

**BRIEFING**

# Recognition of professional qualifications

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October 2024



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This briefing has three sections:

1. Professional qualifications in the European labour market
2. Developments in the European higher education sector
3. The Draghi report on European competitiveness

For many years, the EU's legislative framework for the recognition of professional qualifications and the wider higher education policy perspectives of the Bologna Process were parallel universes. Only tentatively – some would say reluctantly – has the interface developed substance and impinged on practice.

EUA has always favoured this process of alignment, at the very least in respect of mobility instruments, while acknowledging the specificity of legal competences, national, sectoral and professional interests.

It may seem perverse for this briefing to separate the two spheres, but they remain sufficiently distinct to do so. Clarity would suffer otherwise. Still, some topics appear in both sections. They confirm that we are on the cusp of a new digital-green-AI mobility paradigm. Europe is on the move.

Where there are references in this briefing to 'the Directive', without further specification, it is the [consolidated version of Directive 2005/36/EC of the European Parliament and of the Council of 7 September 2005 on the recognition of professional qualifications](#) which is intended.

Section 3 is a hasty *addendum* on Mario Draghi's report published on 9 September. Already established as a future reference for EU policy makers and already proving controversial, it is sufficiently substantial to warrant comment here. It argues passionately for a highly skilled EU labour force, holding member state education systems partially responsible for its absence. EU higher education policy is likely to feel some shock waves.

## **1. THE EUROPEAN LABOUR MARKET CONTEXT**

### **Hungarian presidency of the Council of the EU**

1.1 We are now at the mid-term of Hungary's presidency; so far there have been no surprises in the direction or management of the internal market. The [Hungarian programme](#) offered continuity with the Belgian presidency which preceded it. It promised to prioritise EU competitiveness and to progress the digital and green transitions in the framework of a flexible labour market. The programme presented is ambitious, coherent and progressive. But the calm may not last.

1.2 The six-month term began controversially, with the visit of Victor Orbán to Vladimir Putin, deemed to be certainly a breach of EU consensus if not also of the Treaties. A number of member states, as well as the European Commissioners, promptly decided to boycott informal meetings chaired by Hungary.

1.3 Competitiveness and labour market consolidation in any case are not unproblematic. While Hungary promises strong action on illegal immigration, its programme says nothing about facilitating the legal entry of qualified third country migrants. Meanwhile, overseeing the EU's defensive inward investment screening measures while being the biggest importer of Chinese capital suggests a conflict of interest in an area of geo-strategic sensitivity.

### **The newly elected European Parliament**

1.4 What's more, Hungary's position on the right of the political spectrum gives it no guarantee of good relations with the European Parliament, newly elected with a centrist majority. The internal market committee (IMCO) will still be chaired by the German Green [Anna Cavazzini](#). The international trade committee (INTA) also has a German chair, the re-elected [Bernd Lange](#) (Socialists & Democrats). S&D will

chair the environment committee (ENVI), with the Italian [Antonio Decaro](#), while another German Green, [Nela Riehl](#), takes the culture and education committee (CULT). [Adam Jarubas](#) (Poland) of the centre-right European People's Party, will chair ENVI's public health sub-committee (SANT).

1.5 This broadly left-leaning group of committee chairs will have input on matters relating to professional qualifications and their role in the Single Market. So too will the new College of Commissioners, who have nominated by member states, given portfolios by re-elected Commission President Ursula von der Leyen, and are to be vetted by the Parliament in the autumn.

### The Draghi and Letta Reports

1.6 The period of September to December is likely to be eventful. The war in Ukraine, conflict in the Middle East, persistent geo-strategic tensions and the looming US presidential election all ensure that the new EU institutions will not be allowed to settle gently into new routines.

1.7 Internal market matters are likely to be dominated by reflections on Enrico Letta's '[Much more than a market](#)' report, published in April, as well as on the [Draghi report](#) on EU competitiveness which appeared in September (see section 3 below).

- ◆ Enrico Letta is president of the Jacques Delors Institute and formerly of *Sciences-Po* in Paris. His report, commissioned by the Belgian and Spanish governments, primarily addresses market integration in financial services, energy, telecoms and, to a lesser extent, healthcare.
- ◆ He addresses the need for deeper integration of the internal market, as the pre-condition for boosting growth to the level at which the EU can compete effectively with its global rivals. Draghi, for his part, elaborates on global competitiveness, while deferring to Letta on the specificities of the market. Effectively, the two reports are complementary. Draghi makes higher demands on the future EU budget: hence its higher profile and its exposure to controversy.
- ◆ Letta calls for recognition (professional and academic) to be expedited, the rationalisation of member states' regulatory structures and practices, improved mapping of labour market needs at EU level, and the introduction of a European degree (pp.102-3). All of these shine the light on professional and student intra-EU mobility, as well as on the need to facilitate the entry of highly qualified third country migrants and posted workers. To drive down emigration, Letta looks to the upgrading of working and research environments.
- ◆ For both reports, the existence of a highly skilled and integrated workforce is a *sine qua non*. How far will the EU's ageing demographic and its rejuvenated education systems succeed in driving economic growth without a significant input of qualified immigrants from third countries? The prevailing political climate discourages this debate. Time will tell whether Letta and Draghi can open it up.

