

EUROPEAN ECONOMIC AREA

STANDING COMMITTEE OF THE EFTA STATES

Brussels, 10 October 2003
Ref. no. 1013520

WORKING GROUP ON THE MUTUAL RECOGNITION OF DIPLOMAS

Comments by the EEA EFTA States on the Commission's proposal for a Directive on the recognition of professional qualifications¹

GENERAL COMMENTS

1. The EEA EFTA States welcome the Commission's proposal to merge the existing Community legislation on the mutual recognition of professional qualifications into one consolidated directive. Also, the various adjustments proposed to the recognition procedures, are in general considered appropriate. Shorter deadlines and enhanced transparency should also help citizens exercise their rights, particularly through contacts with the competent authorities for rulings on applications for recognition, and hopefully lead to enhanced mobility of workers within Europe.
2. The EEA EFTA States share the view that relevant work experience of the migrants should be taken properly into consideration by the host states. In this respect, reference is made to recent developments in Iceland and Norway underlining the importance of non-formal learning in the workplace and the education system.
3. The general extension of the right to provide services raises some concern, particularly on how ensure the interest of the consumers as regards the safety and quality of the services offered. It may also pose problems to small countries where a considerable number of workers are migrants.

SPECIFIC COMMENTS

4. Some of the changes proposed by the Commission need further clarification. This includes the obligation on the host Member State to allow partial access on its territory to a regulated profession which combines two distinct and autonomous professional activities (Article 4).
5. The introduction of five levels of education (Articles 11 and 12) is not fully justified, and it is therefore the view of the EEA EFTA States that four levels, as in the first and second general system directives, would be sufficient.
6. Furthermore, the use "European platforms" (Article 15) introduces a new element into the mutual recognition of professional qualifications, and should therefore be

¹ [COM\(2002\) 119 final](#) of 17 March 2002

implemented with care, on the basis of experience gained from pilot sectors. Representative European organisations, including those covering countries outside the European Union, must be involved in establishing the platforms.

7. The abolition of the form of training for general medical practitioners (Articles 20-45, and page 13 in the explanatory memorandum) is strongly opposed by the EEA EFTA States, as the possibility for special training in general medicine is important for the status of and the recruitment in this profession.

8. Also, the proposal that the host country should provide migrants with language training, when necessary (Article 49), is somewhat unclear, especially regarding the financial obligations.

9. The EEA EFTA States fully supports the Commission's proposal to appoint national coordinators and contact points for the implementation of the directive (Article 53) although their role and functioning remain to be specified further. In this respect, possible co-operation or coordination with the Solvit network, as well as National Reference Points established as a result of the work of the European Forum on Transparency of Vocational Qualification, should be looked into.

10. Perhaps of equal importance for the migrants is access to relevant information on the Internet. Important steps have already been taken by the Commission towards developing functional portals for mobility and dialogue with citizens. These portals should also include information on the EEA EFTA States, given the scope of the EEA Agreement. To assure this, the EEA EFTA States have expressed their willingness to contribute financially to the development and maintenance of the services.

11. Finally, against the background of EEA EFTA involvement in the current comitology structure, participation of the EEA EFTA States in the new committee should be ensured.

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