition procedures can be completed remotely and by electronic means, and that third-country nationals who are not residing in that Member State can access and complete recognition under Titles II

and III remotely from their country of residence. Such a possibility shall not prevent the competent authorities of the host Member State from requesting certified copies at a later stage in the event of justified doubts and where strictly necessary.

2. The host Member State shall grant or extend the validity of residence permits to third-country nationals who fulfil all of the following conditions:

   (a) they are legally residing in the host Member State;

   (b) they can demonstrate an ongoing effort to secure employment in the profession concerned, such as registration with a public employment service, submission of job applications, or a conditional offer of employment;

   (c) they have applied for recognition of their professional qualifications under Title II or Article 26 at least four months before their long-stay visa or residence permit expires.

   Member States shall ensure that the residence permit remains valid during the recognition procedure, including where procedural delays occur that are not attributable to the applicant.

3. Member States shall grant or extend the validity of residence permits for the period needed for completing compensation measures required pursuant to Article 9 to third-country nationals legally residing in the Member State, unless it can be established at the time of the application for recognition of their professional qualifications that the third-country national does not satisfy the other conditions for the issuance of such a permit.

Article 31

Fees and charges

1. A host Member State shall either waive fees for recognition procedures and compensation measures or, except for the cases referred to in Article 23(2), point (d), ensure that any fees charged do not exceed the actual cost incurred in providing the service to applicants.

2. By way of derogation from paragraph 1, Member States may impose flat-rate charges if they can be justified by the average cost of providing the service to applicants.

3. Member States shall ensure that detailed information on the structure of the fee and justification for any charges imposed as part of the recognition process is publicly available and easily accessible and shall actively inform applicants of this information before the recognition process begins.

Article 32

Information provision

1. Member States shall ensure that third-country nationals, irrespective of whether they reside within or outside their territory, have access to timely, comprehensive and user-friendly information and support concerning procedures for the recognition of qualifications under this Directive.

2. The information referred to in paragraph 1 shall cover the following aspects:

   (a) applicable legal and administrative requirements;

(b) procedural steps, expected timelines and applicable costs;

(c) the rights and obligations of applicants;

(d) available remedies, appeal mechanisms and complaint procedures.

3. Member States shall ensure that the information they provide in accordance with paragraph 2 clearly distinguishes and explains the different procedures laid down in Titles II and III.

4. Where applicable, Member States shall provide comprehensive information on compensation measures, including adaptation periods, aptitude tests, tests of professional competence and bridging courses, as referred to in Articles 9 and 25, covering their organisation, conditions, obligations for applicants, and other relevant practical arrangements.

5. Where applicable, Member States shall provide comprehensive information on any complementary measures available to third-country nationals, including language courses and integration support, reskilling or upskilling pathways, and links to employment services.

6. Member States shall ensure that refugees, beneficiaries of subsidiary protection in accordance with Regulation (EU) 2024/1347 have access to tailored information, assistance and support services, considering their specific legal status, needs and vulnerabilities.

7. To facilitate a coherent and user-friendly experience, Member States shall, where appropriate, organise information provision through coordinated or streamlined arrangements, including digital platforms, and activities of the national assistance centres as laid down in Article 34.

8. Member States shall ensure that the information referred to in this Article is also made available on existing Union tools and platforms.

9. Member States shall ensure that the information provided pursuant to this Article is regularly reviewed and kept up to date. They shall put in place mechanisms to collect and analyse feedback from third-country nationals, with a view to improving the quality, clarity, accessibility and coherence of the information and of the support services.

10. Member States and the competent authorities involved shall ensure the confidentiality of personal and sensitive information obtained in the context of information provision and assistance, in accordance with applicable Union and national law.

Title V
Reporting and final provisions

Article 33

Group on the recognition of qualifications of third-country nationals

1. Member States shall assist one another in the implementation of this Directive.

2. A group on the recognition of qualifications of third-country nationals (‘the Group’) is established as an advisory group to the Commission.

3. The Group's tasks shall be the following:

(a) promoting uniform application of this Directive;

(b) contributing to the effective cooperation between Member States' authorities and the Commission with regards to matters covered by this Directive;

(c) advising the Commission, as appropriate, in the early preparations of draft implementing acts to be adopted pursuant to this Directive;

(d) contributing to the smooth cooperation with other relevant expert groups;

(e) facilitating the exchange of experience and best practices for an efficient and effective organisation of recognition of qualifications of third-country nationals, including through outreach to professionals, their representative organisations and social partners, quality assurance agencies and qualifications recognition networks.

4. Each Member State shall appoint one representative and one alternate representative to the Group.

5. The Group shall be chaired by the Commission. The Commission shall provide the Group's Secretariat.

On a proposal by the Commission, the Group shall adopt its rules of procedure.

6. The Group shall meet at regular intervals that allow the Group to effectively perform its tasks provided for in this Directive.

Article 34

Assistance centres

The assistance centres designated by Member States pursuant to Article 57b of Directive 2005/36/EC shall provide assistance on the recognition of qualifications relating to third-country nationals provided for in this Directive, for the benefit of third-country nationals including through cooperation, where appropriate, with employers, other contact points, and authorities in other Member States and third countries.

The assistance centres shall operate without prejudice to the responsibilities of other competent authorities under Union or national law.

Article 35

Alert mechanism

Where a third-country national is restricted or prohibited, including on a temporary basis, by a national authority or court from pursuing, in whole or in part, on the territory of a Member State, any of the professional activities referred to in Article 56a(1) of Directive 2005/36/EC, the competent authority of that Member State shall inform the competent authorities of all other Member States. For this purpose Article 56a of Directive 2005/36/EC shall apply mutatis mutandis.

Article 36

Exercise of the delegation

1. The power to adopt delegated acts is conferred on the Commission subject to the conditions laid down in this Article.

2. The power to adopt delegated acts referred to in Article 12(3) and Article 16(2) shall be conferred on the Commission for a period of five years from the entry into force of this Directive. The Commission shall draw up a report in respect of the delegation of power not later than nine months before the end of the five-year period. The delegation of power shall be tacitly extended for periods of an identical duration, unless the European Parliament or the Council opposes such an extension not later than three months before the end of each period.

3. The delegation of power referred to in Article 12(3) and Article 16(2) may be revoked at any time by the European Parliament or by the Council. A decision to revoke shall put an end to the delegation of the power specified in that decision. It shall take effect on the day following the publication of the decision in the Official Journal of the European Union or at a later date specified therein. It shall not affect the validity of any delegated acts already in force.