### Healthcare workforce

1.8 Letta is right to put his finger on the EU healthcare workforce, the sector which – at least in terms of public perceptions – is the most fragmented and ill-distributed. The Belgian presidency of the Council of the EU gave its integration a new impetus, subsequently slip-streamed by doctors (CPME) and pharmacists (PGEU) who have [called](#) for a “coordinated EU Health Workforce strategy that prioritises retention and recruitment by safeguarding minimum training requirements and lawful practice conditions, as well as investing in workforce planning”.

1.9 Estimates for 2022 recently published by [Eurostat](#) show how wide the scatter of qualified personnel was. The graduation rate of medical doctors per 100,000 inhabitants varied between 29.5 (Bulgaria) and 11.4 (Slovenia). For dentists, the spread lay between 9.9 (Romania) and – disregarding zero in Malta – 1.4 (Italy). Post-Covid-19 data, when available, will give a more accurate picture.

1.10 The Hungarian Council presidency makes no health-specific commitments but speaks in general terms of mobilising ‘ internal labour reserves’ and ‘ untapped labour potential’ . Whether this approach will satisfy employers in the healthcare sector remains to be seen. [Nurses \(EFN\)](#) are sympathetic, strongly opposing the ‘ unethical recruitment of foreign nurses to EU member states’ and instead seeing recruitment and retention in terms of higher salaries and improved working conditions. At the same time, they call on the EU institutions to “enlarge the EU for further harmonisation of nurses’ education in Europe and preserve the current Directives regulating the nursing profession which are fundamental for nurses’ professional development”.

1.11 Hospital pharmacists (EAHP) are alarmed by the ageing of their membership. They [urge](#) increased student recruitment, more systematic continuing professional education and clearer career pathways. They stress the multi-professional context in which they work: “Bedside clinical pharmacy services with their focus on patient education, medicines reconciliation and engagement in the multidisciplinary treatment team have become an important feature of the hospital pharmacy practice.”

## One Health

1.12 The long-established One Health initiative has sought to integrate training in medicine, pharmacy, veterinary and environmental studies. Accelerated by Covid-19 it now faces the challenge of climate change and the emergence of new zoonotic diseases. For this, it needs concerted policy coordination at the level of the EU agencies. The setting up of the [Cross-Agency One Health task force framework for action](#) is a welcome development. Populated by the European Centre for Disease Prevention and Control (ECDC), the European Chemicals Agency (ECHA), the European Environment Agency (EEA), the European Food Safety Authority (EFSA) and the European Medicines Agency (EMA), the advisory task force will expedite the formulation of strategy, coordination of agenda setting, and data collection.

1.13 One of the task force’s objectives is to broaden the knowledge base available to planners and beneficiaries of the next EU Framework Programme for Research and Innovation, to come on stream in 2028. It also has a strong focus on capacity building – via Erasmus+, in support of university alliances such as [Una Europa](#) and in EU candidate countries. Given that the speed at which professional skill sets evolve is bound to rise, the task force envisages an expansion of in-service training as well as the development of One Health modules in partnership with higher education institutions and research centres.

## EU legislation on professional qualifications

1.14 Events outpace the legislative process, but still there are developments to report.

- ◆ In February the Official Journal published [Directive \(EU\) 2024/505](#). It amended Directive 2005/36/EC and set out the conditions governing the recognition of the qualifications of general care nurses trained in Romania.
- ◆ We reported last time on Delegated Decision 2023/2383, which brought the listings in Annex V up to date: for each of the seven sectoral professions – the evidence of formal qualification, the title of the relevant certificate, and the awarding body. [Delegated Decision 2024/1395](#) adds a further update, including, for the first time, sports medicine.

## Traineeships

1.15 The Hungarian presidency declared its intention to progress the discussion of the ‘ traineeships package’ . The key features of the debate straddle the interface of EU legislation on recognition and the Bologna Process promotion of student mobility.

- ◆ Article 55a of the Directive concerns the mandatory periods of training imposed by national competent authorities for accession to a profession. It allows the traineeships required in one member state to be undertaken in another, subject to appropriate guidelines, in particular regarding the role of the trainee's supervisor in setting the learning objectives.
- ◆ Recital 27 makes it clear that the intention is to foster cross-border traineeships. The 'young graduates' to which it refers would in principle, during the year following their graduation, be eligible for Erasmus+ support. To this extent, mobile students/trainees fall within the scope of the Directive.
- ◆ In practice, cross-border traineeships encounter difficulties. A [case study](#) produced by Maastricht University showed how far they can be hampered by mutually inconsistent regulatory regimes.
- ◆ The ongoing discussion turns on two documents emanating from the Commission in March. The first is a proposed [Traineeships Directive](#). It sets out to deal with traineeships which are non-compliant or which are disguised forms of regular employment; both are cost-cutting measures taken by employers.
- ◆ The proposed Directive will align with other relevant EU legislative instruments, including Erasmus+, and in particular with the Quality Framework for Traineeships. The QFT, however, dates from 2014. Hence the second publication: a [proposal for a Council Recommendation on a reinforced QFT](#). This is based on a Commission evaluation which "noted the possibility of extending the scope of QFT from OMTs [open-market traineeships] and traineeships that are part of active labour market policies (ALMP) to also cover other traineeships, such as those that are part of formal education and training curricula". Traineeships which are mandatory elements in the basic training of e.g. doctors and architects are therefore covered in the proposal.
- ◆ The [Council's Recommendation to revise the 2014 Quality Framework for Traineeships](#) retains the spirit and much of the letter of the Commission's proposal. In those points which directly relate to higher education provision in the sectoral professions, the Council urges member states to:

