



The European Council of the Liberal Professions (CEPLIS), registered in the European Union Transparency Register under number 638812928460-69, with its office in Rue Saint-Georges 32, Brussels, **hereby submits its contribution to the Skills Portability Initiative**. Contact email: secretariat@ceplis.org.

The European Council of the Liberal Professions (CEPLIS) is composed of **interprofessional associations representing the liberal professions in their respective member states, as well as monoprofessional bodies representing specific liberal professions at the level of the European Union**. As representative of the professions of health, compass, number, and law, CEPLIS is by nature interdisciplinary and committed to the promotion of professional excellence and deontology within the Union. Our professions are major agents for job-creation, innovation and growth across the EU.

This document provides a response to the three initiatives submitted for Public Consultation by the European Commission within the framework of the **Skills Portability Initiative**.

This contribution is sent to the European Commission, with the specific request that it be duly taken into consideration and that CEPLIS be invited to any meetings and working groups that may be deemed appropriate.

1. **The individual contributions of CEPLIS' members must be considered**, as they directly affect each of their countries' profession or professional sector. This contribution identifies cross-cutting issues, common to all of them, although each country/profession presents specific circumstances that must also be taken into account.
2. This is not merely a technical initiative on mobility, but rather a broader and more strategic approach that **may affect the balance between the functioning of the internal market, the digitalization of procedures, and the preservation of the guarantees** inherent and necessary to certain professions.
3. **CEPLIS views positively the European Commission's objectives**—to streamline procedures, improve professional mobility, and advance digitalization and transparency—, insofar as they may contribute to the better functioning of the internal market.
4. **The Commission must avoid overly general solutions** that fail to take into account the specificities of each country and each profession. National competencies regarding the regulation of professions and the definition of conditions for access and practice must be respected.
5. In every EU Member State there are different models of regulation regarding the necessary assessment before allowing the practice of a Profession with an impact to the general interest and to public health and safety. These systems find their justification in the internal legal traditions and the experience of each country.
6. Not all professions, jobs, or occupations fall under the same concept. **Liberal professions have specific characteristics that must be taken into account** in any reform, particularly due to their **connection with fundamental rights, the rule of law, public health and safety**. Liberal

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professionals are not principally motivated by lucrative objectives, but rather their vocation is to serve their clients and patients through their service, advice and expertise in all matters relevant to their specific disciplines. Thus, a number of particular features pertaining to their exercise, especially their regulations, must preserve their essence as a European social concept. And this, because they contribute to safeguarding citizens' fundamental rights through professional practice characterised, in particular, by responsibility, independence of judgement, and oversight of practice in accordance with specific rules of conduct embodied in each profession's code of ethics (deontology). In addition, these professions have requirements of high-level education and lifelong learning. This ensures professional practice is defined by quality and meets the needs of clients, patients, and users. Specifically, a liberal professional adheres to the following essential principles:

- a. Relevant/adequate university qualification** given the provision of services of a markedly intellectual nature, as well as continuing education, continuous professional development, and the recognition and validation of professional competence.
 - b. Independence** of professional judgment or clinical/technical autonomy during the professional act in all fields of activity, including those based on public and private employment relationships.
 - c. Professional responsibility** as a consequence of their freedom to act according to their knowledge and conscience.
 - d. Oversight of professional conduct by an independent, autonomous, and impartial body** that may exercise disciplinary and ethical/deontological functions.
 - e. Practice based on the public service interest and/or the interest of the client, patient or user**, ensuring quality and a firm commitment to strict compliance with ethical, deontological and professional standards.
 - f. We would like to attract your attention to the fact that CEPLIS has adopted, after broad consultation, a document containing the ethical principles common to all the professions of all our sector which can be consulted in [Common Values - CEPLIS](#).**
7. In the case of these professions, **the quality of professional practice, legal certainty, and the protection of the public interest must prevail over a purely mobility-oriented logic**, without this being incompatible with the improvement and modernisation of existing procedures.
 8. **CEPLIS and its membership are firmly committed to improving mobility and qualification recognition processes, as well as to transparency and the digitalization of skills**, and to attracting and retaining talent. As an example of this commitment, CEPLIS has set up Working Groups to promote discussion, good exchange of practice, and proposal-drafting regarding the impact of the AI and Digitalisation in the practice of our professions. Through our relationship with DG EMPL, the SME Envoy Group and the competent EP Committees we are trying to share

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our experience on the field with European institutions and to be a constructive partner in shaping the future, with the interest of the citizens in mind.

9. CEPLIS is at the European Commission's disposal to provide further information on these initiatives but wishes to stress the indispensable **need for dialogue between professional organizations and public administrations, as well as funding, to develop initiatives that align with the Commission's objectives.**
10. CEPLIS has set up a committee composed of representatives of Young Professionals coming from all our organisation members. We feel that their voice **must be seriously taken under consideration as they represent the future of our sector and of the quality of services in Europe.** We would like to join their contribution to this document.