4. Before adopting a delegated act, the Commission shall consult experts designated by each Member State in accordance with the principles laid down in the Interinstitutional Agreement of 13 April 2016 on Better Law-Making.

5. As soon as it adopts a delegated act, the Commission shall notify it simultaneously to the European Parliament and to the Council.

6. A delegated act adopted pursuant to Article 12(3) and Article 16(2) shall enter into force only if no objection has been expressed either by the European Parliament or the Council within a period of two months of notification of that act to the European Parliament and the Council or if, before the expiry of that period, the European Parliament and the Council have both informed the Commission that they will not object. That period shall be extended by two months at the initiative of the European Parliament or the Council.

Article 37

Statistics

1. By [31 May of the year following the third year of entry into force], and annually thereafter, Member States shall report to the Commission statistics on the implementation of this Directive. Those statistics shall cover the previous calendar year and include the following information:

   (a) the number of applications received and handled, and decisions taken, disaggregated by:

      (i) citizenship;

      (ii) occupation;

      (iii) status (i.e. the residence or migration status under which the third-country national is present or seeking to be present in the Union);

      (iv) type of procedure (procedures under Article 6; Title II, Chapter 2; Title II, Chapter 3; Article 24, Article 25 and Article 26);

      (v) outcome of the decision (positive, positive with partial access; positive with compensation measure, broken down by type of compensation measure; negative);

(b) the proportion of applications that are complete at first submission;

(c) the average duration of processing applications;

(d) the average number of information exchanges per case;

(e) the number of authenticity checks requested.

2. The Commission shall make a summary of the information provided in accordance with paragraph 1 publicly available.

Article 38

Committee procedure

1. The Commission shall be assisted by the Committee on the Recognition of Professional Qualifications established by Article 58(1) of Directive 2005/36/EC. That committee shall be a committee within the meaning of Regulation (EU) No 182/2011.

2. Where reference is made to this paragraph, Article 5 of Regulation (EU) No 182/2011 shall apply.

Article 39

Reports

1. By 31 May [of the year following the third year of entry into force], and every five years thereafter, Member States shall submit a report to the Commission on the application of this Directive. The report shall contain the following information regarding the recognition of qualifications in the context of procedures for access to regulated professions and for obtaining a long-stay visa or residence permit:

(a) processing times of applications;

(b) outcomes;

(c) user experience;

(d) results of the review of the procedures, including constraints and areas requiring improvement identified.

As part of preparing the report, Member States shall collect feedback from employers, professional bodies, third-country nationals, and other stakeholders.

2. No sooner than seven years after the date of transposition of this Directive, the Commission shall carry out an evaluation of this Directive and present a report on the main findings to the European Parliament and the Council. Member States shall provide the Commission with the information necessary for the preparation of that report.

Article 40

Transposition

1. Member States shall bring into force the laws, regulations and administrative provisions necessary to comply with this Directive by [2 years after entry into force] at the latest. They shall forthwith communicate to the Commission the text of those provisions.

When Member States adopt those provisions, they shall contain a reference to this Directive or be accompanied by such a reference on the occasion of their official publication. Member States shall determine how such reference is to be made.

2. Member States shall communicate to the Commission the text of the main provisions of national law which they adopt in the field covered by this Directive.

Article 41

Entry into force

This Directive shall enter into force on the twentieth day following that of its publication in the *Official Journal of the European Union*.

Article 42

Addressees

This Directive is addressed to the Member States in accordance with the Treaties.

Done at Strasbourg,

For the European Parliament	*For the Council*
The President	*The President*
[...]	*[...]*

LEGISLATIVE FINANCIAL AND DIGITAL STATEMENT

1. FRAMEWORK OF THE PROPOSAL/INITIATIVE

1.1. Title of the proposal/initiative

Proposal for a Directive of the European Parliament and of the Council on the recognition of qualifications of third-country nationals

1.2. Policy area(s) concerned

Employment, social affairs and inclusion. The initiative is also relevant to the internal market policy area (recognition of professional qualifications) and to the migration and home affairs policy area (legal migration and integration of third-country nationals), given its interaction with Directive 2005/36/EC and with the Union's legal migration acquis.

1.3. Objective(s)

1.3.1. *General objective(s)*

To facilitate the recognition of qualifications held by third-country nationals so as to help address labour and skills shortages in the Union.

1.3.2. *Specific objective(s)*

Specific objective No

1. Streamlined recognition systems within and between Member States: Improved alignment and consistency between national recognition systems across the EU, and coherence within Member States, between recognition procedures for access to regulated professions and those embedded in migration regimes.

2. Reduced legal and administrative complexity for recognition of qualifications of third-country nationals: Clearer and less burdensome requirements, documentation and procedural steps for third-country national applicants, employers and authorities, including, reduced administrative steps and enhanced user-friendliness.

3. Increased trust and understanding of qualifications obtained in third countries: Improved transparency, comparability and trust of third-country qualifications within the EU, through enhanced information availability and mechanisms that support the assessment of foreign qualifications and skills.

1.3.3. *Expected result(s) and impact*

Specify the effects which the proposal/initiative should have on the beneficiaries/groups targeted.

For third-country national applicants: shorter and more predictable recognition procedures, clearer information on requirements, and a genuine prospect of recognition for qualifications obtained outside the Union, with an associated increase in the probability of employment matched to their qualification level and a reduction in the incidence of overqualification. For employers, including SMEs: faster access to recognised professionals, reduced administrative costs linked to hiring, and improved ability to fill vacancies in sectors facing structural shortages, including healthcare. For competent authorities and Member States: reduced administrative burden and duplication of effort, more consistent decision-making, and stronger evidence and cooperation channels through which to identify and act on fraudulent documentation. For the Union as a whole: a measurable contribution to addressing

labour and skills shortages and to the coherence of the Union's approach to legal migration.

1.3.4. *Indicators of performance*

Specify the indicators for monitoring progress and achievements.