[...]

2. Require that traineeships are based on a written agreement concluded at the beginning of the traineeship between the trainee and the traineeship provider;

[...]

4. Promote best practices as regards learning and training objectives in order to help trainees acquire practical experience and relevant skills; the tasks assigned to the trainee should enable these objectives to be attained;

5. Encourage traineeship providers to designate a supervisor for trainees guiding the trainee through the assigned tasks, monitoring and assessing his/her progress;

[...]

13. Promote the recognition and validation of the knowledge, skills and competences acquired during traineeships and encourage traineeship providers to attest them, on the basis of an assessment, through a certificate;

[...]

16. Facilitate the cross-border mobility of trainees in the European Union *inter alia*, by clarifying the national legal framework for traineeships and establishing clear rules on hosting trainees from, and the sending of trainees to, other Member States and by reducing administrative formalities;

[...]

22. Promote the active involvement of employment services, educational institutions and training providers in applying the Quality Framework for Traineeships;

[...]

**Infringements**

1.16 Infringements may be occasioned by a variety of factors: delays in parliamentary or bureaucratic processes, reluctance of regulators to depart from established practices, protectionist postures within the professional bodies. So far in 2024 there have been relatively few new cases identified by the Commission. These are displayed below in order of increasing gravity. Note, however, that while the Commission is formally the guardian of the Treaties its attitudes to infringements can be political as well as legal: the block on imports from Ukraine applied by a number of member states met with no triggering of the infringement procedure.

| STAGE OF PROCEEDINGS | MONTH | MEMBER STATE(S) | INFRINGEMENT   |
|----------------------|-------|-----------------|--|
| Formal notice        | April | France          | <p>Failure to comply with EU rules on freedom of establishment and service provision, in respect of veterinary services.</p> <p>The French rules require veterinarians to be present in each of their offices at least part time. This requirement practically limits the number of establishments a veterinarian can own and consequently, the number of offices they can operate. In addition, while French law in principle allows for the free provision of services, in practice, France restricts veterinarians established in other Member States from offering their services on a temporary and occasional basis in France.</p> |

| STAGE OF PROCEEDINGS        | MONTH | MEMBER STATE(S)   | INFRINGEMENT   |
|-----------------------------|-------|-------------------|--|
|                             | April | Hungary           | <p>Failure to comply with EU law and the ruling of the Court of Justice of the European Union in case <a href="#">C-66/18</a>.<sup>1</sup></p> <p>The Court of Justice established in its judgement, delivered on 6 October 2020, that Hungary breached EU legislation as well as the General Agreement on Trade in Services (GATS) by making the exercise, in Hungary, of teaching activities leading to a qualification by foreign higher education institutions situated outside the European Economic Area (EEA) subject to two conditions. Hungarian legislation required that the government of Hungary and the government of the state in which the institution concerned has its seat agree to be bound by an international treaty. Secondly, it requires that to exercise activities in Hungary, the educational institution should deliver higher education in the state in which it has its seat, including member states of the EEA. A new law adopted on 18 May 2021 no longer contains the second requirement. However, the new law still requires the conclusion of an international treaty between Hungary and their home state, in continuous breach with the principles of the GATS and the Charter of Fundamental Rights of the EU.</p> |
| Additional formal notice    | none  |                   |  |
| Reasoned opinion            | July  | Belgium, Bulgaria | Failure to properly implement the EU Proportionality Test Directive for regulation of professions. [See the referrals below for more details]  |
| Additional reasoned opinion | none  |                   |  |

<sup>1</sup> This is the case of the Central European University which, under pressure from the Hungarian government, chose to relocate to Vienna.



