



**JOINT POSITION STATEMENT
ON THE CONSULTATION MECHANISM TO ALLOW THE INPUT
OF THE PROFESSIONS IN RELATION TO THE Proposal for a
Directive of the European Parliament and of the Council on
the Recognition of Professional Qualifications
COM(2002)119Final2002/0061(COD)**

ACE/CAE – Architects’ Council of Europe

CPME – Standing Committee of European Doctors

DLC Dental Liaison Committee of the EU

EMA - European Midwives Association

FVE – Federation of Veterinarians of Europe

EFN – The European Federation of Nurses Associations

PGEU/GPUE - Pharmaceutical Group of the European Union

REPRESENTING OVER 4 MILLION PROFESSIONALS IN EUROPE.

Without prejudice to the preparation, by any of the above organisations, of a position paper that sets out in detail the views of that organisation in relation to the proposed Directive on Professional Recognition COM (2002) 119 final and,

having regard to the numerous bilateral and multilateral contacts with the Commission on the Proposal for a Directive on recognition of professional qualifications, and having particular regard to the proposed consultation mechanism intended to allow the input of the professions to the activities of the Single Committee of Member State Representatives as foreseen in the proposed Directive,

the professions are convinced that to ensure the proper functioning of the proposed automatic recognition system and a good level of co-ordination of education and training throughout Europe, it is essential to maintain the input of the professions in a similar manner as previously guaranteed by the Advisory Committees operating alongside the Sectoral Directives, and to improve on the efficiency of this input in future.

The professions welcome that the Commission, in the Explanatory memorandum on the proposal for a Directive on recognition of professional qualifications COM (2002) 119 final, appreciates the necessity of maintaining the consultation with the professional representative bodies and the relevant educational establishments benefiting from automatic recognition¹.

Provided certain clarifications and legal guarantees are obtained, the professions are prepared to cooperate with the Commission in the establishment of the future consultation mechanism.

The tasks devolved to the professions according to the proposed consultation mechanism will place a substantial additional workload on representative bodies of the professions at both Member States level and EU level. The professions ask the Commission to ensure that these efforts will be used in the best interest of European citizens and professionals.

The representatives of the professional associations, have discussed within their membership the informal document handed out by the Commission to support the continuing operation of automatic recognition for the professions based on minimum co-ordination of education and training, and have agreed to communicate to the Commission the following preliminary comments:

- It is essential, in the opinion of the professions, that any arrangement made for a consultation mechanism must be confirmed in an appropriate **legal form**, which guarantees that the arrangement can be maintained in the future. The professions seek clarifications on the legal form that the Commission plans to use.
- The professions welcome the fact that the Commission has considered that the input of a specific profession can be **proactive**, for example to put forward a proposal for change, and **reactive**, for example to respond to a request from the Committee.
- The professions ask the Commission to foresee that the profession concerned should receive appropriate **feedback** from the Committee on any proposal or document submitted to the Committee. Such feedback should be provided in an acceptable and agreed timeframe and when the Committee does not adopt a recommendation, the reasons for such a decision should be stated.
- The professions welcome the Commission assurance that any document submitted by the professions will be circulated to the Committee in the appropriate timeframe. However, in the opinion of the professions, it is essential that these documents are circulated by the Commission in the appropriate **format** and **language** used by the Committee.
- The professions would welcome efforts from the Commission aimed at encouraging Member States to ensure that the matters relevant to a specific profession are dealt with, in the Committee by the **appropriate national representative(s)** dealing with those specific professional issues.
- The professions seeks clarification on the minimum **frequency of meetings** specific to single professions

¹ ...guarantees for the provision of information, recommendations and reports on the operation of the regime at the European level can be ensured by arrangements to be entered into between the Commission and the relevant representative bodies of the professions and educational establishments benefiting from automatic recognition on the basis of minimum co-ordination of training requirements" –... - "These arrangements should ensure that information and advice are provided to the Commission and the Member States on a regular basis. They also ensure that such contributions will be included in the agenda for the next relevant meeting of national officials organised by the Commission dealing with the relevant profession. These arrangements could be confirmed by the Commission in an appropriate form [COM(2002)119 Final].

The European Federation of Nurses Associations (EFN)
Registration Number 476.356.013
Clos du Parnasse 11A, 1050 Brussels, Belgium
Tel: +32 2 512 74 19 Fax: +32 2 512 35 50
Email: efn@efn.be Website: www.efnweb.org