General objective

(a) Share of third-country nationals in qualification-matched employment within 12 months of arrival

(b) Number of recognition procedures initiated and completed per year by third-country nationals

Specific objective 1

(a) Share of cases requiring parallel submissions (duplicate qualification checks across recognition and migration procedures)

(b) Number of cases requiring re-submission or additional information, as a share of total applications

(c) Share of recognition applications submitted digitally

Specific objective 2

(a) Average end-to-end processing time per recognition procedure, by Member States and procedure type

(b) Average number of documents requested per application, including certified translations

(c) Estimated applicant-side cost per recognition procedure Share of complete applications at first submission

Specific objective 3

(a) Number of authenticity checks processed via the EU-level service per year

(b) Share of CA reporting sufficient information on third-country qualification systems to make timely decisions without requesting additional documentation or compensation measures

(c)Processing time for sectoral professions under automatic recognition channel

1.4. **The proposal/initiative relates to:**

☑ **a new action**

☐ **a new action following a pilot project/preparatory action** [1]

☐ **the extension of an existing action**

☐ **a merger or redirection of one or more actions towards another/a new action**

1.5. **Grounds for the proposal/initiative**

1.5.1. *Requirement(s) to be met in the short or long term including a detailed timeline for roll-out of the implementation of the initiative*

[1] As referred to in Article 58(2), point (a) or (b) of the Financial Regulation.

In the short term, Member States will need to transpose the Directive's common procedural rules (timeframes, information requirements, single points of contact) within the transposition deadline of 2 years. The Commission will need to establish the authentication service and make it operational and adopt any implementing measures needed to specify the professions eligible for automatic recognition. In the longer term, full-scale operation of the automatic recognition channel and of the authentication service will require ongoing coordination with Member States, competent authorities and third countries, periodic review of the list of professions covered, and monitoring of implementation.

1.5.2. *Added value of EU involvement (it may result from different factors, e.g. coordination gains, legal certainty, greater effectiveness or complementarities). For the purposes of this section 'added value of EU involvement' is the value resulting from EU action, that is additional to the value that would have been otherwise created by Member States alone.*

Reasons for action at EU level (ex-ante) Recognition of third-country qualifications is currently handled through divergent national procedures, with no common Union framework equivalent to Directive 2005/36/EC for intra-EU mobility. This fragmentation generates duplicated authenticity checks across Member States, inconsistent outcomes for applicants with comparable qualifications, and an absence of the trust infrastructure needed to support automatic recognition for professions facing acute shortages. Individual Member States acting alone cannot replicate the economies of scale of a shared authenticity-verification service, nor secure the cross-border consistency needed to build mutual trust between competent authorities.

Expected generated EU added value (ex-post) A common Union framework is expected to reduce duplication and verification costs across Member States, increase the consistency and speed of recognition decisions, and strengthen the Union's collective ability to address labour and skills shortages, in a manner that no individual Member State could achieve acting alone.

1.5.3. *Lessons learned from similar experiences in the past*

The experience of Directive 2005/36/EC demonstrates that a common Union framework for recognition, combined with structured administrative cooperation (competent authority networks, the Internal Market Information system), can substantially reduce recognition timeframes and improve consistency, while showing that purely voluntary cooperation (as tested under Policy Option 1 in the impact assessment) is insufficient to achieve comparable results at Union level. The Directive's existing minimum training requirements for a number of professions offer a further lesson, showing that agreement on common substantive standards, and not only procedural rules, can itself be a basis for building trust and cooperation between competent authorities, a precedent relevant to the design of the automatic recognition channel under this initiative. The Council Recommendation of 22 December 2020 on a comprehensive approach to the recognition of qualifications of third-country nationals offers a related lesson, in that its non-binding, voluntary approach has not resulted in the level of convergence or consistency needed across Member States, reinforcing the case for the more binding measures proposed under this initiative. The German Federal Recognition Act experience shows that formalised recognition procedures for foreign qualifications are associated with a measurable increase in the probability of qualification-matched employment.

1.5.4. *Compatibility with the multiannual financial framework and possible synergies with other appropriate instruments*

This proposal is compatible with the Commission's proposal for the Multiannual Financial Framework 2028-2034. It generates synergies with Action 1 of the Skills Portability Initiative, with Directive 2005/36/EC as amended under Action 2, and with instruments under the Fair Labour Mobility Package and the EU Talent Pool.

1.5.5. *Assessment of the different available financing options, including scope for redeployment*

The preferred financing option is direct financing from the Union budget, as the initiative requires the development, deployment and operation of a common European authentication system that will be used across all Member States. A centrally financed solution ensures economies of scale, avoids duplication of costs, and guarantees interoperability and consistent implementation across the Union.

Alternative approaches based on separate national developments or decentralised financing would require multiple parallel investments, increase integration costs and create risks of fragmentation and inconsistent implementation. Financing through existing Union programmes and budgetary resources allows the initiative to build on existing digital infrastructure and expertise while ensuring efficient use of Union funds. Where appropriate, existing resources will be redeployed to support the implementation of the initiative.

The current proposal entails additional staff costs under Heading 4 of the proposal for the 2028-2034 multiannual financial framework, as it is a new action. For operational costs, it builds on the Commission proposal for National and Regional Partnership Plans and its EU Facility under Heading 1 of the 2028-2034 multiannual financial framework, subject to its adoption, and the EU annual budgetary procedure.

1.6. **Duration of the proposal/initiative and of its financial impact**

☐ **limited duration**

☐ in effect from [DD.MM]YYYY to [DD.MM]YYYY

☐ financial impact from YYYY to YYYY for commitment appropriations and from YYYY to YYYY for payment appropriations.

☑ **unlimited duration**

Implementation with a start-up period from YYYY to YYYY,

followed by full-scale operation.

1.7. **Method(s) of budget implementation planned**[(2)]

☐ **Direct management** by the Commission

☑ by its departments, including by its staff in the Union delegations;

☐ by the executive agencies

☐ **Shared management** with the Member States

[(2)] Details of budget implementation methods and references to the Financial Regulation may be found on the BUDGpedia site: https://myintracomm.ec.europa.eu/corp/budget/financial-rules/budget-implementation/Pages/implementation-methods.aspx.