| STAGE OF PROCEEDINGS             | MONTH | MEMBER STATE(S) | INFRINGEMENT  |
|----------------------------------|-------|-----------------|---|
| Referral to the Court of Justice | April | Czechia         | <p>Failure to ensure the correct transposition of the Proportionality Test Directive (<a href="#">Directive 2018/958</a>) into national legislation.</p> <p>This Directive governs the proportionality assessment of new rules restricting access to regulated professions. Member states are required to ensure that any national regulation of professions pursues legitimate public interest objectives and is necessary and balanced. The availability of a clear and common assessment framework before adopting the regulation of professions is crucial to prevent unjustified barriers in the Single Market and to facilitate access to regulated professions. Czechia failed to ensure that all measures covered by the directive, in particular those being initiated by professional bodies and parliamentary amendments, undergo a prior proportionality assessment. In addition, Czechia neglected to ensure the assessment of the cumulative impact of multiple requirements introduced simultaneously.</p> |
|                                  | May   | Greece          | <p>Failure to ensure the correct transposition of the Proportionality Test Directive (Directive (EU) 2018/958) into national legislation.</p> <p>Greece failed to ensure that all measures covered by the Directive, in particular those being initiated by professional bodies, parliamentary initiatives, and parliamentary amendments, undergo a prior proportionality assessment. In addition, Greece does not ensure continuous monitoring of adopted rules, as the Greek authorities have not transposed with sufficient clarity the criterion of systematic or regular proportionality review over time.</p>   |

| STAGE OF PROCEEDINGS | MONTH | MEMBER STATE(S) | INFRINGEMENT   |
|----------------------|-------|-----------------|--|
|                      | July  | Greece          | <p>Non-compliance of national rules with the EU legislation on the recognition of professional qualifications.</p> <p>[...] Under Greek law, professionals qualified as school directors in other member states must follow a more burdensome procedure of academic recognition of their qualifications to be able to work in Greece. This is contrary to the Directive and it makes access to the Greek labour market more difficult for some professionals. The Commission considers that efforts by the authorities have, to date, been insufficient and is therefore referring Greece to the Court of Justice of the European Union.</p> |

## Trade agreements

1.17 In the last few months the EU's drawn-out negotiations with Australia, India, Indonesia, Mercosur, Mexico and Thailand, have not come to fruition. By contrast, the draft [Association Agreement with Andorra and San Marino](#) is likely to go through at speed. It will give the two small states access to what is referred to as the 'homogenous extended internal market', in which the European Economic Area (EEA) countries (Iceland, Liechtenstein and Norway) already figure. (Access to the financial services market is however, subject to conditions.) "In addition, the Agreement includes a framework for possible cooperation in policy areas outside the four freedoms such as research and development, education, social policy, the environment, consumer protection, culture and regional cooperation."

1.18 Compliance with EU legislation on the recognition of professional qualifications, including the European Professional Card, the Proportionality Directive and the Delegated Regulation on ski instructors, will be reached within a transition period of three years in the case of Andorra, and two years in the case of San Marino. Both states will appoint observers to the Group of Coordinators. Annexes V and 11 also cover the legal professions.

1.19 Whether the new Commission tends towards an intensification of its defensive discourse on strategic autonomy or instead adopts an expansive trade policy remains to be seen. A key indication will be the policy agenda of Maroš Šefčovič, Commissioner-designate for Trade and Economic Security, as well as Interinstitutional Relations and Transparency.

1.20 The European Free Trade Area countries (EFTA = the EEA 3 + Switzerland), for their part, have indeed reached a [trade and economic partnership agreement with India](#) (TEPA). Article 7.1 acknowledges the "role of skilled workforce development to advance job opportunities, including through cooperation in basic, higher and technical-vocational education and skill training, capacity building and exchange programs".

1.21 The TEPA's Annex 6d deals with the recognition of service suppliers' qualifications. Its language is looser than in the Directive or in the Lisbon Recognition Convention:

- ◆ It rests on an undefined principle of equivalence, rather than on comparability;
- ◆ It avoids the terminology of substantial difference and compensation mechanisms;
- ◆ It gives language competence the same status as professional knowledge and skill;
- ◆ It encourages sector-specific mutual recognition agreements (MRAs), to be reached within two years of its entry into force.

Of the five Parties, only Iceland and Norway have ratified UNESCO's [Global Convention on the Recognition of Higher Education Qualifications](#).

1.22 The EU's [Trade and Cooperation Agreement](#) with the UK has been in place for three years. The ill-feeling generated during the Johnson and Truss prime-ministerhips began to be dissipated by the Conservative government led by Rishi Sunak. The recently elected Labour government under Keir Starmer has pledged to pursue the *rapprochement*. For present purposes two issues stand out: recognition of professional qualifications and a youth mobility programme which would include students in higher education. The former is on the UK's wish list; the latter, roundly and repeatedly rejected by the UK in defiance of domestic public opinion, is among the aims of the EU. This suggests the possibility of horse-trading, either step-by-step or at the time of the scheduled review of the TCA in 2026. The review is near enough for both parties to begin preparing. Perhaps overarching considerations of geo-strategy and security will foster a meeting of EU and UK minds.

1.23 Both issues are overshadowed, on the UK side by the government's inherited budget deficit, and on the EU side by the need to deflect demands that it regards as 'cherry-picking', as well as to maintain the unity of member states, more of which have nativist leanings than hitherto. The Commission took umbrage, according to [LSE's Anne Corbett](#), when the UK attempted to seal bilateral mobility deals with France, Germany, Spain and other western member states. An agreement with Germany is still on the cards. Meanwhile, the UK government is wary of re-joining Erasmus+, to which it was a substantial net contributor, and remains nervous of right-wing reaction to any return to even a limited mode of free movement.