CEPLIS Young Professionals Committee Contribution

1. Introduction

The Young Professionals Committee (YPC) of CEPLIS welcomes with great interest the European Commission's Skills Portability Initiative, aimed at improving the understanding, comparability, recognition, and digitalization of qualifications and skills across the European Union. This initiative represents a particularly important step for the future of the professions and for the proper functioning of the Single Market, especially from the perspective of the new generation of liberal professionals. From the perspective of young liberal professionals, the portability of qualifications represents a key element in ensuring:

- professional mobility;
- the proper functioning of the Single Market;
- European economic integration;
- the attractiveness of the profession.

Despite the progress achieved through the Directive on the Recognition of Professional Qualifications, numerous practical and structural obstacles continue to limit the full effectiveness of these instruments. This document represents the preliminary contribution of the YPC, based on the direct experience of young European professionals and on the internal discussions held within the Committee.

2. Problems and challenges related to the portability of skills and qualifications

2.1. Understanding and acceptance of qualifications obtained in other Member States

The YPC considers that the difficulty employers face in understanding and accepting qualifications obtained in other Member States represents a significant challenge. The main causes include:

- substantial differences between national education and training systems;

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- lack of easily understandable common standards;
- difficulty in assessing the equivalence of educational pathways;
- absence of clear and accessible comparison tools;
- lack of knowledge about the situation of the profession in other member states.

This issue is particularly relevant in regulated professions, where access requirements may vary considerably between countries.

2.2. Understanding skills acquired through professional experience

Difficulties also exist in the recognition of skills acquired through professional experience, especially when such experience has been gained in different national contexts. This is due to:

- lack of standardised systems for skills certification;
- differences in vocational training structures;
- difficulty in assessing skills that are not formally certified.

2.3. Complexity of qualification recognition procedures

The YPC considers qualification recognition procedures to be one of the main barriers to professional mobility.

Key challenges include:

- excessive length of procedures;
- administrative complexity; high costs;
- lack of transparency;
- uncertainty regarding outcomes.

These factors particularly discourage young professionals, who often have limited resources. In addition to the structural and administrative barriers already described, further operational challenges affect the efficiency and predictability of qualification recognition procedures. In particular, the absence of clearly defined procedural timelines, service standards, and traceable workflows creates uncertainty for professionals seeking recognition. Applicants are often unable to monitor the status of their applications, anticipate processing times, or understand the reasons for delays or additional requirements.

This lack of procedural transparency disproportionately affects young professionals and small professional practices, which may not have access to institutional or administrative support. Establishing clearer procedural frameworks would significantly improve trust, efficiency, and accessibility.

2.4. Structural differences between national education systems

Significant differences remain in the duration, structure, and content of educational pathways for the same profession across different Member States. These differences make it difficult to establish equivalence and hinder automatic recognition of qualifications. This highlights the need for greater harmonization or, at minimum, more effective tools to facilitate comparability. Also, the need to establish common criteria, so that there are no substantial differences between the same profession, depending on the country where it has been studied. These challenges are further exacerbated by the absence of profession-specific

competence frameworks that clearly define minimum expected learning outcomes and professional readiness. Without common reference points beyond formal diplomas, competent authorities may face difficulties in assessing the equivalence and practical relevance of qualifications obtained in other Member States. Greater alignment of competence descriptors would significantly improve comparability and facilitate recognition.

2.5. Digitalisation and digital credentials

The YPC recognises the potential of verifiable digital credentials in facilitating the recognition of qualifications.

Benefits include:

- faster procedures;
- reduced administrative burden;
- improved transparency and security;
- increased trust between institutions and employers.

However, it is essential to ensure:

- data security;
- legal validity of digital credentials;
- interoperability between national systems;
- accessibility for all professionals.

2.6. Regulatory complexity in defining contribution criteria

Difficulties also exist to understand how to manage professional contributions. This difficulties are due to Insufficient coordination between social security funds and uncertainty about tax residence and contribution obligations in the case of temporary cross-border activities. There is no one-stop shop for tax and social security matters.

2.7. Administrative fragmentation and lack of coordinated cross-border support

Professionals seeking to exercise their profession in another Member State often face fragmented and uncoordinated administrative requirements involving multiple authorities, including recognition bodies, social security institutions, tax authorities, and insurance providers. These parallel administrative processes create unnecessary complexity and uncertainty.

The absence of coordinated support mechanisms or integrated procedures increases administrative burden and discourages mobility. More structured coordination between competent authorities and clearer administrative pathways would significantly improve accessibility and efficiency.

3. Awareness and use of existing European tools

The consultation highlights several European tools supporting qualification recognition, including EQF, Europass, ESCO, ECTS, and others.