☐ **Indirect management** by entrusting budget implementation tasks to:

- ☐ third countries or the bodies they have designated;
- ☐ international organisations and their agencies (to be specified);
- ☐ the European Investment Bank and the European Investment Fund;
- ☐ bodies referred to in Articles 70 and 71 of the Financial Regulation;
- ☐ public law bodies;
- ☐ bodies governed by private law with a public service mission to the extent that they are provided with adequate financial guarantees;
- ☐ bodies governed by the private law of a Member State that are entrusted with the implementation of a public-private partnership and that are provided with adequate financial guarantees;
- ☐ bodies or persons entrusted with the implementation of specific actions in the common foreign and security policy pursuant to Title V of the Treaty on European Union, and identified in the relevant basic act
- ☐ bodies established in a Member State, governed by the private law of a Member State or Union law and eligible to be entrusted, in accordance with sector-specific rules, with the implementation of Union funds or budgetary guarantees, to the extent that such bodies are controlled by public law bodies or by bodies governed by private law with a public service mission, and are provided with adequate financial guarantees in the form of joint and several liability by the controlling bodies or equivalent financial guarantees and which may be, for each action, limited to the maximum amount of the Union support.

Comments

[...]

2. MANAGEMENT MEASURES

2.1. Monitoring and reporting rules

The Commission will monitor implementation on a continuous basis through the indicators set out in section 1.3.4, drawing on administrative data reported by Member States' competent authorities, authentication service caseload and processing-time data, and periodic surveys of competent authorities. Member States will report on transposition and on the functioning of national recognition procedures in accordance with the reporting obligations set out in the Directive. The Commission will carry out an evaluation in accordance with the Better Regulation Guidelines within 7 years of the deadline for transposition, assessing effectiveness, efficiency, coherence, relevance and EU added value against the general and specific objectives.

2.2. Management and control system(s)

2.2.1. *Justification of the budget implementation method(s), the funding implementation mechanism(s), the payment modalities and the control strategy proposed*

Direct management, as per article 62.1(a) of the Financial Regulation, is the preferred mode of implementation, as the actions will be carried out by the European

Commission, specifically Directorate-General for Employment, Social Affairs and Inclusion (DG EMPL), which will ensure the coordination with Member States and the various stakeholders.

2.2.2. *Information concerning the risks identified and the internal control system(s) set up to mitigate them*

The controls are part of the internal control system of DG EMPL. The new activities will be subject to the same risk identification and mitigation approach.

2.2.3. *Estimation and justification of the cost-effectiveness of the controls (ratio between the control costs and the value of the related funds managed), and assessment of the expected levels of risk of error (at payment & at closure)*

The controls are integrated into the internal control system of DG EMPL. The new activities will generate negligeable additional control costs at DG level.

2.3. **Measures to prevent fraud and irregularities**

The Commission shall ensure that, when actions financed are implemented, the financial interests of the Union are protected by the application of preventive measures against fraud, corruption and any other illegal activities, by effective checks and by the recovery of the amounts unduly paid and, if irregularities are detected, by effective, proportional and dissuasive penalties. The Commission is authorised to carry out checks and verifications in situ under this Decision, in compliance Council Regulation (Euratom, EC) No 2185/96 of 11 November 1996 concerning on-the-spot checks and inspections carried out by the Commission in order to protect the European Communities financial interests against fraud and other irregularities. If need be, investigations shall be carried out by the European Anti-Fraud Office and shall be governed by Regulation (EC) No 1073/1999 of the European Parliament and of the Council of 25 May 1999 concerning investigations conducted by the European Anti-Fraud Office.

3. **ESTIMATED FINANCIAL IMPACT OF THE PROPOSAL/INITIATIVE**

3.1. **Heading(s) of the multiannual financial framework and expenditure budget line(s) affected**

Existing budget lines

In order of multiannual financial framework headings and budget lines.

The estimated impact on expenditure and staffing for 2028 and beyond is added for illustrative purposes only and does not pre-judge the next Multiannual Financial Framework. The source of financing and scope of Union financial commitment in the post-2027 period remain subject to the outcome of interinstitutional negotiations on the MFF 2028-2034 and thereafter shall be determined through the annual budgetary procedure. All appropriations and staffing allocations as of 2028 are indicative.						
Heading of multiannual financial framework	Budget line	Type of expenditure	Contribution			
	Number	Diff./Non-diff. (3)	from EFTA countries (4)	from candidate countries and potential candidates (5)	from other third countries	other assigned revenue
1	To be determined after the adoption of the MFF and in the context of the annual budgetary	Diff./Non-diff.	YES/NO	YES/NO	YES/NO	NO

(3) Diff. = Differentiated appropriations / Non-diff. = Non-differentiated appropriations.
(4) EFTA: European Free Trade Association.
(5) Candidate countries and, where applicable, potential candidates from the Western Balkans.

	procedure for the EU Facility – Successor of 07 02 04 00 – ESF+ EaSI strand					

New budget lines requested

In order of multiannual financial framework headings and budget lines.

Heading of multiannual financial framework	Budget line	Type of expenditure	Contribution			
	Number	Diff./non-diff.	from EFTA countries	from candidate countries and potential candidates	from other third countries	other assigned revenue

3.2. **Estimated financial impact of the proposal on appropriations**

3.2.1. *Summary of estimated impact on operational appropriations*

☐ The proposal/initiative does not require the use of operational appropriations

☑ The proposal/initiative requires the use of operational appropriations, as explained below:

3.2.1.1. *Appropriations from voted budget*

The estimated impact on expenditure and staffing for 2028 and beyond is added for illustrative purposes only and does not pre-judge the next Multiannual Financial Framework. The source of financing and scope of Union financial commitment in the post-2027 period remain subject to the outcome of interinstitutional negotiations on the MFF 2028-2034 and thereafter shall be determined through the annual budgetary procedure. All appropriations and staffing allocations as of 2028 are indicative

EUR million (to three decimal places)

Heading of multiannual financial framework		Number				1 - Economic, social and territorial cohesion, agriculture, rural and maritime prosperity and security			
DG: EMPL		Year **2028**	Year **2029**	Year **2030**	Year **2031**	Year **2032**	Year **2033**	**2034 and subsequent years**	**TOTAL MFF 2028-2034**
Operational appropriations									
Budget line – successor 07 02 04	Commitments (1a)	p.m.	p.m.	p.m.	p.m.	p.m.	p.m.	p.m.	**p.m.**
	Payments (2a)	p.m.	p.m.	p.m.	p.m.	p.m.	p.m.	p.m.	**p.m.**
Appropriations of an administrative nature financed from the envelope of specific programmes [6]									
Budget line	(3)	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.	**n.a.**

[6] Technical and/or administrative assistance and expenditure in support of the implementation of EU programmes and/or actions (former 'BA' lines), indirect research, direct research.