1.24 On professional qualifications, the UK has said little beyond repeated allusions to veterinarians. By this it actually means a sanitary and phytosanitary agreement (SPS in World Trade Organisation terminology), i.e. shared standards governing trade in plant and animal products. Both parties would appear to benefit. Yet here again there is financial jeopardy for the UK, as port authorities, having spent vast sums on inspection infrastructure which may never be used, begin to press for compensation. Both parties would also benefit, in the view of [The Guardian](#), in the fields of aviation and industrial chemicals, as well as the oft-cited accountancy and architecture professions.

1.25 Post-Brexit, under the Conservatives, the UK first signed controversially generous Free Trade Agreements with Australia and New Zealand before shifting its focus to a series of non-binding agreements with US states. It has, for example, a [Statement of Mutual Cooperation with Texas](#). While headlining cooperation in innovation in green energy, life sciences and critical minerals, with the involvement of 'our world-leading academic institutions', it also commits to encouraging 'regulators and professional bodies interested in pursuing recognition arrangements of professional qualifications'. Similar agreements or MOUs exist with the states of North and South Carolina, Florida, Indiana, Oklahoma, Utah, and Washington. The priority areas may differ, according to what each state may offer, but academic cooperation and the recognition of qualifications are constant features.

1.26 The US-based [Cato Institute](#) has published an overview of the eagerness displayed by American states to relax the immigration rules for qualified medical doctors. This is not good news for the EU's healthcare workforce integration efforts.

1.27 On 15 December the UK will accede to the [Comprehensive and Progressive Agreement on Trans-Pacific Partnership](#) (CPTPP), a rapidly expanding trade agreement which will then boast eleven members: Australia, Brunei, Canada, Chile, Japan, Malaysia, Mexico, New Zealand, Singapore, Vietnam and the UK. A long queue of applicants has already developed, including Costa Rica, Ecuador, Ukraine and Uruguay, as well as both China and Taiwan (Chinese Taipei, as it is known in various international organisations).

1.28 Annex 10-A of CPTPP concerns professional services and contains clauses on recognition. Members are encouraged to align with the architecture and engineering frameworks already in place under the [Asia-Pacific Economic Cooperation](#) (APEC) agreement. Beyond these two professions, CPTPP's approach is decentralised and optimistic: its hopes appear to be vested in the potential for bilateral agreements to coalesce into a wide professional mobility network. A Professional Services Working Group (with a minimal quorum of two member countries) exists to progress this process, but recent information is hard to find. This may be because the CPTPP secretariat does not yet have a permanent home and is provisionally hosted by the Australian government. It may in any case be too soon to expect concrete outcomes.

### Enlargement

1.29 Still, trade deals have only a marginal impact on the EU labour force. The possible and in any case gradual accession of the nine candidate countries will be more significant. Problems and mis-matches currently prevail: Ukrainian migrants are in general under-employed (*Financial Times*, 17 January), while other migrant nationals in employment tend to be over-qualified, according to [Lighthouse's brain waste report](#). The availability of [ESCO in Ukrainian](#) will help job-seekers and employers navigate the labyrinth of occupations and qualifications. So too – particularly in respect of higher education – will the [expanded coverage of Eurydice](#) to Georgia, Moldova and Ukraine.

**1.30 The Group of Coordinators**

The table below displays the topics raised in recent meetings of the Group of Coordinators – member state nominees who liaise with the Commission on the implementation of the Directive. The various agendas and minutes are available [online](#).

| DATE OF MEETING<br>2024 | AGENDA / MINUTES                     | TOPIC   |
|-------------------------|--------------------------------------|---|
| March                   | Agenda and minutes                   | <p>Creation of a sub-group on <a href="#">Common Training Frameworks</a> (CTF), with an initial focus on physiotherapists. Other professions may follow.</p> <p>Discussion of quality assurance of qualifications in the seven sectoral professions, in which the European Quality Assurance Register (EQAR) participated. The Commission pointed out that ultimate responsibility for QA rests with the member states.</p> <p>The Commission presented details of (1) a webinar series devoted to the simplification of the recognition of third country nationals, and (2) ongoing <a href="#">Talent Partnerships</a> with Bangladesh, Egypt, Pakistan, Morocco and Tunisia, which have a focus on migration management also covering recognition. It also offered to provide training sessions on the Proportionality Directive.</p> <p>Also discussed: ongoing digitalisation of recognition procedures; current audit of the EU recognition system by European Court of Auditors (ECA); initial discussion of the operation of the Directive, in the light of the implementation report scheduled for mid-2025; impending publication of a draft delegated Directive updating the minimum basic training requirements for veterinary surgeons .</p> |
| June                    | Agenda; minutes not yet posted       | <p>Similar agenda to March meeting above, main item being the digitalisation of recognition instruments, informed by a 14-page discussion paper provided by the Commission (too detailed to summarise here, but available on the same GoC website). The models proposed for applications and competent authorities both deploy AI tools – a document authenticator, a substantial analyser and a precedent analyser. Member states’ initial feedback may become clear in the minutes when published.</p>  |
| October                 | Draft agenda; minutes not yet posted | <p>A mutual learning session on quality assurance, led by Sweden.</p> <p>Follow-up of items featured in the year thus far, including the ECA report, the Proportionality Directive, the sub-group on CTF, digitalisation.</p> <p>In addition, the report on midwifery compiled by an external consultant.</p>   |