However, the YPC notes that many of these tools:

- are not widely known among professionals;
- are not sufficiently integrated into national systems;



- are not consistently used in practice.

Therefore, in addition to developing new tools, it is necessary to improve:

- the visibility of existing instruments;
- their accessibility;
- their operational integration.

4. Need for action at European level

The YPC considers that strengthened action at European Union level is highly necessary to:

- ensure transparency and consistent understanding of qualifications;
- simplify and accelerate recognition procedures;
- improve the digitalisation of qualifications;
- strengthen interoperability between national systems.

Many of the existing barriers cannot be effectively addressed solely at national level and require a coordinated European approach.

Establishing minimum procedural standards at EU level would represent a significant step forward. This could include defined timelines for recognition of procedures, transparent service standards, and clearer procedural requirements. Strengthening cooperation and mutual trust between competent authorities across Member States would also contribute to reducing duplication, accelerating procedures, and improving the overall effectiveness of the recognition system.

5. Attraction of qualified professionals from third countries

The YPC recognises the importance of attracting qualified professionals from third countries. However, priority should be given to improving the recognition system within the European Union itself, and thus contribute to ensuring the free movement of professionals. An efficient and transparent recognition system within the EU represents an essential foundation for the effective recognition of qualifications obtained in third countries.

6. Digitalisation and digital tools for qualification recognition

The YPC supports the development of European digital tools to facilitate qualification recognition.

The most useful tools would include:

- unified digital portals for managing recognition procedures;
- automated qualification verification systems;
- European digital credential wallets;
- European qualification databases.

These tools could significantly reduce administrative burdens.

In addition to digital credentials, the development of European digital professional portfolios could provide a more comprehensive and reliable representation of qualifications, professional experience, and continuous training. Such portfolios could allow competent authorities and employers to assess professional readiness more efficiently while maintaining high standards of reliability and transparency.

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Ensuring interoperability between national digital systems and guaranteeing legal recognition of digital credentials across Member States will be essential for the success of these initiatives.

7. Possible solutions at EU level

7.1. Creation of a European digital qualification recognition system

An interoperable European digital system would enable:

- rapid verification of qualifications;
- improved transparency;
- greater administrative efficiency.

7.2. Creation of a European database of professional requirements

An accessible European database would allow professionals to clearly understand the requirements for practicing their profession in other Member States, and guide students from university onwards on the possibility of practicing in other countries, explaining the situation of the profession and the requirements necessary to be able to practice.

7.3. Simplification of administrative procedures

It is necessary to reduce:

- processing times;
- costs;
- administrative complexity.

7.4. Improved dissemination of existing tools

Existing EU-developed tools should be made more visible and accessible.

7.5. Strengthening professional mobility

The YPC encourages the development of initiatives aimed at facilitating mobility for young professionals, including professional mobility programmes like the Erasmus model.

7.6. One-stop shop for tax and social security

The creation of a one-stop shops for tax and social security matters that allows for automatic compensation between social security systems, minimum insurance standards and automatic recognition of insurance policies.

7.7. Establishment of clear procedural timelines and service standards

Introducing EU-level procedural timelines and service standards would improve predictability, transparency, and efficiency in recognition procedures. Professionals would benefit from clearer expectations regarding processing times and procedural requirements.

7.8. Development of fast-track recognition pathways

Fast-track recognition procedures could be developed for professionals whose qualifications and professional experience can be easily verified. This would facilitate mobility while maintaining high professional standards.

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7.9. Development of profession-specific competence frameworks

Developing competence frameworks at European level for specific professions would improve comparability between national systems and support competent authorities in assessing qualifications more effectively.

7.10. Strengthening cooperation and trust between competent authorities

Improving cooperation mechanisms between competent authorities would reduce administrative duplication, improve communication, and accelerate recognition procedures.

8. Operational implementation measures

To ensure the effective implementation of the Skills Portability Initiative, additional operational measures could be considered.

One key priority would be the development of an EU-wide “end-to-end recognition” approach, addressing not only the formal recognition of qualifications but also broader aspects of professional readiness, including compliance with insurance, regulatory, and administrative requirements.

The establishment of Single Points of Contact or coordinated case management systems could provide essential support for professionals navigating complex cross-border administrative processes.

The introduction of standardised European formats for documentation, authentication, and translation would also contribute to reducing administrative costs and improving efficiency.

Pilot projects focusing on selected professions could allow testing and refinement of new recognition mechanisms before broader implementation.

Finally, increasing transparency through the publication of recognition procedures, timelines, and statistical outcomes would improve accountability and support continuous system improvement.

9. Conclusion

The portability of qualifications represents a fundamental element for the proper functioning of the Single Market and for the future of European professions. The YPC welcomes this initiative and considers it an important opportunity to concretely improve professional mobility across Europe. We remain available to provide further contributions and input.