TOTAL appropriations for DG EMPL	Commitments	=1a+1b+3	p.m.	p.m.	p.m.	p.m.	p.m.	p.m.	p.m.	**p.m.**
	Payments	=2a+2b+3	p.m.	p.m.	p.m.	p.m.	p.m.	p.m.	p.m.	**p.m.**
Heading 1			Year **2028**	Year **2029**	Year **2030**	Year **2031**	Year **2032**	Year **2033**	**2034 and subsequent years**	**TOTAL MFF 2028-2034**
TOTAL operational appropriations	Commitments	(4)	p.m.	p.m.	p.m.	p.m.	p.m.	p.m.	p.m.	p.m.
	Payments	(5)	p.m.	p.m.	p.m.	p.m.	p.m.	p.m.	p.m.	p.m.
TOTAL appropriations of an administrative nature financed from the envelope for specific programmes		(6)	0.000	0.000	0.000	0.000	0.000	0.000	0.000	**0.000**
TOTAL appropriations under HEADING 1 of the multiannual financial framework	Commitments	=4+6	p.m.	p.m.	p.m.	p.m.	p.m.	p.m.	p.m.	p.m.
	Payments	=5+6	p.m.	p.m.	p.m.	p.m.	p.m.	p.m.	p.m.	p.m.
Heading of multiannual financial framework			Number							

DG: <.....>	Year **2024**	Year **2025**	Year **2026**	Year **2027**	**TOTAL MFF 2021-2027**

Operational appropriations							
Budget line	Commitments	(1a)					**0.000**
	Payments	(2a)					**0.000**
Budget line	Commitments	(1b)					**0.000**
	Payments	(2b)					**0.000**
Appropriations of an administrative nature financed from the envelope of specific programmes [7]							
Budget line		(3)					**0.000**
TOTAL appropriations for DG <.....>	Commitments	=1a+1b +3	**0.000**	**0.000**	**0.000**	**0.000**	**0.000**
	Payments	=2a+2b+3	**0.000**	**0.000**	**0.000**	**0.000**	**0.000**
DG: <.....>			Year **2024**	Year **2025**	Year **2026**	Year **2027**	**TOTAL MFF 2021-2027**
Operational appropriations							
Budget line	Commitments	(1a)					**0.000**
	Payments	(2a)					**0.000**
Budget line	Commitments	(1b)					**0.000**
	Payments	(2b)					**0.000**

[7] Technical and/or administrative assistance and expenditure in support of the implementation of EU programmes and/or actions (former 'BA' lines), indirect research, direct research.

Appropriations of an administrative nature financed from the envelope of specific programmes [8]										
Budget line		(3)								**0.000**
TOTAL appropriations for DG <.....>	Commitments	=1a+1b +3	**0.000**	**0.000**	**0.000**	**0.000**				**0.000**
	Payments	=2a+2b+3	**0.000**	**0.000**	**0.000**	**0.000**				**0.000**
Heading 1			Year **2028**	Year **2029**	Year **2030**	Year **2031**	Year **2032**	Year **2033**	**2034 and subsequent years**	**TOTAL MFF 2021-2027**
TOTAL operational appropriations	Commitments	(4)	p.m.	p.m.	p.m.	p.m.	p.m.	p.m.	p.m.	p.m.
	Payments	(5)	p.m.	p.m.	p.m.	p.m.	p.m.	p.m.	p.m.	p.m.
TOTAL appropriations of an administrative nature financed from the envelope for specific programmes		(6)	0	0	0	0	0	0	0	0
TOTAL appropriations under HEADING 1 of the multiannual financial framework	Commitments	=4+6	p.m.	p.m.	p.m.	p.m.	p.m.	p.m.	p.m.	p.m.
	Payments	=5+6	p.m.	p.m.	p.m.	p.m.	p.m.	p.m.	p.m.	p.m.

(8) Technical and/or administrative assistance and expenditure in support of the implementation of EU programmes and/or actions (former 'BA' lines), indirect research, direct research.

			Year **2028**	Year **2029**	Year **2030**	Year **2031**	Year **2032**	Year **2033**	**2034 and subsequent years**	**TOTAL MFF 2021-2027**
TOTAL operational appropriations (all operational headings)	Commitments	(4)	p.m.	p.m.	p.m.	p.m.	p.m.	p.m.	p.m.	**p.m.**
	Payments	(5)	p.m.	p.m.	p.m.	p.m.	p.m.	p.m.	p.m.	**p.m.**
TOTAL appropriations of an administrative nature financed from the envelope for specific programmes (all operational headings)		(6)	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.	**n.a.**
TOTAL appropriations Under Heading 1 to 3 of the multiannual financial framework (Reference amount)	Commitments	=4+6	p.m.	p.m.	p.m.	p.m.	p.m.	p.m.	p.m.	**p.m.**
	Payments	=5+6	p.m.	p.m.	p.m.	p.m.	p.m.	p.m.	p.m.	**p.m.**
Heading of multiannual financial framework			4				‘Administrative expenditure’ [9]			
DG: EMPL			Year **2028**	Year **2029**	Year **203**	Year **2031**	Year **2032**	Year **2033**	**2034 and**	**TOTAL MFF 2021-2027**

[9] The necessary appropriations should be determined using the annual average cost figures available on the appropriate BUDGpedia webpage.

				0				**subsequent years**	
Human resources		0.582	0.582	0.582	0.582	0.582	0.582	0.582	**4.074**
Other administrative expenditure		0	0	0	0	0	0	0	**0**
TOTAL DG EMPL	Appropriations	0.582	0.582	0.582	0.582	0.582	0.582	0.582	**4.074**
TOTAL appropriations under HEADING 4 of the multiannual financial framework	(Total commitments = Total payments)	**0.582**		**0.582**	**0.582**	**0.582**			**4.074**

EUR million (to three decimal places)

		Year **2028**	Year **2029**	Year **2030**	Year **2031**	Year **2032**	Year **2033**	**2034 and subsequent years**	**TOTAL MFF 2021-2027**
TOTAL appropriations under HEADINGS 1 to 4 of the multiannual financial framework	Commitments	p.m.	p.m.	p.m.	p.m.	p.m.	p.m.	p.m.	**p.m.**
	Payments	p.m.	p.m.	p.m.	p.m.	p.m.	p.m.	p.m.	**p.m.**

The staff needed to implement this proposal has been assessed at 3 full time equivalent (FTE), of which 1 are redeployed from existing staff in the DG and 2 are to be covered by the redeployment pool of the Commission.