## 2. DEVELOPMENTS IN THE HIGHER EDUCATION SECTOR

2.1 Bologna Process ministers met in Tirana in May and issued their expected [Communiqué](#). As is now traditional, it reiterated many of the policy ambitions still only partly fulfilled: implementation of the Lisbon Recognition Convention (with renewed stress on automatic recognition and on refugees' qualifications), student-centred learning, student participation in higher education governance, and comprehensive data collection. The excellent [Bologna Implementation Report](#) published by Eurydice gives a detailed account of where the Process stands at present.

2.2 Ministers nonetheless succeeded in conveying a sense of urgency. Announcing the continuing suspension of Belarus and Russia, they added in Annex a lengthy statement of the five [fundamental values](#) of the European Higher Education Area (EHEA). They resolved to push ahead with the social dimension agenda (diversity, equity, inclusion), the digital and green transitions, micro-credentials, and they returned to the topic of artificial intelligence broached at the 2020 summit in Rome.

2.3 They are due to meet only once more, in 2027, three years before 2030, by when they trust that the EHEA will have fully realised its 'vision'. Recognising that the intervening years involve a likely paradigm shift – micro-credentials, blended mobility, AI – they commissioned a revised version of the *European Standards and Guidelines for Quality Assurance in the EHEA* (ESG) by 2026 and a review of the *ECTS Users' Guide* by 2027.

2.4 These measures are timely and most welcome. They require joined-up thinking, as evidenced in the [call](#) on ministers by the European Quality Assurance Register (EQAR) to “remove the remaining obstacles to the cross-border recognition of quality assurance results and decisions, especially with regard to joint programmes”. EQAR continues to work – as does EUA – with the Bologna Process [Thematic Peer Group - Constructing Recognition in the EHEA](#).

2.5 The European Students' Union (ESU) canvassed national unions on the question of degree and credit recognition and found that on cost, ease of use and non-discriminatory character, student views were decidedly mixed. [Bologna With Student Eyes](#) regards it as 'beyond comprehension' (p.193) that the conditions for automatic recognition have not been met. It comes up with a battery of cogent recommendations.

2.6 Notwithstanding ESU's scepticism, automatic recognition took an important step forward in May when the [Baltic-Benelux Treaty](#) came into effect. Readers will be familiar with the concept, which assures the mutual recognition of qualifications within the parameters of the EHEA – namely, reference to the European Qualifications Framework, a three-cycle system, and compliance with ESG. It does not guarantee admission to courses of study. Here is the definition enshrined in the Treaty:

the automatic recognition, without any procedure, of a higher education qualification issued in accordance with the legislation of one of the Parties and belonging to its higher education system, at the same level of the corresponding higher education qualifications issued in accordance with the legislation of the other Parties

2.7 It is not clear why the text differs from the one proposed by the Bologna Process Pathfinder Group on Automatic Recognition in 2015:

Automatic recognition of a degree leads to the automatic right of an applicant holding a qualification of a certain level to be considered for entry to the labour market or a programme of further study in the next level in any other EHEA-country (access).

Nor is it clear how or whether the two definitions might conflict in certain circumstances.

2.8 The Treaty binds eight higher education systems: Belgium (Flemish, French, German), Estonia, Latvia, Lithuania, Luxembourg, and Netherlands. It welcomes applications from other countries, which may advance the EU's hope of seeing automatic recognition firmly in place by 2025.

2.9 Baltic-Benelux covers academic qualifications only. It does not apply to qualifications falling within the scope of the Directive, whether in the internal market or in respect of EU-third country professional mobility.

2.10 For a thoughtful and suggestive reflection on the use of AI in recognition, readers unaware of the implications will appreciate the [input of CIMEA](#), the Italian NARIC. It stresses the dire need for AI literacy in the higher education community – a crucial key to navigating the paradigm shift.

2.11 In May, the Council adopted the [Recommendation on Europe on the Move – learning mobility opportunities for everyone](#), following a proposal from the Commission. Its constituency of reference is the [European Education Area](#) – not coterminous with the EHEA, since it extends only to EU member states and covers all stages of the learning career, from early years to adult education. Its intended completion date is 2025.

2.12 As far as higher education is concerned, the highlight of the Recommendation is its determination to secure a foreign learning mobility experience for at least 23% of graduates. This is a compromise target. The Commission's proposal was for 25%, while the EHEA has for many years retained a benchmark of 20% which has never been reached.

2.13 An ambitious compromise, nonetheless – backed by a strong focus on cross-border traineeships (Article 11), faith in the growth of Talent Partnerships (see para.1.30 above) and most of all in the continuing expansion of the institutional alliances forged within the European Universities Initiative (EUI); these have a (to some astonishing) 50% mobility target rate.

2.14 Admiration of the Council's ambition must be tempered by the knowledge that the legacy of Covid-19 has diluted the definition of mobility. It may now include virtual learning, although in what range of combinations with physical mobility is still to emerge from the practice of the alliances. The concept of virtual mobility, deployed by some, is particularly problematic. Hence the Council's invitation to the Commission to “put forward by 2026 a proposal for an updated methodology to measure the share of graduates with a learning mobility experience abroad in higher education.” On this eventual proposal the revised ECTS Users' Guide requested by the Bologna ministers (para.2.3 above) will necessarily depend, since guidelines cannot be derived with clarity from undetermined metrics.

2.15 Hence, too, the Council's timely recommendation that the [Mobility Scoreboard](#) be re-vamped (Article 23). The most recent edition (2023) made no mention of a mobility target. In fact, the name is misleading, for the focus of the Scoreboard is qualitative rather than quantitative. It uses the traffic light code to display the progress made by national systems in the elimination of the obstacles to mobility: information provision, language preparation, portability of funding and recognition. Moreover, its country coverage is neither EU nor EHEA. It monitors EU member states, the EFTA countries, additional Erasmus+ programme countries (North Macedonia, Serbia, Türkiye), as well as the candidate countries Albania, Bosnia and Herzegovina, and Montenegro. It omits Belarus, Russia, Ukraine, as well as the UK, a major player in international student mobility.

2.16 [EUA](#) reacted to the sharp rise in approved EUI alliances, declaring that the potential leap forward in European cooperation was contingent on more substantial long-term funding and the elimination of regulatory barriers at national level. It argued that the necessary reforms should benefit the higher

education sector as a whole and not just the alliance members. Alignments in governance structures would also be necessary, while posing no threat to institutional autonomy which was sacrosanct.

2.17 Eliminating regulatory barriers would certainly facilitate the establishment of the [European degree](#), of which the Commission is much enamoured. Seen as a rationalisation of existing joint and double degree arrangements consecrated by EU labelling, it is intended to give an extra push to EU labour market mobility. As a new legal construct, it will have to be integrated into existing mobility and recognition instruments, notably the EQF, ESCO, EUROPASS and EDCL. The Commission also intends to explore potential 'links' with the Directive; here, the first obvious way forward is to bestow the European degree label on the Common Training Frameworks.

2.18 To help the European degree take root in common practice, the Commission envisages an [upgrading of quality assurance and recognition procedures](#). The proposal was unsurprisingly welcomed by [EQAR](#), a major player in its eventual delivery. Exploratory interfacing with the Directive is not on the agenda here; nor is there evidence that DG GROW, regulatory or professional bodies were involved in prior consultations.

2.19 The feeling that Europe is stiffening its sinews for what EUA envisages as a leap forward – in quality assurance, recognition, micro-credentials, ECTS and the European degree, not to mention the digital and green transitions – is reinforced by two evaluations completed in March.

2.20 The externally commissioned [Study Supporting the Evaluation of the Council Recommendation of 22 May 2017 on the European Qualifications Framework for Lifelong Learning](#) is both broad and deep in its coverage. As well as a cost-benefit analysis and detailed reflection on the EQF's core mechanisms (levelling and referencing), it pauses to look at the state of play in international (p.63) and non-EQF third country qualifications (pp.236 et seq). As far as professional qualifications are concerned, it points out correctly that the Directive's acknowledgement of the existence of the EQF dates only from 2013 and extends only as far as its enlistment in the constitution of Common Training Frameworks, to be defined by Delegated Acts. It adds that "[h]ow the Directive's provision and possible coherence with the EQF would work in practice remains unclear; as yet, no such delegated acts have been adopted." Physiotherapists (see para.1.30 above) may prove to be the pioneers. The findings of the study were taken on board by the Commission's own evaluation, published as a [staff working document](#). This adds nothing to the study's note on the Directive or to the potential 'links' with the European degree.

2.21 The Commission's [Report on Europass](#) was also informed by a prior [external study](#). This took the view that there had been significant improvements in user-friendliness and interoperability with other recognition instruments, although accessibility and public profile could be further enhanced. Without direct mention of the Directive, it cites European Labour Authority (ELA) research indicating that Europass has been effective in matching personal profiles with labour market needs, particularly in respect of nursing professionals, specialist medical practitioners, ICT professionals, and accountants. The Commission's Report and the accompanying [staff working document](#) generally echo the study's conclusions. We have to assume that there is no intention of extending the interoperability of Europass to include the recognition of professional qualifications, no doubt because – for mobile qualified professionals – DG GROW has the [European Professional Card](#) at its disposal and continues to upgrade its online [Internal Market Information](#) system (IMI).