3.2.2. *Estimated output funded from operational appropriations (not to be completed for decentralised agencies)*

Commitment appropriations in EUR million (to three decimal places)

Indicate objectives and outputs ⇓			Year **2028**		Year **2029**		Year **2030**		Year **2031**		Enter as many years as necessary to show the duration of the impact (see Section 1.6)						**TOTAL**	
	OUTPUTS																	
	Type (10)	Average cost	No	Cost	No	Cost	No	Cost	No	Cost	No	Cost	No	Cost	No	Cost	Total No	Total Cost
SPECIFIC OBJECTIVE No 1 (11): [...]																		
Output				p.m.		p.m.		p.m.		p.m.		p.m.		p.m.		p.m.		p.m.
Output																		
Output																		

(10) Outputs are products and services to be supplied (e.g.: number of student exchanges financed, number of km of roads built, etc.).

(11) As described in point 1.4.2. 'Specific objective(s)...'

Subtotal for specific objective No 1		p.m.		p.m.		p.m.		p.m.		p.m.		p.m.		p.m.		p.m.
SPECIFIC OBJECTIVE No 2 ...																
Output																
Subtotal for specific objective No 2																
SPECIFIC OBJECTIVE No. 3																
Output		p.m.		p.m.		p.m.		p.m.		p.m.		p.m.		p.m.		p.m.
Subtotal for specific objective No. 3																
TOTALS		**p.m.**		**p.m.**		**p.m.**		**p.m.**		**p.m.**		**p.m.**		**p.m.**		**p.m.**

3.2.3. *Summary of estimated impact on administrative appropriations*

☐ The proposal/initiative does not require the use of appropriations of an administrative nature

☑ The proposal/initiative requires the use of appropriations of an administrative nature, as explained below:

3.2.3.1. *Appropriations from voted budget*

VOTED APPROPRIATIONS	Year **2028**	Year **2029**	Year **2030**	Year **2031**	Year **2032**	Year **2033**	**2034 and subsequent**	**TOTAL MFF 2021-2027**

							years	
HEADING 4								
Human resources	0.582	0.582	0.582	0.582	0.582	0.582	0.582	**4.074**
Other administrative expenditure	0.000	0.000	0.000	0.000	0.000	0.000	0.000	**0.000**
Subtotal HEADING 4	0.582	0.582	0.582	0.582	0.582	0.582	0.582	**4.074**
Outside HEADING 4								
Human resources	0.000	0.000	0.000	0.000	0.000	0.000	0.000	**0.000**
Other expenditure of an administrative nature	0.000	0.000	0.000	0.000	0.000	0.000	0.000	**0.000**
Subtotal outside HEADING 4	**0.000**	**0.000**	**0.000**	**0.000**	0.000	0.000	0.000	**0.000**
TOTAL	0.582	0.582	0.582	0.582	0.582	0.582	0.582	**4.074**
The estimated impact on expenditure and staffing for 2028 and beyond is added for illustrative purposes only and does not pre-judge the next Multiannual Financial Framework. The source of financing and scope of Union financial commitment in the post-2027 period remain subject to the outcome of interinstitutional negotiations on the MFF 2028-2034 and thereafter shall be determined through the annual budgetary procedure and the steering mechanism. All appropriations and staffing allocations as of 2028 are indicative.								

3.2.3.3. *Total appropriations*

The estimated impact on expenditure and staffing for 2028 and beyond is added for illustrative purposes only and does not pre-judge the next Multiannual Financial Framework. The source of financing and scope of Union financial commitment in the post-2027 period remain subject to the outcome of interinstitutional negotiations on the MFF 2028-2034 and thereafter shall be determined through the annual budgetary procedure and the steering mechanism. All appropriations and staffing allocations as of 2028 are indicative.

The appropriations required for human resources and other expenditure of an administrative nature will be met by appropriations from the DG that are already assigned to management of the action and/or have been redeployed within the DG, together, if necessary, with any additional allocation which may be granted to the managing DG under the annual allocation procedure and in the light of budgetary constraints.

3.2.4. *Estimated requirements of human resources*

☐ The proposal/initiative does not require the use of human resources

☑ The proposal/initiative requires the use of human resources, as explained below

3.2.4.1. *Financed from voted budget*

Estimate to be expressed in full-time equivalent units (FTEs) [(12)]

VOTED APPROPRIATIONS	Year **2028**	Year **2029**	Year **2030**	Year **2031**	Year 2032	Year 2033	2034 and subsequent years
Establishment plan posts (officials and temporary staff)							
20 01 02 01 (Headquarters and Commission's Representation Offices)	3	3	3	3	3	3	3

(12) Please specify below the table how many FTEs within the number indicated are already assigned to the management of the action and/or can be redeployed within your DG and what are your net needs.

20 01 02 03 (EU Delegations)		0	0	0	0	0	0	0
01 01 01 01 (Indirect research)		0	0	0	0	0	0	0
01 01 01 11 (Direct research)		0	0	0	0	0	0	0
Other budget lines (specify)		0	0	0	0	0	0	0
External staff (in FTEs)								
20 02 01 (AC, END from the 'global envelope')		0	0	0	0	0	0	0
20 02 03 (AC, AL, END and JPD in the EU Delegations)		0	0	0	0	0	0	0
Admin. support line [XX.01.YY.YY]	at Headquarters	0	0	0	0	0	0	0
	in EU Delegations	0	0	0	0	0	0	0
01 01 01 02 (AC, END - Indirect research)		0	0	0	0	0	0	0
01 01 01 12 (AC, END - Direct research)		0	0	0	0	0	0	0
Other budget lines (specify) - Heading 7		0	0	0	0	0	0	0
Other budget lines (specify) - Outside Heading 7		0	0	0	0	0	0	0
TOTAL		**3**	**3**	**3**	**3**	**3**	**3**	**3**
This proposal is a new action and no current staff is assigned to this new task. The three FTE mentioned above are additional staff needed to implement the proposal, to be covered by the redeployment pool of the Commission.								

3.2.4.2. *Financed from external assigned revenues*

3.2.4.3. *Total requirements of human resources*

The staff required to implement the proposal (in FTEs):

	To be covered by current staff available in the Commission services	**Exceptional additional staff***		
		To be financed under Heading 7 or Research	**To be financed from BA line**	**To be financed from fees**
Establishment plan posts	3	0	N/A	N/A
External staff (CA, SNEs, INT)	0	0	N/A	N/A

The staff needed to implement this proposal has been assessed at 3 full time equivalent (FTE), of which 1 are redeployed from existing staff in the DG and 2 are to be covered by the redeployment pool of the Commission.