2.22 The positive, albeit qualified, evaluations are a sound take-off platform. How great a leap forward will be made by the new Commission and Parliament, the European Council led by Portuguese socialist António Costa, together with the Hungarian and Polish presidencies, remains to be seen. At the very least, it can be said that European higher education policy is on the move.



### **3. THE DRAGHI REPORT ON ‘THE FUTURE OF EUROPEAN COMPETITIVENESS’**

3.1 Mario Draghi, former prime minister of Italy and president of the European Central Bank, was asked by Commission President Ursula von der Leyen to produce a report on EU competitiveness. It was published, after some delay, on 9 September.

3.2 His report comes in [two separate volumes](#), downloadable from the same site. The first gives an overview of the EU’s economic power base seen in its global context. The second goes into detail and offers recommendations.

3.3 In line with his predecessor Mario Monti, whose report on the Single Market dates from 2010, Draghi places huge stress on the integration of the EU labour force. He focuses on skills, with much less attention paid to other higher education policy issues, with the exception of research and innovation.

3.4 Perhaps the key sentence – as far as professional qualifications are concerned – is Draghi’s assertion that “competitiveness today is less about relative labour costs and more about knowledge and skills embodied in the labour force” (Part A, p.9). Much of his diagnosis of the EU digital and green challenges is unsurprising. High- and low-skills gaps exist in many sectors, notably in ICT and in decarbonisation. The high-skill deficit in clean technology is glaring. Across the EU labour force gender gaps abound.

3.5 Although Draghi professes to compare EU performance with its global rivals, China goes without mention, doubtless because its state capitalist model is not regarded as a useful comparator. It is the US which sets the benchmark. The EU labour force is shrinking, while in America it is expanding. The EU produces fewer STEM graduates. Its education systems, particularly at adult education level, operate seriously under par. In-company skills mismatches are attributable to this systemic inadequacy, exacerbated by less than competent human resource management.

3.6 Draghi assumes that the demand for highly skilled labour will rise, while lamenting that the EU lacks the capacity to forecast skills requirements accurately; even where it possesses sound granular data it struggles to translate this into policy. The fault lies with member states, with the industrial sector, with dysfunctional regulatory practices, and with EU governance structures which do not have the muscle to coordinate effectively.

3.7 The judgements are forceful but the recommendations, insofar as they touch the higher education sector, are by no means far-reaching. Issues that higher education institutions have been grappling with – sometimes for decades – come across as potential innovations: university-industry cooperation, employer involvement in curriculum design, recognition, inclusion, employability, lifelong learning, individual learning accounts, micro-credentials, data collection.

3.8 This is because Draghi relies heavily for his sources on economic research departments, think-tanks and international organisations. Not a word on the Bologna Process. Beyond an oblique reference to Erasmus+ (which he notes would require a quintupling of its budget if it were to become ‘Erasmus for All’), higher education policy has a very low profile and the sector has no voice at all. This is regrettable and an opportunity missed.

3.9 The sectors that Draghi is interested in are industrial rather than those of civil society. He calls for the recognition of professional qualifications in the field of clean tech: solar panel, heat pump, and wind turbine technicians. He flags the possibility of an Automotive Skills Academy to address the demand for ‘massive upskilling and re-skilling’ in electric vehicle maintenance. Pitched at higher education level, he comments – usefully – that the Academy could take the form of the Common Training Framework enshrined in the Directive’s Article 49a.

3.10 His wish to accelerate the digital and green transitions leads him to cast doubt on the adequacy of the existing recognition regime. In an apparent allusion to the upcoming review of the Directive, he observes that “assessing whether it is actually necessary to regulate entry into specific professions, and how to effectively and fairly recognise the validity of country-specific qualifications, and occupational licensing are still unresolved policy issues”.

3.11 Like Letta, Draghi laments the emigration of high-skilled workers and the failure to encourage compensatory inward migration. Immigrant workers, when they come, tend to occupy low-skill jobs. Here, too, the EU falls short of the US benchmark. He calls for member states to use the Blue Card system more energetically to recruit skilled professionals in key industrial sectors, such as battery development.

3.12 While the implications of the Draghi report for research and innovation are relatively clear, its impact on higher education policy is less so. Nevertheless, it should be read closely by the sectoral bodies, rectors' conferences, institutions and relevant professional organisations. Given that Draghi lays much of the blame for the EU's under-performance at the door of its education systems, the first reaction of ministries and higher education institutions may have to be defensive.

3.13 At the same time, Draghi gives them the opportunity to identify lobby opportunities for aspects of the work they already undertake, in the hope that his influence on the top level of EU decision makers will have a positive effect on policy coherence and implementation, as well as on budgets.

Comments and corrections are welcome:

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The European University Association (EUA) is the representative organisation of universities and national rectors' conferences in 48 European countries. EUA plays a crucial role in the Bologna Process and in influencing EU policies on higher education, research and innovation. Thanks to its interaction with a range of other European and international organisations, EUA ensures that the voice of European universities is heard wherever decisions are being taken that will impact their activities.

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