Description of tasks to be carried out by:

Officials and temporary staff	Outsource the authentication services to an external entity by public procurement, writing the specifications for the tendering procedure; monitor the work of the selected entity; ensure the functioning of the authentication services.
External staff	

3.2.5. **Overview of estimated impact on digital technology-related investments**

Compulsory: the best estimate of the digital technology-related investments entailed by the proposal/initiative should be included in the table below.

Exceptionally, when required for the implementation of the proposal/initiative, the appropriations under Heading 7 should be presented in the designated line.

The appropriations under Headings 1-6 should be reflected as "Policy IT expenditure on operational programmes". This expenditure refers to the operational budget to be used to re-use/ buy/ develop IT platforms/ tools directly linked to the implementation of the initiative and their associated investments (e.g. licences, studies, data storage etc). The information provided in this table should be consistent with details presented under Section 4 "Digital dimensions".

TOTAL Digital and IT appropriations	Year **2024**	Year **2025**	Year **2026**	Year **2027**	**TOTAL MFF 2021-2027**
HEADING 4					
IT expenditure (corporate)	0.000	0.000	0.000	0.000	**0.000**
Subtotal HEADING 4	**0.000**	**0.000**	**0.000**	**0.000**	**0.000**
Outside HEADING 4					
Policy IT expenditure on operational programmes	0.000	0.000	0.000	0.000	**0.000**
Subtotal outside HEADING 4	**0.000**	**0.000**	**0.000**	**0.000**	**0.000**
TOTAL	**0.000**	**0.000**	**0.000**	**0.000**	**0.000**

3.2.6. *Compatibility with the current multiannual financial framework*

The proposal/initiative:

☑ can be fully financed through redeployment within the relevant heading of the multiannual financial framework (MFF).

☐ requires use of the unallocated margin under the relevant heading of the MFF and/or use of the special instruments as defined in the MFF Regulation.

☐ requires a revision of the MFF.

3.2.7. *Third-party contributions*

The proposal/initiative:

☑ does not provide for co-financing by third parties

☐ provides for the co-financing by third parties estimated below:

Appropriations in EUR million (to three decimal places)

	Year **2028**	Year **2029**	Year **2030**	Year **2031**	Year **2032**	Year **2033**	Year **2034**	Total
Specify the co-financing body (EFTA, (potential) candidate countries, third countries)	p.m.	p.m.	p.m.	p.m.	p.m.	p.m.	p.m.	p.m.
TOTAL appropriations co-financed	p.m.	p.m.	p.m.	p.m.	p.m.	p.m.	p.m.	p.m.

3.3. **Estimated impact on revenue**

☑ The proposal/initiative has no financial impact on revenue.

☐ The proposal/initiative has the following financial impact:

☐ on own resources

☐ on other revenue

☐ please indicate, if the revenue is assigned to expenditure lines

EUR million (to three decimal places)

Budget revenue line:	Appropriations available for the current financial year	Impact of the proposal/initiative [13]			
		Year **2024**	Year **2025**	Year **2026**	Year **2027**
Article					

For assigned revenue, specify the budget expenditure line(s) affected.

[...]

Other remarks (e.g. method/formula used for calculating the impact on revenue or any other information).

[...]

4. DIGITAL DIMENSIONS

4.1. Requirements of digital relevance

If the policy initiative is assessed as having no requirement of digital relevance:

Justification of why digital means cannot be used to enhance policy implementation and why the 'digital by default' principle is not applicable

[...]

Otherwise:

High-level description of the requirements of digital relevance and related categories (data, process digitalisation & automation, digital solutions and/or digital public services)

Reference to the requirement	**Requirement description**	**Actors affected or concerned by the requirement**	**High-level Processes**	**Categories**

[13] As regards traditional own resources (customs duties, sugar levies), the amounts indicated must be net amounts, i.e. gross amounts after deduction of 20% for collection costs.

Article 11	Paragraph 1c: Member States shall recognise evidence of formal qualifications for doctors (with basic and specialised training), nurses responsible for general care, dental practitioners, specialised dental practitioners, midwives, veterinary surgeons, pharmacists, and architects obtained in a third country, provided the following conditions are met: (c) The evidence of formal qualifications is issued as a digital credential, ensuring authenticity, security, and ease of verification.	Member States Third countries' institutions	Issuance of qualifications	Data/ Digital solutions
Article 28 (1-3)	The Commission shall provide support services for the assessment of authenticity. 1. In providing these services, the Commission shall shall support Member States in the recognition of	European Commission provides the system for Member States upload evidence provided by the applicant in the system	Processing, assessment and recognition of evidence authenticity	Data/Digital Solutions/Digitalisation-automation of activities/Digital Public Services

	qualifications obtained in a third country by offering assessments on the authenticity of submitted evidence of formal qualifications. 2. At the request of a competent authority of a Member State, the Commission shall assess the authenticity of qualifications, diplomas, certificates or other evidence of formal qualifications issued in a third country and submitted in the context of an application falling within the scope of this Directive, in particular by utilising digital tools, international databases and through cooperation with third countries and educational and professional bodies. Requests shall be submitted electronically and be accompanied by the documents necessary for the assessment and proof of payment of any			

	applicable fee referred to in paragraph 8. 3. The Commission shall provide the requesting Member State with a substantiated assessment of authenticity, including detailed explanations of the evaluation process and findings. That assessment shall be advisory in nature and shall not be binding on competent authorities of the Member States who shall remain solely responsible for the recognition decision.			
Article 28 (8-11)	The processing of personal data by the Commission for the purposes of the support services for assessment of authenticity shall comply with Regulation (EU) 2018/1725 and be limited to what is necessary and proportionate for the	European Commission	Processing of personal data	Data/ Digital solutions

	performance of a task carried out in the public interest as laid down in Article 5(1)(a) of Regulation (EU) 2018/1725. The Commission shall ensure that personal data is processed lawfully, securely, and with the necessary safeguards to protect individuals' privacy rights, including data minimisation, transparency, and access rights for data subjects. The Commission shall periodically report on the activities and effectiveness of support services to ensure transparency and continual improvement. Member States are encouraged to provide feedback to facilitate enhancements in service delivery.			
Article 30	Access to recognition procedures Member States shall ensure that all requirements,	Member States Applicants professionals (users)	Recognition procedure	Data/Digital public services/Digital Solutions/Digitalisation-

	procedures and formalities in recognition procedures may be easily completed, remotely and by electronic means. This shall not prevent competent authorities of Member States from requesting certified copies at a later stage in the event of justified doubts and where strictly necessary.			automation of activities
Article 36	Statistics Member States shall communicate to the Commission statistics on the implementation of this Directive. Those statistics shall cover the previous calendar year and include information on the number of applications received and handled and decisions taken, and shall be disaggregated by citizenship, by occupation, status (beneficiaries of international protection,	European Commission Member States	Statistics on the recognition processes	Data/Digital Solutions/Digitalisation-automation of activities

	beneficiaries of the right to free movement, etc), type of procedure (Article 6; Title II, Chapter 2; Title II, Chapter 3; Article 23; Article 24 or Article 25), and outcome of the decision (positive, positive with partial access; positive with compensation measure, broken down by type of compensation measure; negative). They shall also include the share of complete applications at first submission, average processing times, average information exchanges per case, and number of authenticity checks requested.			
Article 38	Reports Member States shall send a report to the European Commission on the application of this Directive. To this end, Member States shall collect data on processing times, outcomes, and user	European Commission Member States	Reporting on the recognition processes	Data/Digital public services/Digital Solutions

	experience across both procedures for access to regulated professions and for migration purposes, and include this information in the report. They shall also review the procedures to report on identified bottlenecks and opportunities for improvement. Member States shall collect feedback from employers, professional bodies, third-country nationals, and other stakeholders as part of this exercise.			

4.2. **Data**

High-level description of the data in scope

Type of data	**Reference to the requirement(s)**	**Standard and/or specification (if applicable)**
Digital qualification attestations	Article 11 – Formal qualifications issued as digital credentials by Third country institutions/Article 28 – Support services for assessment of authenticity, provided by the Commission	N/A
Non-digital evidence of formal	Article 28 – Support Services for	Documents listed in Annex VII of

qualification and other supporting evidence	Assessment of Authenticity	Directive 2005/36/EC; accepted in any official language of the Union
Personal information used for the support services for assessment of authenticity, provided by the Commission	Article 28 – Processing of personal data by the Commission to provide support services for assessment of authenticity	EUDPR (Reg. (EU) 2018/1725); data minimisation, transparency and data-subject access rights (Art. 28)
Annual statistical summary of recognition procedures (includes number of applications received and decisions, breakdowns, outcomes, processing times and delays)	Article 36	
Report on the application of the Directive. Member States shall send a report to the European Commission with data regarding the processing times, outcomes, procedures on the recognition processes. Moreover, this report should also include the identification of bottlenecks and opportunities for improvement. The European Commission shall submit a report to the European Parliament and the Council on the application of the Directive.	Article 38	

Alignment with the European Data Strategy

Explanation of how the requirement(s) are aligned with the European Data Strategy

[...]

Alignment with the once-only principle

Explanation of how the once-only principle has been considered and how the possibility to reuse existing data has been explored

[...]

Explanation of how newly created data is findable, accessible, interoperable and reusable, and meets high-quality standards

[...]

Data flows

High-level description of the data flows

Type of data	**Reference(s) to the requirement(s)**	**Actors who provide the data**	**Actors who receive the data**	**Trigger for the data exchange**	**Frequency (if applicable)**
Type of data #1					
Type of data # 2					

4.3. **Digital solutions**

High-level description of digital solutions

Digital solution	**Reference(s) to the requirement(s)**	**Main mandated functionalities**	**Responsible body**	**How is accessibility catered for?**	**How is reusability considered?**	**Use of AI technologies (if applicable)**
Digital solution #1						
Digital solution #2						

For each digital solution, explanation of how the digital solution complies with applicable digital policies and legislative enactments

Digital solution #1

Digital and/or sectorial policy (when these are applicable)	**Explanation on how it aligns**
AI Act	
EU Cybersecurity framework	
eIDAS	
Single Digital Gateway and IMI	
Others	

Digital solution #2

Digital and/or sectorial policy (when these are applicable)	**Explanation on how it aligns**
AI Act	
EU Cybersecurity framework	

eIDAS	
Single Digital Gateway and IMI	
Others	

4.4. **Interoperability assessment**

High-level description of the digital public service(s) affected by the requirements

Digital public service or category of digital public services	**Description**	**Reference(s) to the requirement(s)**	**Interoperable Europe Solution(s)(NOT APPLICABLE)**	**Other interoperability solution(s)**
Support services for assessment of authenticity	The support services will be tasked with supporting Member States in the recognition of qualifications obtained outside the Union by offering assessments on the authenticity of submitted evidence of formal qualifications. Requests to the service shall be submitted electronically. The service might use digital tools and international databases to perform its tasks.	Article 28 (1-3)		

	As mentioned in Article 28(12), delegated acts will be prepared by the Commission to set out the organisational and technical measures required for the operation of the service. The interoperability assessment of the service will be carried out in the context of these delegated acts.			

Impact of the requirement(s) as per digital public service on cross-border interoperability

Digital public service #1

Assessment	**Measure(s)**	**Potential remaining barriers (if applicable)**
Alignment with existing digital and sectorial policies. Please list the applicable digital and sectorial policies identified	Digital or sectorial policy #1 Digital or sectorial policy #2 Digital or sectorial policy #3	Barrier #1 Barrier #2 *Barrier #3*
Organisational measures for a smooth cross-border digital public services delivery. Please list the governance measures foreseen	Governance measure #1 Governance measure #2 *Governance measure #3*	Barrier #1 Barrier #2 *Barrier #3*

Measures taken to ensure a shared understanding of the data. Please list such measures	Measure #1 Measure #2 *Measure #3*	Barrier #1 Barrier #2 *Barrier #3*
Use of commonly agreed open technical specifications and standards. Please list such measures	Measure #1 Measure #2 *Measure #3*	Barrier #1 Barrier #2 *Barrier #3*

4.5. **Measures to support digital implementation**

High-level description of measures supporting digital implementation

Description of the measure	**Reference(s) to the requirement(s) of digital relevance that it supports**	**Commission role** (if applicable)	**Actors to be involved** (if applicable)	**Expected timeline** (if applicable)
Measure #1				
Measure #2				
Measure #3				